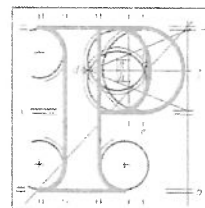


Our Case Number: ABP-314724-22



An
Bord
Pleanála

Juliana and Joe Boland and family
Nevinstown Lodge
Nevinstown
Swords
Co. Dublin
K67 K6H6

Date: 04 April 2025

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 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.

If you have any queries in the meantime, 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,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

RA05

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Juliana and Joe Boland & Family , Nevinstown, Swords, Co Dublin RE: ABP-314724-22

Juliana Moran Boland
Nevinstown Lodge
Nevinstown
Swords
Co Dublin
Ireland
K67 K6H6

Mob 00353 87 2478392

julianamoran@yahoo.ie

26th March 2025

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

RE: Case Ref. ABP – 314724-22
Railway (Metrolink - Estuary to Charlemont Via Dublin Airport) Order (2022):
Amended submission dated 31st January 2025
Response to Wild Ireland Defence

AZ1 Northern Section (Estuary Station, Car Park, Alignment as far as Dublin Airport North Portal

Observations/Arguments re proposed Metrolink route in Swords area submitted by:

Juliana and Joe Boland and family
Nevinstown Lodge
Nevinstown
Swords
Co Dublin
K67 K6H6

Joe Boland Motor Salvage
Nevinstown
Pinock Hill
Swords
Co Dublin
K67 P788

Map references:

Plan Drawing No. ML-RO301 V-W

House Adjoining Business premises of Joe Boland Motor Salvage owned by Boland Family (Patrick Joseph Boland) : proposed to be demolished – Advised by TII that permanent CPO will be necessary due to direct alignment and pumping station.

Joe Boland Motor Salvage: K67 P788 (Business premises) – Advised by TII that permanent CPO will be necessary re open cut section of alignment at back of yard and underground through the middle of the property with service road through property

Family Home: at K67 K6H6: proposed to be demolished – Advised by TII that permanent CPO will be necessary due to alignment.

Further Ref Details of Properties owned by Boland family to which CPO is applicable are referenced on submission by TII as Area 301 Land Tag number:

ML 1 U-A11 family home K67 K6H6

ML 1 V-A2 family home K67 K6H6

ML 1V-A5 family home K67 K6H6

ML 1V-A6 family home K67 K6H6

ML 1V-A7 family home K67 K6H6

ML 1V-A16 Cottage owned by Boland family

ML 1V-A18 Cottage owned by Boland family

ML 1V-A19 Joe Boland Motor Salvage business premises K67 P788

ML 1V-A20 Joe Boland Motor Salvage business premises K67 P788

ML 1W-A1 Joe Boland Motor Salvage business premises K67 P788

Dear Sirs

Thank you for inviting us to make a submission.

I have read the lengthy submission made on 31/1/25 re Response to Wild Ireland Defence.

While I claim no professional qualification with regards to our wild nature from a personal view point it is important that ABP bear in mind that part of the reasoning for Dublins need for a Metro is to protect the environment.

The Metro is a large infrastructure project by its very nature will have long term impacts on the wild life particularly abundant on the north of the Airport.

Mention is made several times in the applicants response that mitigating factors will prevent any adverse consequences and infers that wildlife wont be affected or that they will find new foraging areas. Examples Refer to 2.2.1, 3.2 and 3.3.1

From a personal insight I can tell you that for instance the foxes which used our garden as a thoroughfare to gain access to / from the 'forest area' opposite our house (behind the Texaco garage) still cross through our garden trying to find their previous home, which now has houses and an apartment block currently under construction, Fosterstown, Swords on the

R132 / Boraimhe / Airside Junction. They sit on the wall at the front of our house and 'bark', they also go into the construction site, presumably looking for their previous home.

With regards to the PFAS and water quality it could be years before any adverse affect is shown by which time it could be too late for our water wildlife. Stating that they may find new homes surely is what we are trying or at least should be trying to prevent.

Wild animals follow routes set down through generations, each new generation learning the routes from their elders as with the African Bush elephants in Namibia, I am very sure that our wild sealife and the migratory birds follow the same generational learning.

I worry that in our fight to save the environment we are actually doing more harm than good.

