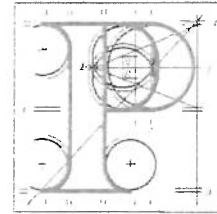


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Fingal County Council
County Hall
Main Street
Swords
Co. Dublin
K67 X8Y2

Date: 31 October 2024

Re: DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch
Dublin City Centre and Drogheda, located in counties Dublin, Meath and Louth

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Aisling Reilly
Executive Officer
Direct Line: 01-8737131

RA03

Teil
Glaó Áitiúil
Facs
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Ríomhphost

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64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902



22 October 2024

The Secretary,
An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street,
Dublin 1,
D01 V902

By email to: sids@pleanala.ie

Re: ABP-NA29N.320164 DART+ Coastal North Railway Order 2024 Application

Dear Secretary,

Fingal County Council welcomes the application for a Railway Order for DART+ Coastal North which is being developed to improve capacity and level of service on the rail corridor between Drogheda, Fingal, and Dublin City through the electrification of the route and various associated infrastructure. To facilitate the project, some interventions are required to remove constraints along the route. Fingal County Council is supportive of this strategic infrastructure and the authority welcomes the opportunity to engage with Iarnród Éireann to ensure an optimal design solution for communities located along the rail corridors in Fingal, and to the delivery of high-quality transport options for Fingal the wider Dublin area and for the Eastern region.

National Level Policy Context

Project Ireland 2040-National Planning Framework (NPF) identifies the need for reliable, affordable, sustainable, and integrated public transport in Dublin and in this regard promotes the delivery of key infrastructure projects as set out in the *Transport Strategy for the Greater Dublin Area*. A cornerstone project of the Strategy includes the DART Expansion programme, including the electrification of the Drogheda line to Dublin City Centre. The following National Strategic Outcome (NSO) is explicit in its support for the proposed project:

- NSO4: Expand attractive public transport alternatives to car transport to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer-term population and employment growth in a sustainable manner through the following measures: Deliver the key public transport objectives of the transport strategy for the Greater Dublin Area by investing in projects such as New MetroLink, DART Expansion Programme, BusConnects in Dublin and key bus-based projects in the other cities and towns.

The *National Development Plan 2021-2030* sets out the investment priorities that will underpin the successful implementation of the NPF. DART + is specifically identified as one of the five 'Strategic Investment Priorities' that aligns with NSO4 (Sustainable Mobility) of the NPF, providing a sustainable, safe, efficient, integrated and accessible public transport service between Drogheda and Dublin City Centre, forming a key element of the overall integrated public transport system for Dublin, alongside MetroLink and BusConnects as well as facilitating compact and transport-led development at key locations.

The *National Sustainable Mobility Policy* sets out a strategic framework for active travel and public transport journeys to 2030, to help Ireland meet its climate obligations. It is accompanied by an Action Plan which contains measures to improve and expand sustainable mobility options across the country by providing safe, green, accessible, and efficient alternatives to car journeys. It also includes demand management and behavioural change measures to manage daily travel demand more efficiently and to reduce journeys taken by private car. The policy includes three key principles including, Safe and Green Mobility, People Focused Mobility and Better Integrated Mobility. The policy document supports safe and green mobility through the roll out of the DART + Programme in the Greater Dublin Area, including extending DART services to Drogheda.

The National Investment Framework for Transport in Ireland (NIFTI), the strategic framework for future investment decision making in land transport guides transport investment, supports the Climate Action Plan and promotes positive social, environmental, and economic outcomes throughout Ireland. NIFTI sets out the modal hierarchy in Ireland as; 1. Active Travel; 2. Public Transport; 3. Private Vehicles. It also outlines an intervention hierarchy which seeks to: 1. Maintain; 2. Optimise; 3. Improve; 4. New. In this regard, NIFTI supports sustainable mobility, encourages active travel and public transport, and supports projects that will reduce urban congestion, particularly those which include new sustainable mobility infrastructure, and which optimise existing infrastructure to prioritise sustainable transport modes.

Regional Level Policy Context

The *Eastern and Midland Regional Assembly-Regional Spatial and Economic Strategy (RSES) 2019-2031* promotes the growth of Dublin and regional centres in a sustainable manner, aligning services with population and economic growth, optimising infrastructure including public transport and the promoting compact urban settlement patterns. RSES promotes the DART expansion programme and the proposed electrification of the rail line to Drogheda which represents a significant opportunity for sustainable transport orientated development both along the transport corridor and the Dublin Belfast Economic Corridor.

The following Regional Policy Objectives (RPO's) of relevance to the project include:

- RPO 5.2: Support the delivery of key sustainable transport projects including MetroLink, DART and LUAS expansion programmes, Bus Connects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the Metropolitan area transport network, existing and planned.
- RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.
- RPO 6.3: Support the effective planning and development of large centres of population and employment along the main economic corridor, in particular Drogheda and Dundalk.
- RPO 8.8: The RSES supports delivery of the rail projects set out in Table 8.2, subject to the outcome of appropriate environmental assessment and the planning process.

