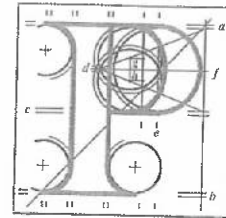


Our Case Number: ABP-316119-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Sharon Matthews
48 Kylemore Drive
Ballyfermot
Dublin 10

Date: 01 June 2023

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 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,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

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Observations for the DART+ South West Railway Order Application

Sharon Matthews
48 Kylemore Drive
Ballyfermot
Dublin 10

These observations relate to the section of the project between Le Fanu bridge and Kylemore road bridge.

Environmental Impacts

I am a Zoology graduate of Trinity College and have completed a course with Bat Conservation Ireland and the National Biodiversity Centre on bat identification. I am very concerned about some of the irreversible impacts this project will have on the EU and Irish protected bat and bird populations in my local area.

I have engaged with the Dart + South West project for the public consultations and the City Edge sub project. I informed the project of my concerns over roosting bats on Le Fanu Road Bridge and of my ideas for managing and maintaining local habitat and biodiversity in the Ballyfermot/Cherry Orchard area. I have confirmation emails of both engagements.

I have been documenting and collecting informal data about bats foraging around my back garden and the adjacent mature trees since 2018 and I have gathered data about birds and invertebrates in my locality.

I received a letter dated 04.10.21 about Ground Investigation (GI) work that was going to be undertaken on 11.10.21. I called the information number and spoke to RPS about my concerns for the bat roost on this bridge in October 2021. I first received an email from one of the ecologists saying:

All bridges/structures and trees likely to be impacted by the proposed development (including GI) have been assessed along the rail corridor through the following methods:

- Ground-based preliminary bat roost assessment to identify suitability for roosting bats;

- Bat emergence and re-entry surveys (at locations identified as having suitability for roosting bats) to confirm presence/absence of roosting bats; and
- Bat activity surveys at specific locations along the rail corridor to identify commuting and foraging bats.

I then had a phone call with the ecologist and the communications officer (notes were taken and emailed). I asked had bridge been surveyed specifically and was told that those raw data had not yet been processed and the Environmental Impact Assessment would be released in early 2023.

After reading through and assessing the EIA, I have found that two of the three bridges (Kylemore bridge and Le Fanu bridge in Ballyfermot) that are proposed to be demolished in this project have not been fully assessed/surveyed for bat roosts.

I have been in contact with RPS via a Teams meeting on 10.05.23. I told the ecologist that according to their EIA, the 2 bridges had not been assessed using bat emergence and re-entry surveys or static detectors or active detectors. I was told that the area would have been assessed to see if it was possible for bats to roost. Bats can roost in a small space like a crack in a bridge. I asked why these standard surveys were not done on these bridges but I was told the ecologist who did the surveying was on leave and they mustn't have been deemed suitable.

Static detectors were only used in 4 locations on the project. There were problems with batteries and data storage on these detectors.

Emergence/re-entry surveys were done (2022) after I had told RPS about the potential roost on Le Fanu bridge and still this bridge was not considered a candidate for one of these surveys.

I think my consultations with the proposed project and the concerns I raised in 2021 were not given proper assessment/importance and were not acted upon. I think I was not listened to even though I have local knowledge and relevant qualifications in the area of biodiversity.

Not enough time was given for residents to read the EIA and to put together a submission (circa 6 weeks) when the chapters are each 100 odd pages.

There were no hard copies of the EIAR available in the library for borrowing. I think this is not good enough for people who are not able to spend long-enough in the library to read the whole document. Also some people with disabilities/educational disadvantages are not able to read the information online, so I think it is justified to have a hard copy available to borrow.

In the EIA, it says that RPS were not able to gain access to these bridges because of health and safety issues. I do not think this is a reasonable excuse for not surveying these bridges. Iarnrod Eireann need to be able to access these bridges and could have accompanied the ecologists during their surveying.

There is public land directly adjacent to the Le Fanu bridge where entry and re-emergent surveys could have been conducted. This is a proposed construction compound (chainage 12+590)

Also, it says that they were not able to gain access to private gardens bordering the railway track. When I engaged with them in 2021, I told them I could get neighbours to agree to access these gardens but RPS never contacted me again.

The mitigation proposals (installation of 2 Schwegler 1FF and 2 Schwegler 2F bat boxes for Le Fanu bridge) are not enough for bridges that have not had complete bat surveys done. The proper investigations should have been undertaken before the project has reached this stage of seeking planning permission.

I do not think that employing just 1 ecologist and 1 clerk of works is sufficient staffing for such a large project.

The findings in the Biodiversity chapter (8) are not echoed in the 2 page Non-Technical Executive Summary.

I would like an EIA survey carried out by a different and/or independent organisation on these bridges for the presence or absence of bat roosts. I know there are Soprano Pipistrelles roosting in the Le Fanu bridge and would like this confirmed or not before this project is given the go-ahead by An Bord Pleanála.

Public Health

Air Quality

As part of the project there is mention of an increase in diesel trains because of increased capacity due to the new track layout. I received numerous information leaflets regarding the consultation process for the Dart South-west project. There was no reference to an increase for diesel train capacity. I found this out by reading the EIA.

This raises potential health risks from emissions of NO₂, SO₂ and particulates from these diesel trains. While nationally this might decrease

overall emissions, it is unlikely to decrease car traffic or truck freight in the local area, and so we face having an increase in pollution in Ballyfermot close to the tracks.

I'm asking if the Board can put restrictions on Irish Rail with regard to the potential to increase diesel trains. Potentially limit the increase in diesel train units. As well as require them to commission and publish more details reports on the impact of the local pollution from these units on residents, adjacent and near the tracks. And to install monitoring for NO₂, SO₂ and particulates along the tracks and to publish the measurements, real-time if possible.

I also have concerns about the air quality controls during the building phase of the project. The proposed mitigations of misting for dusting do not seem sufficient for the scale of the project works

Noise and Vibrations

I have concerns about the noise levels and vibrations, especially at night. The project has decided to prioritise the commuter comfort over the local residents in this instance. The areas of Ballyfermot affected are a mix of elderly, young families and working class people. They deserve to have a decent nights sleep. The proposed mitigations included community liaisons and possible relocations during the heavy works just isn't good enough as the threshold for relocations or what the project considers acceptable noise and vibration may not take into account individual circumstances. What might be acceptable noise or vibration for the average person could be intolerable for a disabled person, people with young families, elderly or people with mental health issues. The project will only consider relocations for people directly bordering the works and not in the immediate area, for example my family home is within 50meters of the works but would not be considered for relocation.

I ask the board to stipulation no night time works be permitted and to request Irish Rail lay on buses at Hazelhatch, Cherry Orchard etc, to Heuston for affected commuters.

Traffic Management

The traffic management plan calls for traffic to be diverted down Kylemore Avenue when Kylemore road bridge and le Fanu roads are closed or partially closed. This road is not equipped to handle the volume of traffic that these diversions will cause. The community will also be subjected to increase noise and pollution from closer proximity to the large volume of traffic. There is also a safety issue with regard to the playground that is adjacent to Kylemore Avenue. And, while Kylemore Drive is not part of the traffic management plan, traffic does divert down Kylemore Drive during heavy traffic periods to avoid the speed bumps on Kylemore Avenue and to try "skip ahead" of the backlogged traffic.

I ask the board to stipulate that traffic should be kept to the more suitable larger roads, i.e. Le Fanu Road, Ballyfermot Road and Kylemore Road. With suitable signage at the Ballyfermot roundabout and Le Fanu/Ballyfermot Road junction advising of the road closures.