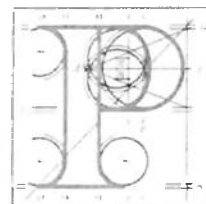


Our Case Number: ABP-316119-23



An
Bord
Pleanála

Dublin Cemeteries Trust
Glasnevin Cemetery
Finglas Road
Dublin 11

Date: 12 March 2024

Re: DART+ South West Electrified Heavy Railway Order - Hazelhatch & Celbridge Station to Heuston Station, and Hesuton Station to Glasnevin
County Dublin and County Kildare

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted.

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 relation to the matter 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,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

RA03

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Monday 11 March 2024 14:31
To: Jane Doyle
Subject: RE: ABP 316119- 23 Rail Order Response

A Chara,

The Board acknowledges receipt of your email, official acknowledgement will issue in due course.

Kind regards,

Lauren

From: Jane Doyle <jane@doylekent.com>
Sent: Monday 11 March 2024 14:22
To: LAPS <laps@pleanala.ie>; Lauren Griffin <lauren.griffin@pleanala.ie>
Subject: ABP 316119- 23 Rail Order Response

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/ Madam,

We act for Dublin Cemeteries Trust (DCT), Glasnevin Cemetery, Finglas Road, Dublin 11 and have been requested by DCT to respond to IE / CIE response to the submission made by our clients in September 2023.

We attach a detailed response prepared by Doyle Kent Planning on behalf of for Dublin Cemeteries Trust (DCT).

We request an acknowledgement of this submission.

Your Faithfully

Jane Doyle



t +353 87 626 3918 (Jane)
t +353 85 739 4853 (Karl)
e info@doylekent.com
w www.doylekent.com



An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

11th March 2024

Re: Case Number ABP - 316119- 23

Dart + South West Electrified Heavy Rail Order- Hazelhatch & Celbridge Station to Heuston Station and Heuston Station to Glasnevin, Co Dublin and Co Kildare.

Dear Sir / Madam,

On behalf of our clients Dublin Cemeteries Trust (DCT), Glasnevin Cemetery, Finglas Road, Dublin 11, we wish to respond to the Applicants Iarnród Éireann/ CIE response to the submission made by our clients in September 2023.

Our clients property is located on both sides of Glasnevin Cemetery Road Bridge (OBO10), St Pauls Glasnevin Cemetery, Finglas Road, Dublin 1, and includes the car park on the Finglas Road side and the Cemetery located on the far side of the railway bridge. St Pauls Cemetery is a busy burial ground being a more recent part of the Glasnevin Cemetery with most plots still having space for additional burials. On an average week St Pauls could have in the region of 12-15 burials with an average of two/ three burials per day, Monday through to Saturday. The burial times fluctuate from 10 am to 2pm each day and cannot be strictly timetabled due to circumstances beyond our clients control. Thus Dublin Cemeteries Trust need full access and associated car parking to be able to run their burial services in a dignified manner.

Our clients have had previous discussions with the Project Team where that have set out in detail the issues that most concern them in relation to the project works at this location. They are most disappointed with the Response Document prepared by the project team in relation to their specific concerns.

Our clients were sent a Draft Agreement on or about the 29th February 2024, which they have not signed up to and consider that this agreement does not give them any clarity or comfort on

the issues that they have continued to highlight in their engagement with this railway order process to date. They are not satisfied that the commitments made by the EI/CIE Design Team will minimise impacts and they continue to have serious concerns in relation to the manner in which they will need to operate throughout the construction period which will cause significant inconvenience to cemetery users including providing dignified burials throughout this period.

We have set out below our response to the issues with IÉ response to the issues raised in italics:

IE/CIE Response

1. -----the current proposal, which involves a temporary interruption to vehicular access to St. Paul's, was the most practical solution.

CIÉ/IÉ has committed to managing the construction stage of the DART+ South West project so that the impact on the Cemetery and funeral proceedings are minimised. The duration of the bridge closure will be kept to a minimum.

