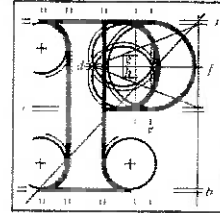


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Joanne Mallon and Simon Gregory and others  
3 Railway Terrace  
Dublin Road  
Drogheda  
Co. Louth

**Date:** 10 September 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 submission in relation to the above mentioned proposed railway order and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions received in relation to the application will be made available for public inspection at the offices of the relevant County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto: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

RA05

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

**AN BORD PLEANÁLA**

**IN THE MATTER OF AN APPLICATION BY IRISH RAIL / DART PLUS NORTH  
PROJECT BEARING THE REFERENCE NUMBER 320164-24**

**WRITTEN OBJECTIONS / OBSERVATIONS SUBMITTED HERE BY:**

FRANK & RICHENDA BYRNE  
OWNERS / OCCUPIERS  
2 RAILWAY TERRACE  
DUBLIN ROAD  
DROGHEDA  
CO. LOUTH

JOANNE MALLON & SIMON GREGORY  
OWNERS / OCCUPIERS  
3 RAILWAY TERRACE  
DUBLIN ROAD  
DROGHEDA  
CO. LOUTH

MARIE MCKEOWN  
OWNER / OCCUPIER  
4 RAILWAY TERRACE  
DUBLIN ROAD  
DROGHEDA  
CO. LOUTH

LIAM CLARKE  
OWNER / OCCUPIER  
5 RAILWAY TERRACE  
DUBLIN ROAD  
DROGHEDA  
CO. LOUTH

ELIZABETH HICKEY  
OWNER / OCCUPIER  
6 RAILWAY TERRACE  
DUBLIN ROAD  
DROGHEDA  
CO. LOUTH

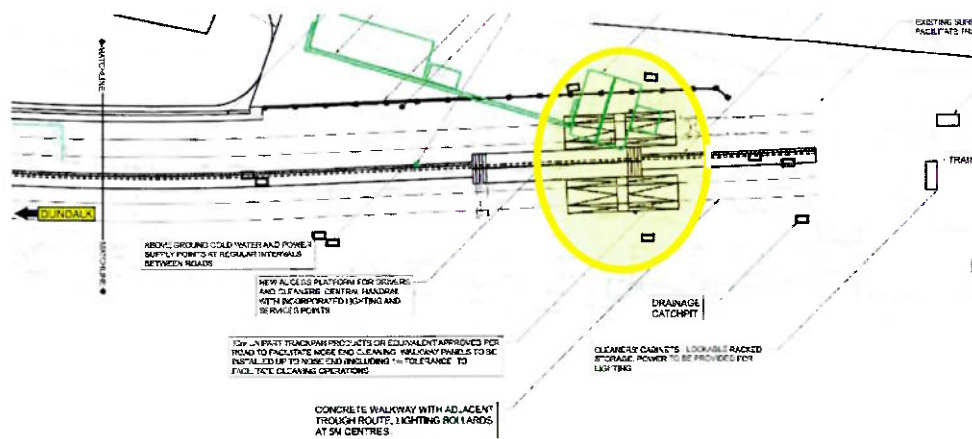
**Location of our residences at Railway Terrace Drogheda in proximity to the proposed works:**



**We the owners / occupiers of Railway Terrace, Dublin Road, Drogheda wish to object to the proposed DART Plus North works at and surrounding Drogheda McBride Rail Station, identified as Zone E in the proposal, on the grounds of the following observations:**

**NOISE DISTURBANCE CAUSED BY PROPOSED NEW TRAIN CLEANING EQUIPMENT**

- Proposed train cleaning equipment spanning two tracks / sidings adjacent to the service depot poses risk of serious noise disruption to residents as it is located in close proximity to homes. When asked in public consultation if any new equipment or machinery was to be proposed outside of the depot building, residents of Railway Terrace were told that no such additions were planned. As such, this equipment was not disclosed at public consultation stage. No information has been given in the proposal on the noise levels of this equipment or its hours of operation. Despite a request sent to Irish rail in advance of this submission to provide this information, no further details have been provided. This equipment has the potential to cause serious noise disturbance and to be in operation at any time day or night and no measures at all have been proposed to mitigate against this disturbance.



**In relation to the above equipment we request that a condition be imposed that this equipment / machinery be omitted entirely or moved to a more suitable location much further away from residences.**

#### **NOISE DISTURBANCE DUE TO REGRADING OF THE EARTH BUND ADJACENT TO THE SERVICE DEPOT**

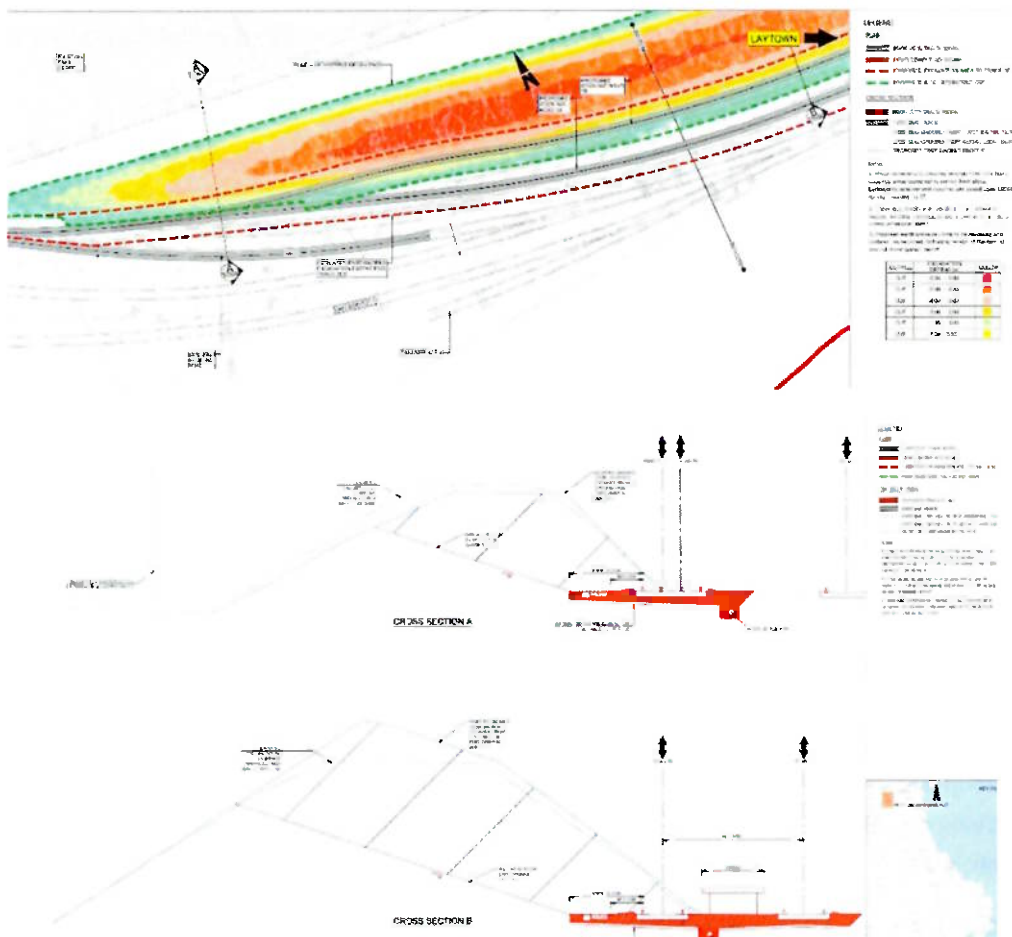
- The proposal states: *“The railway depot is not predicted to result in any significant operational noise effects; therefore no noise mitigation is proposed”*. This statement, from our experience living adjacent to the depot is fundamentally untrue and does not acknowledge the current active noise disturbance complaints or the compounding effects of the proposed alterations to the adjacent landscape or potential increase in operational hours of the depot. The lack of mitigation in regard to these noise issues will cause a serious health risk to adjacent residents. These issues and their possible mitigation were discussed at length with residents at public consultation but sadly have been completely omitted from the proposal.
- The proposed regrading of the earth bund adjacent to the depot building will indeed result in a very serious increase in noise both day and night and will make living in our homes very difficult and sleeping on our homes almost impossible. In the EAR submitted to An Bord Pleanála for this project it is deemed that *“no mitigation measures need be employed as no increase of noise disturbance is expected when this project is in operation.”* This is as far from true as we can stress. The depot is in very close proximity to our homes and there is a well documented history of complaints lodged both informally and formally to Irish rail directly (locally and nationally) and through public channels (via the local authority and the EPA) about noise disturbance from the depot as it currently operates. This noise is mainly coming from the equipment and machinery inside the depot and is a disturbance day and night. We have documented to Irish Rail noise recordings in excess of 70 and 80 decibels in the middle of the night / small hours of the morning on a regular basis. These are far above the operational noise thresholds of 45 decibels by day and 55 decibels at night set out by the World Health Organisation and reiterated in this proposal by Irish Rail. Both Irish Rail in this proposal and the WHO agree that any noise disturbance of greater than 10 decibels above the threshold has an adverse impact on health. Our current noise baseline when the depot is in operation is upwards of 30 decibels above the threshold with the most significant impact being during night time operations. As yet no mitigating action has been taken despite our requests.

Current depth and height of the earth bund and planting that is providing sound buffering and visual screening:





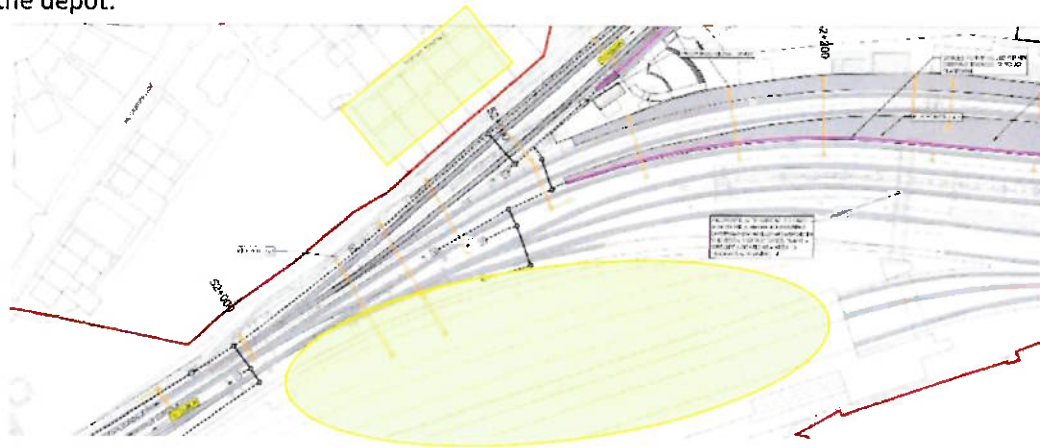
- At public consultation it was disclosed only that 1 meter in height would be removed from the bund. As per the images in the proposal below it is clear that this not at all the case. It is proposed to reduce the bund by 1.5 meters and the bunds depth will all but be removed effectively removing any sound buffering that this bund currently provides:



- As we currently live with noise disturbance upwards of 70 and 80 decibels in the middle of the night we can only fathom what the disturbance levels will be once this bund is altered as proposed. The public liaison officer for the Dart Plus North Project himself stood with us at the end of our gardens and agreed in conversation that the current noise level was problematic particularly at night due to changes in the ambient noise in the area.

- The project proposal argues that resident's exposure to noise and vibration at Drogheda will be less than current levels as the trains that will be in use on the Dart lines will be electric. Despite our in depth conversations about this issue in public consultation with Irish Rail, their proposal to An Bord Pleanála has failed to acknowledge or correctly assess the noise disturbance from maintenance equipment and machinery. This is currently the cause of disturbance, not train engines, and this current disturbance will be exacerbated and increased by removal of the current sound buffering landscaping.
- It is important also to note in this context that the proposed increase in the fleet of trains is expected to lead to an increase in the hours of operation of this noise producing equipment inside and surrounding the depot. This, along with the removal of the sound buffering landscaping will make our homes impossible to live or sleep in. Despite promises from Irish Rail that proposed depot operating hours will be documented in the proposal, no such information has been provided to inform residents of the expected duration of depot operating noise once the fleet of trains to be maintained has been significantly increased. We must deduce therefore that the increase of fleet will increase the operating hours and thus compound the noise disturbance further by extending it through full night time hours until morning.

