

Submission No.			258	
Organisation Name or Name of Submitter			Phibsboro Village Tidy Towns (PVTT) - 37 Munster Street, Phibsborough	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: ABP-314724-22 Railway (MetroLink - Estuary to Charlemont via Dublin Airport) Order [2022] [ALGDMS-MAIN.FID826974]				
1	Note on submission fees	2	Phibsboro Village Tidy Towns believes that it is unfair to require citizens to pay €50 to submit an observation on the Railway Order. It’s particularly unfair to penalise those who are financially disadvantaged. Metrolink will be an irrevocable change to the city’s fabric and the right to comment should not be limited to better-off individuals and groups.	This is a matter for the Board.
2	Section 2 - What's prooposed - Metrolink construction	3	<p>It looks likely that Phibsboro could be the epi-centre of overlapping major infrastructure works for a period of years through a wide variety of agencies and third-party contractors.</p> <p>Obviously, at a local level it brings with it the physical addition of extra construction plant materials (including placement and transport of heavy cranes, excavation machines and large tipper trucks) and all associated pollutants of light, noise, dust, congestion and access issues.</p>	<p>As detailed in Chapter 5 (MetroLink Construction Phase), the programme for construction of the proposed Project has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional. The construction programme also takes cognisance of concurrent major infrastructure projects, such as BusConnects, to minimise disruption to the surrounding communities. MetroLink will coordinate with other projects / plans for the Phibsboro area as required.</p> <p>The haul routes for construction traffic have been determined based on a review of all potential road crossings/access points for traffic to and from the construction sites/compounds and based on the identification of those road crossings/access points with the capacity to accept a large number of vehicle movements. As detailed in Appendix A5.1 Outline CEMP, construction vehicles will be strictly controlled in terms of hours of operation, and by imposing restriction on vehicle size and weight. Traffic management plans have been developed to minimise congestion and disruption to all road users, and to maintain continual access to businesses and other premises. The Dublin City Council urban traffic signal control system will be used to optimise the flow of traffic along the diversion routes to mitigate queuing and delay which would otherwise be expected during peak periods. Further details on the impact to traffic and transport are presented in Chapter 9 and the associated appendices.</p> <p>Light pollution can be a problem on construction sites where new or temporary lighting is installed and large areas flood lit, causing over illumination and nuisance. Lighting will therefore be designed to ensure that any artificial light emitted from a site does not prejudice health or create a nuisance. Lighting will be positioned and directed so as not to intrude unnecessarily on adjacent buildings and land uses and to avoid unnecessary interference with local residents or passing transport users.</p> <p>Chapter 13 (Airborne Noise and Vibration) and Chapter 14 (Groundborne Noise and Vibration) outline the anticipated impacts of noise and vibration during both the construction and operational phases. There are no statutory standards in Ireland relating to noise and vibration limit values for construction works, however the contractor(s) will prepare a Construction Noise and Vibration Management Plan (CNVMP) to identify predicted construction noise and vibration levels, and the requirement for mitigation measures specific to each work area, to minimise noise and vibration impacts so far as is reasonably practicable.</p> <p>Similarly, an Air Quality Management Plan and a Dust Management Plan will be prepared by the contractor(s) and submitted for approval to the relevant planning authorities, including measures such as an inventory and timetable of activities which may give rise to emissions or dust, and details of dust monitoring arrangements and monitoring equipment to be used.</p>

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3	Section 3 — Ecological risks	7	According to the Metrolink plan for the Mater Station there will be a replacement of 50 mature trees in Four Masters Park, Phibsboro with a decreased number of younger trees. This will reduce the ecology of the area and is also contrary to the Government Climate Action and Biodiversity Policy.	<p>The EIAR Chapter 27 (The Landscape) details the impact on the landscape and visual amenity of the stations during both the construction and operational phases. The Park and its surroundings will be updated and improved, particularly in respect of the shared space to the front of the original hospital building, the refinement of the Park layout and the tree and plant species selection, and therefore a positive impact is anticipated.</p> <p>A major part of the landscape design for the project has involved the identification and retention of valuable landscape & visual assets where possible and feasible, across the proposed Project which includes existing mature trees. An Arboricultural Impact Assessment was carried out and can be viewed as Appendix 27.3 to the EIAR. This contains information on the existing tree conditions and the arboricultural impact of the proposed Project. This is also assessed in Chapter 27 Landscape & Visual (Section 27.6.1) and a number of mitigation measures to reduce impact are outlined. These measures include:</p> <ul style="list-style-type: none">- Identification and retention of existing mature trees of good quality, through adjustment of the alignment, location of structures/buildings and the outline design of the proposed Project;- Specific proposals to ensure the effective retention of existing mature trees can include:- Protection and maintenance of tree root zones during construction;- In sensitive locations, residual landscape and visual effects may be significantly reduced through the inclusion in the proposed planting of