

Submission No.			279	
Organisation Name or Name of Submitter			Shandon Residents Association (48 Shandon Park, Phibsboro)	
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] - case number 314724				
1	Note on submission fees and community participation	3	Shandon Residents Association (SRA) objects to the requirement to pay ABP €50 to submit an observation on Metrolink. It’s unfair to penalise those who are financially disadvantaged. The right to comment should not be limited to better-off individuals and groups. It’s important that an open oral hearing forms part of this planning process to provide the opportunity to engage fully with such a seismic change to the area.	<p>Thank you for your submission and for sharing your observations with regards to the MetroLink project to which we have responded below.</p> <p>An overview of the Oral Hearing process is provided in the EIAR Chapter 8.9.2. An Board Pleanála have confirmed an Oral Hearing will be held. The purpose of the oral hearing will be to allow issues relevant to an application for approval be examined. The oral hearing can be attended by anyone, but only those that have made a written application may make an oral submission at the oral hearing. The oral hearing is managed by An Bord Pleanála.</p> <p>With regard to the €50 fee, this is a matter for An Board Pleanála. The Board is entitled to set the fees under section 144 of the PDA2000 and this is approved by the Minister.</p>

Submission No.			279	
Organisation Name or Name of Submitter			Shandon Residents Association (48 Shandon Park, Phibsboro)	
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] - case number 314724				
2	Section 3 — Planning conditions	8	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 and ecologically important corridor provided by the Royal Canal in such an urban environment and the huge disruption to residents’ lives.	<p>TII have considered the potential impacts and proposed mitigations which are included within the EIAR and will be bound into subsequent construction contracts.</p> <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; aquatic macroinvertebrate survey of Royal Canal basin in June 2021, etc. The Royal Canal was also surveyed for otter activity on the 27th of March 2020.</p> <p>Potential impacts arising from the proposed Project during construction on this pNHA site may occur as a result of:</p> <ul style="list-style-type: none">• Habitat degradation as a result of surface water runoff related hydrological impacts (see Section 15.4.3.2);• Impacts on rare and protected plant species arising from habitat degradation as a result of hydrological impacts (see Section 15.4.3.3);• Habitat degradation as a result of air quality impacts (see below in this Section);• Habitat degradation as a result of introducing/spreading non-native invasive species (see Section 15.4.3.2);• Impacts on otter arising from disturbance/displacement (see Section 15.4.3.4.1);• Impacts on bats arising from disturbance of flight patterns due to operational lighting (See Section 15.4.3.4.2); and,• Impacts on freshwater molluscs arising from habitat degradation as a result of hydrological impacts (See Section 15.4.3.5.2). <p>Mitigation measures will be implemented to ensure that Royal Canal pNHA will not be significantly affected by the proposed Project during construction or operation such as, inter alia:</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 Construction Environment Management Plan (CEMP) included as EIAR Appendix 5.1 further details the proposals to manage environmental impacts and the responsibilities to do so.</p> <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>As detailed in EIAR Chapter 5 (MetroLink Construction Phase) the programme for the construction of the proposed Project has been optimised to minimise the duration of the Construction Phase in order to lessen the duration of potential environment impacts, while ensuring that the areas surrounding the work sites remain operational and functional. Work will run concurrently at all MetroLink site locations to ensure the Project is delivered in an effective and timely manner. Once a contractor has been appointed, TII will seek to further optimise the programme with a view to reducing the overall duration of works at the proposed Glasnevin Station. TII will consult with stakeholders on any such proposals received from the contractor.</p> <p>Potential impacts associated with the construction phase activities of the proposed Project on the residences and businesses are addressed in Chapter 11 (Population & Land Use) of the EIAR, with mitigation measures proposed where required. The construction site for Glasnevin Station will give rise to inconveniences and disturbances affecting activities and services at a localised level and Prospect Road in particular. This includes potential noise and vibration impacts from construction activities as detailed in Chapter 13 (Airborne Noise & Vibration) and Chapter 14 (Groundborne Noise & Vibration), disturbances to the local road network as detailed in Chapter 9 (Traffic & Transport), and dust risk as detailed in Chapter 16 (Air Quality).</p>

