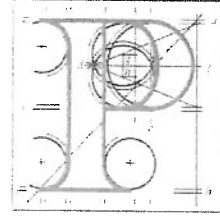


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Stephaney Bissett
Riverside
Bissett's Strand
Malahide
Co. Dublin
K36 XN96

Date: 17 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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 (01) 858 8100
Glaó Áitiúil 1800 275 175
Facs (01) 872 2684
Láithreán Gréasáin www.pleanala.ie
Ríomhphost bord@pleanala.ie

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

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

Riverside
Bisset's Strand
Malahide
Co Dublin K36 XN96

1st October 2024

The Secretary
An Bord Pleanála
61-64 Marlborough Street
Dublin 1 D01 V902

Re: Bord Pleanála Case reference: NA29N.320164

Dear Sir/Madam

I wish to make a submission on CIÉ's Application for Railway Order DART+ Coastal North Railway Order 2024.

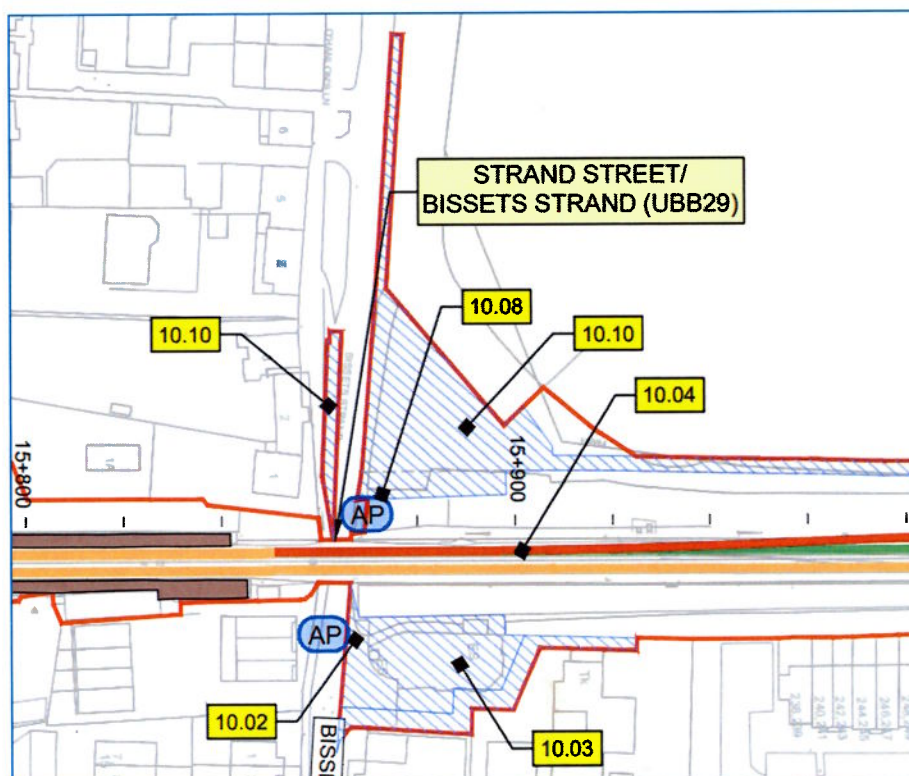
1. PARKING/BIN COLLECTION FOR RESIDENTS WHO LIVE CLOSE TO THE WORKS

Railway Order – Works Layout Plan No. 10 Malahide Station and Surrounds -

[https://www.dartplus.ie/S3mvc/media/DART-Coastal-North-Railway-Order/03.1%20RO%20Book%201/Railway-Work-Plans-Combined-\(Set-1-of-3\).pdf](https://www.dartplus.ie/S3mvc/media/DART-Coastal-North-Railway-Order/03.1%20RO%20Book%201/Railway-Work-Plans-Combined-(Set-1-of-3).pdf)

(Page 10)

(Portion of plan shown below)



Railway Order - Works No. 10.10 –

https://www.dartplus.ie/S3mvc/media/DART-Coastal-North-Railway-Order/02%20Book%20of%20Reference%20-%20Schedules/01-Book-of-Reference_All-Schedules.pdf

(Pages 16 & 17)

(Description below)

	include a new induction buffer stop and a new raised lit walkway for drivers.	NO. 10
10.10	Establish a temporary construction compound to facilitate modular reinforced earth wall works. Works will include fencing / hoarding and include storage of certain construction plant and equipment required to carry out the works and to facilitate plant and vehicle movements.	Works Layout Plan No. 10

I live in the house numbered 3 shown on the section of the plan above i.e. in front of the narrow strip numbered 10.10. A photo of this section is shown.