Please see proximity and size of residences in relation to the bund and size of the depot for reference to gauge our exposure to noise from maintenance operations in and adjacent to the depot:



- The references made by Irish Rail to the sound measuring that was undertaken as part of this proposal are very problematic. Irish Rail, elsewhere in their proposal, have cited the current operational noise levels as below based on readings taken at Drogheda ( 5 Railway Terrace / Location 2) on 29<sup>th</sup> March 2024:
  - 7am to 7pm = 53 to 64 decibels
  - 7pm to 11pm = 55 to 64 decibels
  - 11pm to 7am = 49 to 61 decibels
- However, there is no evidence that these figures are factual or based on the survey undertaken. Firstly these readings were taken over one 24 hour period only. Despite claims by Irish Rail we believe that this cannot be an accurate representation of the ongoing and

changeable operational noise experienced by residents from an operation of this scale, which is often in excess of 70 or 80 decibels according to readings taken on several occasions by the residents themselves. The sound survey itself, undertaken by NVM Environmental & Structural Monitoring, is only partially included in the proposal with the full signed & validated reports from several locations including Drogheda having been omitted. Out of 17 locations surveyed by NVM only the full reports for two locations have been submitted to An Bord Pleanála by Irish Rail. Nowhere in the application is there accurate impartial evidence of the current sound levels or sound sources at Railway Terrace, Drogheda (sound survey 'Location 2' as per the NVM report) by day and by night. The NVM noise graph has been omitted along with evidence From NVM of the times the readings were taken and thus, no verification of the quoted decibel levels has been provided. Despite a request sent to Irish rail in advance of this submission to provide the full signed and validated report of readings taken at Drogheda, no such details have been provided.

**This should render the sound levels quoted at Drogheda and 14 other locations unreliable and unsubstantiated.**

- Despite our concerns being raised and acknowledged in public consultation and our mitigation proposals being discussed and documented, the only proposed measures to mitigate against the certainty of an increase in noise is the replanting of the trees that are to be removed as part of the regrading of the bund. This is not nearly enough to ensure residents are protected from an untenable living situation. Instead, this should be seen as an opportunity, not to worsen the situation but instead to make improvements.

**We propose the following planning conditions be imposed in relation to the service depot in order for us to be able to remain living in our homes once the project is operational:**

- 1. Sound proofing the depot building itself (as suggested in examples below).**
- 2. Trees and hedgerows to be planted on the bank adjacent to our gardens in addition to the proposed replanting of the bund.**
- 3. Replanting on the bund should be very mature in height / growth as saplings could take upwards of 30 to 40 years to provide the same sound buffering as the current planting.**
- 4. Expenses to be offered to residents in adjacent homes to implement domestic soundproofing measures.**

Possible Sound Proofing Solutions to be implemented for the depot building:

External Sound Barrier wall



External Sound Insulation

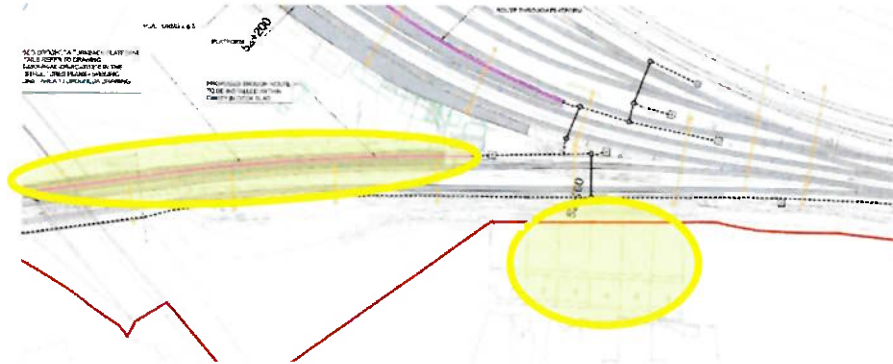


Internal Ceiling Insulation



## NOISE & LIGHT DISTURBANCE FROM TO RAILWAY OPERATIONS DUE TO PROPOSED LOCATION OF PLATFORM 4 AND CONCOURSE

Proximity of platform and concourse to our residences:



- The proposal states “no significant noise impacts associated with the operation of the railway have been identified; therefore, no residual significant railway noise effects are predicted”. This is fundamentally untrue. During public consultation discussions were had at length with residents about expected noise disturbance and many mitigation measures were suggested.
- The proximity of our homes to the proposed platform 4 and connecting concourse will undoubtedly cause new and significant disturbance in terms of railway operations both day and night from the following sources directly adjacent to our homes:
  1. Noise from new Platform PA / Tannoy systems
  2. Noise from Train Horns on the proposed Platform 4
  3. Platform noise from rail users
  4. Noise from on board train systems (door alarms, PA systems etc)
- No formal design for the lighting scheme on Platform 4 has been included in the proposal or on the new sidings adjacent to the depot. Residents were informally told during public consultation that it is the intention of Irish Rail to have the lighting on the sidings operated by motion sensor only to minimise light pollution and to have the platform lighting angled away from residents’ homes and in operation only when the platform is in use. As this has not been included in the proposal we have no guarantee that this indeed what is intended, nor are there any guarantees about the hours of use of the Platform now or in the future. It is certain that, if poorly or cheaply implemented, lighting on the proposed Platform 4 will cause serious glare towards our homes and a change in the ambient light of the area.
- The installation of pylons and overhead wires on the tracks adjacent to our homes will have a severely negative impact on the view out of our windows and from our gardens. We will be faced with many unsightly wires, cables and large masts in direct view of our windows.



**In order to mitigate against these significant disturbances, we request that the following planning conditions be imposed:**

- **Operational time restrictions be placed on the use of PA / tannoy systems on Platform 4 between the hours of 11pm and 7am.**
- **Operational time restrictions be placed on the use of train horns between the hours of 11pm and 7am.**
- **Appropriate digital signage be use on Platform 4 in lieu of the use of PA / tannoy systems where possible.**
- **Planting of mature trees on the bank adjacent to our homes to shield against light and unsightly wires and masts and to maintain privacy.**
- **All lighting poles to have glare shields fitted to restrict light and ensure only the desired space for rail users are illuminated.**
- **Operational time restrictions be placed on the use of lighting on Platform 4 to ensure lights are turned off once the space is not in use.**

#### **LOSS OF PRIVACY DUE TO PROPOSED LOCATION OF PLATFORM 4**

- **The location of the proposed Platform 4 is in itself problematic as it will incur a serious loss of privacy for residents in homes adjacent to the rail line with our windows and gardens etc in full view of rail users on this platform. During public consultation we requested that mature trees be planted on the bank adjacent to our gardens to provide privacy screening and mitigation against glare from lighting. Despite an informal agreement on the part of Irish Rail to include this in their proposal, no such proposal has been included.**
- **The development adjacent to our homes involves altering and upgrading the two current freight tracks. One of these tracks will run alongside the proposed platform 4. We have a concern that the project may lend itself to future development on the other track directly adjacent to our home. We are very concerned that this project could open the possibility of Irish Rail having rail users or maintenance staff using this side of the tracks in the future. This would cause us further loss of privacy and leave us open to further noise and light disturbance along with serious risks to the security of our property stemming from increased access.**

**We propose the following planning conditions be imposed in relation to these issues:**

- **As above, planting of mature trees on the bank adjacent to our homes to shield against light and to maintain privacy.**
- **Further development of the bank of land directly adjacent to our properties for either public or service use to be prohibited.**

## REMOVAL OF EXISTING LANDSCAPE FEATURES AND HEDGREWS

- It is proposed to remove a substantial amount of planting in order to facilitate the new platform 4 and track changes adjacent to the Dublin Road R132. The EAR Volume 1 states *“significant negative impact on trees of special amenity value at Dublin Road Bridge, Drogheda”*. The planting in this area and these trees provide great sound buffering for residents of Railway Terrace from the heavy traffic on the R132.
- **We wish to request a condition be imposed that requires this planting be maintained so that we are not subject to increased noise disturbance from this road. If trees are to be removed and replanted we wish to request a condition be imposed that ensures the replanting be specific to the protected species being removed and is very mature in height / growth as, again, saplings, though cheaper, could take upwards of 30 to 40 years to provide the same sound buffering as the current planting.**

