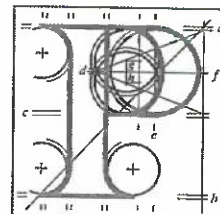


**Our Case Number:** ABP-314724-22

**Your Reference:** Vincent Harrison and others



**An  
Bord  
Pleanála**

Marston Planning Consultancy  
23 Grange Park  
Foxrock  
Dublin 18

**Date:** 07 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](http://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 Marlborough Street  
Dublin 1  
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The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

21<sup>st</sup> November 2022

Our Ref. 22115

**Re: Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022**

**Formal submission**

Dear Sir / Madam

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin, D18 T3Y4, are instructed by our client's:

- Vincent Harrison, no.1 Coke Oven Cottages, Royal Canal Way, Dublin 11
- Stephen, Alex, Robin and Lauren Smith; and Sheila Boyd, no. 2 Coke Oven Cottages; Royal Canal Way, Dublin 11
- Francis Mackey and Jacqueline McElhinney, no. 3 Coke Oven Cottage; Royal Canal Way, Dublin 11
- Nessa Winder, no. 4 Coke Oven Cottage; Royal Canal Way, Dublin 11

to make the following submission to An Bord Pleanála in respect of the proposed Metrolink referenced in the statutory notices as the *"Application by the National Roads Authority (operating as Transport Infrastructure Ireland for the Railway (Metrolink – Estuary to Charlemont via Dublin Airport) Order (2022)"*.

Our submission on behalf of our clients and the full reasons and considerations upon which this is based are set out below. We can confirm that we are familiar with, and have visited the subject site and have examined the Metrolink drawings, the project EIAR and other particulars that form part of the Metrolink project. We have enclosed/paid the fee of €50.00 for the making of this submission (as specified in the statutory notice). This submission is submitted in accordance with the methods identified within the statutory notice.

We note that there is no appeal process to An Bord Pleanála under a Railway Order process. It is therefore incumbent on the applicant in this instance, to ensure that the most robust application is made; and that the most thorough assessment of the application is undertaken by An Bord Pleanála. Our clients have concerns in respect of certain aspects of the proposed development and the information provided within the Metrolink application before An Bord Pleanála.

Our client's, as long established residents along the Royal Canal, are reliant on the shared roadway that extends along the north side of the Royal Canal from Prospect Road (R108) to get to and from their residential properties by foot and vehicles on a day-to-day basis. There is a need also to ensure service and emergency vehicles to gain vehicular access to their houses and the need for others to access other lands along this stretch of the canal. One of our client's at no. 2 Coke Oven Cottages also have two children, of which one has special needs.

We respectfully submit that the current application has a complete lack of detail on a number of key points relevant to the proper management and use of the proposed development as well as maintaining our clients' access to their property.

In addition to the recent Part 8 Greenway application by Dublin City Council along this part of the Royal Canal, the proposed Metrolink station referenced as *"Glasnevin Station"* in the Metrolink application will result in a further increase in the intensity of activity at the entrance used by our clients off the public road to access their properties via the shared surface towpath.

Our clients can confirm that no agreement exists between the residents of Coke Oven Cottages and Dublin

City Council (re access) between the 5<sup>th</sup> and 6<sup>th</sup> Lock along the canal where the towpath must be widened to accommodate future expected additional traffic arising from the proposed Greenway. Our clients are concerned that the proposed Greenway in combination with the proposed Glasnevin Station (Metrolink station) and the works in its immediate vicinity will negatively impact their existing residential amenity and day to day access to their dwellings both during construction and operation of the Proposed Development.

Our clients are concerned with the lack of detail within the material provided with this Railway Order before An Bord Pleanála. On that basis we respectfully request that An Bord Pleanála fully consider the content of this submission in the interests of the proper planning and sustainable development of the area. Prior to outlining the detailed grounds for our client's submission it is useful that the context of this proposed development is laid out in relation to our clients' dwellings at Royal Canal Way.