Projects relevant to Fingal outlined in Table 8.2 include the delivery of DART services to Drogheda.

The *Transport Strategy for the Greater Dublin Area 2022-2042* sets out various proposals for future transport investment for the next 20 years. Within the Strategy, significant investment is planned for Fingal particularly as it relates to the corridor connecting Fingal and Dublin City Centre which includes the delivery of DART + Coastal North, as well as enhanced train service capacity at Howth Junction,

Clongriffin and Malahide. The delivery of the proposed project is highlighted under Section 12.4.5 of the Strategy, where DART + Coastal North is supported by Measure RAIL1-DART+ and where a railway order will be made in 2023/2024.

Local Level Policy Context – Fingal Development Plan 2023-2029

Fingal Development Plan 2023-2029 (FDP)

The *Fingal Development Plan 2023-2029* through its strategic objectives, seeks to transition to an environmentally sustainable carbon neutral economy, reduce car dependency and promote and facilitate sustainable modes of transport, prioritise walking, cycling and public transport, while supporting an efficient and effective transport system and advancing well-connected and well served communities with emphasis on transport linkages to Dublin City including support for the DART + programme. Chapter 6 of the FDP 2023-2029- Connectivity and Movement is explicit in the promotion of integrated land-use and transportation and acknowledges that public transport is crucial in supporting future sustainable and economic growth within Fingal, providing more efficient and reliable access to key urban centres within the region, as well as connectivity to other major towns and cities.

Supportive policy and objectives as set out in the Development Plan include the following

Policy CMP1 – Decarbonisation of Motorised Transport

Support the decarbonisation of motorised transport and facilitate modal shift to walking, cycling and public transport and taking account of National and Regional policy and guidance, while supporting an efficient and effective transport system.

Objective CMO1 – Transition to Sustainable Modes

Work with the NTA, TII and other transport agencies in facilitating the integrated set of transport objectives for the County as set out in this Plan, in line with National and Regional policy including the NTA's GDA Transport Strategy and any subsequent plan to encourage modal shift towards more sustainable modes of transport and patterns of commuting to reduce reliance on the private car.

Policy CMP3 – Integrated Land-Use and Transport Approach

Provide for an integrated approach to land-use and transportation aimed at minimising the demand for travel and prioritising sustainable modes of transport including walking, cycling and public transport.

Objective CMO3 – Integration of Public Transport and Development

Support and facilitate high-density, mixed-use development and trip intensive uses along public transport corridors and to ensure the integration of high-quality permeability links and public realm in conjunction with the delivery of public transport services through plan frameworks to generate and reinforce sustainable patterns of compact growth and development in the County.

Policy CMP18 – Public Transport

Support the provision of a high-quality public transportation system that is accessible to all to serve the needs of the County and to enable a significant shift from car-based travel to public transport.

Objective CMO23 – Enabling Public Transport Projects

Support the delivery of key sustainable transport projects including MetroLink, BusConnects, DART+ and LUAS expansion programme so as to provide an integrated public transport network with efficient

interchange between transport modes to serve needs of the County and the mid-east region in collaboration with the NTA, TII and Iarnród Éireann and other relevant stakeholders.

Objective CMO24 – NTA Strategy

Support NTA and other stakeholders in implementing the NTA Strategy including MetroLink, BusConnects, DART+, LUAS and the GDA Cycle Network.

Objective CMO29 – Integration of Public Transport Services and Development

Work with the NTA, TII and other relevant national transport agencies to optimise accessibility to public transport, increase catchment and maximise permeability through the creation of high-quality walking and cycling routes linking to public transport stops.

Objective CMO30 – Cycling and Walking Links

Avail of the opportunities provided by any public transport infrastructure works to improve and provide new cycling and walking links, including crossings of motorways and major roads which currently represent major permeability barriers to active travel especially in South Fingal.

DART+ Coastal North will provide a high-capacity service along the Drogheda corridor to Dublin city centre, serving existing and new communities within Fingal including developing employment and residential areas. The proposed scheme will also support economic growth and competitiveness within the Dublin-Belfast Economic Corridor.

Specifically, the route will serve extensive residential, and employment zoned lands not previously served by DART, notably within Balbriggan, Skerries, Rush, Lusk and Donabate where such areas currently benefit from proximity to the rail corridor, served by Balbriggan, Skerries, Rush/Lusk and Donabate train stations. With regard to these settlements, it should be noted that Balbriggan is undergoing a major Urban Regeneration programme with sizable investment from Fingal County Council and the Department of Housing, Local Government and Heritage through the Urban Regeneration Development Fund. Regarding Donabate, there is significant residential capacity in this strategically located town where DART expansion would support ongoing urban expansion and consolidation of the town's economic and service base, thereby supporting future population growth. The proposed scheme will also enhance train service capacity for existing and new communities within areas already serviced by DART, including Malahide, Portmarnock, Clongriffin and Howth, supporting and strengthening connectivity within these areas.

