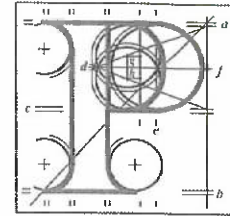


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Prospect Architectural Conservation Area (ACA)
6 Prospect Square
Glasnevin
Dublin 9
D09 W0F2

Date: 06 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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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Date: 22nd November, 2022

Names: Lesley Hewson, Lorraine Rooney, Alfreda Kavanagh.

Address: Prospect Architectural Conservation Area (ACA)
c/o 6 Prospect Square, Glasnevin, Dublin 9, D09 W0F2.

Observation relating to An Bord Pleanála Case Reference Number: NA29N.314724 -
Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022], as it
relates to Prospect Architectural Conservation Area.

Note: Prospect ACA is making this observation and paying the required fee on the basis
that I can submit other information as necessary due to the delay in publishing all the
RO documentation by TII.

Introduction

Prospect ACA is an enclave of some 115 houses and several hundred residents
comprising Prospect Square, DeCoursey Square, Prospect Avenue, St. Teresa's Place and
St. Teresa's Road that is bounded by Botanic Road, Finglas Road, Glasnevin Cemetery
and the Botanic Gardens.

Broadly speaking residents are in favour of any measures that improve public transport
and reduce fossil fuel and particulate pollution from road vehicles. Nevertheless, the
contents of the above major infrastructure development has raised significant concerns
related to a number of aspects contained in the Railway Order – these are outlined
below. We seek to have those concerns included for consideration by the Board in
whatever decision-making procedures, including oral hearings that may arise from the
planning process in this regard. Our observations on Metrolink are gathered under a
number of broad headings: Communication; Damage to Property; Living with Major
Construction; Glasnevin Station; Other Metrolink Stations and Infrastructure, and
Ecological Issues.

Communication

Firstly, Prospect ACA would like to comment on the poor communication, lack of timely
information and failure to engage with local stakeholders by the NTA and TII. As non-
technical people with little experience of dealing with large planning issues, the overall
approach adopted by the responsible government agencies on Metrolink has caused
significant difficulty as we scramble to try and read enormous documents, digest the
information and make intelligible observations on this development. Why was the
Railway Order sought prior to all documentation being published? And why were
inadequate timelines given to even the Independent Engineering Experts, RINA, to issue
a complete their review of RO documents and allow time for consultation with their
stakeholder groups to clarify the information. This is not time lost, rather it should be
viewed as time well spent in that stakeholder feedback will be more fine-tuned and
considered.

It has been unhelpful and unfair of professional agencies to take what appears to be a
take-it-or-leave-it attitude to a project that is going to occupy our neighbourhoods and
indeed our lives for at least 8 years and probably considerably more. Community
goodwill is not a given and should be taken seriously and fostered at every opportunity.

Building sustainable stakeholder relationships will be key to the public's cooperation with this prolonged mega project and cannot be developed through the offhand approach that is currently in evidence, whether knowingly or unknowingly, by the NTA and TII/Metrolink. There is a high risk of this project falling between agencies as we have already found lapses in communication between the agencies that leave communities and individuals at a disadvantage.

Planning Condition Sought – Ensure that one agency is responsible and that they engage key staff, internationally as necessary, with experience of mega-projects such as Metrolink. Following on from the Children's Hospital, we would also seek absolute clarity as to what agency, or individual, will be responsible for overseeing the cost effectiveness of the ongoing spend on Metrolink. The Law Society Gazette cites the spend to date as being in the region of €88m.

Damage to Property

Houses in the ACA are all over 100 years old, some properties date back over 150 years and would be described as unfounded as noted in the IEE's report on the RO documentation as follows:

The first group [*as in Prospect ACA*] have expressed significant concerns about the possibility of settlement and noise and vibration caused by the TBM advance directly beneath their potentially poorly founded, mid-Victorian terraced houses, both in the short and longer terms as the clay ground consolidates over time in the years following construction. This part of the alignment is in 'mixed' ground (part in rock, part in the overburden) **and such concerns are not therefore unreasonable.** (RINA – Metrolink Independent Engineering Expert, *Review of ROA Documentation, Draft 1 – p. 58*).

The issue of ground water and surface water gets some coverage, and it would appear that the water table in this area can be high as some locations are very slow to drain and dry out. However it should also be noted that there are a number of underground waterways, most notably the Cemetery Drain, running under a section of DeCourcey Square, the lower end of Prospect Avenue into Prospect Square and another related waterway running to the rear of Prospect Square and also under part of DeCourcey Square. We have no idea of the depth of these waterways, nor do we know how the channels of these waterways may be effected by settlement post drilling. No consideration of these waterways appears to have been given in the damage report that we can find. See map attached (Source: *The Rivers of Dublin* by Clair. L. Sweeney – Published by Dublin Corporation, 1991)

We note in the Damage (Assessment) Report that representative buildings have been selected along the proposed alignment for assessment of damage from the effects of tunneling and some mention was made of carrying out such an exercise in the ACA initially, but no work has taken place to date. Indeed Paolo Merlanti of RINA states that Phase 2a simply fixes the zones using a generic building. He then goes on to explain that Phase 2b and Phase 3 will require the contractor to 'design the zones according to the final settlement calculations to be done for each building.' As the potential for settlement may differ from one location to another the final zone of inclusion may be expand and contract according to that potential for damage and settlement.

Planning Condition Sought - Due to the vulnerable nature of the houses in the ACA we are asking that ABP impose a Planning Condition that requires Metrolink to expand that

assessment process across the full ACA and the extension of the POPS to cover the unfounded properties of the ACA.

Also, to mitigate potential damage from vibration due to drilling and subsequent settlement, the ACA seek enhanced monitoring of the drilling process in the area such that real time adjustments can be made to minimise damage from drilling to the lowest possible level.

Furthermore, as the ACA stands on boulder clay the potential for settlement problems even 10 years or more following the original drilling is a genuine concern. We therefore ask that there should be a long term ongoing monitoring programme over a 15 year period to assess ground movement and settlement and carry out whatever works or mitigations are required to protect the ACA properties.

Living with Major Construction

We would like to comment on the many construction projects already mooted for the road leading from Doyle's Corner as far as the Botanic Gardens and how they will be coordinated. They include: Phibsboro Shopping Centre; Dalymount; the site beside the Bald Eagle pub; the development site at the old mill on the Royal Canal, development at the old Smurfit site, further construction at Daneswell and the stalled apartment building on the old Addison Hotel site on Botanic Road. This is not even including Bus Connects with all that that entails. The potential for clashing construction projects is enormous and could contribute to chronic traffic jams for residents and commuters.

Planning Condition Sought – ensure that a single agency is responsible for construction project coordination, not simply from a planning perspective, but on a day to day basis to ensure that the city continues to move and that money is not wasted digging and redigging roads for enabling works and utilities.

As the ACA will be effectively sandwiched between the Glasnevin and Griffith Stations, there are concerns about how this work will impact our ability to move about on the roads, the levels of noise, vibration and dust and the hours of work, and how the area will be kept clean. There are some references to these issues in the EIAR, section 10.6 In section 10.6.3 it states that these are mapped, but is not clear as to where those details can be found in what is a very large document. Also, health problems that can arise due to disturbed ground such as Aspergillus, a fungus producing spores that can cause lung infections that can spread to other parts of the body in those with weak immune systems. This area has a high proportion of elderly residents, so we would expect that this problem would also be monitored to prevent unnecessary illness.

There are concerns too about the monitoring of blast waves from the explosive used for excavation – for example up to what distance away from the blasts will be monitored and how will this information inform damage limitation for local properties? We would also expect that blasting takes place only during the day-time and that advance notice is given of blast timings.

With regard to parking, it is to be expected that a significant amount of workers will be travelling to Glasnevin and Griffith each day and we would like assurances that Prospect ACA will not be returning to the bad old days (prior to paid parking) of having a continuous stream of hundreds of cars cruising through the ACA seeking parking at all hours of the day and night.

