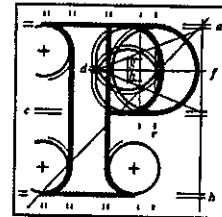


Our Case Number: ABP-314724-22



An
Bord
Pleanála

Phibsboro Village Tidy Towns (PVTT)
c/o Susan Dawson
37 Munster Street
Phibsborough
D07 DY82

Date: 05 December 2022

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 submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

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 the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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% Susan Dawson

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D07 DY82

phibsborotidytowns@gmail.com

AN BORD PLEANÁLA	
LDG-	<u>054574-22</u>
ABP-	
28 NOV 2022	
Fee: €	<u>50</u> Type: <u>cash</u>
Time: <u>12.23</u>	By: <u>hurd</u>

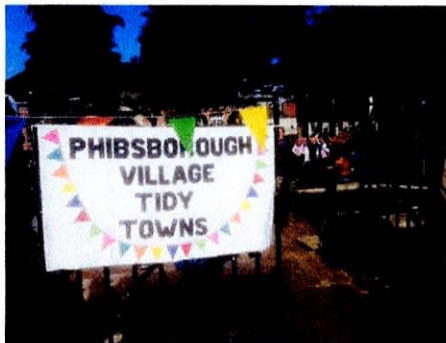


Phibsboro'
Village
Tidy Towns

Metrolink Railway Order Submission 2022

Ref: ABP-314724-22 Railway (MetroLink - Estuary to Charlemont via Dublin Airport)
Order [2022] [ALGDMS-MAIN.FID826974]

Section 1 — Who we are — Phibsboro Village Tidy Towns



Phibsboro Village Tidy Towns (PVTT) is a community group of dedicated volunteers working together to improve the local environment as a place to live, work and visit. It consists of three sub-groups - the Clean-Up Club which organises group litter removals and enhances the streetscape, the Sustainability Group and the Biodiversity Group. PVTT is a competitor in the annual nationwide Tidy Towns Competition. It recently won First Place in the Urban Village Category Central Area Dublin City Neighbourhood Awards.

In January of this year, Phibsboro Village Tidy Towns launched its Biodiversity Action Plan with support from the Community Foundation of Ireland. This 90-page document assesses the village's ecology and provides recommendations on how its natural environment can be enhanced. The group has begun the process of working through the recommendations.

The PVTT biodiversity sub-group undertakes many of these projects including the creation of a special garden-for-nature in a previously unused space alongside Mountjoy Prison with generous support and permission by the Governor.

During the summer of 2022, PVTT installed a rain garden planter in the middle of the village to divert water runoff into the city's drain system. The planter also supports a wide range of pollinator-friendly plants.

PVTT also runs the annual Buzzfest mini-biodiversity and sustainability festival in the gardens of St Peter's Church. September 2022 marked its sixth year anniversary. It included a repair café, music and food. The biodiversity group provided a 'bulbs for pollinators stall' so that people could learn how to support queen bumblebees in early Spring. Guests at this year's Buzzfest included the Lord Mayor of Dublin, Dublin City Council Biodiversity, Local

Authority Water Programme and Creative Entomologist Nessa Darcy who works with schoolchildren.

As part of the Biodiversity Action Plan, PVTT commissioned the Phibsboro Insect Survey 2022 - a baseline survey of insects in Phibsboro. The Biodiversity Group is also currently surveying the trees in Phibsboro.

***Note on submission fees**

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.

Section 2 — What's proposed — Metrolink construction

The Metrolink project looks to be a very welcome addition to public transport in the Dublin Metropolitan area. The high-speed mass transit system will hopefully take thousands of vehicles off the roads of the capital and reduce emissions significantly.

From the Railway Order planning application, Glasnevin Station at Crossguns Bridge looks to take the longest to be constructed (eight-years and three months) as it would also be an Irish Rail interchange for two different commuter lines. Once operational, it's planned that commuter trains will be running at 10-minute frequencies.

As per the plans, during the construction phase the tunnel boring machine is set to continue under the homes of Leinster Street, Munster Street and then across Phibsboro Road and under Phibsboro Library before joining Mater Station at the Four Masters Park.

The machine will be in operation over 24-hours and cover a distance of 7m to 10m per day. Irish Rail is also seeking to operate track works parallel to the Royal Canal 24-hours per day across seven-days weekly as they will be levelling track near Glasnevin Station by 2m.

