

Metrolink submission (Railway Order) 2022

Ref: ABP-314724-22 Railway (MetroLink - Estuary to Charlemont via Dublin Airport) Order [2022] — case number 314724

The proposed Metrolink project is welcome. It will hopefully help to solve Phibsboro's dire traffic crisis. The area is one of the key routes into the city and suffers from high amounts of daily air and noise pollution due to excessive throughput. By providing a clean, safe and connected public transport system, Metrolink should be hugely transformative for the area and its residents. By the incorporation of local knowledge, we hope that the project can be made even more valuable and its cost to the public be reduced.

As the previous iteration of Metrolink veered towards Drumcondra and did not include Phibsboro, we had never interacted with TII previously. Local groups learnt of what was happening late on compared to other areas on the route. It also appeared to be the case that Phibsboro didn't seem to be viewed as affected as the station is Glasnevin by virtue of being on the other side of Crossguns Bridge. It was a local residents group in Glasnevin that shared the information about the new station with us.

We would like it noted that we are aware that there has been substantial new information submitted by the applicant since day one of the hearing, much of which represents information that was missing or inadequately referenced in the EIAR and/or represented the subject of specific requests for information from the applicant that went unanswered. We will not be responding to much of this new information today as we have not yet had reasonable time to consider it in detail before making our oral submission. We would expect sufficient time to be allocated by the inspector at the end of the hearing for observers' responses to this new information to be heard.

Brand new station

Phibsboro will be deeply affected by the Metrolink works for a period of possibly up to a decade due to the complexity of Glasnevin's interchange station. Many residents live mere metres away from the extensive site. A brand new station is set to be built over two Irish Rail tracks and the Metrolink tunnel. The site is due to span from the edge of the Royal Canal at Crossguns and will remove from what is now Des Kelly's Carpets to the historic Brian Boru pub.

It's disappointing that the Brian Boru or Hedigan's Pub, in particular, will be completely eradicated for the construction of the new station as it is one of Dublin's historic landmarks. It has been a public house for over 200 years and was even referenced in James Joyce's Ulysses. The site was where Brian Boru's army camped before the Battle of Clontarf in 1014. Works on the Royal Canal began at Crossguns in 1790. It is also the point where the

canal enters Dublin City. There doesn't appear to be any reference in the station design shown in the plans to its historic location. Could some remnants at least be incorporated into the design to reference these events?

The station should be constructed with greater imaginative green building principles and with newest environmentally progressive abilities such as seen in other European station designs. A Green roof and living wall needs to be incorporated into the design and rainwater run-off managed in a way that does not contribute further to the overburdened drainage system but that is put to good use. The new station needs to be future-proofed to allow such elements to be enhanced over time as new technology and needs become apparent.

We would be supportive of innovation wherever possible such as solar thermal systems producing hot water and green roofs allowing the building to harvest rainwater which is then used to service the toilet facilities. Green roofs and living walls should be seen as a valuable component of building works and incorporated into public realm infrastructure wherever possible.

Traffic management

Traffic management during the construction phase will clearly be hugely challenging. Currently, during the comparatively minor construction of Phase 3 Royal Canal Greenway there has been a cumulative negative knock on effect for the rest of Phibsboro. It would be expected that traffic management would not be minimised and given due consideration necessary for the safety and health of local residents.

This is especially important in the context of a new temporary bridge proposed to cross the Royal Canal below Lock 6. It is set to divert canal traffic away from the construction site and exit into the much smaller roads and one-way systems around Shandon, Leinster St and Ulster Street. The temporary bridge would need to be used by emergency service vehicles, Waterways Ireland, septic tank trucks for Coke Oven Cottage residents as well as pedestrians and all cycle traffic including ebikes, scooters, etc.

The proposed bridge wraps the exit road around the back of residents apartments in Shandon Mills, and exits on to Shandon Road at the end of Shandon Park. This will have a significant negative impact on the residents of Shandon Mills, Shandon Park, Shandon Road, Leinster St, Ulster and Connaught St. *It would be far preferable to use the pre-existing roadway through the derelict flour mill site coming to an arrangement to do that should be a priority.*

Biodiversity

It is welcome to see ecological oversight included for the project. It was also heartening to learn of the recent updates to Metrolink's EIAR on the Otter Mitigation Plan developed with the NPWS. Otters use the Royal Canal and are a species with strict protections in EU and Irish law. Local residents deeply value both the ecological and amenity value of this precious green space in the city. It would be hoped that as the project is constructed, ecology is respected and adjustments made to ensure the best possible outcomes for nature.