In this regard, DART+ Coastal North fulfils key strategic objectives of the FDP 2023-2029 for sustainable growth, connecting existing and new communities and employment areas along the route with Dublin City Centre and the wider region as well as providing transport mobility and network integration for residents, commuters, and visitors. In addition, this strategic infrastructure will provide a fast and efficient sustainable transport alternative to the private car which is vital in promoting modal shift away from non-sustainable travel modes and enabling a reduction in transport related carbon emissions.

Natural and Built Environment and the Fingal Development Plan 2023-2029

Landscape Designations

The importance of the coastal area in which the proposed scheme is located is reflected in the number of international, national, and local protection designations which relate. Furthermore, significant portions of the coastline are visually sensitive as evidenced by the inclusion within the Development Plan of policies and objectives governing protected views, high amenity lands, open space, greenbelt, highly sensitive landscape designations, coastal and estuarine landscape character types and tree belt

designations. The Fingal coastal corridor is also the county's most important wildlife resource, home to protected wildlife species and habitats.

Malahide, Baldoyle and Rogerstown Estuaries which the scheme crosses, or which lie adjacent the scheme, are designated Special Areas of Conservation [SACs] and Special Protection Areas [SPAs] under the EU Habitats Directive and Birds Directive, respectively. The estuaries are also designated as Ramsar Conservation Wetlands and Statutory Nature Reserves and proposed Natural Heritage Areas [pNHAs].

High amenity lands adjoining these estuaries are designated ecological buffer zones which support the estuaries and where development is restricted. These ecological buffer zones function as important feeding/roosting habitat for wader birdlife associated with the estuaries.

Landscape designations afforded to the lands within the coastal corridor indicate the high landscape value of the area and the need to carefully balance the protection of these lands against the development of this strategic infrastructure. In this regard, the Fingal Development Plan in Chapter 9 Green Infrastructure and Natural Heritage includes policies GINHP5, GINHP7, GINHP9, GINHP11, GINHP19, GINHP25, GINHP26, GINHP28, GINHP29 and objectives GINHO2, GINHO18, GINHO28 and GINHO41 which seek to protect these sensitive landscapes. Sheets 4, 5, 6, 7, 9 and 10 and Green Infrastructure Maps 14, 15 and 16 of the FDP 2023-2029 also indicate relevant zoning objectives and landscape designations in the context of the proposed scheme. Please consult www.fingal.ie/development-plan-2023-2029 for electronic copies of these map sheets and <https://fingalcoco.maps.arcgis.com/apps/webappviewer/index.html?id=b97f2adda903489caddb77378565df29b> for an interactive webmap of the Development Plan Sheets.

The majority of the works required to facilitate the scheme are to be carried out within the existing railway corridor which minimises impacts on these high value designated lands. However, it is acknowledged that proposed works are also required outside the railway corridor to facilitate the scheme. In this regard, a key area of concern relates to the extensive construction compound proposed within the high amenity lands of 'Racecourse Park'. These lands adjoin the Mayne River which flows into the adjoining Baldoyle Estuary, a designated European site.

The FDP 2023-2029 includes protection requirements in relation to the Mayne River notably, Objective IUO26 which seeks to establish riparian corridors free from new development along all significant watercourses and streams in the county within development boundaries and to ensure a minimum 10m wide riparian buffer strip measured from the top of the bank either side of all watercourses. Other supportive Objectives as set out in Chapter 14 Development Management Standards of the Plan relating to the protection and enhancement of rivers and streams and ecological corridors and includes, Objectives DMSO154, DMSO156, DMSO158 and DMSO210.

Built Heritage

The protection, maintenance, and enhancement of the built heritage of Fingal is a key strategic objective of the FDP 2023-2029 and the Plan includes supportive policy and objectives relating to the protection and enhancement of protected structures, historic building stock, bridges, designed landscapes and character landscapes of high value and significance, as set out in Chapter 10 Heritage, Culture and Arts. Relevant Development Plan Policies include HCAP3, HCAP8, HCAP11, HCAP12, HCAP13, HCAP14, HCAP18, HCAP21 and HCAP27 Relevant Objectives referred to in the Development Plan include HCAPO25, HCAPO46 and HCAPO48.

To facilitate the scheme, direct localised interventions are proposed to a number of historic viaducts, industrial heritage assets and designated Protected Structures. The Protected Structures directly impacted include Gormanstown Viaduct (RPS No. 001) Balbriggan Viaduct (RPS No. 036), Rogerstown Viaduct (RPS No. 516) and Malahide Viaduct (RPS No. 420), and Rail Bridge at Clongriffin (RPS No. 919).