Outside the Railway Order planning application, it's important to note that — for a very small geographic area — there are additional but separate planning applications submitted for BusConnects on two main routes crossing the centre of Phibsboro — Blanchardstown to City Centre and Ballymun/Finglas to City Centre.

Also, there is an amended TII/DCC planning application due to be made public for the Greenway from Ashtown to Lock 5 Crossguns. The original planning sought to narrow the canal channel by over two metres in three sections.

Both the Department of Housing, Local Government and Heritage and Dublin City Council's Biodiversity Office expressed serious concerns in separate observations on the original planning application. It is worrying that the approach to greenway construction on this delicate ecosystem of the canal included fragmentation and destruction of habitat by removal of mature hedgerow, native plants and also demonstrated a risk of waterway contamination.

Meanwhile, there are also major planning applications on-going for private developers — one at Crossguns Old-Bakery site (this confusingly subdivides into two different planning applications currently, one is in court APB v Leinster Street/Shandon Residents and a second from Bindford Ltd to DCC) and a second potentially for the corner of Phibsborough Road and North Circular Road.

In addition, there will also be the possible redevelopment of Dalymount and construction phase of the Royal Canal greenway (Crossguns to East Wall) due to commence in 2023.

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.

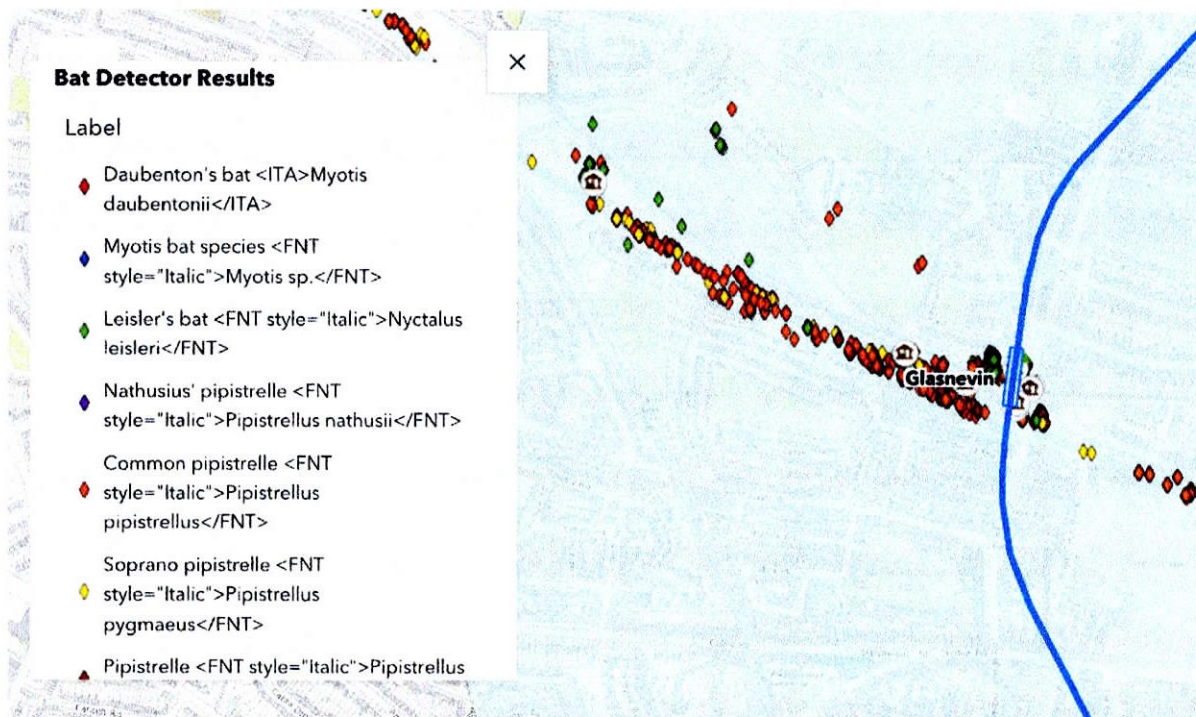
Obviously, at a local level it brings with it the physical addition of extra construction plant materials (including placement and transport of heavy cranes, excavation machines and large tipper trucks) and all associated pollutants of light, noise, dust, congestion and access issues.