This section of the road is used for parking by residents of the Strand, but is also used by rail commuters and shoppers as it is free parking and is in close proximity to the station and village. As residents of the Strand we do not have access to permit parking, despite many requests to Fingal County Council. We also do not have any access to permit parking in nearby areas. If access to this area is removed, even on a temporary basis, it will be

impossible for us to park anywhere nearby as the parking area on the sea side of the road is also included in Works No 10.10.

The photo shows the area which has been hatched with a yellow box to allow for the bin collection for 7 houses and no provision appears to have been made to facilitate this during the works in the documentation.

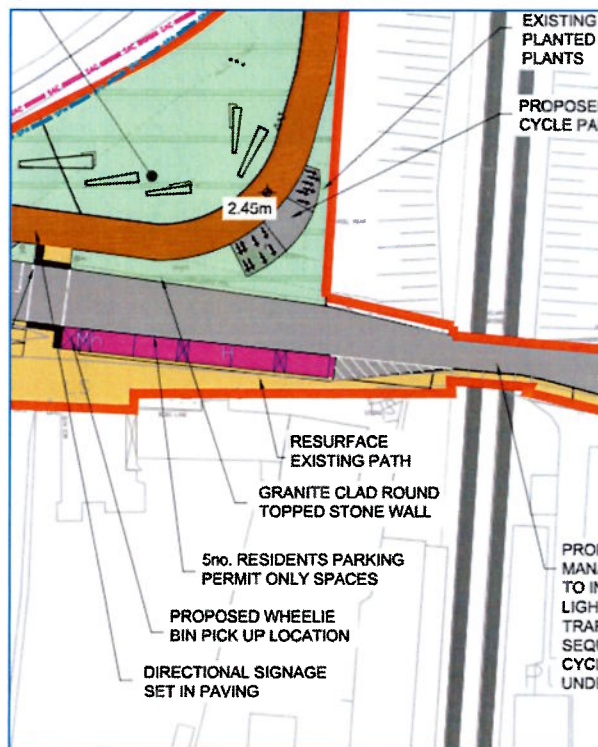
Currently the Broadmeadow Way is under construction. In Fingal County Council's (FCC) responses to submissions made to An Bord Pleanála (ABP) for the project they committed to providing 4 residents parking spaces in this area (note that 5 spaces were included in the design plans (see below).

<https://consult.fingal.ie/en/consultation/broadmeadow-way> - Response to submissions redacted.pdf (Page 21)

- **Parking Bisset's Strand** – Four new residential car park spaces are being provided on Bisset's Strand. The remainder of the car park spaces provided are replacing existing car parking spaces. As part of its safety remit Fingal County Council will review the greenway layout adjacent to the proposed parking to investigate the potential to provide a buffer strip between the greenway and the parking spaces.

From FCC responses to submissions made to ABP Nov 2019

<https://consult.fingal.ie/en/consultation/broadmeadow-way> - Planning Drawing Layout 12_160_464.pdf



The timeline for the Broadmeadow Way works indicates that the works will be completed in 2026 (see <https://www.fingal.ie/fingalgreenways/broadmeadow-way>) and the walkway will be opened when the Dart Coastal North works will take place – see the timeline indicated at [01_DART-Coastal-North-Natura-Impact-Statement-\(NIS\)-D-WP56-ARP-P3-NL-RP-EVBD-000003-P03-02_1.pdf](https://www.fingal.ie/01_DART-Coastal-North-Natura-Impact-Statement-(NIS)-D-WP56-ARP-P3-NL-RP-EVBD-000003-P03-02_1.pdf) (dartplus.ie) – Page 14.

If this area is used, even on a temporary basis, what provision is there for the residents parking which will be provided on completion of the walkway?