Modifications are also proposed to some historic masonry bridges, that do not have a statutory protection, to increase their parapet heights. Along the rail line the insertion of the required wirescape and supporting frames or poles for the electrification of the line will have a visual impact.

In addition to the above protected bridges and viaducts, there are other designated protected structures of historic station buildings and bridge structures within or adjoining the rail corridor including:

RPS No. – Structure Name

- 788 – Former Signalman’s House, Howth Junction
- 558 - Former Station Masters House, Howth
- 559 - Howth Station
- 388 - Malahide Rail Station
- 387 - Former Station Masters House Malahide
- 502 - Railway Bridge, Corballis Road/Kilcrea
- 510 - Former Station Masters House, Donabate
- 511 - Donabate Railway Station
- 286 - Rail Bridge, Rogerstown
- 288 - Lusk and Rush Station
- 292 - Road Bridge Tyrrelstown Big, Lusk
- 246 - Road Bridge, Ballykea, Loughshinny
- 231 - Rail Bridge – Townspark, Skerries
- 191 - Skerries Railway Station
- 192 - Station Masters House, Skerries
- 880 - Rail Bridge, Barnageeragh, Skerries
- 879 - Rail Bridge, Barnageeragh, Skerries
- 19 – Chimney of Former Seamills Hosiery Factory, Balbriggan
- 35 - Former RNLI Boathouse, Balbriggan
- 30 – Balbriggan Railway Station
- 31 - Station Masters House, Balbriggan
- 28 - Marian House, Balbriggan
- 53 – Croom House, Seapoint Lane, Balbriggan
- 12 – Railway Bridge, north of Bremore Castle, Balbriggan
- 0001 Gormanstown Viaduct

The scheme proposes a new small signalling and telecoms equipment building within Malahide Train Station complex (RPS No. 388), and a large OHLE Maintenance Compound and substation are sited close to the protected station building of Rush and Lusk (RPS No. 288).

The historic designed landscapes of Malahide and Ardgillan Demesnes are designated Architectural Conservation Areas (ACAs) in the FDP 2023-2029. These border the proposed scheme. The associated historic boundary treatments and mature tree belts form part of the character of these ACAs.

There are archaeological monuments and sites protected by National Monument legislation and are set out in the list of Recorded Monuments in Appendix 6 of the Development Plan which border the rail corridor and are shown on the relevant Development Plan maps.

A careful balance is required between the need to preserve and enhance the built heritage features on or adjoining the proposed scheme and the provision of this strategic infrastructure. The project should be designed to minimise the impact on the architectural, archaeological, and designed

landscape heritage, having regard to the relevant protection and enhancement provisions set out in Chapter 10 Heritage, Culture and Arts of the FDP 2023-2029.

In this regard, key areas of consideration relate to the following proposed works on, or adjacent to existing protected structures:

Balbriggan Viaduct: Historic images of the viaduct show that originally, vertical breaks were formed by solid metal capital/panels to the top of each pilaster fronting the arches/piers of the viaduct. It would be desirable that these elements of the original design, (or a modern interpretation which satisfactorily addresses Health and Safety requirements), be reinstated to the outer face of the pedestrian railing and form a consideration of the proposed scheme.

Pedestrian Overbridges Donabate, Rush and Lusk: Whilst it is acknowledged that the inclusion of solid panels to the parapets of existing pedestrian overbridges are proposed in the context of safety requirements, further consideration should be given to a more appropriate aesthetic where the panels are as visually permeable as possible to mitigate the overall impact on existing bridge parapets.

Rush and Lusk: Further consideration should be given to a reduction in the overall scale, massing, and height of the proposed substation building, with an attempt to break up the proposed structure into smaller volumes given its proximity to the historic Rush and Lusk Train Station complex. Use of appropriate materials/finishes to ensure visual harmony and which incorporate low maintenance finishes should be considered.

Malahide: The location of a new signalling and telecoms equipment building should be re-examined and relocated as close as possible to the northern end of the platform, away from the original historic Malahide Train Station building. Materials/finishes should ensure visual harmony and be discrete as possible e.g. grey brick finish rather than yellow.

Clongriffin: A new rail bridge is proposed to the east of the protected structure (RPS No. 919 Rail Bridge, Clongriffin) (Iarnród Éireann Ref. UBB19) to carry the East Loop Line. Further consideration should be given to ensuring an enhanced fencing design to the protected bridge, in place of the existing palisade fencing proposed for retention.

The imposition of appropriate conditions, as necessary to address the foregoing would be welcomed by the Planning Authority.