The proposed temporary pedestrian bridge will be sufficiently wide to accommodate access for pedestrians (and carrying of remains) during the period of its use. CIÉ/IÉ will agree details of access arrangements with Dublin Cemeteries Trust, with a view to making the temporary arrangements practical and dignified.

Due to the nature of the works, there will be a short-term impact on availability of car-parking and impacts on vehicular access to the St. Paul's section of the Cemetery. The project design and phasing has been planned to minimise the level and duration of impact. CIÉ/IÉ will continue to liaise with Dublin Cemeteries Trust in order to develop an operational plan for the construction phase that minimises impacts to the fullest extent possible, and enables a dignified access to the cemetery.

DCT Response

DCT need greater assurance in relation to maintaining safe and accessible pedestrian access to St. Paul's cemetery via the temporary bridge.

They also need to be satisfied that the bridge is wide enough to take a coffin to be carried by family members or if on customised electric trolleys with coffin bearer either side with adequate space either side to ensure the funeral procession can take place in a safe and dignified manner. DCT are not satisfied that the proposed width of the temporary bridge is adequate in this regard.

We note in the documentation that it is intended that the replacement of the existing bridge to St. Paul's will be completed in an overall period of approximately **3 months**. They also state that it is intended that the closure of the vehicular access can be limited to approximately **3 weeks**. We are seeking clarification on what precisely is meant by stating that the vehicular access can be limited to 3 weeks. Is it intended that it will just take 3 weeks to replace the bridge and that after a 3 week period a hearse and funeral cars can travel across the new bridge as referred to above.

Bridge Closed

- *IE will fund the keeping of the vehicles and other equipment deemed necessary by GCT within St. Paul's cemetery during the period that the bridge is closed. The list of GCT requirements in this regard is attached at **Appendix 2**.*

DCT need confirmation that IE will also source and supply the hearse and mourner vehicles for people with limited mobility;

- *IE will fund the rental of a motorised trolley to assist with carrying coffins across the temporary pedestrian bridge, if required.*

This **will be** required if DCT cannot access the bridge with a hearse.

- *IE will provide security for this equipment during the construction phase.*

DCT need confirmation as to the precise location and nature of the security arrangements for housing equipment.

Construction Stage

IE will ensure that appropriate space is provided in the remaining area of the St. Paul's car park for a hearse and mourning cars to park and for safe access to the temporary pedestrian bridges for funerals.

The size of the temporary construction compound has been kept as small as possible in order that some car-parking spaces (estimated at 16 No.) will remain available to the public.

*The parking/ access measures will be closely linked to the **communications plan** included above.*

DCT Response

The Response received gives us no comfort in relation to parking. The holding area for hearse and associated cars and the management flow of cars in and out, particularly for more than one service arriving at the same time will create problems for those trying to use the car park. We note that IE will employ a security guard to coordinate construction traffic. However to allow for an efficient flow of cars in and out of the car park there will need to be a dedicated traffic attendant employed to manage traffic for those attending funerals. No details have been agreed as to how and who will employ this person.

Are these spaces in additions to C 5 space for hearse and funeral? This is too open-ended and does not give any comfort and DCT need to review the location for an alternative temporary parking location. Can an alternative location be sought for the construction compound, with large areas of green space available immediately outside the car park.

DCT are not satisfied that adequate space will be provided for funeral arriving and space for transferring remains in a safe and dignified manner with those attending the funeral, including the turning area for cars. The area proposed for parking and turning a hearse and mourning car is inadequate in area particularly if one funeral is arriving as one is leaving together with associated limousines and family cars arriving and departing. Leaving just 12 car parking spaces with no alternative area identified will lead to delays and traffic chaos and also unauthorised parking on adjacent residential streets.

We note the reference to removal of entrance/ exit barriers

DCT need to be satisfied that they can gain access to their cemetery site - we are seeking clarification on repositioning if the current entrance/ exit barriers to facilitate construction traffic.