Furthermore, we seek clarity on the site depots nearby, other than that planned for Glasnevin Station. We seek information on whether any part of the Botanic Gardens may become a Site Depot?

Planning Condition Sought – It is notable that while most people support Metrolink, that they naturally worry about the loss of general amenity in green spaces and their quality of life for a considerable period of time – some public realm improvements are suggested, but there is no provision of real compensatory measures for the communities effected. To this end we seek a number of conditions. Firstly, the retention of the IEE beyond the planning phase, during the full construction stage and the years following, throughout the settlement period.

Secondly, we seek the setting up of a working group, perhaps a Community Development Committee comprised of local community representatives who can, with the assistance of the IEE meet regularly with the NTA/TII and relevant government agencies to address how the development of Metrolink can benefit the communities along the alignment. Gdra have suggested a Project Construction Traffic Forum including key stakeholders as in residents, the IEE and the NTA as the sponsoring body, perhaps with TII representation. We would support this idea to complement the Working Group.

Thirdly, we also seek the establishment of a Community Development Fund as part of this project – such measures are commonplace in large private sector developments. However, given the size and duration of this project, it is only fair that communities should also benefit from the enormous changes that Metrolink will bring. Without these measures, Metrolink will largely be an engineering exercise and the opportunity for community and commercial benefit will be mostly lost as those most expert in how to maximise the benefit of Metrolink to each community will be excluded from its ongoing planning and development. The working group can also make a significant contribution to the building and maintenance of good relations and communications between all stakeholders and reduce tensions through the opportunity for discussion while fostering mutual understanding.

Glasnevin Station

While the Metrolink RO documents make much of the benefit of a train station and metro line to the local community, we feel that this benefit will actually only fall to a relatively small number of businesses in the area and the admittedly useful extension of transport options. But we feel that this misses what should be wider objectives for this space to create far better commercial, social and cultural benefits.

The Planning Document of the RO p. 130 Section 4.5.8 (and 4.5.8.1 p.131) clearly states how Metrolink fits into the Dublin City Development Plan. It goes on to mention the local zoning of areas close to Glasnevin station and also further north around the ACA as Z1, Z2, Z3 and Z.9 and how they focus on public amenity. Yet Glasnevin Station, beyond being a place to go for a train, or perhaps a coffee, will actually be of little amenity to its surrounding communities – to date nobody even likes the look of the station. The Dublin City Development Plan (Points MT07 and SMT014) state that the station should be mixed use, while DCC cite their objective of having the future Glasnevin station in the Phibsboro Local Environment Improvement Plan or P-LEIP.

I have no doubt that D7 and the Phibsboro community have ambitions beyond the location of some shops and eateries in the station as the definition of 'mixed use' and would seek space that fosters social and cultural activities also – a facility that is very much lacking in the area. For the ACA and this end of Glasnevin, Phibsboro is our natural commercial and social hub. We are stakeholders in this development and should be included due to our proximity to the Station and use of Phibsboro as our commercial hub. In common with Phibsboro we believe that this space could be an amazing public resource and its future use should be influenced by a working group such as a Community Development Committee that would enable genuine stakeholder participation in this SID.

Ultimately, we see the development of Glasnevin station as more than a large glass structure – it should be a living community hub with facilities for the surrounding communities – not simply commercial enterprises – but a portion of the building should be a resource available to the public to foster community cohesiveness, wellbeing, health and collaboration. One of the best ways to ensure that Glasnevin station does not become a soulless glass box that attracts significant anti-social behaviour is to ensure that it is in use as a community hub – and not simply a transport and commercial centre that only paying members of the community access.

Glasnevin station (Planning Document section 4.5.8.1) outlines the 3 storey high building that is basically a glass box. It carries no reference to the buildings it will replace or the inclusion of the Hedigans structure. Indeed the Preferred Route Design Development Report states that the structure cannot be achieved without the demolition of Hedigans Pub. It gives no detail as to what other designs might have been drafted that could actually include this structure, or elements of the other buildings as a means of creating a more sympathetic building that invites exploration and not simply a cursory glance at yet another glass and steel box demonstrating no architectural imagination or inventiveness. If this station is to be a highly visible landmark sitting, as it will, at the top of Whitworth Road beside the Royal Canal and its Greenway, then why not create a building that is worth a second glance.