Our clients would welcome engagement with the applicant and Dublin City Council in order to discuss their specific concerns with a view to generating a strategy in respect of the construction and operational management plan to ensure that all existing access arrangements to their dwellings are maintained in a safe and sustainable manner going forward. This is particularly important given the range of proposed infrastructural activity (i.e the Green Way and the Metrolink projects) which will be ongoing over a significant period of time in the vicinity of our clients' dwellings at Coke Oven Cottages.

### 1. Subject site and environs

We respectfully submit that our client's and their neighbouring residential properties at 1 - 4 Coke Oven Cottages have a unique setting along the Royal Canal. We note that the cottages and the vehicular access to them are not clearly shown on the drawings submitted to An Bord Pleanála. The context of the cottages, and their access in relation to the Proposed Glasnevin station and Metro alignment.



*Aerial view of Coke Oven Cottages (outlined in red) and its context with the approximate position of the Proposed Glasnevin station and Metro alignment (source: Google maps)*

Our clients have lived at nos. 1, 2, 3 and 4 Coke Oven Cottages for a significant period, with the resident at no. 1 having been resident in their property for 70 years and have enjoyed the long established residential amenity offered at this location as well as the unique setting and access along the towpath associated with the Royal Canal.

This unique location is a semi-rural canal side location which has the benefit of its close proximity to Phibsborough and Dublin city centre. All the Coke Oven Cottages includes a long established vehicular access along and off the towpath. There is no other vehicular or pedestrian access to the cottages nor do they have access to car parking facilities elsewhere in the area. The towpath is also used to access agricultural lands by other landowners beyond them as well; as Waterways Ireland, ESB, CIE and Cabra Kayak Club



vehicles. In order to access their dwellings our clients are required to drive along the towpath for 840m from the access point on the north side of the Cross Guns Bridge. It appears that part of the our client access route will be altered as a result of the proposed Glasnevin Station and its associated ancillary surface level urban realm and landscaped area.



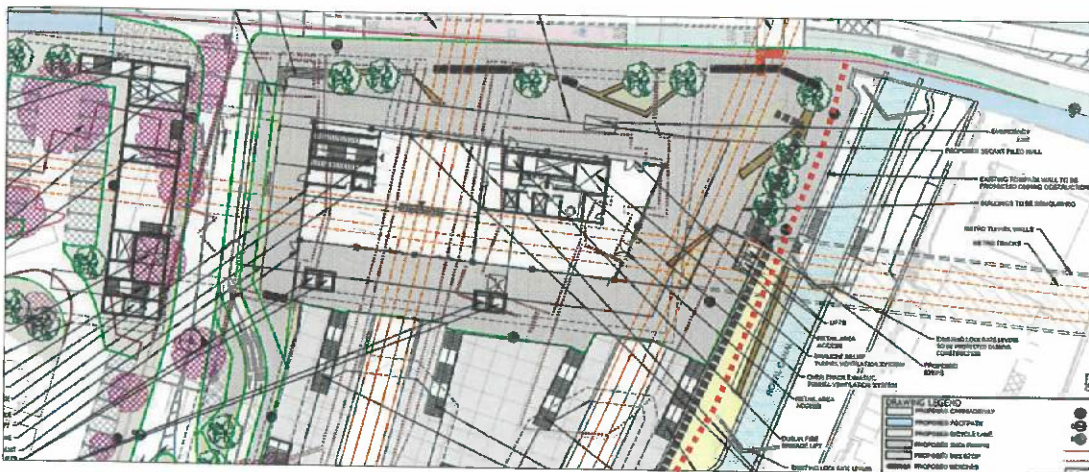
*View of existing access at Cross Guns basin*

As it stands our clients at Coke Oven Cottages are required to share the towpath with pedestrian and cyclists, as well as other users of the amenity. It is notable that our clients are unique in this regard. In addition our clients' properties are located along the proposed greenway which is currently the subject of a Part 8 application by Dublin City Council.

