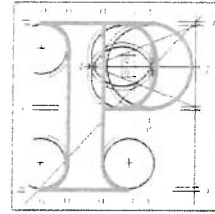


Our Case Number: ABP-314724-22



An
Bord
Pleanála

District 7 Community Alliance
c/o Sebastian Vencken
2 Saint Michaels Place
Dublin 7

Date: 10 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.

Please be advised that those who have already paid €50 are not required to pay the €50 fee associated with this Further Information submission, a refund will be issued to the debit/credit card used to make payment for this submission.

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

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



Sebastian Vencken on behalf of the District 7 Community Alliance
2 St Michael's Place, D07C6H0
Dublin 7

08/10/2024

OBSERVATION LETTER

An Bord Pleanála Application Reference: NA29N.314724

Application Title: Metrolink

Applicant: Transport Infrastructure Ireland

On behalf of the District 7 Community Alliance I would like to submit this observation for the MetroLink rail order application (ABP ref 314724). The District 7 Community Alliance is an alliance of 6 residents associations and a business association in the Mounjoy, Broadstone and Dorset Street areas in Dublin.

Our observation relates primarily to the Mater station proposed in the MetroLink scheme. This station will be located in the heart of our community at a location of significant community amenity and historical value. While the community welcomes a metro station in the neighbourhood and the convenience this will bring, concerns exist regarding the design of the overground elements of the station and regarding the construction phase of the project.

We would be very grateful to the Board to take our observations listed below under consideration.

1. Mater Station Design, Park Restoration And Mitigation Works

We have several concerns about the design of the station itself and its impact on the Four Masters Park.

While we welcome the proposed reduction of the height of the station skylights to between 1.1m and 0.8m above ground level and that signage will not be affixed to the glass façade on the canopy at Mater Station (Chapter 4 EIAR, pp 3-4), we have significant concerns about the station design and proposed restoration of the Four Masters Park. The scale and visual impact of the proposed station entrance portal are needlessly and unacceptably harmful to



the historic surroundings, which include original 19th century buildings belonging on Eccles Street to the Mater Misericordiae University Hospital, the 19th century St. Joseph's Carmelite Church on Berkeley Road, the Four Masters Park on Berkeley Road and the historic streetscape of Berkeley Road itself.

We have stated from the very beginning that the design and scale of the overground structures, which include the station entrance portal, the passenger and fire brigade lifts are out of keeping with their location in a historic urban parklet (Four Masters Park). The design of these features as currently planned has no support from local residents. Considering the prominent location of these modern structures, which will be in the line of sight of historic Protected Structures and streetscapes, their design should be more sensitive to and in keeping with the local urban fabric.

Instead, priority appears to be given by Transport Infrastructure Ireland to uniformity of design and construction, possibly to save costs or to require a common design language. No consideration has been given to the effect the overground structures will have on the small size of the much-loved Four Masters Park nor the historical and local design of the surrounding buildings.

The new photomontages supplied by TII (Updated March 2024. Day 21: Book 2 of 2) show the highly invasive effect of the overground structures and their impact on the street scape, blocking several historic vistas.

Figure 1 below shows the huge dominance of the station's entrance portal, obscuring the historical view of the Mater Misericordiae University Hospital and St Joseph's church. Due to the station's location, the generic design, devoid of any local or historical context, will have a very negative impact on the heritage value of the surrounding buildings and park. Furthermore, from the plans, it is not entirely clear how far along Berkeley Road the line of bollards will extend and we would like this to be clarified.



Figure 1. View from Berkeley Road towards the Mater Hospital

Figure 2 below shows the passenger lift box obscuring the vista of the Mater Hospital. The finish and the materials used are at variance with existing building materials. Unfortunately, the design of all overground structures entirely misses the opportunity to use materials that are inspired by the materials that were used for the local buildings, such as red brick or granite.



Figure 2. View of passenger lift from Berkeley Road.

This is also evidenced in the design for the very dominant Dublin Fire Brigade lift box (**Figure 3 below**) which has a particularly utilitarian look. No effort has been made to consider local materials, such as granite, to integrate these in the urban streetscape.



