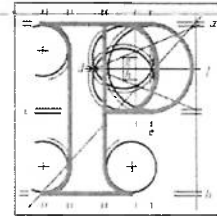


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

Development Applications Unit
Department of Housing, Local Government and Heritage
Government Offices
Newtown Road
Wexford
Co. Wexford
Y35 AP90

Date: 08 October 2024

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

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.

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,


Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

RA03

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Lauren Griffin

From: LAPS
Sent: Tuesday 8 October 2024 14:39
To: 'Housing Manager DAU'
Subject: RE: Your Ref: ABP-314724-22 Our Ref: SID-DF-2024-027

A Chara,

The Board acknowledges receipt of your email, official correspondence will issue in due course.

Kind regards,

Lauren

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Tuesday, October 8, 2024 9:11 AM
To: LAPS <laps@pleanala.ie>
Subject: Your Ref: ABP-314724-22 Our Ref: SID-DF-2024-027

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Attached please find the archaeological and nature conservation observations and recommendations of the Department in relation to the aforementioned Strategic Infrastructure Development Planning Application.

Can you please confirm receipt of same?

Kind Regards,
Sinéad

—
Sinéad O' Brien
Executive Officer

—
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90



Your Ref: ABP-314724-22

Our Ref: **SID-DF-2024-027**

(Please quote in all related correspondence)

8 October 2024

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

Via email to laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): 2nd Consultation re MetroLink which is an application for permission to carry out railway works and all works necessary to enable the construction, operation, maintenance and improvement of a railway designated as a metro including inter alia the construction of a fully segregated and automated railway and metro mostly underground approximately 18.8km in length with 16 stations. A multi storey 3000 space park and ride close to the M1 Motorway will be provided at Estuary Station, a maintenance depot is located near Dardistown Station which will house all the facilities required for the maintenance and operation of the MetroLink and its rolling stock and the Operational Centre. The proposed location is for 16 stations which run from the North of Swords at Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and the City Centre to Charlemont in the south of Dublin City Centre.

A Chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated headings.

Archaeology

The Department has reviewed the additional documentation published during and on foot of the Oral Hearing held in relation to the proposed MetroLink project.

The Department notes that in the applicant's Response to Submissions they provided more specific detail as to how the National Monument of Lissenhall Bridge (RMP DU011-081----; Protected Structure No 341 (Fingal)) will be protected during construction works, including



the minimum extent of the exclusion buffer zone. This information resolves the Department's previous queries in relation to this site.

In regard to all other matters, the Department's original observations as issued on 16 January 2023 are unchanged.

Nature Conservation

In the Department's original submission of November 2022 in relation to the MetroLink project from a nature conservation perspective a number of conditions were recommended to be attached to any permission that might eventually be granted for MetroLink. One of these conditions was that a Cross Guns Otter Bypass Plan be submitted to the planning authority for its agreement before the commencement of any works in connection with the proposed scheme in the vicinity of the 5th and 6th Locks and Cross Guns Bridge, Phibsborough, in order to provide for the preservation of the possibility of the movement of otters along the Royal Canal past the construction works on Glasnevin Station to be built in that area for the duration of those works. In response to this condition recommended by the Department, and following consultation with the Department's National Parks and Wildlife Service (NPWS), the applicant drew up an Otter Bypass Plan which was included in Section 10 of the EIAR (Environmental Impact Assessment Report) Biodiversity Update Report submitted to the Board at the Oral Hearing. The Department is satisfied that the Otter Bypass Plan as proposed by the applicant, involving the provision of an otter passage along the southern side of the canal basin between the 5th and 6th Locks during the two three month periods it is to be drained to facilitate works connected with the construction of Glasnevin Station on the northern side of the Royal Canal, can form the basis of a finalised Otter Bypass Plan to be submitted to the planning authority before the commencement of works on MetroLink in the Cross Guns area. If the plan is implemented in full it should allow otter movement along the canal in this area during the two three month periods when the canal is to be dried out. It should be noted however that the downstream end of the otter fencing to be installed in the drained canal basin will need to be extended across the width of the basin immediately above the upper gates of the 5th Lock so as to effectively funnel otters moving upstream into the proposed otter passage, and not just end adjacent to the southern side of the basin as depicted in Drawing No. ML1-EIA-R001_XX-DR-Y-3100002 'Otter Mitigation Measures Royal Canal-Cross Section' of the EIAR Biodiversity Update Report. The provision of an otter ledge along the northern canal bank during the 'in-between' circa 24 month period when the main construction works on Glasnevin station will be undertaken, as also set out in the Otter Bypass Plan submitted by the applicant, should aid movement of otters along the canal as well during this period.