I thank you for giving us this opportunity to put our observations to the Bord and wish you well in your considerations.

Yours sincerely

A handwritten signature in cursive script that reads "Juliana Boland".

Juliana Boland

For and on Behalf of Juliana and Joe Boland and family

2.2.1 Potential Impacts on SCI species at Dardistown As set out in the RO application NIS, the proposed Project does not traverse, nor is it located directly adjacent to any European site; as a result, there is no potential for direct habitat loss (including ex-situ) and/or fragmentation to occur. As noted in the RO application NIS, SCI listed bird species that were previously recorded both within the proposed Project Boundary, and within 300m off, may be connected to the local SPA populations. The RO application NIS documented that there was no potential for the proposed Project to directly affect the SCI bird populations of those SPA sites as a result of any habitat loss at inland feeding (exsitu) or roosting sites remote from the SPA sites in any measurable way, including at Dardistown for reasons documented in Section 6.1.1 of the RO application NIS. These included: (i) the relatively low frequency of occurrence of SCI bird species, evidencing that these species do not regularly use or rely upon these lands as foraging and/or roosting habitat; (ii) the relatively low numbers of SCI birds recorded, evidencing these sites are not significantly important to the corresponding SPA SCI populations; and, (iii) the availability of large areas of suitable foraging and/or roosting habitat for these SCI bird species in the wider locality of the proposed Project, including those in closer proximity to the nearby SPAs. Furthermore with the implementation of standard best practice international mitigation (prescribed in Section 7.4 of the RO application NIS), the conclusion presented in the NIS does not change. Notwithstanding the temporary storage and testing site is located at Dardistown, within the Metrolink Red Line Boundary and which will ensure the absence of any possible pathways for PFAScontaminated soil or water or runoff entering the receiving environment, the following holds true: The proposed Project is sufficiently remote from any European sites that there is no possibility of any disturbance effects to affect any Special Conservation Interest populations within any SAC or SPA sites. Therefore, there is no possibility of any other plans or projects acting in combination with the proposed Project to adversely affect the integrity of any European sites as a result of any such disturbance effects associated with the proposed Project (See Appendices I – IV). The outcome of the PFAS analysis after the implementation of the robust mitigation strategy, is that the proposed Project will manage, contain and prevent the spread of existing PFAS from entering any pathways that could interact with European sites.

3.2 Changes to Published Conservation Objectives Initially, 17 European sites were identified as being within the zone of influence (Zoi) of the proposed Project (NIS Section 8). During the Oral Hearing, an AA Update Report was submitted, which included a scoping exercise. This exercise identified additional sites within the Zoi, specifically the North-West Irish Sea cSPA, Seas off Wexford cSPA, Saltee Islands SPA, and Wicklow Head SPA, all of which are at risk of potential effects from the proposed Project, including in combination with other plans or projects Table 1 confirms the status of the European sites and summarises any changes that have occurred since the closure of the Oral Hearing. Table 1 identifies all European Sites within the ZOI and identifies any changes to the SCCOs since the Oral Hearing There have been changes to several European sites due to revisions in the Conservation Objectives documents. For SPAs, this primarily involved updating from First Order Conservation Objective documents to Site-Specific Conservation Objective documents, a process that is currently ongoing. Recently published site-specific Conservation Objectives include those for Dalkey Islands SPA, Howth Head Coast SPA, Ireland's Eye SPA, Lambay Island SPA, Skerries Islands SPA, and The Murrough SPA. These details are provided in Appendix IX, as well as Wicklow Head (Appendix V), Following a thorough examination, analysis, and evaluation of the relevant information (as detailed in Appendix V and IX), it has been determined that the revision of site-specific targets and attributes does not alter the outcome of assessment presented in the RO application NIS and Oral Hearing AA Update Report . The conclusion remains that the proposed Project will not adversely affect the integrity of Wicklow Head SPA, either directly or indirectly, alone or in combination with other plans or project. The publication of site specific conservation objectives for Wicklow Head SPA (September 2024) happened after the closure of the Oral Hearing. The SPA, had previously been assessed in the AA Update Report submitted during the Oral Hearing. Its assessment at that point arose following a documented change to the foraging range of Kittiwake² (since the submission of the original AA Screening and NIS). The revised foraging range indicated Kittiwake could potentially during the breeding season utilise foraging habitats within the ZOI of the proposed Project. The changes in respect of Wicklow Head SPA presented in this report relate to the recent publication with site-specific Conservation Objective as published in September 2024. The assessment is presented in Appendix V. Despite the changes in the Conservation Objectives targets and attributes, the conclusion of the reassessment presented in this report remains unchanged. Following a thorough examination, analysis and evaluation of the relevant information, (as detailed in Appendix V)), it has been determined that the revision of site-specific targets and attributes does not alter the outcome of assessment presented in the NIS and Oral Hearing AA Update Report. The conclusion remains that, considering the nature of the predicted impacts from the proposed Project, the implementation of the proposed mitigation measures, and the in combination assessment presented in Section 8 of the RO application NIS and Section 4 of the AA Update Report submitted on Day 12 of the Oral Hearing, as well as the proposed Project will not adversely affect the integrity of Wicklow Head SPA, either directly or indirectly, alone or in combination with other plans or project. As of 14th January 2025, with the publication of Site-Specific Conservation Objectives, all European sites, as noted in Table 1 have site specific conservation objectives.