Figure 3. View of fire brigade lifts from Berkeley Road.

With regard to the proposed Mater station Design, Park Restoration and Mitigation Works:

We request the following additional commitments as discussed at our presentations at the oral hearings:

1. That a serious attempt be made to redesign the station's entrance portal in order that it is less dominant. (For example, the iron frame of the station entrance portal could be reduced in width and that the glass used should be clear and not tinted so as not to obscure the vistas towards the surrounding architecture.)



2. That the visual impact and bulk of the Passenger and Dublin Fire Brigade lifts similarly be redesigned to soften their impact and that they be clad in a material more sympathetic to the surrounding historical architecture.
3. That the steel bollards around the perimeter of the station are out of keeping with the historic environment of the area. We request that these be of granite rather than polished steel to match the granite plinths of the railings and granite kerbing. It is stated that 'Treatment of bollards and how they integrate with the environment will be agreed with the local authorities and other relevant stakeholders.' This has been agreed for the Stephen's Green Station (see 'Hostile Vehicle Mitigation') and should be provided for the Mater Station to blend in with the existing use of granite in railing plinths, kerbing and architecture around the park and in the use of granite in the plinth for the station entrance portal. It is also not clear how far south along Berkeley Road the bollards run along the footpath. We require clarification on this.
4. The amount of paving is excessive - there are too many hard surfaces - turning the Park into an open plaza (similar to that at Broadstone Plaza). Experience at the latter site shows that this attracts skateboarding, broken glass and discarded litter (including chewing gum). It also prevents water permeability, especially during periods of heavy rain - there are already instances of pooling of water after heavy rainfall along Eccles St near St Joseph's Church and at Berkeley Road near the former McSweeney House. We request that, in keeping with the Sustainable Urban Drainage Systems described in the Dublin City Development Plan, this issue be addressed by TII and that some raised beds be introduced into the paved area around the entrance portal to soften the effect of the paving.
5. Similarly we feel that the 'restoration' of the park after construction of the station will alter the character of this rare green space in the north inner city. The Mater Park Mitigation Measures (outlined in Document 199, Dated 21/03/24) pp.104-5) at BH-72 states 'Following construction of the station box the gates, railings and plinth walls will be reinstated on a revised alignment in accordance with a conservation method statement to be prepared by the PCA.' We require a commitment from TII that these

fragile historic railings are conserved by a professional conservator prior to reinstatement.

6. The plan provided by TII regarding reinstatement of railing length and green space (Four Masters Park. Railing Length and Green Space, Day 16: Book 1 of 1 (= Document 48. Letter from TII dated 19.03.24) is not legible (see below).

