

Shandon Residents Association submission — Metrolink RO case number 314724
48 Shandon Park, Phibsboro, Dublin 7 D07FX40

Metrolink submission (Railway Order) 2022

Ref: ABP-314724-22

Railway (MetroLink - Estuary to Charlemont via Dublin Airport) Order [2022]

Case number 314724

This submission is a response to the new information supplied during the course of the Oral Hearing on 13 March 2024.

Firstly, we would like to note that the proposed Metrolink project is welcome. It will hopefully help to solve some of Phibsboro's dire traffic crisis. The area is one of the key routes into the city and suffers from high amounts of daily air and noise pollution due to excessive throughput. By providing a clean, safe and connected public transport system, Metrolink should be hugely transformative for the area and its residents. By the incorporation of local knowledge, we hope that the project can be made even more valuable and its cost to the public be reduced.

Throughout the Oral Hearing (starting on Day 1), substantial new information was submitted by the applicant, much of which represented information that was missing or inadequately referenced in the EIAR and/or represented the subject of specific requests for the Applicant to provide information that had not so far been answered.

This submission is a response to the Additional Oral Hearing Documents, focusing on questions of concern to residents of Shandon Mill and Coke Oven Cottages and members of Phibsboro Village Tidy Towns and Royal Canal Cleanup Group, and in respect of which we do not consider that we have received any adequate response to date.

It is disappointing that there are currently no public minutes or recordings available of the Oral Hearing and none will apparently be available to reference [until after the case has been decided](#) [see ABP website].

We initially attempted to locate the answers to our questions in the documents uploaded during the course of the hearing. We were very grateful to the Independent Engineering Expert (IEE) for the review of the documentation provided during the Oral Hearing (issued on 9th August 2024) and for the invaluable help of RINA's Ruth Allington (IEE team leader) who helped us navigate the additional documents, as it was very challenging to find documents

relating to our concerns. However, the new documentation that she helped us access did not provide all the answers.

Subsequently, we sent the unanswered questions via RINA to TII/Metrolink on September 10th and only received a response back via email on September 30th.

In this submission, we provide our comments on each of TII's main responses from that document that relate to our questions — 27/9/2024 Response to RINA questions 1 and 2 received under cover of Jacobs Idom report dated 27th September 2024: *"Response to RINA Questions Regards the Second Statutory Consultation Material"* [Document reference ML1-JAI-CPS-ROUT XX-CO-Z-00023 P01.1].

Temporary bridge at Lock 6 (over the Royal Canal)

Our question: Will temp exit road now go through the Crossguns site rather than via Shandon Park?

TII/Metrolink response: No, as shown by the RO application, the temporary exit road will be through Shandon Park.

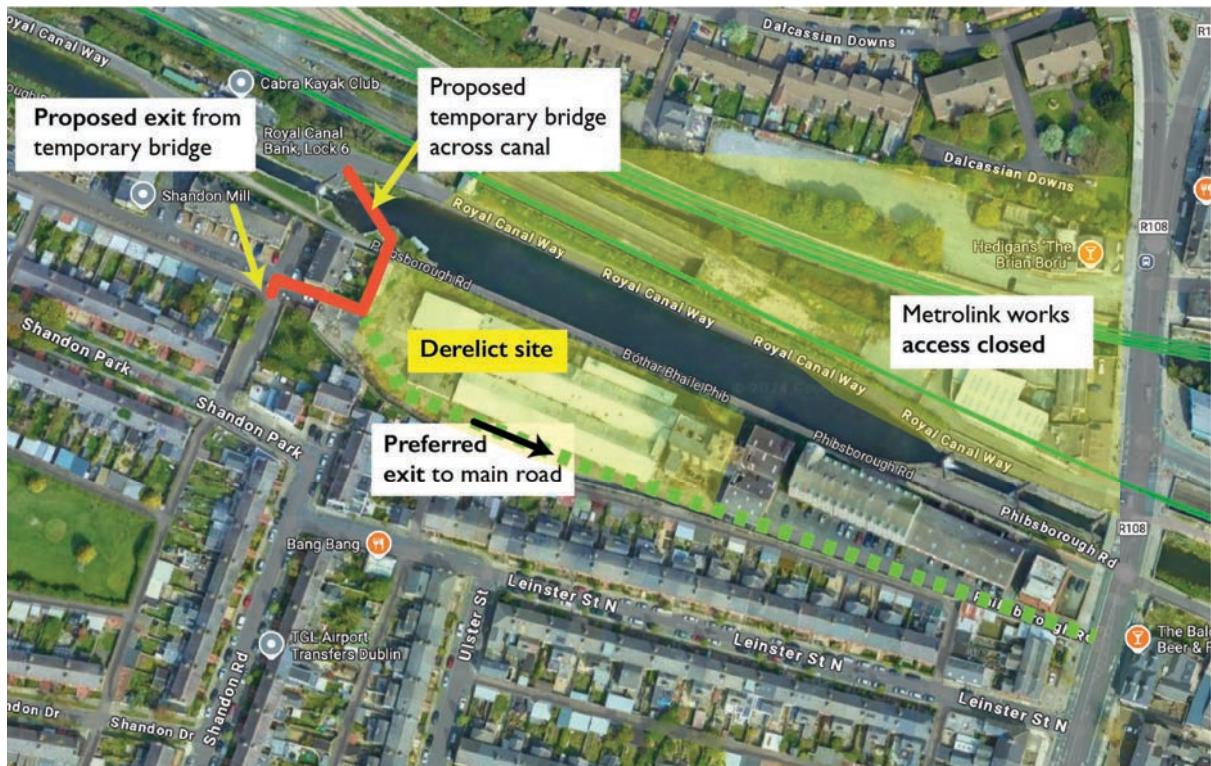


Figure 6.4 Proposed southern access to the temporary bridge

We have not been given any or any satisfactory reason why the temporary exit road cannot be routed through the Crossguns site rather than via Shandon Park, and it is disappointing not to find amongst the Additional Documents an explanation as to why this has been rejected by TII.

Our recollection, as recorded in our own contemporaneous notes from the Hearing, is that the inspector [was interested to know why TII would not consider this alternative] and also that he queried the proposed gradient of the bridge. Regarding the design of the temporary bridge (especially the gradient) and we asked the question in the Oral Hearing and included it in the questions emailed on September; the response from TII for this query was: *Whilst this subject was discussed at the Oral Hearing, no new drawing was requested nor produced for this bridge. TII confirms that the bridge will be designed to the relevant technical standards.*

There was no satisfactory answer during the Hearing or in the Additional OH Documents, or since, as to why the temporary access could not be routed through the derelict industrial site instead of through Shandon Mills. This would not preclude future development when the station is finished. There is also a remaining concern that the temporary bridge will be difficult to navigate for the size of the vehicles required to use it on the tight turns and steep gradient (as can be seen from applicant's proposal on previous page).



Additionally, this decision will cause huge disruption to local residents. All Waterways, DCC and Coke Oven residents traffic — including emergency services, septic tank vehicles and any other vehicles requiring access will be moved on to a very tight section of streets rather than exit onto the more logical Phibsboro Road. See above image showing the direct preferred route versus the tight exit as planned. The direct and straight route to Phibsboro Road will have a lesser impact and is already on built road surfaces. There are also repercussions for increased air pollution from these additional vehicles in the Shandon area.

The derelict Crossguns site is the logical and preferred route for the temporary residents' access and we are frustrated that the reasons for not considering it have not been explained. We strongly advocated for priority consideration to be given for an alternative temporary

access route from the temporary bridge through the derelict flour mill site not yet developed and we request that the Inspector requires a comparative analysis of the alternative routes to be carried out by TII.

Operational station and exits

We also sent the following concerns and questions concerning the station itself:

Our Question: Glasnevin Station Plaza design surface not accounting for heavy goods traffic (Inspector said proposed surface would be crushed after a few Waterways trucks, for example).

Response: *Whilst we do not recall the comment about the trucks specifically, TII can confirm that all surfaces will be designed to the relevant technical standards taking account of the traffic that will be using the route. Drawing ML1-JAI-SRD-ROUT_XX-DR-Y-02057 shows separation between the station concourse (vehicles excluded by bollards, planting boxes etc.) and the entrance to the tow path [and different surfaces indicated for both accordingly].*