Since this version of the Metrolink plans were originally developed, Ireland now has published the 4th National Biodiversity Action Plan 2023–2030. There is also the Dublin City Biodiversity Action Plan 2021-2025 and the 2019-2021 Phibsboro Biodiversity Action Plan from Phibsboro Village Tidy Towns. The proposed Natural Heritage Area of the Royal Canal is a key habitat corridor for urban wildlife including many species of bats, birds and insects. It's obviously important for the project to incorporate up-to-date information during the works process and abide by any changing guidelines.

In the Metrolink EIAR Biodiversity Update: Section 2.6, it says "Hedgerow loss in DCC is confined to a single hedgerow feature adjacent to the Royal Canal at Glasnevin. The loss of hedgerow in DCC will not result in a likely significant negative residual effect at any geographic scale."

We know the importance of eco-system services provided by hedgerows including the ability to sequester carbon, increase biomass, mitigate air pollution and absorb excess water from more extreme weather events. We have asked that the current hawthorn and blackthorn hedgerow be reinstated post construction. The hedgerow affected by the project currently grows alongside the canal from Lock 6 to Crossguns Bridge.

We argue that this is a greater loss than has been stated in the report. Given that the Royal Canal is a habitat corridor and given our understanding of the vital services provided by hedgerows it would make sense to ensure that a bigger and even more diverse hedgerow be planted to address the sad but understandably necessary loss during the construction phase.

Important considerations:

- Request for ongoing meaningful dialogue with TII/Metrolink over the proposed timeline of the project. It would be infinitely preferable to solve problems with local residents groups as they arise. A liaison person is key. Who will have oversight of potentially overlapping timelines across projects in the area between BusConnects, Eirgrid high-power cable installation, Royal Canal Greenway Phase 4 and Metrolink?
- Acknowledging the long history of the site either by design or incorporating some of past history into the new Glasnevin Station
- Adequacy and safety for service vehicles and emergency services as well as local residents for access via temporary bridge.
- Reduce impacts from new bridge on Shandon (security and amenity)
- Request for priority consideration to be given for an alternative temporary access route from the temporary bridge through the derelict flour mill site not yet developed. Why the temporary access could not be routed through the derelict industrial site instead of through Shandon Mills. This would not preclude future development when the station is finished.

- Residents seek assurances from TII that the proposed alignment and width of the temporary access road and bridge (especially the tight curves needed to go around Shandon Mills) are suitable for all vehicles which will use it.
- The small existing hedgerow from Lock 6 to Crossguns Bridge does serve as an important corridor for wildlife. We strongly urge that this be reinstated better than before as it is an important landscape feature and should not be eradicated during this critical biodiversity crisis.
- As the local area will be heavily impacted by the extended construction project for a period of years we are seeking a community fund to be set up to help support local biodiversity and improve amenities.

Finally, I want to acknowledge and express appreciation for all of the assistance from RINA and for a very late stage but productive meeting set up by them with members of the Metrolink team to discuss some of the issues affecting residents.

It would be extremely important for dialogue like that to continue for the support and benefits to this hugely valuable project.

**Following on the below pages are notes from that meeting from the independent engineering experts supporting local groups to help contextualise the plans and impacts on residents.*



METROLINK



MetroLink Independent Engineering Expert Services

Briefing note on issues at Glasnevin Station
(Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT)

MetroLink Independent Engineering Expert Services

Briefing note on issues at Glasnevin Station raised by
Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT



Summary of issues and questions/requests for clarification from TII following meeting with residents and site walk on Saturday 3rd February 2024