2.1.5 Estimated Project Duration

The overall construction phase of the Proposed Development is anticipated to be approximately 36 months. This construction programme has considered both efficiency in terms of phasing and duration as well as any measures needed to reduce the potential for environmental impacts.

A high-level indicative construction programme is set out in Figure 2-1 identifying the key construction phases and the duration of same over the construction period. It is noted that the period allowed for testing and commissioning also includes sufficient time for decommissioning of redundant assets, other than those decommissioned at the start of the project.

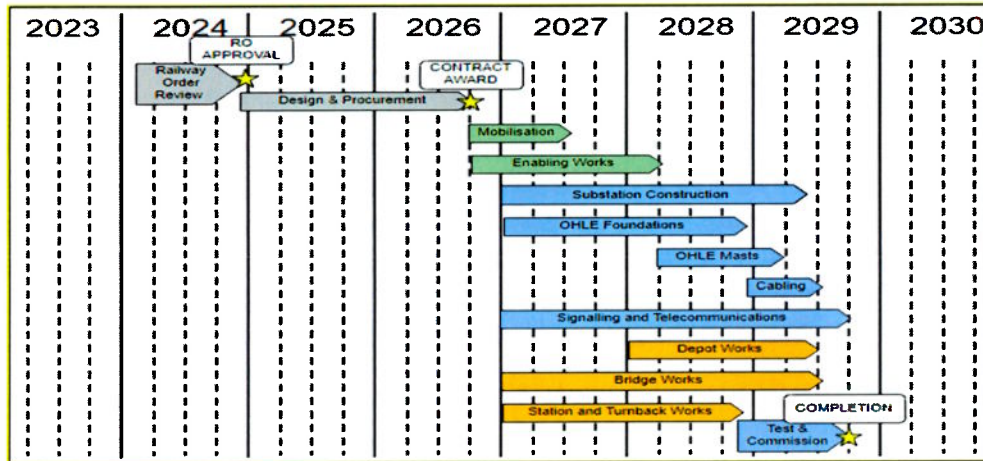


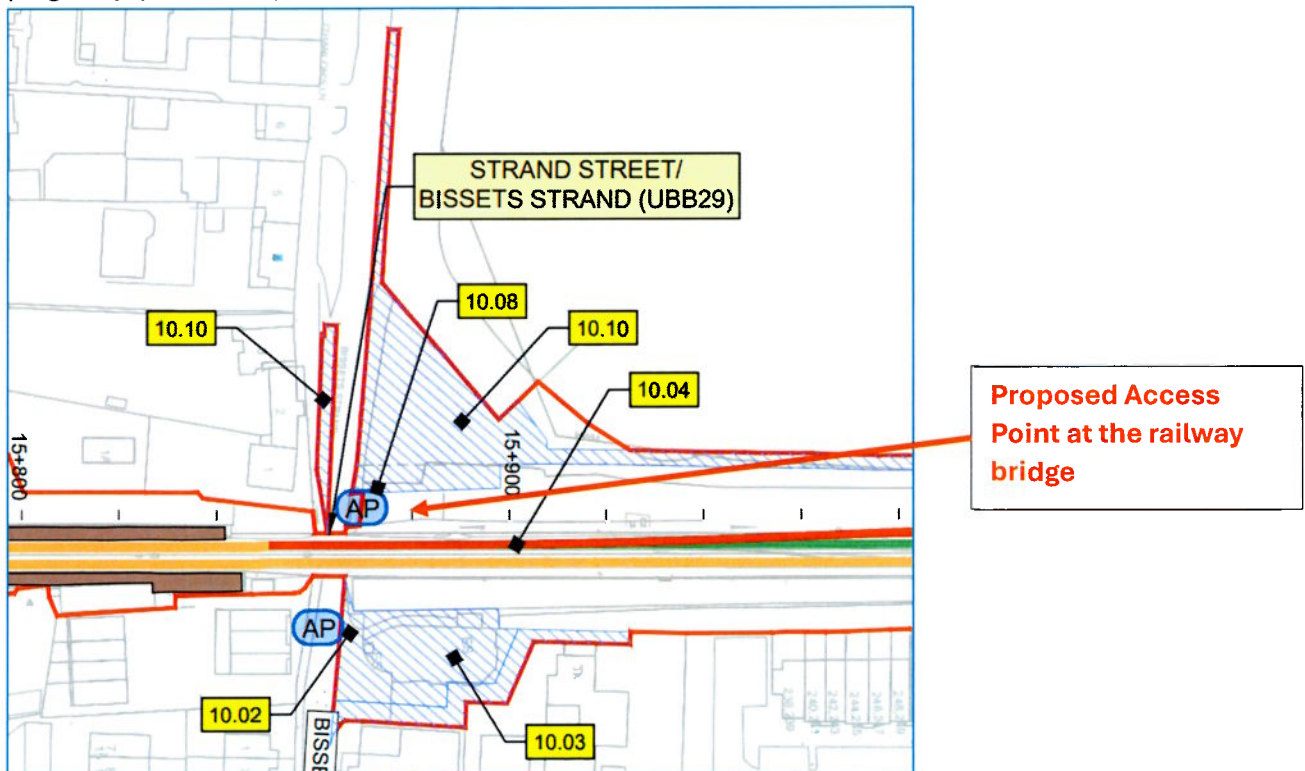
Figure 2-1 High-Level Construction Programme³