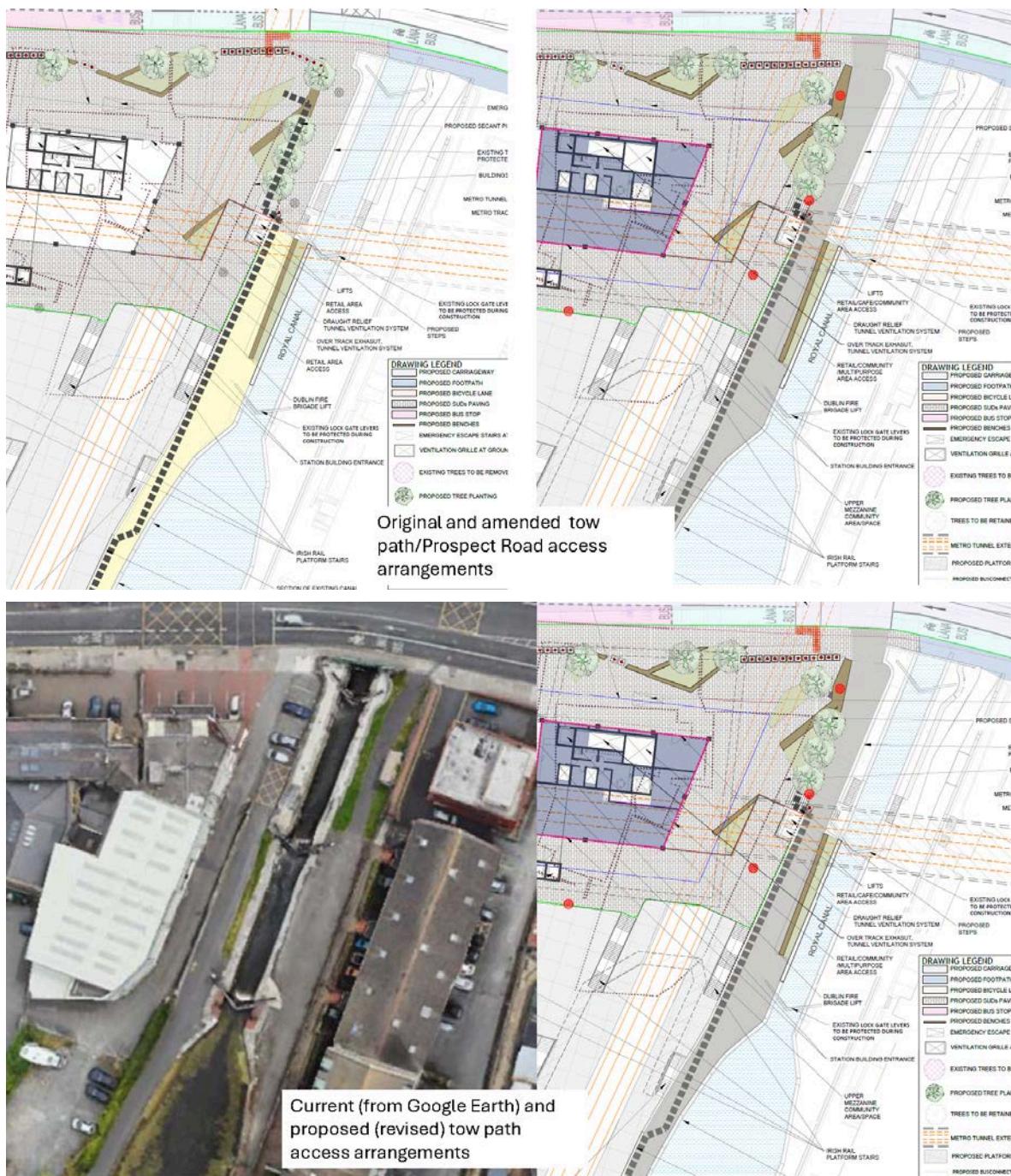
Also, as a related issue:

Our Questions:

- Traffic plan for exiting Station Plaza in operation specifics?
- How pedestrians and traffic will share space safely (images previously showed steel bollards in situ)
- Details on station design interior and levels. The slides appear to be what was shown previously.