## 2. Nature and extent of the proposed development

The proposed project will comprise a high-capacity, high-frequency metro railway between Estuary Station and the Park and Ride facility, north of Swords via Dublin Airport to Charlemont Station. The proposed alignment is 18.8km long from end to end, whilst the alignment between the two end stations (Estuary to Charlemont) is 18.1km long. The project proposes 16 new stations to be provided along the proposed route, including an underground station, that will include a two storey scaled structure at ground level, known as Glasnevin Station that is located immediately adjacent to Cross Guns bridge, Phibsborough. The Glasnevin Station will provide a key interchange point with the heavy rail network, with the Maynooth and Kildare lines serving the Glasnevin DART station.

Glasnevin station is identified as a Metrolink Main Interchange station and that this part of the route is to be delivered in a tunnel format. As a result Glasnevin Station is an underground station with a two storey element above ground. The street level design of the station is shown below. This indicates clear conflicts with the ability to access our clients' properties, with the access off the Prospect Road heavily restricted and with 6m high lighting proposed in the centre of the roadway.



*Excerpt from Drawing no. ML1-JAI-SRD-ROUT\_XX-DR-Y-02057 (Plan drawing no. ML-ST 304 N-01) indicating access to cottages in broken red line*

Chapter 5 of the EIAR deals with Construction, and Table 5.7 (page 23) identifies that the following demolition will be required to accommodate the proposed development;

*“Commercial/industrial properties during Enabling Works and retaining walls and MGWR tunnel during Civil Works:*

- *Prospect House, Prospect Road - commercial 2-storey building;*
- *Des Kelly Interiors, 1A, Prospect Road - large 2-storey commercial/ industrial building; and*
- *Brian Boru Public House, 5 Prospect Road – 2-storey building”.*

Section 4.17.7.2 of the Metrolink EIAR sets out the following in respect of the proposed underground Glasnevin Station *“Urban Realm and Landscaping Design”*, it provides for:

- *A pavilion providing a shared entrance to both MetroLink and Iarnród Éireann;*
- *Clear wayfinding to both MetroLink and Iarnród Éireann transport modes;*
- *Platforms open to the mezzanine level;*
- *A separate Upper Concourse level;*
- *Linear circulation to both MetroLink and Iarnród Éireann platforms;*
- *Principles of access for all;*
- *FOH and BOH on all levels;*
- *Natural light over the MetroLink and Iarnród Éireann platforms (this principle is affected slightly because of the green roof over the station entrance, which is intended to unify the public space, and includes glazed areas so that natural light can still pass onto the plaza); and*
- *Design in line with a common architectural language used for all of the stations along the alignment.*

The following is also provided for at Glasnevin Station:

- *Provide an intermodal concourse at street level, designed as an open space under a light canopy;*
- *Provide a potential café or shops for passengers;*
- *Re-build the Dalcassian Downs car park over the station roof slab;*
- *Provide a car park / large cycle park area and drop-off on the area of the existing Brian Boru car park;*
- *Design landscaping with green integration on slopes;*
- *Integrate station ventilation grilles in green areas; and*
- *Consider the requirements for revenue protection for the different modes, as well as safety in design, specifically regarding adherence to Iarnród Éireann's codes of practice.*

The interlinked works with the existing main line will require the western commuter line (that backs onto the Coke Oven Cottages) to be closed for a period of 21 months; and the south-west commuter line for 5 months. Section 5.10.6 indicates that the train track will be lowered by c. 2m although the alignment drawings provide no detail as to where and along which stretch of the railway this reduction will occur. The application also provides no detail on noise mitigation during the construction and operational phases of the project. It is incumbent that the highest level of noise mitigation is installed along the boundary with the Coke Oven Cottages for both phases of the development.

#### **4. Grounds of submission**

The full grounds of our clients' submission together with the arguments, reasons and considerations upon which it is based is set out below. The current scheme does not appear to provide continued access to our clients' properties once the station is in operation nor for a period during construction. We submit that it is essential that access to their houses is maintained at all times. The closure of the towpath for a period of 4 weeks, and the inability to access our clients' properties, whilst the temporary bridge is being installed is unacceptable.

Our clients are seriously concerned that there is a lack of a clear and defined strategy and management plan for the control and use of the greenway and the proposed Glasnevin Station as well as safeguarding the residential amenity and safe access to the existing dwellings at Coke Oven Cottages both during construction and following completion of works.

The proposed Glasnevin Metrolink station will increase the level of pedestrians and cyclists along the tow path access road, and therefore there is a need for a robust set of management measure in order to ensure public



safety and safeguard against user conflicts at this point, and all other points, along the greenway and the proposed station.

Our clients have long enjoyed the benefits of living at this location. However, they are mindful on a day to day basis as active users of the towpath of the particular sensitivities of the merging of a variety of users along it. They are aware of the conflicts that arise and the need to ensure long term measures which promote safe access and usage by all users of the towpath. This is already becoming a significant issue where they have to deal with conflicts with other users on an almost daily basis. This will clearly be compounded by the location of the Glasnevin Station.

There is a need to ensure users of the towpath are appropriately forewarned and properly alerted to the range of users of the towpath and the conflicts that may arise. This is required in order to ensure public safety, prevent traffic hazards and ensure that the amenity value as well as the residential amenity function (as a means of vehicular access) is considered in a balanced manner at this location.

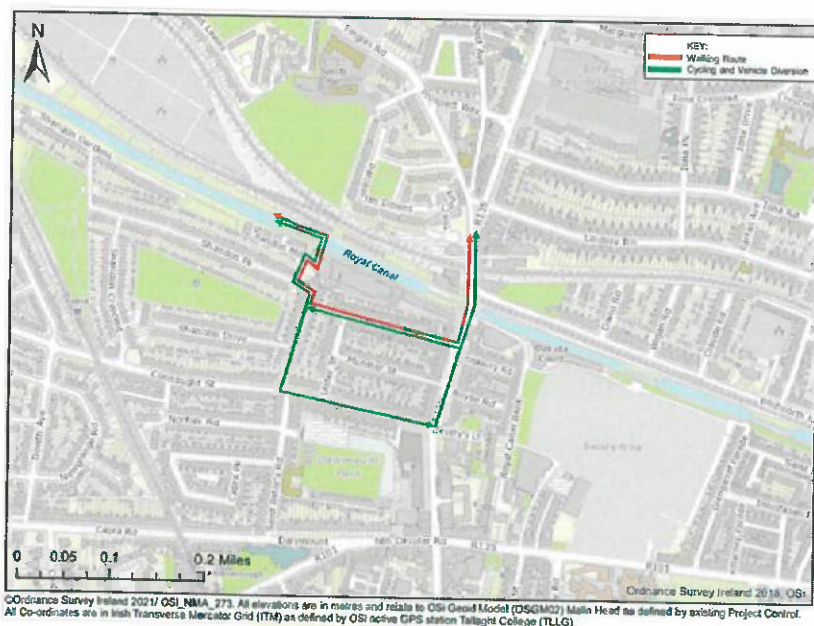
Our client considers that this is a reasonable and prudent approach to achieve a vibrant user friendly green route at this location in combination with the proposed Glasnevin Station Metrolink facilities. Unfortunately, our clients remain concerned that the documentation and plans provided with the Metrolink application do not give sufficient comfort to the residents of Coke Oven Cottages particularly in terms of the management of the lengthy construction phase as well as the long term management strategy of the proposed station and its immediate environs as well as the proposed greenway, it is within this context that our clients have made this submission.

#### **Access to Coke Oven Cottages**

Chapter 9 of the EIAR deals with Traffic and Transportation, and p.152 sets out that the Royal Canal Way (our client's only access route to their dwellings at Coke Oven Cottages) will be closed off during construction. It states that:

*"During all phases of the Main Works, local access to the cottages via Royal Canal Way will be impacted due to the construction footprint. The proposed diversion will be via Leinster Street North or Connaught Street, where traffic will then route north on Shandon Road, utilising the newly built bridge to re-join Royal Canal Way approximately 300 meters west of the existing access. This diversion route is illustrated in Diagram 9.45".*

Whilst Diagram 9.45 is referenced in the text, the diagram is labelled as Diagram 9.44 it shows the following:



The diagram is somewhat confusing and does not clearly identify to our clients how it will be possible for them to access their dwellings during the construction phase. It would appear to indicate a 90degree turn off the temporary bridge that will extend across from the east of Shandon Mills complex some 300m west of the existing access. This would appear to be across the canal between the first and second lock at Royal Canal

Lock 6, although the poor quality detail of this drawing makes it unclear.

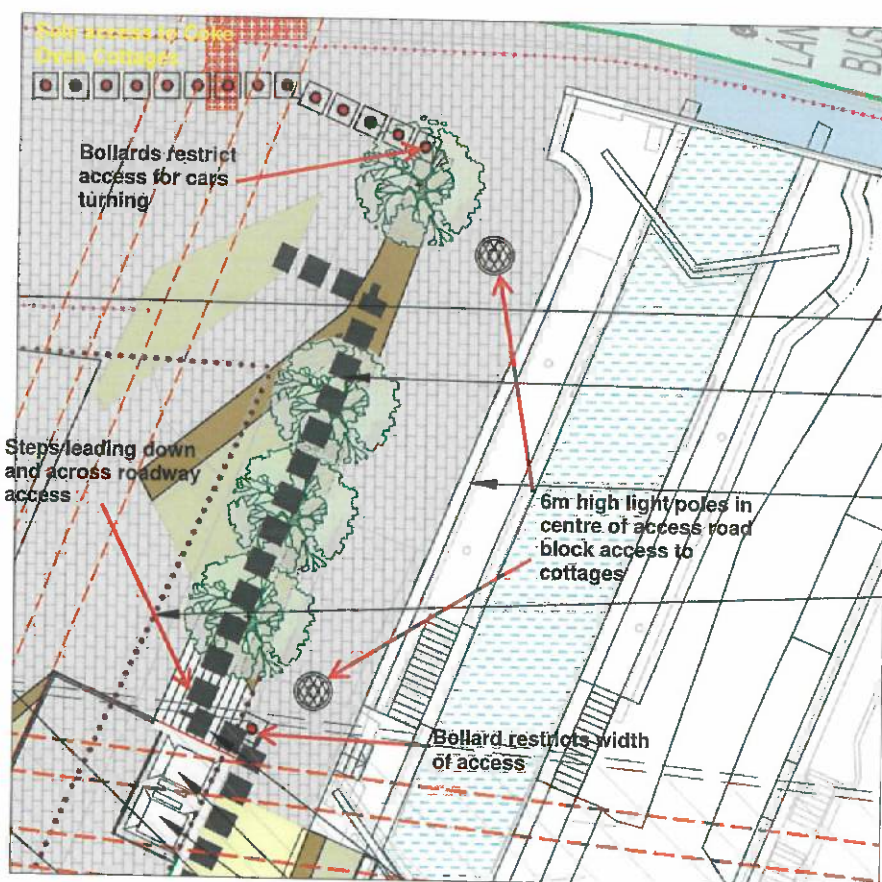
We note that the Railway Order does not identify how long these interim access arrangements will be in place, although it identifies that the construction of the Glasnevin Station will take some 102 months (8.5 years). Such a length of time will seriously disenfranchise our clients ability to access their properties. Our clients would request that the applicant identifies:

- *What length of time will the bridge referenced on page 152 of chapter 9 of the EIAR be in operation?*
- *Has the proposed route to Coke Oven Cottages been designed in order to be accommodate Emergency vehicles/bulk gas deliveries/septic tank waste disposal/postal deliveries?*
- *Have swept path analysis been undertaken to establish that the above traffic can safely utilise the temporary bridge in a safe manner?*
- *Have local residents (on the south bank of canal) been consulted with regard to the additional traffic movements required to access the cottages as a result of these temporary access arrangements?*

In addition to the station and tunnel construction, we note that works to the rear of their properties is also proposed under the Railway Order. The Irish Rail Tracks are proposed to be realigned, and a new retaining wall erected along the south-side of the railway adjacent to our clients' houses (refer to Drawing no. ML1-JAI-ARD-ROUT\_XX-DR-Y-03081 / Plan no. ML-RO 304 8-9). It is again unclear how long these works will take.

### **Operational Phase of the proposed Metrolink**

Our clients at Cove Oven Cottages have extremely serious concerns in relation to the operational phase of the proposed Metrolink at Glasnevin Station and the proposals in its immediate vicinity. Our clients would request that the applicant and An Bord Pleanála ensure the safeguarding of our client's access to their properties in a safe and sound manner. The current proposals appear to remove the vehicular access to their property; as well as creating pedestrian pathways across the access road along the towpath that would create a traffic conflict. The submitted surface level drawing of the Glasnevin Station indicates 2 no. 6m high lights located centrally within the access road to our clients' cottages.



Excerpt from Drawing no. ML1-JAI-SRD-ROUT\_XX-DR-Y-02057 (Plan drawing no. ML-ST 304 N-01) indicating access to cottages in broken red line



The drawings provide a lack of clarity between the existing width of the towpath and the new towpath. Bollards along the main road also appear to restrict access for north travelling cars. The steps from the station concourse at street level that provides a connection to the canal will result in pedestrians blindly walking onto the access to the cottages, which is compounded by the position of the lifts abounding the steps and access road. This will result in a serious traffic and pedestrian conflict. The bollard on the road at the base of the steps will also further restrict our clients ability to access their property.

We respectfully submit that it is clear that currently our client's access arrangements are not being upheld. It is critical that both greater clarity is provided and design changes are made to ensure that their access is maintained without creating unrequired traffic conflicts. These changes should ensure the following:

- Ensure that the residents of Coke Oven Cottages have their full vehicular/pedestrian/cyclist access via the towpath roadway restored upon completion of the Glasnevin Station;
- Ensure that their right to turn left or right at the Cross Guns Bridge exit is restored after the Glasnevin Station works are completed; and
- Any proposed signage to be agreed relating to the 'Rights of Way to be Respected' relating to Coke Oven Cottages.

### **Noise and Vibration Construction Impacts at Coke Oven Cottages**

The EIAR identifies in section 5.4 "Summary of Construction Programme" that the estimated construction timeframe for the Glasnevin Station is 102 months. Section 5.2.4.2 identifies that there will be specific works which require additional working hours including 24 hours working activities that are indicated as being adjacent to our clients.

Chapter 13 of the EIAR, and entitled Airborne Noise and Vibration identifies that one of the gardens to the rear of Coke Oven Cottages was selected as one of the noise monitoring locations (Table 13.29, ID UT39) and Table 13.31 identifies that Coke Oven Cottages was one of the vibration monitoring locations (VM01).

Our clients are extremely concerned about the reference in the EIAR to the fact that there will be 24 hour construction works, 7 days a week at certain locations in order to undertake specific activities, and the lack of clarity in terms of noise attenuation and mitigation being proposed. We note that Glasnevin Station, and works associated with it, is identified as a location for this format of intense construction activity. This is of particular concern to our clients at Coke Oven Cottages due to their house's proximity to the proposed station and the expansive works in the vicinity of the station including works to the existing rail line, and the lack of noise attenuation proposed.