2. ACCESS POINT FOR PROPOSED WORKS COMPOUND

Railway Order – Works Layout Plan No. 10 Malahide Station and Surrounds -

[https://www.dartplus.ie/S3mvc/media/DART-Coastal-North-Railway-Order/03.1%20RO%20Book%201/Railway-Work-Plans-Combined-\(Set-1-of-3\).pdf](https://www.dartplus.ie/S3mvc/media/DART-Coastal-North-Railway-Order/03.1%20RO%20Book%201/Railway-Work-Plans-Combined-(Set-1-of-3).pdf)

(Page 10) -(Portion of plan shown below)



Railway Order - Works No. 10.10 –

https://www.dartplus.ie/S3mvc/media/DART-Coastal-North-Railway-Order/02%20Book%20of%20Reference%20-%20Schedules/01-Book-of-Reference_All-Schedules.pdf

(Pages 16 & 17)

(Description below)

10.08	Proposed access to temporary construction compounds 10.10 shall be via Bissets Strand.	No. 10 Works Layout Plan No. 10
-------	--	---------------------------------------

An access point is indicated on the plan (marked AP above). This access point location seems to be the reason for using the parking spaces as a temporary compound. This location is directly beside the protected mid 19th century railway bridge – the bridge can be seen in the photographs and it is listed in FCC Record of Protected Structures - <https://www.fingal.ie/sites/default/files/2024-03/record-of-protected-structures-and-acas-2023-2029.pdf> - *Item number 0423*

0422	Rodsweils Castle	Malahide, Co. Dublin	Five bay two-storey house connected to 14th century stone tower house
0423	Railway Bridge	Bissett's Strand, Malahide, Co. Dublin	Mid-19th century stone rail bridge over road

Currently the compound for the Broadmeadow Way works is located at the larger area marked 10.10 on the plan above. As this area is to be used as a temporary compound for Dart + Coastal North I feel that the current entrance should be used (see photos below). This has been the entrance for all the heavy work since 2009 (when the railway bridge collapsed). The construction of the access road for the bridge repairs in 2009 involved the delivery of large volumes of stone etc. and this access point was used then. Now during the construction of the Broadmeadow Walkway bridge delivery of various types of stone, very large precast concrete elements, delivery of large construction machinery (cranes etc.) use this entrance.



Access point currently used for Broadmeadow Way which is a safer option

Proposed Access Point at the railway bridge

This compound appears to be provided to facilitate works for the Malahide Turnback which will include the construction of “a new modular reinforced earth wall, and a modified earthworks embankment alongside the proposed Broadmeadow Way greenway.” -

[https://www.pleanala.ie/publicaccess/EIAR-](https://www.pleanala.ie/publicaccess/EIAR-NIS/320164/05.2%20Natura%20Impact%20Statement%20(NIS)/01_DART+%20Coastal%20North%20Natura%20Impact%20Statement%20(NIS)-D+WP56-ARP-P3-NL-RP-EVBD-000003-P03.02.pdf?r=419588736711231802)