IE - Providing advance notice of any specific works that might cause noise or localised disruption (this will also be included in the communications plan above). Dedicated point of contact.

DCT need a commitment that noise and disruption will only take place before 10am or after 2pm.

Co-ordination of timing of construction activities, avoiding for example HGV traffic or major deliveries at the same time as funerals.

DCT consider that all deliveries should take place before 10am or after 2pm to avoid any interference with funerals. We request that this is included within any confirmation of the Rail Order by An Bord Pleanála.

*A **noise management protocol** will be developed by the construction company following consultation with GCT. This would include, for example, adapting construction activities when a funeral cortege may be passing the construction area and pedestrian bridge.*

DCT consider that a noise assessment and mitigation plan including a base line noise survey should be provided to GCT before this project is decided by An Bord Pleanála and furthermore a commitment that construction activities will not include noise related work throughout the burial services and not just as stated when a funeral cortege may be passing the construction area and pedestrian bridge.

2. Area identified for works compound is different to previous communications and need to be agreed.

IE Response to Issue Raised

The works compound location is dictated by the presence of the bridge and will be positioned largely in the same location as discussed with Dublin Cemeteries Trust. The scale and position of the compound has been optimised to find the most practical solution that enables railway works to be undertaken safely while minimising impacts on cemetery operations. The proposed

temporary pedestrian bridge will be sufficiently wide to accommodate access for pedestrians (and carrying of remains) during the period of its use. CIÉ/IÉ will agree details of access arrangements with DCT, with a view to making the temporary arrangements practical and dignified.

DCT need assurance that the temporary pedestrian bridge needs to be wide enough to facilitate remains being carried by families into the cemetery to ensure dignified unhindered access. Dimensions of this need to be clarified see comments above in relation to the proposed temporary pedestrian bridge.

See also comments above in relation to the inadequate size of the car park and location for arrival of a hearse and mourners cars.

3. Summary of Issue Raised – Alternative car parking to be provided outside the gates to allow attendance at funerals.

Response to Issue Raised

A number of parking spaces at St Paul's will be unavailable during bridge works at this location. CIÉ/IÉ has sought to minimise the area involved and the duration. CIÉ/IÉ will collaborate with Dublin Cemeteries Trust and with Dublin City Council to examine alternative parking arrangements during the construction period. The construction stage environmental management plan will address access and parking in more detail.

DCT consider that this does not give them any reassurance and consider that this is not a satisfactory response. DCT need a firm commitment including the precise location as to where suitable alternative parking can be made available during the construction period.

DCT do not consider that this issue should be left to the construction stage environmental management plan as it gives no firm commitment as to where the 30 odd displaced cars will be located throughout the construction period.

Conclusion

Having regard to the above, we do not consider that the Response received from IÉ/ CIE gives our clients the required level of assurance in relation to the safe and dignified level of service required for the operation of St Pauls Cemetery throughout the duration of the works at this location. We would ask the Board to agree with our conclusion and not to determine the rail order until the serious concerns raised are addressed by IÉ/ CIE.

Yours Sincerely

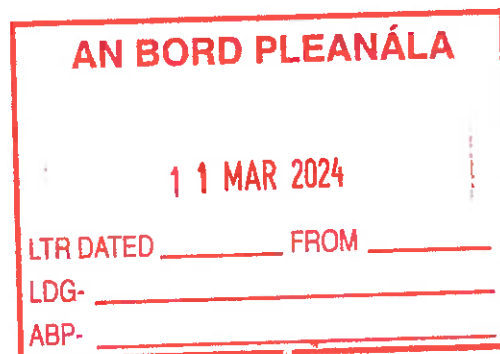


Jane Doyle

Doyle Kent Planning Limited

jane@doylekent.com

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902



11th March 2024

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Jane Doyle

Doyle Kent Planning Limited

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