Response: *Tow path access onto Prospect Road updated (includes: widened entrance, amended Prospect Road junction layout, changed surface treatment to delineate between tow path and Prospect Road footway, and relocation of two lighting columns to edge of tow path). Change of use within Glasnevin Station entrance building from previous proposed retail unit to "Retail / Cafe / Community Use" including addition of mezzanine level with associated access (lift and stairs)."*

From the below, if it has been widened, it isn't very obvious from the amended drawing:



Traffic management

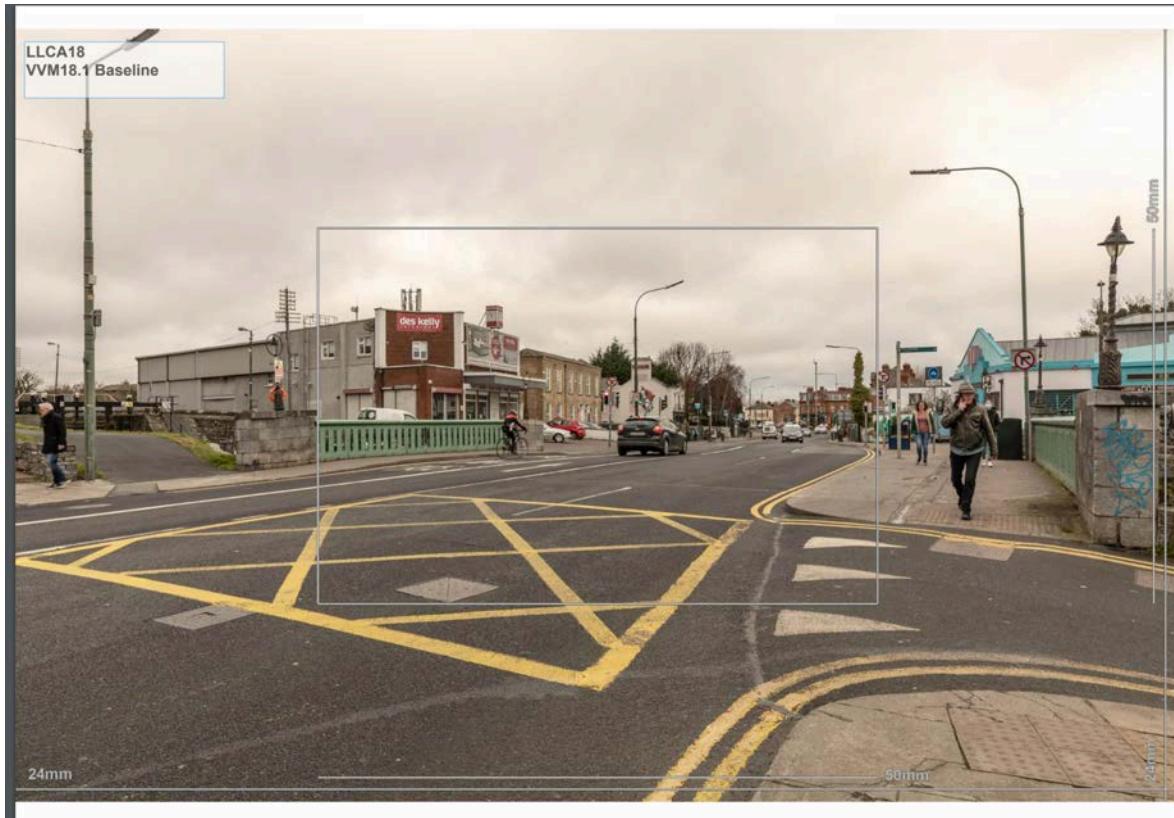
The updated photomontages ([Day 21, item 15](#)) and original photomontages ([Appendix A 27.1 to EIAR](#)) for Glasnevin don't show any discernible differences between the montage showing the SE corner of the station (page 192 of A27.1 and page 123 of the updated photomontages despite the changes to the layout and details shown on the amended drawing .

None of the images included in the Additional OH Information is helpful at showing the planting proposals; we can only get a vague impression of boxes and benches from the

views from the east and north (pages 194 and 196 in the original proposal and 126 and 128 in the updated version) – again differences between the versions are very difficult to spot.

See below sequence:

Baseline image is first, followed by no BusConnects and finally, BusConnects included:





It is difficult to discern the tow path access from the renderings as the camera angle is unhelpful.

The other view provided also doesn't show the access:



It would be important to have greater detail on how this junction will work operationally for the residents who rely on the tow path for vehicular access to their homes.

The only view available in the Additional OH Documents of the access point to Phibsboro Road has been [repeated from the presentation given at the oral hearing](#). This shows the surface that the inspector was concerned may not be suitable to withstand heavy vehicles and it also still shows problematic shared use between pedestrians and traffic.

See below image for reference:



There is no indication of the planting scheme or updated surface in the image.

It is impossible to reconcile the revised drawing showing the layout of the station (and access to the tow path with the amended photomontages and the presentation made at the Oral Hearing.

Environment

It was welcome to see the ecological oversight included for the project. It was also heartening to learn of the recent updates to Metrolink's EIAR on the Otter Mitigation Plan developed with the NPWS. Otters use the Royal Canal and are a species with strict protections in EU and Irish law.

Local residents deeply value both the ecological and amenity value of this precious green space in the city. It would be hoped that as the project is constructed, ecology is respected and adjustments made to ensure the best possible outcomes for nature.

Since this version of the Metrolink plans were originally developed, Ireland has now published the 4th National Biodiversity Action Plan 2023–2030. There is also the Dublin City

Biodiversity Action Plan 2021-2025 and the 2019-2021 Phibsboro Biodiversity Action Plan from Phibsboro Village Tidy Towns.

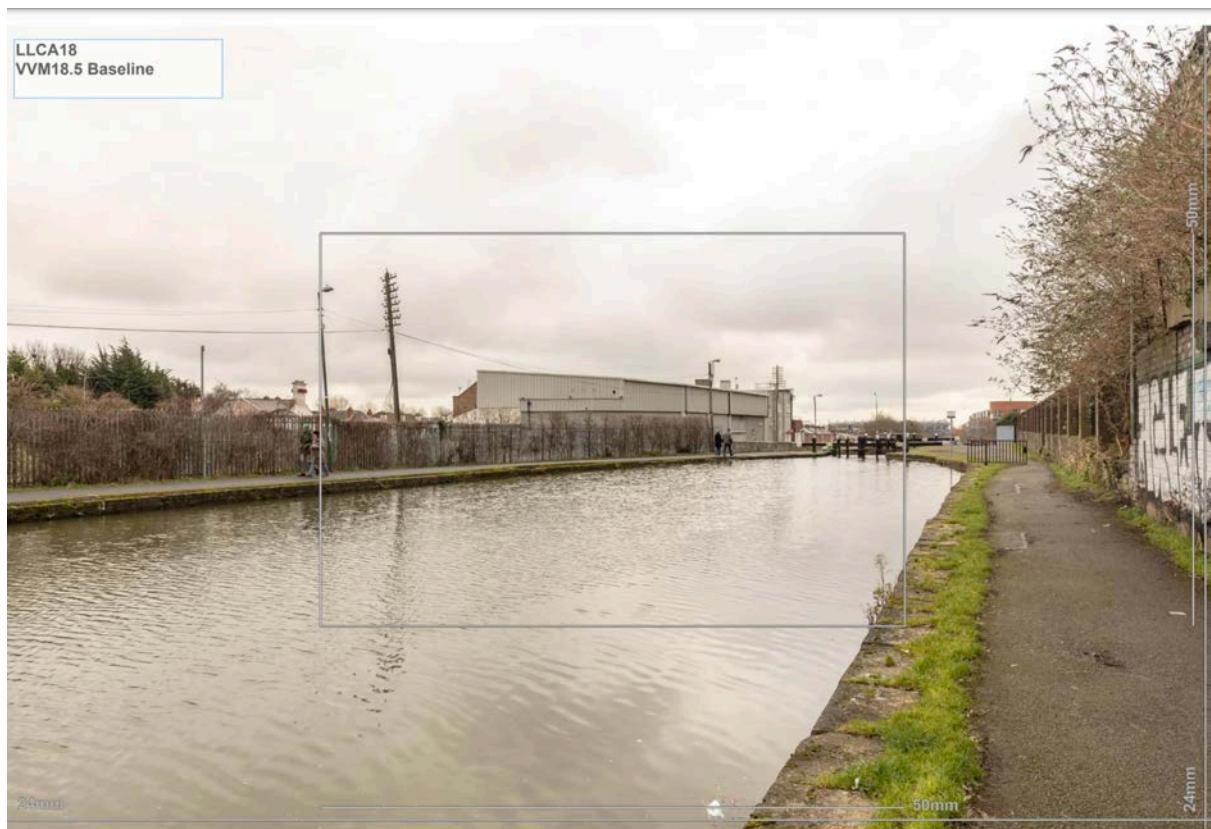
The proposed Natural Heritage Area of the Royal Canal is a key habitat corridor for urban wildlife including many species of bats, birds and insects. It's obviously important for the project to incorporate up-to-date information during the work process and abide by any changing guidelines. The project must respect and enhance local native ecology.