[NIS/320164/05.2%20Natura%20Impact%20Statement%20\(NIS\)/01_DART+%20Coastal%20North%20Natura%20Impact%20Statement%20\(NIS\)-D+WP56-ARP-P3-NL-RP-EVBD-000003-P03.02.pdf?r=419588736711231802](https://www.pleanala.ie/publicaccess/EIAR-NIS/320164/05.2%20Natura%20Impact%20Statement%20(NIS)/01_DART+%20Coastal%20North%20Natura%20Impact%20Statement%20(NIS)-D+WP56-ARP-P3-NL-RP-EVBD-000003-P03.02.pdf?r=419588736711231802)

(Pages numbered 15 and 16 Section 2.1.7 – Extract below

2.1.7 Malahide Station area proposed track works (Malahide Turnback)

Malahide Station is located on the Dublin to Belfast Line at approximate mileage 9 miles from Dublin Connolly (approximate chainage 15+650 to 15+880). The station consists of two platforms: Platform 1 on the Up Main line and Platform 2 on the Down Main line. North of Malahide Station is the Malahide Estuary which includes European sites with protections for biodiversity. The railway crosses the estuary by way of a southern and northern causeway, connected by Malahide Viaduct (UBB30) which is a protected structure.

The proposal is for construction of a new turnback facility north of the station, required to improve operational flexibility and support an increase in the frequency of train services.

The works will introduce a new pocket track between the Up and Down Line located along the southern causeway, in the area between the Strand Road underbridge (UBB29) and the Malahide Viaduct (UBB30). To facilitate the new turnback line the existing corridor needs to be widened to the west above the existing embankment. The works will include the construction of a new modular reinforced earth wall, and a modified earthworks embankment alongside the proposed Broadmeadow Way greenway. The existing OHLE and signalling systems will be modified with the installation of new OHLE and signalling assets beginning just south of the viaduct.

Construction plant for these operations will include excavators, dump trucks, rollers (compactors) and a variety of heavy goods vehicles (HGVs) including tipper trucks, low loaders, and concrete wagons. Additionally, there is the potential for a soil nailing equipment, drilling rig, grout pump and mixers if further stabilisation measures are identified.

The construction works will impact on the Broadmeadow Way greenway (if in place prior to the commencement of construction) with the full width of the greenway being reduced for the duration of construction. Working space will vary along the wall but will be kept to the minimum to ensure a minimum 3m width of greenway is maintained to reduce the impact on the newly constructed greenway. Phasing of the work in small sections will also be used to limit the impact to the greenway and the existing embankment. The phasing and reduced width sections will continue over the full construction duration.

Access to the work front for the wall will only be available from the south direction for operations and suitable traffic management plans are to be in place to be most efficient.

Key activities will include using an excavator to remove rock armour and excavate into the existing embankment, loading tipper trucks to remove rock armour, unloading low loader trucks with wall elements and geotextiles, and discharging concrete wagons, as well as then ultimately placing the earthworks and topsoil backfill material and access equipment to install the fence. If soil nailing is required, these operations will be carried out during daytime hours only.

Presently OHLE extends along where the turnback is planned to be built but ceases close to its northern end. To ease the management of track possessions in the area, the staging and temporary reduction of the existing OHLE just north of Malahide Station will need to be agreed by the Contractor with IÉ and checked against operational requirements and timetabling.

Reading the description of the works and the types of equipment to be used to complete the works it appears that the proposed access point is not sufficient for the safe access and egress of equipment etc. The photos below show the types of equipment currently on the site for the Broadmeadows Way works, and all equipment and materials have been delivered using the access point well away from the bridge, leaving the parking bay opposite available.



**Proposed Access Point
at the railway bridge**



The access point currently in use for works on the Broadmeadow Way.





In summary my concerns are

- the location of the proposed compound where residents in the immediate vicinity park will be utilised during the works – no provision indicated for residents parking or bin collection
- that this use of the area used for parking as a compound appears to facilitate the location of a proposed access point which is beside the narrow overbridge and this does not appear to be the safest location, considering the extent of the proposed works.

Yours sincerely

Stephaney Bissett