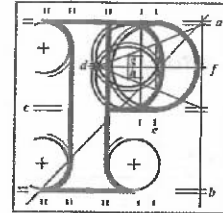


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Shandon Residents Association
48 Shandon Park
Phibsboro

D07FX40

Date: 26 January 2023

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 and oral hearing request (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.

The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you on this matter in due course.

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.

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64 Marlborough Street
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Yours faithfully,

PP EM

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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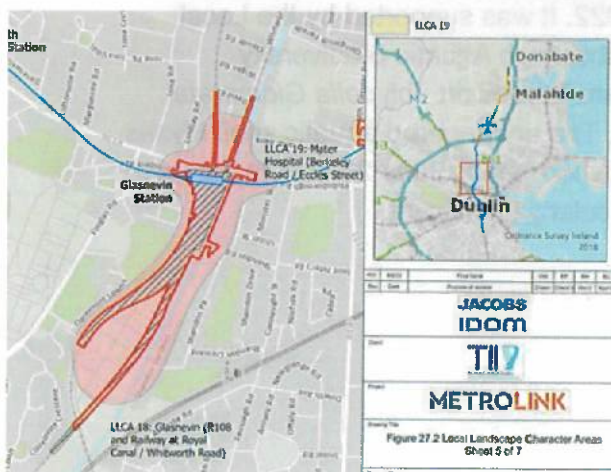
Shandon Residents Association submission — Metrolink RO case number 314724
— Submitted on behalf of Shandon Residents Association by Valerie Vetter, 48 Shandon Park, Phibsboro, D07FX40 » 087 6784701 » valerie.vetter@gmail.com

Metrolink submission (Railway Order) 2022

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

Section 1 — Shandon in Phibsboro

Shandon Residents Association broadly welcomes the proposed Metrolink plans and its aims to reduce harmful car emissions. It looks forward to facilitating the works wherever possible. The Shandon neighbourhood of Phibsboro (highlighted in yellow on the map) is located on the southern side of the Royal Canal to the proposed Glasnevin interchange station. Shandon Residents Association dates back to the early 1930s, when many of the homes were originally built. There is a strong sense of community in the neighbourhood with a monthly park clean-up, twice-yearly big Autumn and Spring neighbourhood-wide clean-ups and an annual Summer street party organised by the area's association. Some residents also volunteer with the long-standing monthly Royal Canal Clean-Up group.



The Metrolink project looks set to bring much-needed modern high-speed public transit to Dublin. Local residents would be in an ideal position to reap its rewards when the estimated eight years and four month construction phase is complete.

The construction timeline proposes to involve 24-hours seven day works on Irish Rail lines — seen

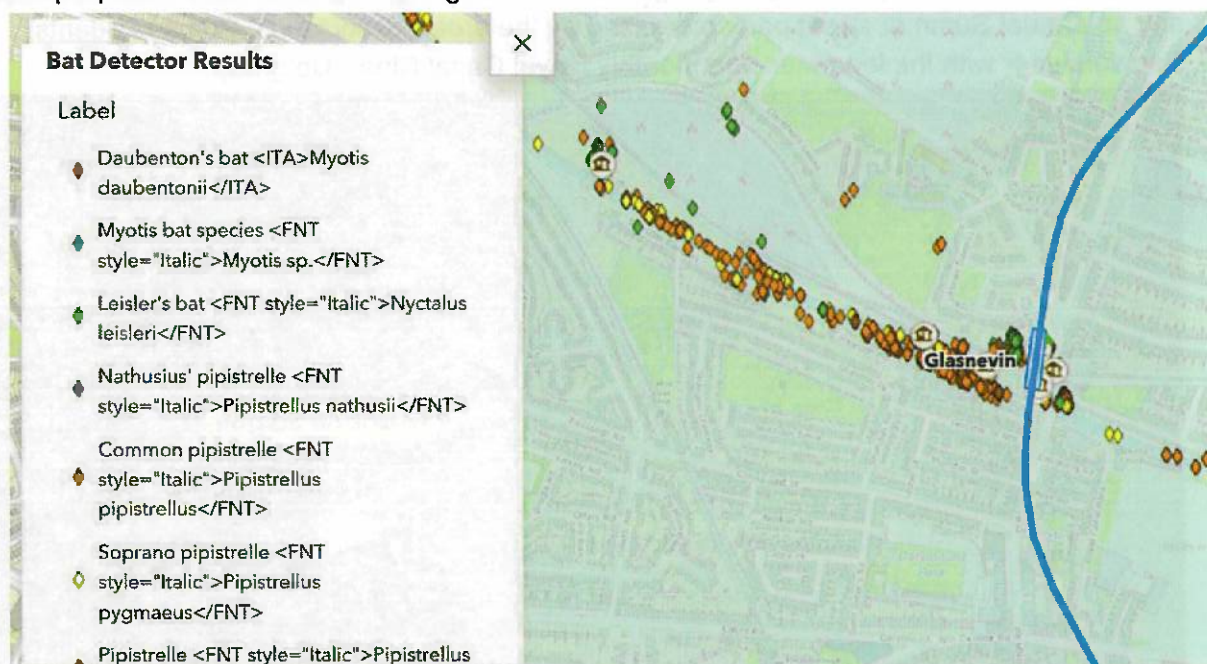
in Fig 27.2 Metrolink RO — extending parallel to the Shandon neighbourhood along the Royal Canal corridor beyond Shandon Gardens and Coke Oven cottages on the northern bank. This will obviously have a major impact on the area from access, noise, dust and traffic for a considerable timespan.