Impacts on Residential Amenity

In terms of residential amenity impacts, key concerns identified relate to proposed construction compounds and substations in proximity to existing residential development, with particular regard to the following specific locations along the rail corridor:

- Kilcrea/Corballis where an existing detached dwelling is located to the immediate south of the proposed compound and substation on lands zoned High Amenity within the FDP 2023-2029. The Kilcrea/Corballis Cottage Road is narrow in width and alignment.
- Skerries South at Hacketstown where there is an existing detached dwelling located to the north/north-east of the proposed construction compound and substation within Greenbelt

zoned lands. There are residential dwellings also sited north of the proposed compound and substation. The carriageway is narrow in width and alignment.

- Skerries North where there is an existing detached dwelling and ancillary garden centre located to the immediate south of the proposed construction compound and substation. The adjoining road network is narrow in width and alignment.
- Balbriggan South where there is an existing residential development and a detached dwelling located immediately north of the proposed construction compounds on either side of the R127 Balbriggan Skerries Coast Road. These lands form part of the Castlelands Masterplan 2021 lands.

The need to minimise the potential for adverse negative impacts of the proposed scheme on existing residential amenity should be carefully considered. Optimum setback relating to construction/substation compounds from existing residential development should be achieved. In addition the construction, maintenance and operational impacts of construction compounds and substations should be carefully assessed in order to protect residential amenities from any potential adverse impacts.

Interfacing with Strategic Residential Lands

Where the proposed scheme interfaces with existing and new large scale residential development along the route, the need to protect the amenity of these areas and to provide for connectivity to high quality public transport nodes and corridors is paramount. The design must respect and enhance the surrounding environment. In this regard, it is noted that large scale residential development permitted or proposed adjoining Clongriffin Train Station and within the Portmarnock South and Donabate Local Area Plan lands and within the Castlelands Masterplan lands adjoining the rail corridor should be carefully considered. **Environmental, Parks and Sustainable Transport Schemes**

Fingal County Council welcomes ongoing consultation with Iarnród Éireann on proposed environmental, parks and sustainable transport schemes which the local authority is currently advancing. A number of relevant map-based objectives adjoining the rail corridor are also noted for consideration and to allow for future plans to be developed. www.fingal.ie/development-plan-2023-2029 refers to relevant map-based local objectives along the route.

Fingal Coastal Way

Fingal County Council is committed to the delivery of this proposed strategic greenway in the context of the FDP 2023-2029. Objective GINHO78 – Coastal Way *‘Plan and develop the Fingal Coastal Way from north of Balbriggan to Kilbarrack taking full account of the need to protect the natural and cultural heritage of the coast and the need to avoid significant adverse impacts on European Sites, other protected areas and species protected by law.’* As part of the wider Coastal Way route, the preliminary design for the Fingal Coastal Way is currently being advanced to link the towns of Donabate, Rush, Loughshinny, Skerries and Balbriggan. This scheme is currently at Phase 2: Option Selection stage, as per Transport Infrastructure Ireland’s project management guidelines, with the emerging preferred route having been identified.

Fingal County Council is appreciative of engagement to date between the Dart+ Coastal North team and the Fingal Coastal Way project team and looks forward to continued engagement in the future. Based on liaison to date, Fingal County Council is confident that coordinated designs and construction programmes at the main interface points of Rogerstown and Balbriggan are achievable to enhance user experience of both schemes.

Enhanced Access to Howth Junction Rail Station

The FDP Plan 2023-2029 includes map-based Local Objective 88 which seeks to, *'Promote the improvement of access to Howth Junction Rail Station'*. Any alterations to the area near the train station should be discussed with Fingal County Council to allow for future plans to be developed.

Sutton to Malahide Pedestrian and Cycle route

The Sutton to Malahide Pedestrian and Cycle Route, currently being developed by Fingal County Council with the support of the National Transport Authority, is in the preliminary design stage and it is intended to make a planning application to An Bord Pleanála within the next year. The scheme is likely to pass through the level crossing on Station Road at Sutton Station and there is ongoing liaison between Fingal County Council and Iarnród Éireann in this regard in terms of the final design proposal.

The scheme also passes under the rail line between Strand Road and Bissett's Strand under existing bridge UBB29. There are no proposals to interfere with this bridge structure as part of the scheme.

Existing local access bridge North of Moyne Road and South of Portmarnock Station

The existing local access bridge can provide for sustainable/active travel linkage as development occurs on both sides of the railway line into the future. Any proposed alterations to this bridge by Iarnród Éireann should facilitate this connection.

Enhanced School Connectivity

Map based Local Objective 51 of the FDP 2023-2029 seeks to, *'Provide for a walkway and cycleway across the rail line to Malahide Community School'*. Any alterations to the area near the train station should be discussed with Fingal County Council to allow for future plans to be developed.