In the Metrolink EIAR Biodiversity Update (submitted on Day 12): Section 2.6, it says "Hedgerow loss in DCC is confined to a single hedgerow feature adjacent to the Royal Canal at Glasnevin. The loss of hedgerow in DCC will not result in a likely significant negative residual effect at any geographic scale."

We know the importance of ecosystem services provided by hedgerows including the ability to sequester carbon, increase biomass, mitigate air pollution and absorb excess water from more extreme weather events. We have asked that the current hawthorn and blackthorn hedgerow be reinstated post construction. The hedgerow affected by the project currently grows alongside the canal from Lock 6 to Crossguns Bridge.

We argue that this is a greater loss than has been stated in the report. Given that the Royal Canal is a habitat corridor and given our understanding of the vital services provided by hedgerows, it would make sense to ensure that a bigger and even more diverse hedgerow be planted to address the sad but understandably necessary loss during the construction phase.

We would still urge considerations to be given to greening alongside and there seem to be contradictory visuals available between the plans showing planters and the renderings (photomontages and artists' impressions) that don't.



As you can see, this above approach severs the idea of a habitat corridor along the canal.

The additional document [Metrolink Plan Biodiversity Policy Objective Note](#) (submitted on Day 19) does provide some very positive amendments on compliance to update actions matched on newer policy since the beginning of the process, including Sustainable Urban Drainage Systems and green roof elements. It also looks for a biodiversity net gain. But cutting off links to Royal Canal green infrastructure at this section is disappointing. And that this is seen as a 'should' but not obligatory.

We also unfortunately note in the Metrolink Plan Biodiversity Policy document that:

"It is a requirement under this policy for all suitable new buildings to incorporate swift nesting blocks into the building fabric. Although Glasnevin Station is theoretically suitable for erecting swift boxes in terms of height above ground (>5m) and having clear adjacent air space, best practice is not to place swift nest boxes next to plate glass windows as they pose a collision risk hazard². Given the Glasnevin Station is almost entirely constructed of glass, it would not be appropriate to erect swift nest boxes on that structure."

The rigid adherence to design features that lock out biodiversity when we are in a dire situation seems very short-sighted. The newest [EPA State of The Environment Report](#) shows the "overall current assessment for nature is 'very poor' (the same as in 2020). Deteriorating trends dominate, especially for protected habitats and bird populations, and Ireland is not on track to achieve policy objectives for nature."

There seems to be a lot of wasted opportunity and ambition for biodiversity net gain where the station is situated alongside such a vital habitat corridor where 'water is life'.

Other and continuing considerations:

Phibsboro will be deeply affected by the Metrolink works for a period of possibly up to a decade due to the complexity of Glasnevin's interchange station. Many residents live mere metres away from the extensive site. A brand new station is set to be built over two Irish Rail tracks and the Metrolink tunnel. The site is due to span from the edge of the Royal Canal at Crossguns and will remove from what is now Des Kelly's Carpets to the historic Brian Boru pub.

It's disappointing that the Brian Boru or Hedigan's Pub, in particular, will be completely eradicated for the construction of the new station as it is one of Dublin's historic landmarks. It has been a public house for over 200 years and was even referenced in James Joyce's Ulysses. The site was where Brian Boru's army camped before the Battle of Clontarf in 1014. Works on the Royal Canal began at Crossguns in 1790. It is also the point where the canal enters Dublin City. There doesn't appear to be any reference in the station design shown in the plans to its historic location. Could some remnants at least be incorporated into some elements of the design to reference these events?

Continuing unresolved considerations include:

- Early appointment of a liaison person is key. Continued request for ongoing meaningful dialogue with TII/Metrolink over the proposed timeline of the project. It would be infinitely preferable to solve problems with local residents groups as they

arise. Who will have oversight of potentially overlapping timelines across projects in the area between BusConnects, Royal Canal Greenway Phase 4 and Metrolink?

- Acknowledging the long history of the site either by design or incorporating some of past history into the new Glasnevin Station
- Adequacy and safety for service vehicles and emergency services as well as local residents for access via the proposed temporary bridge.
- Reduce impacts from new bridge on Shandon (security and amenity)
- The small existing hedgerow from Lock 6 to Crossguns Bridge does serve as an important corridor for wildlife. We strongly urge that this be reinstated better than before as it is an important landscape feature and should not be eradicated during this critical biodiversity crisis.