The entire length of the Royal Canal is designated as a proposed Natural Heritage Area (pNHA) (NPWS, 1995). Otters, along with their breeding and resting places, are protected under provisions of the Irish Wildlife Acts 1976-2021 and have been photographed along the banks at Shandon Gardens in 2018 (photo: Valerie Vetter).

This area is also habitat for the light-sensitive Daubenton's Bat which can be easily seen at dusk on the Shandon-side of the canal during summer months. For example, Metrolink's own environmental assessment below shows the location of many bat species along the canal corridor near

the proposed Glasnevin interchange Station.



Shandon Residents Association commissioned an ecological survey of the canal from Lock 6 to Coke Oven Cottages conducted over summer 2022. It was supported by the Local Authority Water Programme. 'The Royal Canal, Phibsborough Aquatic Biodiversity Assessment & Management Plan 2022' recorded a rare Stonewort *Tolypella Glomerata* along the north bank of the canal near the lock gates. The endangered aquatic snail *Myxas Glutinosa* was also recorded at the Royal Canal, Phibsborough in June 2022. It is very rare in Ireland and the population at Phibsborough is particularly significant.

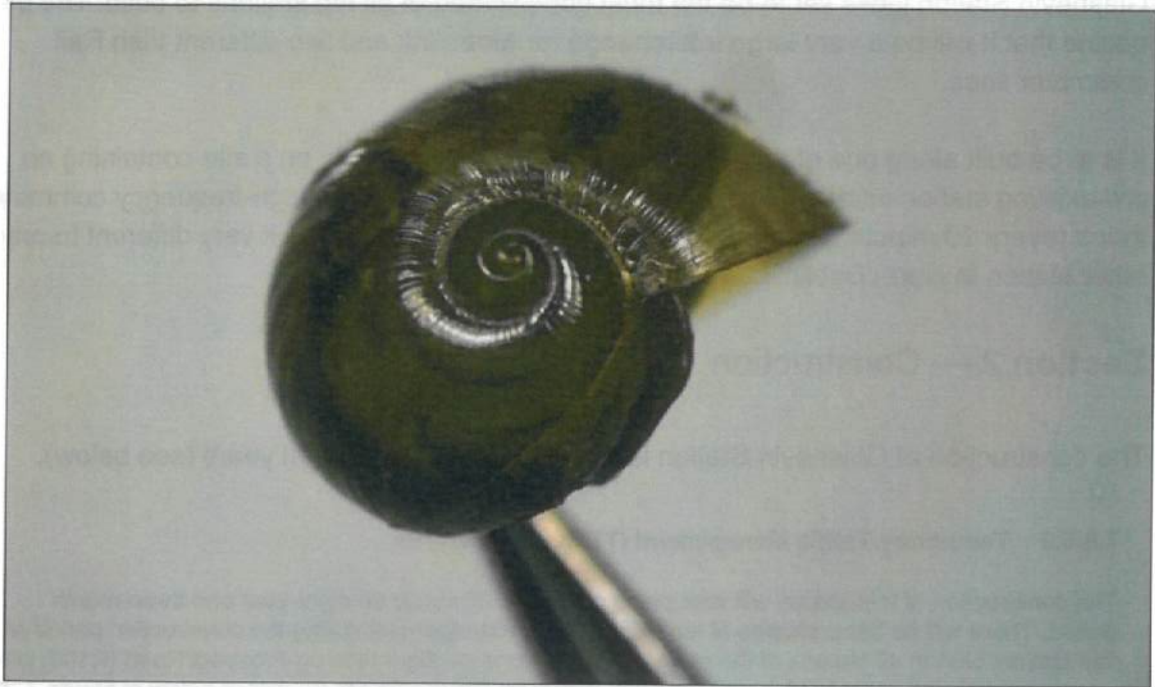


Plate 3.5 The endangered aquatic snail *Myxas glutinosa* recorded at the Royal Canal, Phibsborough in June 2022

The assessment notes: 'the known occurrence of high conservation value species such as clustered stonewort (*Tolypella glomerata*), glutinous snail (*Myxas glutinosa*), the cased caddis species (*Leptocerus tineiformis*) and otter (*Lutra lutra*) within the survey area.'

The Royal Canal is also referred to as an area of ecological importance in the Dublin City Development Plan 2022-2028, Section 15.6.6 Sensitive Ecological Areas: 'In the case of proposals adjacent to a canal, appropriate space should be retained for wildlife and it should also be ensured that wildlife have appropriate access to the water'.

The Draft Dublin City Biodiversity Action Plan 2021-2025, states that 'Objective 6: Implement measures for species that have a local biodiversity value or impact local biodiversity.'

The near decade-long construction phase and subsequent operation of the new interchange will need to provide a way for residents and nature to co-exist alongside this important transport hub.

Note on submission fees and community participation

Shandon Residents Association (SRA) objects to the requirement to pay ABP €50 to submit an observation on Metrolink. It's unfair to penalise those who are financially disadvantaged. The right to comment should not be limited to better-off individuals and groups.

It's important that an open oral hearing forms part of this planning process to provide the opportunity to engage fully with such a seismic change to the area.

Glasnevin Station looks set to be the most complicated of all the stations to build. The plans outline that it will be a very large interchange for Metrolink and two different Irish Rail commuter lines.

It is to be built along one of the busiest traffic routes into the city on a site containing no pre-existing station infrastructure. Once operational there will be high-frequency commuter trains (every 10 minutes) in addition to the metro line which makes it very different to any other station in North Dublin.

Section 2 — Construction

The construction of Glasnevin Station is planned to take over eight years (see below).

7.6.6.2 Temporary Traffic Management (TTM) - Main Works

The construction of this station will take place over approximately an eight-year and three-month period. There will be three phases of temporary traffic management during the construction period of this station. During all phases of the main works, the lane configuration on Prospect Road (R108) will remain unchanged. The TTM during the main works for Glasnevin are illustrated below in Figure 7-23 to Figure 7-25.



Figure 6.4 Proposed southern access to the temporary bridge

Road (via the currently derelict Old Bakery site where these plans have been superimposed above).

The process outlined in the Railway Order includes the closure of the canal to access at Phibsboro Rd with the construction of a temporary bridge below Lock 6 that will divert all current canal traffic into Shandon Mills apartments and out via Shandon Park for approximately four years (see image left from RO 2022). The image overlays the plans for as yet unbuilt apartments. It blocks off the most direct route to Phibsboro



Above image shows the full context for the temporary bridge (Google). The dashed yellow line is the proposed route as seen in the previous Metrolink RO image. It plans to route all traffic through Shandon Mills Apartments car park exiting via Shandon Park and then on via Shandon Road to Connaught Street or Leinster Street — which is a one way system. This is a tight turn for trucks into an already congested two-way traffic system.

The shaded area in the image above shows the proposed construction site where normal access will be blocked to Crossguns bridge. The most direct route would be the green solid line travelling via the edge of the Old Bakery site and out to Phibsboro Road.

This temporary bridge is set to take all canal traffic (including Coke Oven Cottage residents, Waterways trucks, DCC vans, Irish Rail, An Post, septic waste tankers, delivery services, cycle/ebike/scooter commuters and possibly some Metrolink/contractor construction vehicles).

The temporary bridge is shown to be in place for approximately four years. Note that Bindford Ltd has put in a second planning application for the building of apartments at the Old Bakery site at Crossguns. It raises issues around potential construction overlaps, should it be successful.

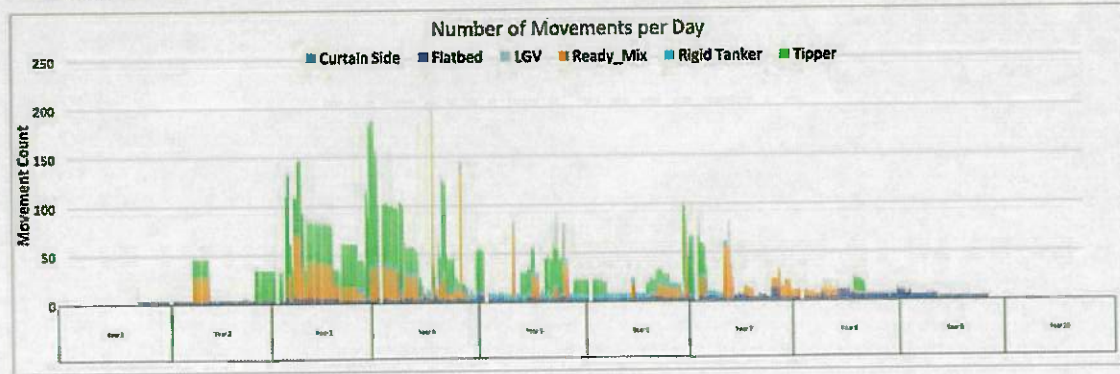
There will be upwards of 100s of truck movements per day — at peak — during years three and four of construction. The majority of these will be tipper trucks removing waste from the site. The engineers from RINA — provided to help understand the plans — weren't clear on how this will be managed while still having usual traffic flow over Crossguns.