In addition to revised drawings in relation to the proposed otter fencing layout, the finalised Otter Bypass Plan to be submitted to the planning authority should include timelines for the bypass plans as then predicted. The finalised plan should also include information on the current status of otters on the Royal Canal in the vicinity of the Cross Guns area works based on surveys to be carried out not more than two months before the submission of the plan



(these surveys to extend at least between the 1st and 10th Locks). In addition, it should provide for monitoring of the occurrence of otters on the canal by similar surveys during the c. 30 months of MetroLink works in the Cross Guns area and for a minimum of 6 months subsequent to their completion; the results of this monitoring to be submitted to the planning authority and to the Department.

The Department notes that in a 'Note on Plan Level Biodiversity Policy Compliance' submitted by the applicant to the Board on Day 19 of the Oral Hearing, it is stated that while the Fingal County Development Plan 2023-2029 requires the installation of mammal ledges or tunnels in any new bridges to be constructed within the area covered by this plan, no such ledges are proposed to be included in the culverts to be installed over the Mayne and Santry Rivers as part of the MetroLink project. With regards to the Mayne River it is stated in this note that because the MetroLink culvert is to be located at the upper end of the river's catchment "any impacts to the ecological corridor function in this area are minimal". The Department agrees with this evaluation. In the note, it is also stated that because the culvert to be installed over the Santry River as part of the MetroLink project is not a new bridge but the extension of an existing culvert which does not have mammal passage facilities, no such facilities are to be included in the new culvert either. As recent otter survey work carried out in connection with both MetroLink and other projects has proven the continued presence of otters on the Santry River however, the Department recommends that the Board should give consideration to requiring the installation of a mammal ledge in the new proposed culvert over Santry River and, if feasible, as a biodiversity enhancement measure the installation of a similar ledge in the existing adjacent culvert also as part of the MetroLink project. The installation of these ledges would help provide for the continued free movement of otters along this water course.

The Department further notes that in this document and in the landscape design proposals originally submitted for the MetroLink project the planting of wildflower meadows is referred to as being included in the landscaping proposed to be undertaken along the project's route, but this is not good nature conservation practice. In this context it should be noted that the All-Ireland Pollinator Plan advises against planting wildflower seed outside a garden setting. To clarify, the following points are taken from the Position Paper by the Dublin Naturalists' Field Club entitled '*The case against 'Wildflower' seed mixtures*' which is endorsed by the All-Ireland Pollinator Plan and reproduced on their website.

- Seeds of non-local origin – even if the species are native – introduce new genetic strains which may displace or compromise the local, naturally-occurring flora.
- Local, native species do not need to be sown. Native plants colonise suitable habitats by natural means.
- Seeds which are commercially produced and deliberately sown cannot, by definition, be wild and introducing them to the natural environment does not contribute to addressing biodiversity loss.



The genetic integrity of what remains of our rare and ecologically significant native species is, therefore, threatened by the introduction of seed from external sources. Pollen from these geographical insertions and intrusions cannot be prevented from fertilising the local native stock of the same species or causing hybridisation with other closely related species.

It is therefore recommended that in order to preserve local biodiversity the Board should include as a condition of any permission granted for the MetroLink project, that the planting of wildflowers should be omitted from the landscaping proposals for the project, but where possible as a conservation measure along the project route bare areas should be left to recolonise with vegetation by natural dispersal and from local soil seed banks, and then managed as wildflower meadows into the future.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink, appearing to read 'Julie Sullivan'.

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration