Our Case Number: ABP-320164-24

An Bord Pleanála

HSE National Environmental Health Service
Fingal Food Control
First Floor Unit 4 & 5
The Nexus Building
Blanchardstown Corporate Park
Dublin 15
D15CF9K

Date: 05 November 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	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Aisling Reilly

From: Aisling Reilly
Sent: Wednesday 23 October 2024 15:43
To: fingalfoodcontrol.peho@hse.ie
Cc: fingalfoodcontrol.peho@hse.ie
Subject: RE: HSE Submission DART plus Coastal North project

Dear Sharon,

I am in receipt of your email; an official acknowledgement will issue in due course.

Kind regards,
Aisling

From: Fingal Food Control Peho <fingalfoodcontrol.peho@hse.ie>
Sent: Monday 21 October 2024 15:22
To: Bord <bord@pleanala.ie>
Cc: Fingal Food Control Peho <fingalfoodcontrol.peho@hse.ie>
Subject: HSE Submission DART plus Coastal North project

Good Afternoon,

Please see attached submission from the HSE National Environmental Health Service.
Kind regards,

Sharon Donnelly
Oifigeach Sinsearach Sláinte Comhshaoil | Senior Environmental Health Officer

Rialú Bia Fhine Gall | FSS Seirbhís Náisiúinta Sláinte Comhshaoil
An Chéad Úrlár Aonad 4 & 5 | Foirgneamh Nexus | Páirc Chorparáideach Bhaile Bhlainséir | Baile Átha Cliath 15 | D15CF9K

Fingal Food Control | HSE National Environmental Health Service
First Floor Unit 4 & 5 | The Nexus Building | Blanchardstown Corporate Park | Dublin 15 | D15CF9K

T: +353.1.8976140 | E: sharon.donnelly@hse.ie | W: hse.ie

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúil don Deasc Seirbhísí ECT ar an nguthán ag +353 818 300300 nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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Rialú Bia Baile Átha Cliath Fhine Gall
Seirbhís Sláinte Comhshaoil
An Chéad Úrlár, Aonad 4/5, Foirgneamh Nexus, Páirc Chorparáideach Bhaile Bhlainséir, Baile Átha Cliath 15, D15 CF9K

Dublin Fingal Food Control
Environmental Health Service
1st Floor, Block 4&5, Nexus Building, Blanchardstown Corporate Park, Dublin 15, D15 CF9K

www.hse.ie
@hselive
t: 018976140
e: lisa.fitzpatrick@hse.ie

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
bord@pleanala.ie

Date:	16th October 2024
Name:	An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902
Re:	EIAR
Proposed development:	DART + Coastal North
Applicant:	Corás Iompair Eireann/Iarnród Eireann
EHIS Reference:	EHIS 4090
ABP Case Reference No.	320164

Dear Sir/Madam,

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 19th July 2024

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O'Moore/ Ina Kelly
- CHO – Carole Broadbank/ Mellany McLoone

If you have any queries regarding this report please contact Lisa Fitzpatrick, Principal Environmental Health Officer, Fingal in the first instance at lisa.fitzpatrick@hse.ie

Yours sincerely

Lisa Fitzpatrick
Principal Environmental Health Officer

HSE Submission Report

National Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000) and Regulations made thereunder)

Date:	16th October 2024
Our reference:	4090
Report to:	An Bord Pleanala at bord@pleanala.ie
Type of consultation:	EIAR
Applicant:	Córas Iompair Eireann/Iarnród Eireann
Address of proposed development:	Coastal North (Dublin City, Fingal, Meath and Louth)
ABP Case Reference No.	320164

Proposed development:

Córas Iompair Eireann/Iarnród Eireann, hereafter referred to as CIE/IE is seeking planning permission, known here as a Railway Order, from An Bord Pleanála (ABP) for the development of an improved and extended electrified rail network between Dublin City Centre and Drogheda including the Howth branch. The DART + Coastal North Project forms part of the wider DART+ programme that aims to modernise and improve existing rail service in the Greater Dublin Area (GDA). The wider programme will see the DART network grow from its current 50km in length to over 150km in length.