Our clients note with particular concern that the EIAR Table 13.63, p.99, chapter 13 entitled "Glasnevin – Track Possession Works – Potential Night Time Significant Construction Noise Impacts", specifies that the predicted magnitude of impact at Coke Oven Cottages (referenced in the Table 13.63) is "Very Significant to Profound". Despite this, there appears to be a complete lack of noise attenuation proposed. It is incumbent on the applicant and the Board to address this failing of the application.

The acknowledgement of the very significant and profound noise impact of the proposed construction period within the EIAR document is alarming to our clients and will without doubt profoundly negatively impact their residential amenity including their ability to sleep during these 24 hour construction periods which is of particular concern to all the residents of Coke Oven Cottage but in particular given the fact that one of the our clients households includes a child with special needs. Yet there is no specific timeframe identified to highlight the duration of the proposed 24 hour works associated with the delivery of the new Glasnevin Station.

Nor is there specific information provided in relation to proposed noise/vibration barriers, their location, their height or the materials they are to be made from. We note that section 13.6.1.2, p.138 of chapter 13 of the EIAR makes general statements in relation to noise mitigation:

*"The key principals relating to noise mitigation will be applied across all construction areas for the proposed Project:*

- *Noise control at Source: Selection of quiet plant, site layout, attenuation at source, operational control (hours and periods);*
- *Noise Control along Pathway: Localised screening to plant items on site, enclosures, site*



- buildings, site hoarding and noise barriers; and
- **Noise Control at Receiver: Noise Insulation (NI) and Temporary Relhousing (TRH)".**

Our clients as sensitive receptors in the vicinity of the proposed works associated with the construction of Glasnevin Station and associated works as acknowledged within the EIAR are extremely concerned at the lack of detail relating to noise attenuation screening, noise/vibration barriers and equally they are concerned at the fact they have not had any engagement from the applicant in terms of noise insulation measures to their dwellings or alternative arrangements. It is incumbent that the highest possible noise attenuation standards are applied at each of our clients' properties to ensure that they are not disenfranchised in terms of their residential amenity during the construction process.

#### ***Noise and Vibration Operational Impacts at Coke Oven Cottages***

We note that the Railway Order provides little detail in relation noise and vibration impacts generated as a result of the additional train movements on the western railway line, and the implications of reducing the railway lines and re-aligning the rail lines to the rear of Coke Oven Cottages. The Railway Order does not indicate any additional mitigation / noise attenuation measures to be proposed to the rear of the Coke Oven Cottages. It is critical that appropriate noise mitigation measures are implemented both during construction, as highlighted above, as well as during the operational phase of the project. The overall project has the potential to result in a significant increase in the level of train traffic on the main line to the rear of the cottages, and it is incumbent, as this is a cumulative impact of the project, that adequate noise attenuation is provided to all of our clients.

#### ***Lack of Appropriate Signage in the vicinity of Coke Oven Cottages***

There is no specific reference or image of a vehicle on this "share with care" sign despite the fact that residential vehicles form part of the user group which will have to share the public space in the vicinity of the station. Our clients at Coke Oven Cottages are extremely concerned in terms of the lack of proposed signage in their vicinity. The residents currently have a right of way access to their homes via the towpath along the Royal Canal from a position to the immediate north of the Cross Guns Bridge.

It is important that the applicants for the proposed Metrolink and users of the towpath are aware of this long established right of way since 1847. This needs to be appropriately expressed in the form of a series of signs along this stretch of towpath/greenway when travelling from the west and east at either end of this section of the pathway where vehicles have the ability to share the surface, but are also required approaching the cottages from both direction. This is required both during construction and the operational phase of the Proposed Development.

It is imperative that new users realise that there are residential vehicles using this part of the towpath and that this is a shared space particularly given the fact that the proposed Glasnevin Station will increase activity both at the station itself and along the towpath.

It is our considered opinion that signage is a key aspect of the day to day management of this part of the towpath/greenway on which our clients are located going forward and is of particular importance in the vicinity of Coke Oven Cottages as a public safety alert mechanism well in advance of the approach to the residences given the range of users at this location and the high potential for conflicts between users. This is compounded by the proposed development.