Submission No.			279	
Organisation Name or Name of Submitter			Shandon Residents Association (48 Shandon Park, Phibsboro)	
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] - case number 314724				
3	Section 3 — Planning conditions	8	The potential overlaps between agencies, third-party contractors and private developers could also lead to a significant lack of oversight - continuous communication between all parties is vital.	<p>TII agree that roles and responsibilities need to be clear across all parties and have undertaken extensive consultation and communication across the route of MetroLink and have listened carefully to the concerns of stakeholders and the community, as documented within EIAR Chapter 8 (Consultation).</p> <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>
4	Section 3 — Planning conditions	8	A Public Oral Hearing should be required as part of the planning process. The local community, relevant stakeholders and resident representatives need to participate.	Please refer to Response (1) above related to the Oral Hearing process.
5	Section 3 — Planning conditions	8	The possibility of rerouting traffic via the temporary bridge over the Royal Canal via the Old Bakery site to exit directly to Phibsboro Road/Crossguns should be explored.	The Railway Order is based on the proposed routing via Shandon Mills as presented in the property drawings.
6	Section 3 — Planning conditions	8	A robust Ecological Management Plan put into action throughout construction with a dedicated, qualified and independent ecologist working across the construction sites to oversee works as decisions are being made. There will be a huge disturbance to the rat population during construction. Management of rodents needs to avoid negatively impacting wildlife.	<p>TII confirm that an Ecological Management plan will be produced. Section 15.5 Mitigation Measures of the EIAR Chapter 15 (Biodiversity) presents the mitigation measures to avoid or reduce the potential impacts of the proposed Project on biodiversity. Section 15.5.1.1 and Section 15.5.2.1 summarise the mitigation measures that relate to the protection of European sites. All other mitigation measures are described in Sections 15.5.1.2 to 15.5.1.13 and Sections 15.5.2.2 to 15.5.2.11. 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>The management of vermin will be undertaken such that it does not negatively impact other wildlife. While rodents will be temporarily displaced as a result of initial construction activities, there is nothing in the Construction Phase which would lead to an increase in the number of rodents. It could be argued that with the rodent control policies in place, there will be a reduction in the level of rodents and the subsequent risk associated disease. The EIAR Appendix A5.1, Construction Environmental Management Plan (CEMP) includes a requirement for the Contractor to ensure effective prevention of infestation from pests and vermin (ref section 5.4).</p> <p>Please refer to Response (2) in relation to anticipated impacts on ecology in this area.</p>

Submission No.			279	
Organisation Name or Name of Submitter			Shandon Residents Association (48 Shandon Park, Phibsboro)	
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] - case number 314724				
7	Section 3 — Planning conditions	8	A Liaison Committee should be in place during the entire construction period that allows 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 and not a PR exercise.	<p>As outlined in Appendix A5.1 Outline CEMP, 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>
8	Section 3 — Planning conditions	8	A Community Fund set up to support a variety of community-driven biodiversity enhancements along the Royal Canal (more trees, native planting, solar panels for community spaces, more green space/walls, bird and bat boxes).	<p>Reinstatement and landscaping of working areas along the canal and adjacent areas will form part of the proposed Project works.</p> <p>In addition, 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>
9	Section 3 — Planning conditions	8 and 9	Open Public Architectural Competition to design Glasnevin Station. This station is arguably the most important as it exists as an Irish Rail/Metrolink interchange. The designs shown in the plans do not appear to reference any of the rich heritage and history of this area of the city. 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>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. The aesthetic values of all eras, including our own, have cultural validity, and therefore the brick is used in a contemporary way reflecting contemporary aesthetic idioms derived from 21st century technology. 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>

Submission No.			279	
Organisation Name or Name of Submitter			Shandon Residents Association (48 Shandon Park, Phibsboro)	
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] - case number 314724				
10	Section 3 — Planning conditions	9	Green building principals. This will be an important and permanent addition to Dublin’s cityscape and should be a future-proof building. Looking to Europe and other parts of the world where green buildings are seen as a desired addition to the built environment.	<p>TII’s Environmental Strategy (TII 2019, Section 2.1) ‘commits to incorporate sustainability principles into the development and operation of the national road, light rail and metro networks; therefore, contributing to social wellbeing, supporting economic efficiency, and protecting, restoring and enhancing environmental systems for future generations.’</p> <p>The Project design includes sustainability initiatives in order to meet the project sustainability aims outlined in TII’s Sustainability Implementation Plan, as outlined in Section 4.6.3 of the EIAR Chapter 4 (Description of the MetroLink Project). For example, one of the sustainability initiative is <i>EN2: Materials and Resources</i>. As outlined in Section 4.8 of the EIAR Chapter 4, sustainable drainage systems (SuDS) have been incorporated into the design to reduce mains water usage, to reuse water and to manage potential pollution of waterbodies. SuDS measures include the implementation of rainwater harvesting, green roofs, swales and retention basins.</p> <p>In addition, Section 17.3.2 Relevant Guidelines, Policy, and Legislation of EIAR Chapter 17, Climate, sets out how the proposed Project assessment has been undertaken with reference to the most appropriate guidance documents relating to climate.</p>
11	Section 3 — Planning conditions	9	Green roofs and living walls should be seen as a valuable component of building works and incorporated into public realm infrastructure wherever possible.	<p>As mentioned in Response (10) above, a number of SuDS elements have been included in the proposed Project design which will contribute to meeting sustainable initiatives such as: Rainwater Harvesting, Green Roofs, Rain Gardens, Filter Drains, Filter Strips, Swales, Infiltration Basins, Pervious/Permeable Pavements, Geocellular Drainage, Retention Ponds and Wetlands, as described in the Section 4.8.3 of the EIAR Chapter 4 (Description of the MetroLink Project). These elements will get progressed at detailed design within the guidelines contained within the EIAR.</p>