Finally, we want to acknowledge and express appreciation for all of the assistance from RINA and particularly for their help in arranging a very late stage but productive meeting before the Oral Hearing session on Glasnevin on 14th February 2024 with members of the Metrolink team to discuss some of the issues affecting residents.

It is extremely important to us that dialogue like that is restarted and continues for the support and benefits that such a collaborative approach will bring to this hugely valuable project.

Thank you.

**On the following pages is the summary briefing note prepared by the IEE and shared with TII following our meeting and site visit with Ruth Allington on 3rd February 2024, supporting local groups to help contextualise the plans and impacts on residents. These notes were used as an agenda for our meeting with members of the Metrolink project team on 14 February 2024. There are very important considerations that still are not being addressed in full and these notes have therefore been included for reference.*



Rialtas
na hÉireann
Government
of Ireland

Tionscadal Éireann
Project Ireland
2040

NTA
Údarás Náisiúnta Iompair
National Transport Authority

TII
Bonneagar Iompair Éireann
Transport Infrastructure Ireland

METROLINK



MetroLink Independent Engineering Expert Services

Briefing note on issues at Glasnevin Station
(Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT)



MetroLink Independent Engineering Expert Services

Briefing note on issues at Glasnevin Station raised by
Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT

Summary of issues and questions/requests for clarification from TII following meeting with residents and site walk on Saturday 3rd February 2024

- **Temporary access arrangements for Coke Oven Cottages during the construction period:**
 - Adequacy and safety for service vehicles and emergency services as well as residents' cars
 - Impact on Shandon Mill (security and amenity)
 - Loss of long term permitted parking for COC residents at Jerry Kelly's on Phibsborough Road
 - Request for consideration of an alternative temporary access track route through the derelict flour mill (Binden site not yet developed)
- **Permanent access arrangements for Coke Oven Cottages during the operational period:**
 - Request for clarification of proposed route for vehicles where Royal Canal Way (RCW) meets Phibsborough Road (possible error on RO structures drawing appearing to show RCW as insufficiently wide and pedestrian only across station concourse)
 - Ensuring safe width for residents' cars, service and emergency vehicles along RCW in the reinstated stretch, especially where it passes along the canal bank.
- **Request for clarification of duration of proposed MGWR track lowering activity N of COC and arrangements for relocation**

MetroLink Independent Engineering Expert Services

Briefing note on issues at Glasnevin Station raised by
Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT



Current access arrangements for Coke Oven Cottages via Royal Canal Way



1



2



Coke Oven Cottages (COC) is a row of cottages about 800m NW of Phibsborough Road along the Royal Canal Way (RCW) [Image 1].

RCW is the only vehicular access to these properties which rely on deliveries of bottled gas and other fuel and tankers to pump out septic tanks. It is also the only vehicular access for emergency vehicles.

Whilst residents have car parking in their driveways, there is an 800m long walk to get to the nearest bus stop. COC residents (some of whom are elderly and/or have mobility problems) have a long-standing agreement with Jerry Kelly's Carpet store to use the parking spaces in front of the store [Images 2 and 3] – this will cease to be available when the construction of Glasnevin Station commences.

2

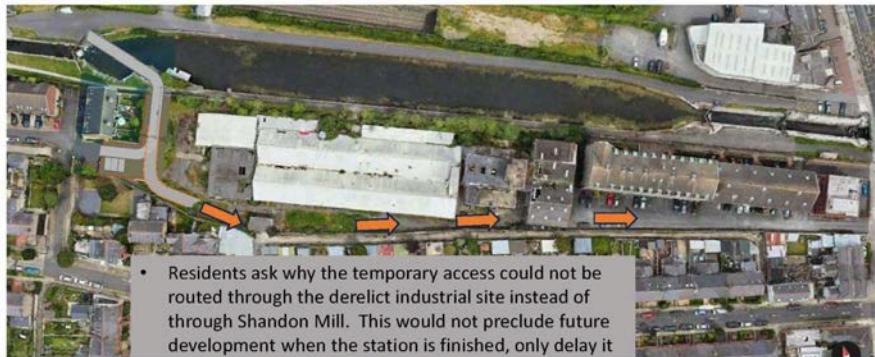
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Briefing note on issues at Glasnevin Station raised by
Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT



Temporary access arrangements for Coke Oven Cottages during the construction period

- COC residents seek assurances from TII that the proposed alignment and width of the temporary access road and bridge (especially the tight curves needed to go around SM) are suitable for all vehicles which will use it (service and emergency vehicles particularly)
- SM residents object strongly to their established development being subject to amenity, privacy and security impacts of the temporary access when there is a large derelict site to the East which could be used instead.



