

| Submission No. | | | 004 | |
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| Organisation Name or Name of Submitter | | | Aine Wellard (25 Townsend Street) | |
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| Item No. | Section Ref. | Page No. | Observation Statement | TII Response |
| Submission to An Bord Pleanala on Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022], Case reference: NA29N.314724 | | | | |
| 1 | Observation / Concerns | 1 | I reside in one of the Dublin City Council homes marked for demolition and I use the swimming pool in Markievicz Leisure Centre. I have applied to the Irish Human Rights and Equality Commission for legal assistance and representation at any oral hearing of the Railway Order application so that my submission can be reasonably considered. | TII will address the issues raised by your representatives at the Oral Hearing. |
| 2 | Observation / Concerns | 1 | <p>I am blind and my home and community provide me with a quality of life not easily replicated elsewhere. As a blind person, I have a navigational knowledge of the local environment and landscape which I have acquired over 40 years. I find swimming extremely beneficial and having a public pool in close proximity to my home has been a vital facility.</p> <p>In recent years I went to great personal expense to adapt my home on Townsend Street to my needs, which I cannot afford to do again. And without these adaptations, I could not live safely and comfortably in any new home.</p> <p>And I will lose all this if my home is demolished and I am relocated elsewhere in the city. In addition, as a visually impaired person I am dependent on local services which will not necessarily be available in a new environment.</p> | <p>TII acknowledge the concerns you have around the demolition of your home and the Markievicz Leisure Centre. Mitigation for the loss of the College Gate apartments is being addressed as part of the Project with the support of Dublin City Council DCC). As the property is in the ownership of DCC, TII will work with DCC to ensure suitable alternative housing is provided in advance of the commencement of construction activities.</p> <p>TII will also continue to work with DCC in relation to the development of an alternative sports and recreational facility to replace the Markievicz leisure centre and intends to fund the alternative. However, TII does not have control over that development, which is part of DCC's function to provide public sport and recreational facilities in its function area. DCC may or may not be in a position to deliver it in parallel with the MetroLink project. Accordingly, the Board should assess the MetroLink project on the basis that the alternative may not be available. The impact would then be significant, but nonetheless one that would not outweigh the strategic scale long term benefits that MetroLink will deliver.</p> |

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| 3 | Observation / Concerns | 1 and 2 | <p>I feel that affected residents have been provided with no satisfactory evidence that demolition of the Townsend street apartments is unavoidable, and that our voices have been largely ignored by the Metrolink project and Dublin City Council.</p> <p>MetroLink's own Environmental Impact Assessment Report describes the impact of the proposed location for Tara station as 'significant':</p> <p><i>"The loss of a number of residential buildings required to build the Option 0 will result in a significant environmental effect and will require the rehousing of all the residents of these units. In addition, the loss of the Markievicz leisure centre will impact on the local population as it serves as the only public swimming pool in this area".</i></p> | <p>Please refer to Response (4) below in relation to the consultation with residential property/landowners and residents’ associations that has taken place throughout the duration of the Project.</p> <p>EIAR Chapter 7 (Consideration of Alternatives) and Appendix A7.2 Tara Street Station Report detail the alternative options that were considered for the location and type of the Tara Street station to try and address concerns raised relating to the demolition of the College gate apartments and the Markievicz leisure centre. In total, 11 alternative options for Tara Station were considered and evaluated before determining that the proposed location provided the optimal solution.</p> <p>Of the alternate options considered, a mined station option at Tara was identified as a potential solution to avoid the demolition of the College Gate building, whilst retaining the required ease of interchange with the adjacent Dart station. However, TII do not consider this option would provide an effective resolution to the residents’ concerns or the wider project requirements for the following reasons:</p> <p>- A mined tunnel option would require two large cut and cover shafts to be constructed at either end of the platform cavern to provide construction access for mining the tunnel and to subsequently provide permanent access, ventilation and back of house facilities for the operation of the station.</p> <p>Mining of the cavern would need to be undertaken 24 hours a day, 7 days a week to ensure the safety and security of the works and to ensure the cavern was completed prior to the required passage of the tunnel boring machine. Alternative 12-hour working would introduce significant programme extension and unacceptable cost escalation as well as requiring additional work to secure the safety of the working face at the end of each day.</p> <p>The mined tunnel option would have the following specific impacts on College Gate residents:</p> <p>- Due to mining of the cavern, which would include drill and blast, it would generate a level of groundborne vibration and noise that would make the College Gate apartments uninhabitable.</p> <p>- There would also be noise and construction disturbance due to the initial adjacent demolition works and shaft construction by the apartment block. Although this work would not be undertaken on a 24-hr basis it would cause significant daytime nuisance to residents.</p> <p>- Tii estimate that to avoid the significant construction impacts on residents relocation would be required for a period of up to 2 years.</p> <p>TII also note the following concerns that do not support the use of a mined tunnel at this location. During construction:</p> <p>- Mined construction is significantly more complex and challenging to manage than a cut and cover option that uses diaphragm walls and propping to provide ground support before excavation commences.</p> <p>- There is a risk that the rock quality/stability above the cavern may require the tunnel/platforms to be made deeper, increasing construction costs, and subsequently affecting ease of passenger access during operation of the metro.</p> <p>- There are increased risks of programme delay and cost increases if issues occur during mining of the cavern (eg groundwater inflows, harder or poorer quality rock or building damage to College Gate due to vibrations or settlement requiring a change in construction process).</p> <p>- Phasing of construction activities would be constrained by the more limited construction working space available compared to the proposed station box construction leading to a longer construction period overall.</p> <p>During operation:</p> <p>- A mined station option would not provide the high-quality operational station that achieves the MetroLink architectural vision of providing passengers with a feeling of space and light as they quickly and easily navigate the station.</p> <p>- There would be a poorer passenger experience, for wayfinding, and accessibility. Access to/egress from the platforms would only be via the platform ends, resulting in inefficient passenger end loading of platforms and also trains as a result of passengers managing their exit from the station.</p> <p>- The mined tunnel would require increased ventilation requirements compared to the other underground stations along the route, requiring additional ventilation plant and space requirements to be provided.</p> <p>- A mined tunnel would introduce different requirements for emergency access and passenger egress in order to meet fire safety requirements and would need Dublin Fire Brigade approval.</p> <p>TII further note that:</p> <p>- Tara Station will be one of the busiest stations on the metro and retention of a high-quality station in keeping with the MetroLink architectural concept is very desirable.</p> <p>- Mitigation for the loss of the College Gate apartments is being addressed as part of the Project with the support of DCC. In particular, TII, in consultation with DCC, will support rehousing and provide compensation for the loss of the residential unit.</p> <p>- The proposed Project retains opportunity for future adjacent development by others.</p> |