Broadmeadow Way

The Broadmeadow Way Greenway at the Broadmeadow Estuary between Malahide and Donabate will provide a link from Malahide Castle to Newbridge Demesne, Donabate. The scheme was granted planning approval by An Bord Pleanála under case reference: YA06F.304624. This permitted scheme is now in construction stage along some of the route. Fingal County Council is delivering this scheme in collaboration with Iarnród Éireann and with the support of the National Transport Authority. The local authority is appreciative of engagement to date between Dart+ Coastal North and the Council's Broadmeadow Way project team. Fingal County Council is supportive of the positioning of the new railway siding at Malahide Station and acknowledge that the proposed closure of the existing level crossing at Kilcrea is of benefit to the Broadmeadow Way. Fingal County Council is committed to the delivery of this proposed strategic greenway in conjunction with Iarnród Éireann and in the context of the FDP 2023-2029 where map-based Local Objective 34 as set out in the Plan seeks the *'Completion of the Broadmeadow Way between Malahide and Donabate to be prioritised during the lifetime of this Development Plan'*.

It is expected that the Broadmeadow Way greenway will be open and operational in 2026. The Broadmeadow Way greenway should be kept open and operational during the construction phase of the proposed Dart+ upgrade works. Space on the southern causeway and at Bissett's Strand should be kept available at all times to achieve a minimum width of greenway of 3.0m during the construction phase of the Dart+ Malahide turnback. A minimum width of 5.0m should be kept available for the permanent Broadmeadow Way greenway on the southern causeway.

The Dart+ upgrade proposed development boundary on the south side of Bissett's Strand encompasses an area that forms part of the permitted Broadmeadow Way scheme. This area is proposed by the

Dart+ upgrade project to facilitate plant and vehicle movements for the Dart+ upgrade works. To minimise impact on the completion of the Broadmeadow Way scheme, Fingal County Council requests that the proposed turning area for vehicles for the Dart+ upgrade be reconsidered, noting that this particular area was not required for the construction of the main estuary bridge as part of the Broadmeadow Way scheme as vehicles had to travel from the west and into the compound thus negating the need for any turning on Bissett's Strand.

Fingal County Council notes that through engagement between the Dart+ team and the Fingal County Council Broadmeadow Way project team, it was agreed that the proposed OHLE masts on the northern causeway will not be located on the west side of the railway but instead will be located on the east side of the railway and cantilever over the railway. This is required to allow the maximum achievable width for the permitted Broadmeadow Way on the northern causeway. The proposed drawings do not appear to align with that agreement. Fingal County Council ask that proposed OHLE masts be located to the east of the railway on the northern causeway.

The imposition of appropriate conditions, as necessary to address the foregoing would be welcomed by the Planning Authority.

Donabate Pedestrian and Cycle Bridge

Fingal County Council is advancing the construction of a pedestrian and cycle bridge over the railway line south of Donabate to provide improved permeability in conjunction with Iarnród Éireann. This will be completed during 2025.

Rush and Lusk Train Station

The Fingal Development Plan contains objectives to improve pedestrian and cycle facilities between Rogerstown Park and Lusk and between Rush and Lusk and the train station. Any development near the train station should be carried out to allow for future pedestrian/cycle linkage and in close consultation with Fingal County Council's Planning & Strategic Infrastructure Department.

Balbriggan Station & Surrounds (Work Layout Plan 17 & 17.17 of the First Schedule) - "Construction Compound"

The improved service to be provided by Dart + upgrade will complement the significant investment being made in Balbriggan Town Centre by Fingal County Council and the Department of Housing, Local Government and Heritage through the Urban Regeneration Development Fund funding of the '*Our Balbriggan Programme*.'

As part of the Our Balbriggan Programme, the area subject to acquisition under the Railway Order and designated as a "Construction Compound" (*Work Layout Plan 17 & 17.17 of the First Schedule*) to the west of the viaduct is currently being developed as part of a public realm scheme that will enhance this area, the area around the viaduct and the vicinity of the harbour. This project was subject to a public consultation and planning process under Part VIII of the Planning & Development Act 2000 as amended and was approved to proceed by the members of Fingal County Council at their meeting on 10th October 2022 and the submission received from CIE at the time references the intention for an agreement in principle regarding co-ordination between the Public Realm and the Dart+ Projects. The submission did not

clearly define the overall extent and nature or impacts of a temporary compound for the Dart+ Project at this location on the public realm proposal.

Following extensive public consultation, the Quay Street, Harbour Road, and environs public realm project is currently under construction with a contract completion date of 2025. The design, high quality materiality and development cost (in excess of €25M Euro) of this extensive new public area should not be forced to accommodate the provision of a space for a construction compound. The proposed use of the area outlined as a construction compound would severely impact the intended use of the newly developed public realm as a key driver in the rejuvenation of Balbriggan, offering improvements in biodiversity, enhanced facilities, and better access to beach and harbour.

In addition, the proposed compound location site is the location of a recently completed upgrade of Uisce Eireann underground pumping station requiring permanent emergency maintenance access and with loading restrictions. These loading restrictions will of themselves place a severe restriction on any potential access or construction activity on grounds above the pumping station networks currently under construction with a contract completion date of 2026.

This area is described in 17.17 of the First Schedule (Appendix 1 - First Schedule – Balbriggan & Its Surrounds) as being designated for a *'temporary construction compound to facilitate viaduct OHLE support works'* and is subject to the Railway Order with the lands being *'outside the current CIE lands'* the subject lands being in the ownership of Fingal County Council.

Fingal County Council is of the understanding from contact with CIE that the works that are necessary at the viaduct are very specific to the viaduct, will require “an area substantially smaller than those indicated in the property referencing drawings” and will be required “on a temporary, short-term basis”, “probably no longer than a couple of months”. (Appendix 1- e-mail correspondence from CIE dated 17th July 2024). The actual requirement for a works site compared to the lands indicated in the Railway Order is also depicted in an update presentation slide title “Balbriggan Viaduct – Proposed Works and Compound.” (Appendix 1 – Dart + - Arup / CIE slide)

The temporary acquisition of this area of the redeveloped Quay Street Environs and Harbour area as a compound is considered disproportionate for the works requirement in the first instance, excessive in terms of the actual area required for those works and unduly onerous given the legal processes and likely cost that will arise given the short duration of the works requirement.

The inclusion of the proposed compound area at the Quay Street environs in the Railway Order is also considered unnecessary given that the works and any necessary work site can be accommodated through the normal licensing processes that fall within the Council’s statutory authority.

It is proposed therefore that the area to be designated as “a temporary construction compound” (Work Layout Plan 17 & 17.17 of the First Schedule) be excluded from

confirmation of the Railway Order and that CIE enter into discussions and an agreement with Fingal County Council for licencing to conduct the works.

In the event that this area is to be included in confirmation of the Railway Order then a condition should be applied requiring details of the proposed temporary work compounds to be agreed with Fingal County council and for full reinstatement in line with the requirement of Fingal County Council.

Tanner's Water Lane Balbriggan

Map-based local objective 2 of the FDP 2023-2029 adjoining the rail corridor seeks to, 'Promote, and facilitate a pedestrian over-bridge as part of an attractive walkway along Tanner's Water Lane to the proposed coastal path linking to the town centre.'

Level Crossings

The increased frequency of level crossing closures on the Howth branch line will create delays to pedestrians, cyclists, and motorists on the local road network, including on the proposed Sutton-Malahide Pedestrian and Cycle Route. Fingal County Council welcomes any improved coordination of train movements to minimise delays in this regard, and any future consideration of infrastructural interventions at these locations to address connectivity and severance issues.

Proposed Site compound locations

Racecourse Park Lands near Mayne Road

Planning permission was granted by An Bord Pleanála under reference 311315-21 for a comprehensive parkland development incorporating active and passive recreational uses relating to the regional 'Racecourse Park' lands. This development includes a number of key elements including new walking and cycling routes c. 4.5km throughout the park, bridge over the Mayne River and repairs to the existing railway underpass connecting to lands within Dublin City Council's jurisdiction. The approved parkland development is at detailed design stage, and it is envisaged that construction will commence in early 2025. In this regard, full consideration should be given to ensuring the schemes compliance with all relevant objectives of the Fingal Development Plan relating to the Mayne River, including setbacks therefrom. Consideration should also be extended to interfaces with the permitted greenway, proposed haul route, as well as reinstatement proposals. Of particular concern is the extent and configuration of the planned construction compound as outlined in *Works Layout Plans 7 & 8*. Currently, this feature is sited in an area planned for the development of a significant Active Regional Hub, a key component of the Baldoyle Racecourse Regional Park currently under development. Consideration should be given in this regard to modifying/reducing the extent and layout of the construction compound to avoid extended delays in delivering the anticipated sports facilities.

Cave Strand

Fingal County Council is open to engagement and co-operation with Iarnród Éireann regarding the project's proposed site compound.

Rush Lusk train station

The proposed compound at Lusk Train station may impact a future active travel scheme between Rush and Lusk. Fingal County Council would welcome future engagement with Iarnród Éireann to minimise impacts and develop solutions.

Consideration should be given for the provision of bicycle parking at the proposed Rush and Lusk OHLE Maintenance Compound. (Drawing File Name: D+WP56-ARP-P4-NL-DR-RO-000710)

Skerries Road South of Balbriggan

The site compounds on the Skerries Road, south of Balbriggan, will impact on the Fingal Coastal way which is currently in design stage. Fingal County Council would welcome further engagement with Iarnród Éireann in order to avoid conflict between the construction of each scheme.