Hedigan's is a notable building being mentioned in Joyce's Ulysses and even its inclusion as part of a Joyce tourist trail in Dublin would be of benefit to the historic and commercial fabric of this part of the city. Too much of Dublin's heritage has already been lost due to developments that take little account of what is already present and of importance to the local community and potentially to the wider population and visitor alike.

We contend that the present design of Glasnevin station is out of character with the built environment into which it is supposed to fit and far from complementing the locality, is likely to become a rundown eyesore within a relatively short period of its construction and a magnet for anti-social behaviour.

Planning Condition Sought - The planned footprint and three storey height is hard to justify if some of that space is not put to use for the benefit of local community groups and activities and to incorporate some elements of the existing buildings on the site. We therefore ask that ABP reject the current design for Glasnevin Station and stipulate an alternative, more sympathetic design that pays due respect to the local historical and built heritage, while also including space for a vibrant community that currently has no such civic space in which they can engage with one another. Create a building that the communities surrounding it will feel proud of and be happy to take ownership of - this would be an achievement worth pursuing.

Other Metrolink Stations and Infrastructure

Our observation on the Metrolink stations from the Mater to Ballymun is that they are quite large compared to many local underground stations one might see in European cities, where stations might simply consist of a stairs and an awning at surface level. It seems difficult to see what is driving the large size of the stations. It cannot be the inclusion of facilities for disabled people to make the descent to the station below as the provision of an elevator doesn't require that much space. For example the Mater station and its Plaza seems to obliterate the lovely little park that it will occupy. One wonders if the local community want a plaza or simply their park reinstated post works – those are the questions that could and should be addressed by a Community Development type group as it would seem unnecessary to inflate the cost of the project by excessively large surface infrastructure. Similarly the footprint of the Griffith Park station seems very large for its location, so it would be helpful to understand the rational behind their large size rather than keeping the stations relatively low profile with a small surface footprint that enables the maximum reinstatement of green space.

The ventilation shaft at Albert College Park appears gratuitously large with a significant loss of space in the park and related amenity for the residents of the area. It does appear strange that the opportunity to create a metro station beside a large university (DCU) is being rejected by TII and we therefore support ACRA and GADRA in their calls for this decision to be changed. The proposal for a large apartment development nearby does nothing to allay concerns about the lost opportunity either. If the argument is that the space is required for the ventilation shaft, then why are other suitable sites within the requisite distance not being considered. Failing to place a station where there is a large population of commuters seems to contradict the very purpose of a metro line in the first place. There is no sense to Metrolink bypassing an adjacent university. Again even if the station were built at Albert College then would it actually need to have such a large surface footprint absorbing as much of the park as currently suggested.

Planning Condition Sought – Reject the use of Albert College as a site for the ventilation shaft and examine the other alternative locations. Reduce the size of the land take at Albert College Park and provide a Metrolink station in a convenient location for the thousands of commuters that travel to DCU every day. Review the overall land take and station size across the Metrolink alignment to ensure that station buildings and Plazas are not unnecessarily large and expensive.

Ecological Issues

Concerns are naturally raised about the potential permanent damage to the Royal Canal and its ecosystems, particularly if it is drained, as canal banks have been known to dry out and crack rendering them useless and in some cases they are beyond repair. There are reports of rare species of invertebrates along the canal banks, although these are as yet to be confirmed. We assume that a full audit of wildlife will be undertaken and that all suitable mitigating factors will be undertaken.

However, while the Royal Canal is an obvious source of concern, there are other less obvious ones, such as contamination in the water table and particulate pollution in the air and high levels of noise that can be very damaging to wildlife – and humans.

Planning Condition Sought – The appointment of an Ecology Officer who will share information with the EPA, various wildlife bodies, Waterways Ireland and any other relevant body. We also would request that the ecological data be shared with the

Map of Underground Waterways in the Prospect ACA – see Section with red lines, part of the Cemetery Drain adjacent to the number 36