The DART + Coastal North project includes, in brief the following core elements

- Extension of existing 1500V DC electrification, which currently terminates at Malahide, as far as Drogheda MacBride Station (approx. 37km)
- Infrastructure works to facilitate the increase in service frequency and capacity in 5 separate locations
- Modifications to existing depots at Drogheda and Fairview to support the new train fleet
- Ancillary works in the areas of civils, utility diversions, drainage and power work.

"The majority of proposed works and interventions are expected to be carried out within the existing railway corridor boundary" (Pg 24 NTS).

The work is divided across 5 geographical zones within the boundaries of four local authorities, Dublin City Council, Fingal County Council, Meath County Council and Louth County Council. The 5 zones are:-

- Zone A: North of Connolly Station to south of Howth Junction and Donaghmede Station

- Zone B: South of Howth Junction and Donaghmede Station to the north of Malahide Viaduct (including Howth Branch)
- Zone C: North of Malahide viaduct to south of Gormanstown Station (Fingal boundary)
- Zone D: South of Gormanstown Station (Fingal border) to Louth/Meath border
- Zone E: Drogheda Station and surrounds (boundary of Louth approx. 1.5km southeast of Drogheda Station)

The construction phase of the proposed development is expected to take 3 years (36 months)
No timeline is given on an operational phase
No decommissioning phase is proposed as it is expected that the infrastructure will be refurbished or renewed to continue functioning as a railway.

Introduction

The local Environmental Health Offices in Dublin North East City (DNEC) and Fingal were consulted during the preparation of this report. Feedback was received from Mr. Geoff Taylor, Senior Environmental Health Officer, DNEC and Ms. Sharon Donnelly, Senior Environmental Health Officer, Fingal.

The Environmental Health Consultation Report only comments on Environmental Health impacts of the proposed development as outlined in the EIAR and the adequacy of the EIAR from the Environmental Health viewpoint.

The Environmental Health Service has made observations and submissions on the following specific environmental health areas:

1. Assessment of the principle and description of the project

As described in more detail above the proposed development is aiming to increase the DART network from an existing 50km to 150km in length. The DART North plus proposed development forms one part of this expansion. It includes an extension of the electrification by 37 km approx. from Malahide to Drogheda, infrastructure works at 5 locations to facilitate the increase in service frequency, modifications to existing depots in Fairview and Drogheda plus ancillary works.

The majority of the proposed works and interventions are expected to be carried out within the existing railway corridor boundary. The primary objective of the DART + programme as stated in the Non-Technical Summary is "to support urban compact growth and contribute to reducing transport congestion and emissions in the Dublin region..." (pg 3 NTS)

The National Environmental Health Service (NEHS) is satisfied that the EIAR provides an adequate description of the proposed project.

2. Assessment of Public Consultation and the Non-Technical Summary (NTS)

Section 1.6 of the NTS describes the consultation stages as part of the project development including two phases of non-statutory Public Consultation. The two phases outlined are

- Consultation on the Emerging Preferred Option – Non-statutory Public Consultation no. 1 (24th Feb – 8th April 2022) and
- Consultation on the Preferred Option – Non-statutory Public Consultation no. 2 (9th May 2023 – 23rd June 2023)

The findings of the Non-Statutory Consultations are found in Appendix A3.1 and A3.2 of the full EIAR. The reports of Public Consultation 1 and Public Consultation 2 describe the process which included press releases at the launch of each public consultation (every consultation took place over a 6 week period), leaflet drops to properties within 100 metres of the railway line, virtual exhibition room, social media campaign, virtual meetings held and attended by the Community Liaison Officer for the project and public information webinars.

The consultation process is also ongoing via the project website where people can contact the DART plus Coastal North project team via a phone number, email address and postal address. It was noted for example under the Public Consultation Findings report that of the 2,115 submissions made, 62 were described under the banner headline "Health Concerns: Noise and Vibration and Impacts of Landowners and Residents".

The NEHS is satisfied that the Non-Technical Summary provides an adequate description of the proposed development and the potential impacts on human health.

The National Environmental Health Service (NEHS) emphasises the need for people to have access to a feedback mechanism where feedback including complaints are received and acted upon by a designation person/liaison within the proposed development. This feedback mechanism is recommended to be in place during all phases of the proposed development but primarily during the construction phase.

3. Assessment of Description of the Physical Environment

As described earlier, the proposed development will take place along the existing railway corridor with additional infrastructure works required to facilitate the increase in service frequency and capacity in 5 locations, modifications to existing deports at Drogheda and Fairview the support the new train fleet, other ancillary works and approx. 37km of an extension to the existing electrified line.

- **Human Health**

Chapter 23 of the full EIAR address the issue of Human Health. It assesses the impact of the DART+ Coastal North project on Human Health during the Construction and Operational Phases. It begins by setting out the legislative, policy and guidance landscape and outlines the methodology used to assess potential health impact along the 50km of existing railway line.

Potential effects are described for both the Construction and Operational Phases of the proposed development. The key issues highlighted in this chapter are (a) Noise and Vibration and (b) Air Quality, specifically dust. In the case of both Noise and Vibration and Dust the potential impacts on human health during the construction phase will, as described here, be minimised by mitigation measures/strict controls. In the case of Noise and Vibration they are outlined in Chapter 14 and in

the case of Dust they are outlined in Chapter 12. Specific reference is made to the Construction Environmental Management Plan (CEMP) within Appendix A5.1 of the full EIAR.

In the context of Air Quality including Dust, and Noise and Vibration, the conclusion drawn in the full EIAR under Chapter 23 (pages 21 and 22) is that in both phases of the proposed development the short-term nature of the effect in any single location coupled with mitigation measures is that both are not expected to pose any risk to human health.

More specific reference to the health relevant chapters of the EIAR are addressed in the following headings. They make particular reference to the following Chapters

Chapter 11 - Hydrogeology
Chapter 12 – Air Quality including Dust
Chapter 13 – Climate
Chapter 14 – Noise and Vibration

Climate Change is widely regarded as the greatest threat to global health this century so is therefore included as an issue of relevance to public health in the context of this proposed development.

- **Hydrogeology**

Chapter 11 of the full EIAR assesses the potential effects of the proposed development on hydrogeology. It begins by outlining the legislation, policy and guidance applicable in this area. It subsequently outlines the methodology utilised to assess the effects of the proposed development in both the construction and operational phases.

As indicated under this chapter "implementation of the proposed design, no additional mitigation measures for hydrogeology are considered necessary for the operation of the Proposed Development." However, a number of mitigation measures are described under 11.8.1.1 "to minimise the risk of spills and contamination of soils and waters".

The NEHS recommends that the mitigation measures described under Section 11.8.1.1 of the full EIAR are adopted as minimum conditions of planning to protect groundwater quality.

- **Air Quality including Dust**

Chapter 12 of the full EIAR addresses the subject of Air Quality. It starts by outlining the legislation, policy and guidance applicable in this area. Thereafter it outlines the methodology employed to assess the effects of the proposed development in both the construction and operational phases.

Essentially two sources of emissions were identified, namely direct emissions from the construction and operational phases and more indirect traffic emissions in the construction and operational phases of the proposed development. Indirect emissions from the generation of energy for operations was also considered. There was a particular emphasis on assessing the impact of construction related dust during the activities of demolition, earthworks, construction and trackout. Traffic emissions related to particulates (PM2.5 and PM10) and NO_2.

Section 12.6 sets out the mitigation measures which are described as "to sufficiently ameliorate the likely air quality impact of the proposed development, a schedule of air quality control measures has

been formulated for both Construction and Operational Phases associated with the proposed development" (pg 62)

The section goes on to say, "no specific operational phase mitigation measures are required" (pg 64).

In terms of controlling dust during the construction phase detailed mitigation measures are set out under Appendix A12.1 of the full EIAR with respect to eleven different measures from communications through to measures specific to trackout.

No specific measures were found described under Section 12.6 in relation to emissions other than dust but on closer inspection many emission mitigation measures aimed at controlling emissions such as particulates and NO_2 as well as green-house gas emissions can be found within Appendix A12.1 of the full EIAR.

Some mitigation measures in relation to transport emissions during the construction phase are described under Section 12.6.1.3 on page 64 of the Air Quality Chapter of the EIAR. They include for example measures to prevent the idling of vehicle engines and efficient scheduling of deliveries to minimise the number of truck movements for example. It does not however indicate that the use of low emission vehicles is an option

The NEHS recommends that the dust mitigation and other air quality mitigation measures detailed under Appendix A12.1 of the full EIAR are adopted as minimum conditions of planning. As outlined these measures should be undertaken in parallel with the Construction Environmental Management Plan (CEMP) under Appendix A5.1.

The NEHS recommends that the measures described under Section 12.6.1.3 for the mitigation of transport emissions during the construction phase are adopted and included in the Construction Environmental Management Plan. The use of low emission vehicles such as Battery Electric Vehicles should be considered as an option to not only reduce emissions of NO_2 and particulates but also as a means to reduce green-house gas emissions.

- **Climate**

Chapter 13 of the full EIAR addresses the issue of Climate from the perspective of both mitigation and adaption in the Construction Phase and the Operational Phase. It begins by setting the legislative, policy and guidance environment. It sets out the methodology adopted for assessing impacts in the construction and operational phases. Following an outline of who was consulted the chapter goes on to describe the potential impacts of the proposed development on climate change (in both phases) and the impact of climate change itself on the proposed development (in both phases). Finally the chapter details mitigation measures to be adopted during both phases of the proposed development.

The mitigation measures detailed in the EIAR are sub-divided into mitigation measures for the construction phase and the operational phase within an overarching strategy for impact minimisation of (a) Avoid, (b) Reduce, (c) Replace and (d) Offset. The mitigation measures to be adopted to reduce Green House Gas emissions are described under 13.6.1 and 13.6.2 of the EIAR.

No mitigation measures in the context of Adaptation was found under this chapter despite the fact that part of the chapter refers to the impact of climate change on the proposed development and specifically makes reference to the fact that appropriate flood risk measures and extreme weather events have been considered as part of the construction planning and in the operational phase.

The NEHS recommends that the mitigation measures described under 13.6.1 and 13.6.2 of the EIAR are adopted as minimum conditions of planning. Additional measures could be adopted to further reduce emissions and support healthy place making. One area to examine is the possibility of using low emission vehicles such as battery electric vehicles. Another area to include is to support sustainable and active travel modes by providing access to other public transport services adjacent to stations and to provide secure bike/scooter parking for those preferring to use active modes of transport.

The use of offsetting as a strategy for reducing green-house gas emissions should be a strategy of last resort. Every effort should be made to reduce emissions at source first.

The NEHS recommends that Adaptation measures to address the potential impact of climate change on the proposed development during the construction and operational phases are included as part of the planning conditions. Measures to reduce exposure and vulnerability to climate change include addressing severe weather events such as floods, heatwaves, dry spells and windstorms as well as addressing the more slow onset changes climate change can bring in areas such as water availability from recycling and reuse plans, and potential changes that enable vectors of disease (mosquitos and flies for example) to proliferate.

The NEHS recommends that the proposed development seek to support health gain and protect health. Reference has already been made to supporting sustainable and active travel modes for those accessing rail services. Actions include ensuring safe access for pedestrians (well signposted, segregated, illuminated displaying walk times to various locations), cyclists and others using active travel to rail stations and supporting secure parking. Provision of park and ride facilities. Users of Electric Vehicles may be supported with EV charging points. Adequate shade should be provided to protect users from the harm of UV sunlight as well as shelter from other types of weather.

- **Noise and Vibration**

Chapter 14 of the full EIAR addresses Noise and Vibration. It begins by setting out the legislation, policy and guidance environment and then explains the methodologies employed to assess the potential effects of noise and vibration in both the construction and operational phase of the proposed development. A further demarcation includes the noise and vibration generated on roads during both phases of the proposed development.

Section 14.6.1 details a number of mitigation measures proposed to be employed during the construction phase of the proposed development. Section 14.6.2 details a number of mitigation measures to be employed during the operational phase with many of the measures detailed for periods of maintenance.

The NEHS recommends that the mitigation measures detailed for Noise and Vibration under section 14.6 of the full EIAR are set as minimum conditions of planning. Particular attention should

be paid to the construction areas outside of the existing railway corridor where proximity to Noise and Vibration Sensitive locations may be closer to effect population health.

For example Clontarf Private Nursing Home DO3 NA78, is a specific potentially sensitive receptor in proximity to the works which will be carried out at Fairview Depot. The service users at this facility are vulnerable.