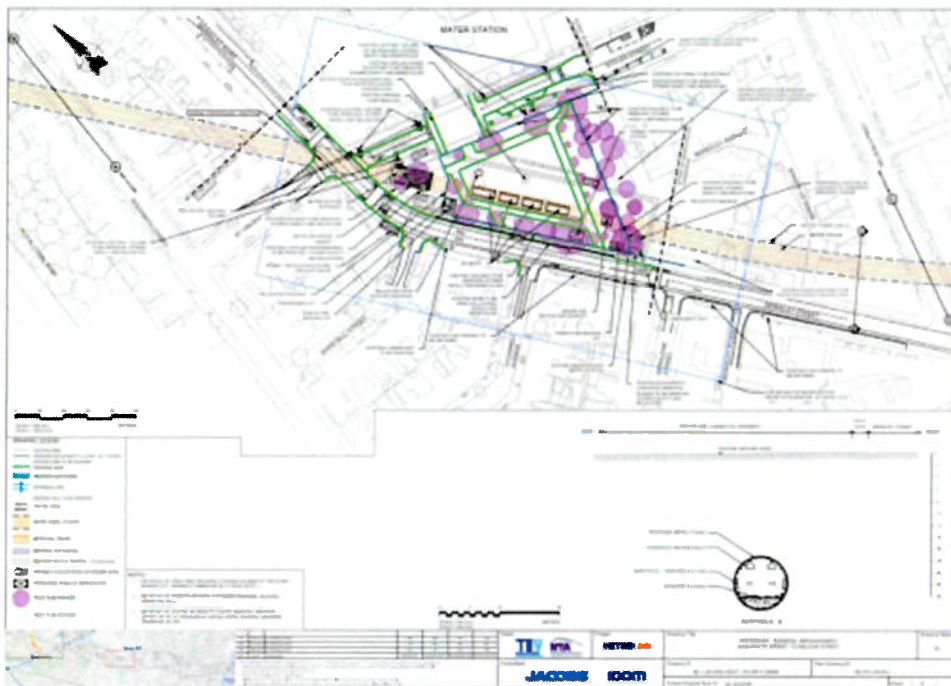


Figure 1.1: Mater Station Alignment Plan – Reinstatement of Railings and Green Space

We therefore request a clearer, more legible version of this plan. We also request that a revised plan of the restored park taking all of the above concerns into account be provided.

Property Owner Protection Scheme

In the document 'Property Owner Protection Scheme) revised April, 2024 (Day 01 Book 1 of 5)' on page 4 we note that the maximum repair value has been increased and will be linked to the Consumer Price Index.

1. We suggest that the repair value be linked to the Construction Price Index instead.
2. We request that any costs incurred by residents in the course of the proposed works,



e.g. increased insurance premiums, will be covered by TII.

Cumulative Impacts

The document 'EIA Report Addendum. 'Chapter 30 Cumulative Impacts. 27.02.24 (Day 07: Book 1 of 2)' has identified four major planned works within the Mater Station area that have been included in the report as having a major impact on the Metrolink project, namely

- 4599/23 Dublin City Council Part 8 - Dalymount Park
- 4947/23 Dublin City Council - Constitution Hill
- 4947/23 Dabrena Properties Ltd. 12 - 16A, Wellington Street Lower, Dublin
- 315984 Garvagh Homes Ltd. 'Former Des Kelly Site' 364-374 North Circular Road, Royal Canal Bank, and 168-169 Phibsborough Road, Dublin 7

However, the document has not been updated and it does not include the following three major planned projects which we had requested to be included at the Oral Hearing, namely:

- **4790/23 Hendron's 36-40 Upper Dominick Street**

Demolition of the existing vacant warehouse buildings, the boundary wall fronting Palmerston Place and the existing dwelling at no. 36 Dominick Street Upper, with a combined Gross Floor Area (GFA) of c. 2,359.6sqm; The construction of a mixed-use development of 93 no. apartments in 3 no. residential blocks (Blocks A to C), including a residential amenity area in Block B and a café/retail unit in Block A. The proposal includes the provision of a public plaza of 193 sq.m on the corner of Dominick Street Upper and Western Way

DCC has approved an extension of a decision Notice until October 2024

- **New Mater Hospital building Eccles Street**

Proposed development of new building between existing Mater Private and



Emergency Ward Block.

● **4145/22 Former Des Kelly site 168-169 Phibsborough Road**

The development will consist of 28 no. car parking spaces (13 spaces for retail, 13 spaces for residential and 2 club car spaces (2 spaces of the allocation will be e-charging), 186 no. cycle spaces and bin stores and collection areas at lower ground level, 2 no. retail units with a total of 1,950 sq. m at ground floor level, coffee shop of 40 sq. m. facing Royal Canal Bank at lower ground level, 80 no. apartments (19 studios, 19 one bed, 41 two bed and 1 three bedroom apartments) overhead in upper floor development.

1. We therefore request that the three developments above be included in the report.
2. We are also concerned that no liaison has taken place regarding the timetabling of all these projects and their combined effect on the Phibsborough area. TII had agreed to come back to us on this but has not as yet.

Issues For Berkeley Road Businesses and Residents

1. We have concerns relating to the close proximity between houses and shops on Berkeley Road and hoarding for Mater Station works.
2. The building works will have a major effect on the dust-sensitive properties and businesses along Berkeley Road which include a dry cleaners, two coffee shops/café's, a flower shop and a pharmacy.