## CONSTRUCTION NOISE AND THE EFFECT OF SAME ON HEALTH

- The proposal cites that *“construction noise constitutes a significant effect where it is determined a major or moderate magnitude of impact will occur for a duration exceeding: 10 or more days or nights in any 15 consecutive days or nights  
A total number of days exceeding 40 in any 6 consecutive months”  
“Night works in particular have the potential to generate the most significant noise effects. All affected sensitive locations will be notified of planned works in advance of the works progressing. The notification will include a description of the works, the expected duration and details of how to contact the contractor to log complaints.”*
- While we understand that it is important that the rail service be protected where possible while works are ongoing. The ongoing decision of Irish Rail to carry out the majority of heavy works at night means that the lives and health of adjacent residents are the cost of this protection. This should not be the case and it is our view that some daytime service disruption while these works are ongoing must be the cost of doing business in order to safeguard adjacent families from the health impacts of recurrent nightly noise disturbance.
- We have serious concerns about construction noise particularly at night as it is our experience that the above notification system is not effective. Notification of disturbance should not be deemed as free reign to cause disturbance.
- The proposed works are significant in scale and pose a risk of prolonged disturbance nightly over a very long period of time. It has been our experience that night time works adjacent to our homes have been in excess of 100 decibels with exceptionally heavy and noisy machinery being used such as pile driving equipment, diesel machinery such as diggers and lighter noisy equipment such as con saws, angle grinders, drills etc at all hours of the night and morning just meters from our bedrooms. On more than one occasion we have been forced to leave our home and sleep elsewhere due to repeated disturbance night after night and the upset caused to family members.

- The contact details on these notifications are usually only for the Irish Rail public liaison office who have been very difficult to contact or get a response from. We have had to log a complaint with the local authorities about poor communications from this office. When this office does respond to a query or complaint they are ineffective to make any changes or deal with any issues. On no occasion when we have had a serious issue has this office helped to resolve it, made any effort to compromise, negotiate or help us to have problematic works changed or altered in any way.
- On no occasion have any contact details for any contractor actually been provided and we have been left having to contact the Gardaí when repeated nightly heavy noise disturbance became unbearable for our family.
- The notifications always state that all possible steps will be taken to minimise disturbance but this is never the case. Quite often the opposite is true and no steps are taken with no noise proofing, no acoustic screening in place and workmen shouting across heavy diesel engines and saws etc. and machinery left idling when not in use during the small hours of the morning.
- As a result of the above points we have little faith that works notifications and works operating procedures for this project will be in any way effective at safeguarding the health of residents due to noise disturbance.

**We therefore request that An Bord Pleanála undertake this safeguarding by imposing the following additional planning conditions on works for this project:**

- **Operating hours of works adjacent to homes be limited to avoid heavy works taking place between 11pm and 7am.**
- **Acoustic screening (e.g. of which pictured below) be used for all heavy works adjacent to residences.**
- **Acoustic enclosures (e.g. of which pictured below) to be used for all lighter works, hand held equipment such as saws, drills etc.**
- **A 'No Idling Policy' be implemented during works where engines of all machinery are turned off when not in current use.**

Possible Acoustic Screening:



Possible Acoustic Enclosures:



## IN CONCLUSION

The EAR Vol 1 (pg 79) states that the *“majority of impacted properties will achieve slight or imperceptible impact post mitigation”*. It is our view, as highlighted in the points above, that this statement is fundamentally incorrect. The potential noise and light disturbance at Drogheda has not been appropriately or correctly assessed or determined, serious issues pertaining to operational disturbance raised at public consultation have not been appropriately acknowledged or addressed and as such no appropriate mitigation whatsoever has been proposed.

We wish to draw the attention of An Bord Pleanála to pg 91, Section 23, of the EAR in relation to Human Health as it pertains to how human health can be affected by disturbances from air, noise water or soil including the psychological effects of these disturbances. In the context of this section we wish to highlight, as documented above, the failings of the proposal to appropriately acknowledge and assess the risk of disturbance to residents directly adjacent to the proposed project and its failure to safeguard the health of these residents due to a lack of appropriate mitigation against operational noise and light from the proposed trains, platform 4, concourse, service depot, landscape changes and increased equipment and machinery on the tracks and sidings along with the serious loss of privacy incurred.

**As such, we request that An Bord Pleanála ensure the safeguarding of the health of residents in adjacent homes at Railway Terrace, Drogheda by refusing permission for this project until these issues have been appropriately addressed and appropriate mitigations have been proposed.**