- **Other aspects to consider in the Protection of Public Health**

Appendix A5.1 sets out the Construction Environmental Management Plan (CEMP) for the proposed development. As stated in the introduction it provides an environmental management framework for the appointed contractors to incorporate mitigating principles into their work, not only to reduce potential adverse effects on the environment but also on human health.

  - **Pest/Vector Control**

The NEHS was unable to locate any reference to pest/vector control measures to be implemented by the contractor during the construction phase of the proposed development under Appendix A5.1 – CEMP. Construction work may disturb rodents resulting in dispersion into the surrounding area. Construction work and inadequate waste management may also create conditions for the proliferation of other vectors of diseases such as flies and mosquitoes. This is also discussed in the context of climate change above.

This issue is not just relevant to the construction phase but also the operational phase where waste management and drainage are key elements to a wider Integrated Vector Management approach to control potential vectors of disease.

It is recommended that a Pest/Vector Control Plan is incorporated into the Design, Construction and Operation of the Proposed Development in the context of Integrated Vector Management to prevent vectors from breeding in the first place to measures that protect population health.

Conclusions

Should permission be granted for the proposed development, the National Environmental Health Service makes the following recommendations:

- **That the local community including residential, landowners, commercial, and others, have access to a feedback mechanism where feedback including complaints are received and acted upon by a designated person/liaison within the proposed development. This feedback mechanism is recommended to be in place during all phases of the proposed development but primarily during the construction phase.**
- **That the mitigation measures described under Section 11.8.1.1 of the Hydrogeology chapter of the full EIAR are adopted as minimum conditions of planning to protect groundwater quality.**
- **That the dust mitigation and other air quality mitigation measures detailed under Appendix A12.1 of the full EIAR are adopted as minimum conditions of planning. As outlined these measures should be undertaken in parallel with the Construction Environmental Management Plan (CEMP) under Appendix A5.1.**

- **That the measures described under Section 12.6.1.3 for the mitigation of transport emissions during the construction phase are adopted and included in the Construction Environmental Management Plan (CEMP). The use of low emission vehicles such as Battery Electric Vehicles should be considered as an option to not only reduce emissions of NO_2 and particulates but also as a means to reduce green-house gas emissions.**
- **That the (green-house gas) mitigation measures described under 13.6.1 and 13.6.2 of the EIAR are adopted as minimum conditions of planning. Additional measures could be adopted to further reduce emissions and support healthy place making. One area to examine is the possibility of using low emission vehicles such as battery electric vehicles. Another area to include is to support sustainable and active travel modes by providing access to other public transport services adjacent to stations and to provide secure bike/scooter parking for those preferring to use active modes of transport.**
- **That the use of offsetting as a strategy for reducing green-house gas emissions should be a strategy of last resort. Every effort should be made to reduce emissions at source first.**
- **That Adaptation measures to address the potential impact of climate change on the proposed development during the construction and operational phases are included as part of the planning conditions. Measures to reduce exposure and vulnerability to climate change include addressing severe weather events such as floods, heatwaves, dry spells and windstorms as well as addressing the more slow onset changes climate change can bring in areas such as water availability from recycling and reuse plans, and potential changes that enable vectors of disease (mosquitos and flies for example) to proliferate.**
- **That the proposed development seek to support health gain and protect health. Reference has already been made to supporting sustainable and active travel modes for those accessing rail services. Actions include ensuring safe access for pedestrians (well signposted, segregated, illuminated displaying walk times to various locations), cyclists and others using active travel to rail stations and supporting secure parking. Provision of park and ride facilities. Users of Electric Vehicles may be supported with EV charging points. Adequate shade should be provided to protect users from the harm of UV sunlight as well as shelter from other types of weather.**
- **That the mitigation measures detailed for Noise and Vibration under section 14.6 of the full EIAR are set as minimum conditions of planning. Particular attention should be paid to the construction areas outside of the existing railway corridor where proximity to Noise and Vibration Sensitive locations may be closer to effect population health.**
- **That a Pest/Vector Control Plan is incorporated into the Design, Construction and Operation of the Proposed Development in the context of Integrated Vector Management to prevent vectors from breeding in the first place to measures that protect population health.**

Kind regards,

Niall Roche

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer
Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)