We seek further assurances from TII that the impact of construction works will be minimised for these businesses.

Aspergillus

In the document 'Updates to Appendix A5.1 Outline CEMP Environmental Impact Assessment Report - Outline Construction Environmental Management Plan (Document 199, Dated 21/03/24. Day 19: Book 4 of 4), p. 53', the issue of Aspergillus exposure is highlighted



in relation to the Mater Hospital and mitigation measures proposed, but it makes no reference to the risk to local residents.

This is of great concern to our residents, especially the elderly and those with underlying health conditions. At our Module 1 presentation on 27.02.24 we requested that TII carry out a risk assessment and survey for Aspergillus for local residents on Berkeley Road separate to those proposed for the Mater Hospital in order to allay their concerns. TII agreed to come back on this but haven't done so.

At our Module 2 presentation on 19.03.24 we raised this issue again and sought a commitment in writing from TII to reassure our residents that they will not be at risk. at its presentation on 27.02.24.

These concerns are not reflected in the revised document of 21.03.24.

1. We request that this issue be addressed as a matter of urgency and a reassurance in relation to mitigation measures for residents in relation to Aspergillus be provided in writing by TII.

Airborne Noise

The noise readings above the tunnel path of 40db were described by TII's expert as not significant. This was challenged by An Bord Pleanála's acoustic expert at the hearing. The expert also challenged the db outputs for vent noise.

1. We request that these differing positions be resolved.

Dust Mitigation Measures

We note under 'Updates to Appendix A5.1 Outline CEMP Environmental Impact Assessment Report. Document 199, Dated 21/03/24. Day 19: Book 4 of 4)' at pages 52-53, that dust mitigation measures will include 'liaison with local authorities and community groups'.



1. We therefore request that these measures be agreed with local residents' representatives prior to the works being carried out.

Parking

1. We require a commitment in writing, as given to the District 7 Community Alliance at a meeting with TII on 26.02.24 that no construction workers will be allowed to park in the area of the station works and contractors will provide off-site parking and workers will be shuttled in.

Traffic Management

We note the Traffic Mitigation Measures outlined in 'Updates to Appendix A5.1 Outline CEMP Environmental Impact Assessment Report. Document 199, Dated 21/03/24. Day 19: Book 4 of 4)' at page 54.

We are concerned that the residential streets in the area, especially those to the west of Berkeley Road will be used as rat-runs for motorists during and after the proposed works.

1. We therefore request any Traffic Management Plan be agreed with representatives of local residents and businesses prior to the works being carried out.

Stakeholder Engagement And Community Gain

We note under ' Stakeholder Engagement Plan Updated February 2024 (Day 08: Book 1 of 1)' that there will be a dedicated TII Local Liaison Officer to manage the Mater, O'Connell and Tara Street stations.

1. We request further clarification on the statement in the 'Stakeholder Management Plan' in relation to availing of the 'services of independent experts'. Will these be mediated through TII or directly with stakeholders?



Our community will suffer during and after the Mater station work is completed. In view of our reservations outlined above. Under the section entitled 'Community Gain', page 15 it is not clear what kind of projects will be funded and whether there is a dedicated budget for this.

2. We request further particulars on what precisely is meant by 'TII will make provision to ensure that the appointed contractors work with Local Communities and the Local Authorities to participate in and support local community initiatives'.

Traffic Calming and Cycle Lanes, Berkeley Road

The proposal does not include any significant modifications to Berkeley Road. This street, which has a speed limit of 30 km/h sees a significant amount of speeding. There are no traffic calming measures implemented on this street. Upon completion of the MetroLink project, it is anticipated that the pedestrian traffic along and crossing Berkeley Road will increase significantly. The current street design, which encourages speeding, will likely put pedestrians at significant risk.

It is also likely that drivers will park illegally on the painted cycle lane for drop-offs and pick-ups to and from the station. This will pose significant risk to cyclists.

1. We request that traffic calming measures and zebra crossings are implemented on Berkeley Road as part of the MetroLink project.
2. We request that the cycle lanes along Berkeley Road are segregated.