relatively mature specimen trees;- Comprehensive proposals for hard and soft landscape works, including tree and hedgerow planting to offset the effects of net loss due to the proposed Project will be developed at detailed design phase. <p>Upon completion of the proposed Project, the visual amenity of the area will be largely restored, much to its existing condition with some minor improvements. Over the initial period after completion of the construction, the maturity and ambience created by the existing trees cannot be matched. However, as the new trees mature, this too will return with views along the adjacent streets and into the Park, much as they were. The restoration of the open green park space within the triangle of buildings along with the proposed amendments to the original Mater Hospital section of Eccles Street, will again impart the tranquil qualities of the existing condition. Overall, the predicted effects on the visual environment and on visual amenity during the Operational Phase will, in the longer term be significant and positive.</p> <p>The station architecture is integrated in the park in a sympathetic fashion with the skylights being framed by planting and providing circulation routes through the park. Existing monuments and protected railings will be relocated within the park. Large mature trees will be placed so as to provide balance and create space within the park. The landscape design itself will be created on top of the station box and sufficient depths and infrastructure are provided for in order to integrate the landscape design.</p>
4	Section 4 — History and Heritage	8	Of note, 50% of the housing in Phibsboro is Victorian and the plans for the stations do not appear to reference any of the area’s long history and heritage. For example, below are two images of views of the proposed Mater Station showing the station view in front of the Mater Hospital and the other of the block housing ventilation and metro plant machinery.	<p>TII believe the commissioning of internationally renowned architect Nicholas Grimshaw and Partners, has delivered a contemporary station design which is appropriate for a state of the art metro system such as MetroLink. Appropriately, significant emphasis is placed on the public spaces. Where feasible, the station concourse is a soaring space illuminated from above with natural light. Dublin's rich architectural heritage has been respected, but not copied in a pastiche imitation. In accordance with best conservation principles, as set out in the ICOMOS Venice Charter of 1964, the stations are architecturally distinguishable so as not to falsify the existing historic context. Reference and due respect to that context is made through the choice of high quality and appropriate materials and the scale of the interventions. At Mater station, the canopy entrance evokes the scale of park structures. TII believe the current station and surface level designs greatly enhance the public realm at all locations along the MetroLink route. There is a unifying commonality in the design of all stations, providing a consistent and coherent architectural language, which assists with orientation and wayfinding, and contributes a new architectural lexicon to the cultural iconography of the city.</p>

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5	Section 4 — History and Heritage	8	The image below is an indicative rendering of Glasnevin Station. It will sit along the historic Crossguns Bridge and the Royal Canal. Despite its location, it has no relationship to the surrounding area. It is generic with a few trees added into a hard landscaped plaza.	<p>Please refer to response item (4) above in relation to the architectural design of stations.</p> <p>The following considerations were addressed in developing the architectural design for Glasnevin Station:</p> <ul style="list-style-type: none">* Provide an intermodal concourse at street level, designed as an open space under a light canopy;* Provide a potential café or shops for passengers;* Re-build the Dalcassian Downs car park over the station roof slab;* Provide a car park / large cycle park area and drop-off on the area of the existing Brian Boru car park;* Design landscaping with green integration on slopes;* Integrate station ventilation grilles in green areas; and* Consider the requirements for revenue protection for the different modes, as well as safety in design, specifically regarding adherence to Iarnród Éireann’s codes of practice. <p>As outlined in Section 27.4.2.19 of EIAR Chapter 27 (Landscape & Visual) potential change to the local built environment in the vicinity of the proposed Glasnevin station building, would however be perhaps less sensitive, since the built environment making way for the proposed station is generally of relatively poor quality, with the possible exception of the Brian Boru pub and the mature garden just to the north of it (at Dalcassian Downs), which is separated from the main road by the historic iron railings along its boundary. Changes to the existing atmosphere of the area may be of some concern, however the dominance of the road and the very heavy traffic upon it, already do much to degrade this atmosphere. The local urban environment is a rather discordant mix of scales, styles and finishes. The area has capacity for change and improvement.</p>
6	Section 5 — Planning conditions	9	Given the size and scale of the proposed works across the entirety of Phibsboro Village, there is a real risk of damage to the delicate ecological corridor provided by the Royal Canal in such an urban environment. The potential overlaps between agencies, third-party contractors and private developers could lead to a lack of oversight - continuous communication between all parties is vital.	<p>EIAR Chapter 15 (Biodiversity) assesses the impact of the MetroLink Project on Biodiversity during the Construction Phase and Operational Phase and proposed mitigation measures to ameliorate the predicted impacts.</p> <p>Baseline surveys were carried out along the Royal Canal to inform the biodiversity impact assessment such as a habitat survey, including invasive plant species and detailed aquatic survey of Royal Canal basin undertaken in 2018, 2019, 2020 and 2021; and an aquatic macroinvertebrate survey of Royal Canal basin in June 2021, among others. The Royal Canal was also surveyed for otter activity.</p> <p>The respondent is correct in noting that all parties need to contribute to the preservation of the ecology in the area. TII intends to champion environmental protection and specific mitigation measures are planned.</p> <p>For example, mitigation measures will be implemented to ensure that Royal Canal pNHA is not significantly affected by the proposed Project during construction or operation and will include:</p> <ul style="list-style-type: none">• Measures to avoid the introduction or spread of non-native invasive plant species to this pNHA - see the Outline Invasive Species Management Plan (ISMP) (Appendix A15.8);• Measures to control surface water runoff to prevent an accidental pollution event affecting sensitive habitats within this pNHA – see Section 18.6 of Chapter 18 (Hydrology); and,• Measures to manage and treat groundwater discharges to surface water – see Section 19.6 of Chapter 19 (Hydrogeology). <p>The implementation of the mitigation measures will result in a no likely significant residual effect. Therefore, the proposed Project will not affect the integrity of, or result in a likely significant negative residual effect on Royal Canal pNHA.</p> <p>TII will engage with other interfacing projects in the Phibsboro area.</p>
7	Section 5 — Planning conditions	9	PVTT believes there's a critical need for certain planning conditions: <ul style="list-style-type: none">• A Public Oral Hearing should be required as part of the planning process so that the local community, relevant stakeholders and resident representatives can fully participate.	ABP has agreed to hold an Oral Enquiry.
8	Section 5 — Planning conditions	9	<ul style="list-style-type: none">• An Ecological Management Plan put into action throughout construction and a dedicated, qualified ecologist working across the construction sites to oversee mitigations as decisions are being made.	<p>A Construction Environmental Management Plan will be produced, as detailed in Section 15.5 Mitigation Measures of EIAR Chapter 15 (Biodiversity) which presents the mitigation measures to avoid or reduce the potential impacts of the proposed Project on biodiversity and ecological receptors. All of these mitigation measures are included in the Schedule of Environmental Commitments which will be implemented by the contractor under supervision of both the Project Ecologist (employed by the Employer) and the Ecological Clerk of Works (employed by the Contractor).</p> <p>An Outline CEMP is included as EIAR Appendix 5.1.</p>

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9	Section 5 — Planning conditions	9	<ul style="list-style-type: none">• A Liaison Committee should be in place during the entire construction period to allow business, resident and community group reps to be included in all decision-making issues as and when they arise. This Committee should comprise of these reps along with those from TII, DCC, NTA and other relevant bodies. It is important that this is an effective group which is not just a PR exercise.	<p>A Stakeholder and Community Engagement Plan has been developed which has guided the frequency and means of communication to date. The proposed Project will continue to progress community engagement by:</p> <ul style="list-style-type: none">▪ Regularly reviewing and updating stakeholder and community engagement plans;▪ Actively maintaining partnerships and design focus groups established with the community; and▪ Communicating in a timely and open manner. <p>TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in the EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works. In the case of works required in response to an emergency, the local authority, local residents and businesses will be advised as soon as reasonably practicable. All notifications will include a local helpline number. In addition, information on the works will also be available on the proposed Project website. TII will further develop the Community Engagement Plan to encompass the construction and operational phases of MetroLink.</p> <p>As detailed in Appendix A5.1 Outline CEMP, a Project Construction Traffic Forum will be established with key stakeholders to ensure that any concerns regarding traffic management can be addressed and resolved in a timely manner.</p>
10	Section 5 — Planning conditions	9	<ul style="list-style-type: none">• A Community Fund set up to support a variety of community-driven biodiversity enhancements in Phibsboro (more trees, native planting, solar panels for community spaces, more green space/walls, bird and bat boxes).	<p>TII will work with established Community Groups through the local community liaison officers along the route to identify projects at local level that would involve the Community in the delivery of MetroLink and its legacy. Such projects could include:</p> <ul style="list-style-type: none">- A local school learning programme.- Enhancement of community amenity within agreed funding limits.- Engagement with final landscape and finishing options, including aspects of biodiversity. <p>TII are willing to explore mechanisms for investing in local initiatives to support affected communities during the works, such initiatives will be subject to funding being made available.</p>
11	Section 5 — Planning conditions	9	<ul style="list-style-type: none">• Open Public Architectural Competition to design Glasnevin and Mater Stations. The designs shown in the plans do not appear to reference any of the rich heritage and history of this area of the city. For example, Glasnevin Station will sit alongside the cornerstone of the Royal Canal, where its building works began in 1790 and the Brian Boru pub is an important historic site where Brian Boru gathered his army in defence of Ireland prior to the Battle of Clontarf.	<p>Please refer to response item (4) and (5) in relation to the architectural design of both Mater and Glasnevin stations, and all stations within the Project.</p>