3.3.1 Codling Fault Zone SAC Previously, the offshore Codling Fault Zone SAC [003015] was outside the effective ZOI of impacts from the proposed Project because its only QI habitat was: “Submarine structures made by leaking gases (1180)”. However, an Amendment Notice dated 20th March 2024 on NPWS website³ confirmed that the Minister had added Harbour Porpoise as a Qualifying Interest to the SAC. Harbour Porpoise has been included in the CO document with a set of target and attributes Based on the implementation of the Metrolink PFAS Management Strategy for Dublin Airport and the in combination assessment presented in Appendix VI, it has been concluded that with mitigation measures during construction and operation, there will be no impact from PFAS on European sites and their QIs/SCIs in the vicinity of the proposed Project. Consequently, there will be no effects on European sites further afield in the aquatic environment. Based on the assessment presented in Appendix VI of this report, there will be no adverse effect on the integrity of the Harbour porpoise as presented in the assessment for the Codling Fault Zone SAC QIs.

3.3.2 Lambay Island SAC Similarly Lambay Island SAC [000204] was considered to be outside the effective ZOI of impacts from the proposed Project. At the time of the Oral Hearing, its QIs were Reefs (001170), Vegetated sea cliffs of the Atlantic and Baltic coast (1230), Grey seal *Halichoerus grypus* (1364), and Harbour seal *Phoca vitulina* (1365). An Amendment Notice dated 22nd⁴ March 2024 on the NPWS website⁵ confirmed that the Minister had added Harbour porpoise as a Qualifying Interest to the SAC. It has since been added to the Conservation Objectives Document⁶. Based on the implementation of the Metrolink PFAS Management Strategy for Dublin Airport and the in combination assessment presented in Appendix VII, it has been concluded that with mitigation measures during construction and operation, there will be no impact from PFAS on European sites and their QIs/SCIs in the vicinity of the proposed Project. Consequently, there will be no effects on European sites further afield in the aquatic environment. Based on the assessment presented in Appendix VII of this report, there will be no adverse effect on the integrity of the Harbour porpoise as presented in the assessment for the Lambay Island SAC QIs.

3.3.3 Rockabill to Dalkey Island SAC Previously, Rockabill to Dalkey Island SAC, which has both Reefs [1170] and Harbour porpoise [1351] as designated QIs, was considered to be outside the effective ZOI of the proposed Project in the RO application NIS. However, the recent re-evaluation in respect of PFAS, along with the recent designation of Harbour porpoise as a QI for the Codling Fault Zone SAC and Lambay Island SAC, required that this SAC be re-evaluated. Based on the implementation of the Metrolink PFAS Management Strategy for Dublin Airport and the in combination assessment presented in Appendix VIII, it has been concluded that with mitigation measures during construction and operation, there will be no impact from PFAS on European sites and their QIs/SCIs in the vicinity of the proposed Project. Consequently, there will be no effects on European sites further afield in the aquatic environment. Based on the assessment presented in Appendix VIII of this report, there will be no adverse effect on the integrity of the Harbour porpoise as presented in the assessment for the Rockabill to Dalkey Island SAC QIs.