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| 4 | Observation / Concerns | 2 | <p>To help mitigate against these effects, the Report promises Metrolink will ensure, in part, that:</p> <p><i>"Clear communication channels are opened with property owners to ensure there is a clear understanding of the process" and "TII will work closely with Dublin City Council to provide an alternative to the Markievicz Leisure Centre."</i></p> <p>However, as a blind person I was left uninformed because, originally we were not notified about public consultation, and subsequently notifications to me appeared in printed format rather than braille, as I had requested. And, in fact, the statutory period of Public Consultation came and went and most local people were unaware that it had even taken place.</p> | <p>EIAR Chapter 08 Consultation (specifically section 8.3.5.5) details the consultation that has taken place with residential property/landowners and residents associations. The Project Team is acutely aware of the potential impacts of the proposed Project to residential property/landowners (and residents associations) in this area in particular, and as a result further engagement was undertaken to allow these stakeholders time to consider the proposals. Consultations took place with all owners of properties and lands which are affected by the proposed Project. During the non-statutory public consultations phase TII represenatives met Ms Wellard on a number of occasions to discuss her specific concerns , further meetings were convened with Ms Wellard post submission of the Railway Order and the conclusion of the statutory consultation stage.</p> <p>Appendix A8.19 notes that 5 meetings were held with Townsend Street DCC tenants throughout 2019, 6 of which are due to be affected by the demolition works and who have lived there for between 20-30 yrs. In preparing the application for Railway Order, the Project Team has consulted with the public and stakeholders in accordance with the following legislative, best practice and planning practice requirements in line with the Aarhus Convention, Consolidated EIA Directive Requirements and requirements of national law. To facilitate public participation, a range of communication materials were generated during each period of non-statutory public consultation, including accessible materials such as braille maps.</p> <p>Ms Wellard raised concerns about the accessibility of the RO application documents on 23 October 2022, seeking a Braille copy of the Non-Technical Summary (NTS) and a tactile version of relevant drawings. TII commissioned a Braille version of the NTS on 7 November 2022 and provided same to Ms Wellard in advance of the end of the consultation period, but had difficulty in getting the tactile drawings produced and printed. A supplier was found and the tactile drawings ordered in December 2022, proofs were received and reviewed on 16 January and the final drawings were received and sent to Ms Wellard in February.</p> <p>TII regrets that it could not supply the tactile drawings during the statutory consultation period despite its best efforts. Ms Wellard can raise any issues arising out of her review of the tactile drawings at the oral hearing and TII will offer her all reasonable assistance to enable her participation in the statutory process.</p> |
| 5 | Observation / Concerns | 2 | <p>And the promised alternative to the Leisure Centre is dependent on Dublin City Council being able to provide a suitable site, which - given the demand for and value of land in the city centre - is likely to be somewhere on the outskirts.</p> <p>In light of all of this I request that An Bord Pleanala refuses approval for the Metrolink project or, alternatively, makes it a Condition of the approval that the location of the Tara station be reworked.</p> <p>I believe that the planning and decision making of Dublin City Council and TII are worthy of vigorous investigation given the burden they are asking local residents to carry.</p> | <p>Please refer to response (2) in relation to the identification of an alternative site for the Markiewicz Centre by DCC.</p> <p>Please refer to response (3) in relation to the alternative options considered for the Tara Street Station, and the reasons why the proposed location has been identified as the preferred option.</p> <p>A station at Tara Street provides good interchange opportunities, serves important key trip attractors such as Trinity College, O'Connell Street shopping areas and the the Internation Finance Centre in the study area with high potential passenger trips. This option also takes a direct and short route through areas of high demand in the centre of the study area.</p> <p>TII recognise that the construction of the MetroLink scheme will impact significantly on local residents , buisnesses and other important stakeholders and sincerely regrets that homes will be lost during the construction of the scheme. However as Dublin’s public transport network grows through the implementation of higher capacity bus routes, light rails services and higher frequency rails servcies it is critically important that to achieve the full benefits and capitalise on these investments. to realise these benifits it is necessary that that they are integrated fully where appropriate to attain “the network effect”. This can be achieved by locating the metrolink station at Tara Street. High quality interchanges can significantly broaden the transport offer for their catchment and add to the appeal and attractiveness of sustainable transport by ensuring that people can easily change services to access a wider range of places by these modes, and each scheme should be designed to ensure that these are as seamless as possible.</p> |

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| 6 | Observation / Concerns | 2 | <p>Please send any responses in braille with the following instructions to the braille transcriber:</p> <ol style="list-style-type: none">1. Please use non-UEB braille, i.e. SEB.2. Write on only one side of the page.3. Use approximate A-4 sized paper and not the very large 3cm x 30cm. | <p>Noted, we will ensure that TII's responses to submissions are available in braille.</p> |