Alert signage which specifies that residential vehicles and maintenance vehicles use this area of the greenway should be placed at the entrance off Cross Guns Bridge (i.e in the vicinity of the proposed Glasnevin Station) and on approach to Coke Oven Cottages; and from the west also at the tunnel at the 7th Lock signage. Our client contends that several signs are required, including wording which indicates a shared surface of car vehicles, pedestrians and cyclists. Our clients respectfully request An Bord Pleanála to take these suggestions onboard.

Existing and new users of the towpath who may be accessing the proposed Metrolink Station need to be made aware that the towpath in the vicinity of Coke Oven Cottages is distinctive in that it is shared with residential vehicles, the provision of signage should play a key role as a public alert mechanism to ensure that all users at this location are catered for in the interests of public safety. This is particularly important due to the fact that the proposed greenway amenity along this part of the Royal Canal will continue to attract increased levels of recreational as well as commuter users wishing to access the new Metrolink. An accurate, clear, coherent

signage strategy should have been treated as an integral part of the design process of the Metrolink and any signage needs to be maintained.

#### ***Lack of creosote surveys***

Based on local knowledge it is our understanding that there is creosote soil/lining within the vicinity of the canal corridor that may be disturbed by the proposed development. This is not referenced in any of the documentation submitted with the Metrolink application. This has the potential to have a significant and materially negative impact on the sensitive environment of the canal. Our clients also raised this as an issue within the recent Part 8 application by Dublin City Council for the proposed Green Way. It is considered that full surveys are required in order to identify the location and a methodology for dealing with this as part of the construction process in order to ensure that no adverse environmental impacts occur during the construction phase of the proposed development. We respectfully submit that it is highly questionable that these works can be undertaken without having such negative impacts.

#### **5. Conclusions**

We respectfully submit that there is an inherent need to uphold reasonable and safe access to our clients' properties both during the construction and operational phases of the project. The current Railway Order lacks clarity in terms of the temporary access to be provided during the construction phase, and appears to have completely removed vehicular access following completion of works. This would appear to be a significant error on behalf of the applicant that is required to be amended as a matter of urgency.

There is a need to ensure our clients have access, service access and delivery access to their properties at all times, and it is critical that this is dealt with as part of the Railway Order process.

In addition, it is imperative, due to the increased number of users that the station will generate along this shared towpath that an improved signage and management system is put in place. This is to ensure public safety and accessibility for all users of this section of the Metrolink, the proposed Green Way and our clients' dwellings.

The increase use of the roadway in front of Coke Oven Cottages has already led to significant conflict between users due to the fact that non-car users are unaware of the fact that the pathway is also open to be accessed by residents seeking to access their houses by cars (as well as service and other vehicles). This has led to our clients being verbally abused on a regular if not daily basis. One of the reasons for this are due to the failure and lack of adequate signage and management of users.

It is also incumbent on the applicant and the Board to provide the highest quality noise attenuation barriers to be erected to the rear of their properties both during construction and operational phases of the Proposed Development so that the noise impacts are adequately mitigated to ensure that the noise impacts are minimal and are mitigated to an unacceptable level.

It is incumbent on the Metrolink project and An Bord Pleanála to review this prior to making a decision on the Metrolink proposals. Unfortunately, there is a complete lack of consideration of how this stretch of the canal will be managed for all users. A unified approach is important, the absence of an agreed strategy will inevitably lead to conflicts, and due to the narrowness of the roadway around the Cross Guns basin will inevitably lead to a traffic hazard as a greater number of people use the pathway.

Irrespective of this fact, it is incumbent on the applicant to review their current proposals and confirm our client's ability to access their properties in a safe and controlled manner both during the construction and operational phases of the proposed development.

We trust that An Bord Pleanála will give due consideration to all matters raised in this submission.

Yours faithfully,



Anthony Marston (MIPI, MRTPI)  
**Marston Planning Consultancy**