Section 3 — Ecological risks

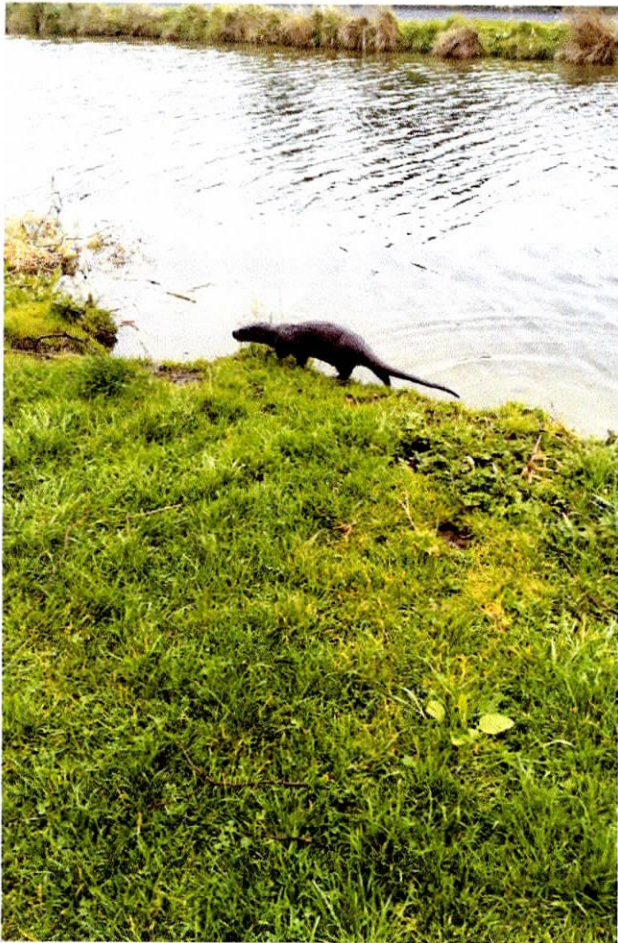
The Railway Order's Environmental Impact Assessment highlights the risks associated with the construction project. These include habitat fragmentation, water pollution (especially damage to the Dublin Bay biosphere) and permanent loss of some habitat supporting vulnerable populations of red-listed wild birds such as the Yellowhammer.

Various ecological surveys have been conducted along the Royal Canal as it's a proposed Special Area of Conservation. These include some by TII/DCC and others driven by local groups like PVTT and Shandon Residents Association — which commissioned a smaller ecological survey (from Lock 6 to the end of Shandon Gardens). That survey took place over the summer of 2022 and its findings included a rare Stonewort *Tolypella Glomerata* and a red-listed endangered Water Snail *Myxas glutinosa*.

The Metrolink's survey for biodiversity discovered many species of bat along the Royal Canal (see below).



As shown in the survey, the light-sensitive Daubenton's Bat depends on the Royal Canal. The bats (see image — courtesy Bat Conservation Ireland) can be easily seen at dusk during the summer months. Otter (see image taken in 2018 by local resident Valerie Vetter along Shandon Gardens) have been photographed on the banks. More unusual butterflies have also been seen during the summer of 2022, including the Comma and Red Admiral (see image taken by Valerie Vetter on Shandon Garden bank).



The canal provides an excellent urban habitat for waterfowl such as Moor Hen, Cormorant, Mute Swan, Black-headed Gull and its hedgerows are home to Goldfinch and Sparrows as it is a rich and diverse long naturalised pocket of the city.

The Phibsboro Insect Survey 2022 showed 4 species of bee and aquatic invertebrates along the Royal Canal such as the Emperor Dragonfly Larvae, Diving Bell Spider, Water Scorpion and Water Stick Insect.

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.

Section 4 — History and Heritage

Phibsboro is a Victorian Village, an Area of Architectural Conservation, with significant buildings: St Peter's Church, built in 1822, the Mater Hospital built in the 1850's, Mountjoy Prison completed in 1850 and the Royal Canal completed in 1817. Hedigans pub, the Brian Boru, was established in 1840.

The central window has a notable painting by Fergus O'Ryan, reflecting the belief that Brian Boru's army camped nearby, prior to the Battle of Clontarf in 1014. On the corner of Eccles Street and Berkeley Road the Four Masters memorial park commemorates four Donegal Franciscans friars who in 1627 and 1637 chronicled the history of the ancient kingdom of Ireland (Neary, Bernard, *Dublin 7*, The Lilliput Press, 2016).

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.





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.



Diagram 26 Indicative View of Glasnevin Interchange Station

Section 5 — Planning conditions

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.

PVTT believes there's a critical need for certain planning conditions:

- **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.**
- **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.**
- **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.**
- **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).**
- **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.**