Post-demolition, the Brian Boru/Hedigans pub and its carpark will form the plant site. It will be a compound with heavy machinery for the duration so there are major concerns around air quality, dust and stresses on the Crossguns Bridge.

The traffic management plan shows that Crossguns Bridge will remain open throughout.

Metrolink RO estimates Tipper Truck numbers (in green) for years three and four of construction. There will be a peak of approximately 200 Tipper Truck movements (per day) removing tons of excavation waste (see following graph from Metrolink RO 2022).

Glasnevin Section



Obviously, there will be associated noise, light, dust, reduction in air-quality from construction even with considerable mitigations in place.

Irish Rail

While Metrolink have applied for 7am to 11pm works, Irish Rail are seeking 24-hours seven-days works. The Western commuter line will be closed for 21 months while the South Western Commuter line will be closed for 5 months. Track will need to be lowered by 2m. This is additional to the major excavation of the station site and 24-hour tunnelling under Leinster Street and Munster Streets where it's understood that the tunnel boring machine should cover 7 to 10m per day. This construction work will be parallel to Shandon Park and Shandon Gardens.



This area has been identified by Metrolink as architecturally significant but the station design (Crossguns Bridge is seen left — image from Metrolink) reflects nothing of this or indeed the origins of the Royal Canal. Crossguns Bridge is the site of the

beginning of the entirety of the Royal Canal construction works in 1790.



Image above left shows the existing streetscape while the image above right shows the proposed station. There is very little green landscaping in evidence from the rendered proposal. Below is a view of the existing canal area versus the proposed station design (from Metrolink).



As can be seen in the images above, no green space remains around the station in this view and the small Hawthorn hedgerow that contributes to the support of the canal bird

populations of Goldfinch and Sparrow has been removed entirely. The rendering also removes the minimal grass verge along the towpath. Biodiversity is critically declining and fragmentation of habitat due to transport infrastructure is problematic. The incorporation of nature into public realm projects should be treated as an opportunity and not an afterthought.

'Infrastructure is the fundamental human enterprise that we must get right, or risk undermining our biodiversity and sustainable development goals for generations to come'
UN Environment Programme — December 2022

Section 3 — 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 and ecologically important corridor provided by the Royal Canal in such an urban environment and the huge disruption to residents' lives.

The potential overlaps between agencies, third-party contractors and private developers could also lead to a significant lack of oversight - continuous communication between all parties is vital.

- A Public Oral Hearing should be required as part of the planning process. The local community, relevant stakeholders and resident representatives need to participate.
- The possibility of rerouting traffic via the temporary bridge over the Royal Canal via the Old Bakery site to exit directly to Phibsboro Road/Crossguns should be explored.
- A robust Ecological Management Plan put into action throughout construction with a dedicated, qualified and independent ecologist working across the construction sites to oversee works as decisions are being made. There will be a huge disturbance to the rat population during construction. Management of rodents needs to avoid negatively impacting wildlife.
- A Liaison Committee should be in place during the entire construction period that allows 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 and not a PR exercise.
- A Community Fund set up to support a variety of community-driven biodiversity enhancements along the Royal Canal (more trees, native planting, solar panels for community spaces, more green space/walls, bird and bat boxes).
- Open Public Architectural Competition to design Glasnevin Station. This station is arguably the most important as it exists as an Irish Rail/Metrolink interchange. The designs shown in the plans do not appear to reference any of the rich heritage and history of this area of the city. 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.

- Green building principals. This will be an important and permanent addition to Dublin's cityscape and should be a future-proof building. Looking to Europe and other parts of the world where green buildings are seen as a desired addition to the built environment.

Germany's Deutsche Bahn has a 'Grüner Bahnhof' (Green Station) programme and incorporates high-tech eco-friendly design and sustainable technologies.



Stations like Horrem (pictured) are powered by solar-power and geothermal energy. Solar thermal systems produce hot water. Its green roof allows 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.

— Shandon Residents Association