- **Temporary access arrangements for Coke Oven Cottages during the construction period:**
 - Adequacy and safety for service vehicles and emergency services as well as residents' cars
 - Impact on Shandon Mill (security and amenity)
 - Loss of long term permitted parking for COC residents at Jerry Kelly's on Phibsborough Road
 - Request for consideration of an alternative temporary access track route through the derelict flour mill (Binden site not yet developed)
- **Permanent access arrangements for Coke Oven Cottages during the operational period:**
 - Request for clarification of proposed route for vehicles where Royal Canal Way (RCW) meets Phibsborough Road (possible error on RO structures drawing appearing to show RCW as insufficiently wide and pedestrian only across station concourse)
 - Ensuring safe width for residents' cars, service and emergency vehicles along RCW in the reinstated stretch, especially where it passes along the canal bank.
- **Request for clarification of duration of proposed MGWR track lowering activity N of COC and arrangements for relocation**

Current access arrangements for Coke Oven Cottages via Royal Canal Way



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Coke Oven Cottages (COC) is a row of cottages about 800m NW of Phibsborough Road along the Royal Canal Way (RCW) [Image 1].

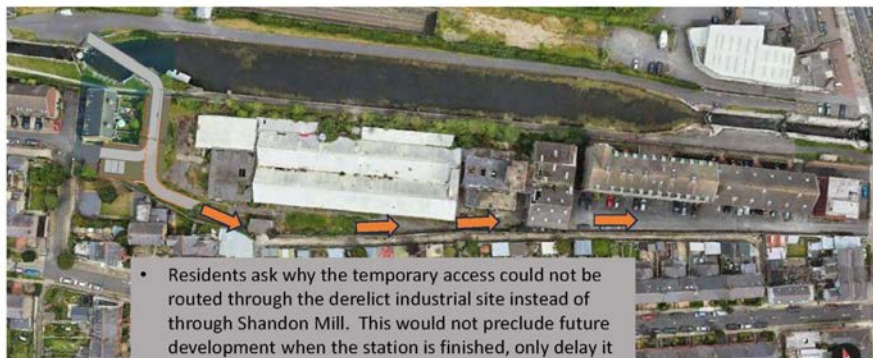
RCW is the only vehicular access to these properties which rely on deliveries of bottled gas and other fuel and tankers to pump out septic tanks. It is also the only vehicular access for emergency vehicles.

Whilst residents have car parking in their driveways, there is an 800m long walk to get to the nearest bus stop. COC residents (some of whom are elderly and/or have mobility problems) have a long-standing agreement with Jerry Kelly's Carpet store to use the parking spaces in front of the store [Images 2 and 3] – this will cease to be available when the construction of Glasnevin Station commences.

2

Temporary access arrangements for Coke Oven Cottages during the construction period

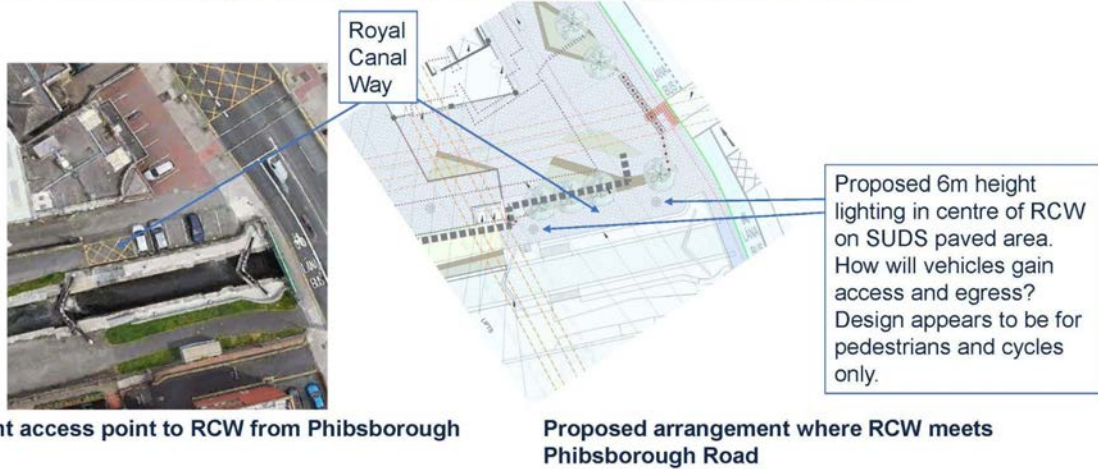
- COC residents seek assurances from TII that the proposed alignment and width of the temporary access road and bridge (especially the tight curves needed to go around SM) are suitable for all vehicles which will use it (service and emergency vehicles particularly)
- SM residents object strongly to their established development being subject to amenity, privacy and security impacts of the temporary access when there is a large derelict site to the East which could be used instead.



- Residents ask why the temporary access could not be routed through the derelict industrial site instead of through Shandon Mill. This would not preclude future development when the station is finished, only delay it

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Permanent access arrangements for Coke Oven Cottages during the operational period:



4

The existing line of trees planted along the fence line by residents and members of the Royal Canal Cleanup Trust is becoming established and is valued as a developing corridor for wildlife. Residents ask could this be reinstated please?

Error on the photomontage showing the proposed Glasnevin Station from the Royal Canal? Residents ask why the image depicts a train at ground level behind the railing. Please clarify what is being shown here.



5

MetroLink Independent Engineering Expert Services

Briefing note on issues at Glasnevin Station raised by Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVT



Residents of COC have asked for clarification of the duration of proposed MGWR track lowering activity N of COC and arrangements that will be available to them for relocation given the expectation of high noise levels (even with mitigation).

Since the meeting RA thinks she has found the answer to the duration of these works as follows:

- Page 67 of A5.5 (Glasnevin Construction Report) states

5. Track lowering for the MGWR railway west of chainage 850, will be carried out in a two week's full track lowering within the planned closure, which will not impact on MetroLink works.

- Reference to pages 84 (plan drawing of MGWR track lowering activity N of COC) and 86 (longitudinal section for the same stretch) show that this activity will be west of chainage 850, and therefore RA infers that the duration of the track lowering N of COC will be 2 weeks.

Please could TII confirm that RA's interpretation of the information is correct as well as providing COC residents with information on temporary relocation options for this period?

Environmental Impact Assessment Report Volume 5
Appendix A5.5 - Glasnevin Station Construction Report

JACOBS
IDOM

7. Interface with Irish Rail Works

The overall sequence of works in the Glasnevin Station area has been linked with the planned Irish Rail (IR) works in the station area as well as works, principally, to the west of the station.

A review of key Irish Rail assumptions, listed below and integrated in the MetroLink programme with the planned Irish Rail works are incorporated.

Assumptions for managing the coordination and integration of the track lowering with MetroLink Station construction activities:

1. IR works (track lowering & platform construction) are independent of the MetroLink Station works.
2. The works for lowering the MGWR tracks will be serviced by rail.
3. The works for lowering the CGWR tracks will be serviced principally by road.
4. Available access, office and welfare accommodation will be independent of, and will not impact on, MetroLink works.
5. Track lowering for the MGWR railway west of chainage 850, will be carried out in a two week's full track lowering within the planned closure, which will not impact on MetroLink works.
6. Track lowering for the MGWR railway east of chainage 850 will be carried out during the planned closure of the MGWR railway for the MetroLink station construction and programmed to follow completion of the MetroLink works to construct a trough to carry the tracks through the station on-bis.
7. The IR works for the MGWR track lowering will include construction of the southern and central platforms. The southern platform works will be completed prior to the final occupying the MGWR railway and the Central platform works will be undertaken in possession after the MGWR is reopened.
8. Track lowering for the CGWR railway will be carried out within a single 5 month's closure of the railway, which will incorporate the final works for sliding the bridge in to place to carry the railway through the station.
9. The works to construct the northern and central platforms to CGWR will be carried out during the CGWR 5 months closure.
10. MetroLink access ramp will be designed and constructed so it can be used for IR works and will be removed by IR works contractor on completion of MGWR central platform.
11. The CGWR diversion of the existing retaining walls assumes the CHLE is not in place and reinstated on completion of the station east in Stage 13.
12. The MGWR CHLE is reinstated concurrently with track lowering works.
13. It is assumed that Diesel rolling stock will be used from Stage 4 onwards and will remain operational until the new CHLE system is ready for use.
14. It is assumed that the new CHLE structures will be installed concurrently with the track lowering operation.

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