- Residents ask why the temporary access could not be routed through the derelict industrial site instead of through Shandon Mill. This would not preclude future development when the station is finished, only delay it

3

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Briefing note on issues at Glasnevin Station raised by
Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT



Permanent access arrangements for Coke Oven Cottages during the operational period:



Current access point to RCW from Phibsborough Road



Proposed arrangement where RCW meets Phibsborough Road

4

MetroLink Independent Engineering Expert Services
Briefing note on issues at Glasnevin Station raised by
Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT



The existing line of trees planted along the fence line by residents and members of the Royal Canal Cleanup Trust is becoming established and is valued as a developing corridor for wildlife. Residents ask could this be reinstated please?



Error on the photomontage showing the proposed Glasnevin Station from the Royal Canal? Residents ask why the image depicts a train at ground level behind the railing. Please clarify what is being shown here.



5

MetroLink Independent Engineering Expert Services

Briefing note on issues at Glasnevin Station raised by Coke Oven Cottages, Shandon Mill, Royal Canal Cleanup Group & PVTT



Residents of COC have asked for clarification of the duration of proposed MGWR track lowering activity N of COC and arrangements that will be available to them for relocation given the expectation of high noise levels (even with mitigation).

Since the meeting RA thinks she has found the answer to the duration of these works as follows:

- Page 67 of A5.5 (Glasnevin Construction Report) states

5. Track lowering for the MGWR railway west of chainage 850, will be carried out in a two week's full track lowering within the planned closure, which will not impact on MetroLink works.

- Reference to pages 84 (plan drawing of MGWR track lowering activity N of COC) and 86 (longitudinal section for the same stretch) show that this activity will be west of chainage 850, and therefore RA infers that the duration of the track lowering N of COC will be 2 weeks.

Please could TII confirm that RA's interpretation of the information is correct as well as providing COC residents with information on temporary relocation options for this period?

Environmental Impact Assessment Report Volume 5
Appendix 5.5 - Glasnevin Station Construction Report

JACOBS
IDOM

7. Interface with Irish Rail Works

The overall sequence of works in the Glasnevin Station area has been linked with the planned Irish Rail (IR) works in the area, and the MGWR works, principally, to the west of the station.

A review of key IRN flat areas, noise, visual screen and integration of the MetroLink programme with the planned IRN flat works are incorporated.

Assumptions for managing the classification and integration of the track lowering with MetroLink station construction activities:

1. IR works (track lowering & platforms construction) are independent of the MetroLink station works.
2. The works for lowering the MGWR tracks will be serviced by rail.
3. The works for lowering the MGWR tracks will be serviced principally by road.
4. Worksite areas, office and welfare accommodation will be independent of, and will not impact on MetroLink construction activities.
5. Track lowering for the MGWR railway west of chainage 850, will be carried out in a two week's full track lowering within the planned closure, which will not impact on MetroLink works.
6. Track lowering to the MGWR railway west of chainage 850, will be carried out during the planned closure of the MGWR works for the MetroLink station construction and programme to follow completion of the MetroLink works to construct a bridge to carry the track through the station on track.
7. The IR works for the MGWR track lowering will include construction of the southern and central platforms. This will be carried out within the planned closure of the MGWR works, and the MGWR, railway and the Central platform works will be undertaken in sequence after the MGWR is re-opened.
8. Track lowering for the MGWR railway will be carried out within a single 5 month's closure of the railway, which will incorporate the final works for adding the bridge in to place to carry the railway through the station.
9. The works to construct the northern and central platforms to MGWR will be carried out during the MGWR 5 month closure.
10. MetroLink access ramp will be designed and constructed so it can be used for IR works and will be removed by IR when the MGWR is re-opened of MGWR closure period.
11. The programme of the existing railway works assumes the CHLC is not in place and reinstated on completion of the station, not in Stage 3.
12. The MGWR CHLC is reinstated concurrently with track lowering works.
13. It is assumed that Diesel rolling stock will be used from Stage 4 onwards and will remain operational until the new CHLC system is ready for use.
14. It is assumed that the new CHLC structures will be installed concurrently with the track lowering works.

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