A proposed transport link to the Hamilton Road from the R127 is also included in the FDP 2023-2029 in the vicinity of these compounds as part of planning permission SHD/015/20. This link includes the construction of a new bridge across the rail line. The bridge will be constructed by the Land Development Agency (LDA) and owned by Fingal County Council. Fingal County Council, the LDA and Iarnród Éireann are currently progressing a bridge agreement. Construction is currently scheduled to begin within the coming year. Fingal County Council is available to discuss a programme and solution with Iarnród Éireann to avoid conflict between the construction of each scheme.

Quay Street Harbour Road See detailed observations under previous section

Bremore Park The compound at the substation north of Bremore park may impact on an active travel scheme along the Drogheda Road. Fingal County Council is available to engage with Iarnród Éireann for these projects to minimise impact and develop a solution.

Station Design

Fingal County Council welcomes any design that supports enhanced security of stations through passive safety, improved passenger facilities and services and CCTV where necessary. This would apply to all stations but in particular, the proposed Howth Junction-Howth service, which will result in passengers having to change trains. In the past, the local authority would be aware of passengers having been deterred from using Howth Junction Station due to perceived security concerns. It is understood that these types of issues can be addressed through high quality station design, adequate staffing and security arrangements, and Fingal County Council would welcome this being developed as the project moves forward and these concerns are addressed in consultation with the community.

The scheme shall ensure that the works within Malahide Train Station as viewed from the estuary would be sympathetic to the surrounding sensitive environment.

Fingal County Council considers the provision of high-quality cycling and pedestrian facilities at stations to be a fundamental aspect of any public transport improvement project. Significant high quality secure cycle parking storage should be provided at each station as part of the Dart+ Coastal North

project. The facilitation of active modes such as walking and cycling is a key objective of Fingal County Council and, in collaboration with the National Transport Authority, several significant cycling and walking infrastructural projects are being implemented in Fingal along the Northern line corridor. The provision of appropriate bike parking facilities will complement these measures. In this regard, Chapter 14 Development Management Standards of the FDP 2023-2029 sets out the required bicycle parking standards. A coordinated approach to active and sustainable transport between the local authority and transport providers is essential with regard active travel. Adequate secure bike parking and bike storage at stations are essential for sustainable transport. Connectivity to local destination points is key to Active Travel movement to and from any railway stations and we look forward to engaging on this further with Iarnrod Éireann.

Compound and Substation Design

Minimisation of any potential adverse environmental and visual impacts of proposed compounds and substations along the route shall be carefully considered given the sensitive environmental setting of the proposed scheme within the coastal corridor.

A more contemporary substation design approach would be welcomed having regard to the visually and environmentally sensitive nature of the lands within the coastal corridor. Design details in relation to proposed compounds and substations, including details relating to noise generation, lighting, entrances, boundary treatment and landscaping should be given careful consideration, particularly in locations proximate to residential development and where sited in high quality sensitive landscapes. Chapter 9 Green Infrastructure and Natural Heritage of the FDP 2023-2029 includes numerous Policies and Objectives which are relevant including GINHP21, GINHP22 and GINHO46.

Native hedgerows and trees should be retained as far as practicable, and any replanting should comprise native species.

Water Services Planning

It is noted that a site-specific Flood Risk Assessment (FRA) Report (*ARUP, July 2024*) has been completed for the project. It is noted that the FRA is stated to be in accordance with 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' published in November 2009 using data relating to flood risk, relevant to the Strategic Flood Risk Assessment (SFRA) of the FDP 2023-2029.

The conclusion of the Stage 2 FRA notes that areas of the scheme are identified as being within Flood Zone A and B, and that the proposed development levels at all crossing points are higher than the recommended flood defence levels. It concludes that the development proposal satisfies all the criteria of the Development Management Justification Test. It is also noted that further investigation of the flood risk in the form of a Stage 3 FRA has been deemed not to be necessary.

It is however, envisaged that there are multiple locations where existing surface water crossing capacities could be increased as design criteria has changed due to climate change and increased development run off over time. Iarnród Éireann should consult with Fingal County Council regarding locations where flow capacity can be increased at crossings. Although the FRA has demonstrated that the risks relating to flooding to the scheme are moderate but acceptable and therefore comply with DoEHLG/OPW and Fingal County Council Planning Guidance, the project SFRA does not consider to what degree crossings are restricting or impacting flow and the consequential hydraulic characteristics of the watercourse on receptors elsewhere. Fingal County Council requests a Stage 3 FRA analysing this with mitigation plans to enable unrestricted flow at crossings.



Dart + - Arup / CIE slide

NTA
DART+ DART+ Project
ARUP

Balbriggan Viaduct, proposed works and compound.

Proposed works:

- Interventions at Piers #3 & #8 to include for supports for OHLE Equipment.
- Replace walkways and adjust to accommodate supports.
- Consultation held with FCC Heritage Officers.

Interface with Balbriggan Public Realm works:

- Construction compounds proposed east & west of Balbriggan Viaduct
 - Proposed solution is safer and quicker than alternatives considered
 - Area to be fully reinstated following completion of works.