

Submission No.			007	
Organisation Name or Name of Submitter			An Post, GPO/ RMLA Planning Consultants	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022 An Bord Pleanála Ref No 314724				
1	Construction / Operation - Impact on Deliveries	3	As per the application documents submitted, construction of the MetroLink is anticipated to last up to 10 years and is programmed as four main works packages: Enabling Works Central and South; Enabling Works North; Main Works Central and South; and Main Works North. An Post acknowledges some disruption is likely to occur given the scale and complexity of MetroLink’s construction, however it is respectfully requested that An Post’s specific operational requirements are recognised in relation to its various post offices and mail sorting offices. These facilities are central to the operation of a reliable public postal service, and it is imperative that their operational viability be protected.	TII recognise the importance of An Post operations and will work to ensure that any disruption is kept to a minimum and operational requirements are not unduly affected. Further detail of how this will be achieved is provided by the responses below to specific points raised by the An Post submission.
2	Construction / Operation - Impact on Deliveries	3	It is evident that there will be a number of temporary traffic management measures, as well as permanent alterations to the transport network in order to facilitate the MetroLink Project that may materially impact accessibility for An Post deliveries and access for staff and customers. Any impact on An Post’s ability to operate its essential public service during the construction stages of MetroLink, including permanent road alterations and/or temporary traffic management measures such as the addition of construction haulage volumes that might materially affect the capacity of the existing road network, could have a serious impact on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State. It is requested that the proposed works do not directly affect An Post’s ability to operate under normal conditions.	The MetroLink Project will not directly impact on An Post's ability to operate and this will be monitored throughout the works. EIAR Chapter 5, MetroLink Construction Phase, section 5.4.12 Traffic Works notes that traffic management plans for the construction of MetroLink have been developed to minimise the impact of the Project on road users, and to maintain access to businesses and other premises. Prior to implementation, all traffic management measures will be agreed with FCC and DCC and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. Traffic management measures and road construction works are based on the key principle of maintaining continual access to all properties during the works. Road works will be monitored throughout the duration of the works to ensure traffic delays, congestion and inconvenience to road users are minimised.
3	Construction / Operation - Impact on Deliveries	3	Furthermore, in relation to the operational phase of MetroLink, An Post wishes to ensure the level of traffic, including the high proportion of Heavy Goods Vehicles expected, is safely accommodated on the road network and strategic junctions along the planned route.	As outlined in EIAR Chapter 9, Traffic and Transport, during the operational phase of the Project, notable reductions in traffic flow will be seen along key routes south of Dublin Airport, including along the M50 Motorway, and along most radial routes into Dublin City Centre. National roads such as the N11, N7, N4, M3 and M2 will also see reductions in traffic flows when the Project is operational. In all modelled scenarios, the number of car trips reduces when the Project is in place and operational, with car mode share also reducing in all model scenarios. As such, the reduction in private vehicles will reduce congestion on some road links and junctions, resulting in journey time savings on the road network. During the operational phase, minimal volumes of HGVs will be associated with the Project and overall improved traffic conditions would be expected to benefit An Post's operations.
4	Potential Land Acquisition	3	The GPO has been identified as ‘Substratum land which maybe acquired’ for the MetroLink Project. The GPO serves as the Headquarters for An Post, as well as being the location of a strategic postal retail unit for the public and as a visitor experience centre. In this regard, An Post, as the licensee of the GPO, wishes to highlight potential concerns around the provision of the MetroLink route below the GPO via tunnel.	The proposed acquisition of substratum land beneath part of the GPO building is necessary for the construction of the Metrolink tunnel. Response (5) below explains the environmental impact assessment that has been undertaken to assess the potential impacts of construction on the GPO and the proposed mitigations to manage these impacts.

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5	Potential Land Acquisition	3	<p>The GPO is a Protected Structure (under Ref. 6010) and is also located within a Conservation Area and the O’Connell Street Architectural Conservation Area, which is subject to a Scheme of Special Planning Control. The GPO is also considered as a building of national importance by the National Inventory of Architectural Heritage (Ref. No. 50010528). As such, the GPO plays an important archaeological and architectural heritage role within the Dublin City landscape, being one of the most important architectural landmarks on O’Connell Street and must be recognised as part of the provision of the MetroLink. In this regard, any potential disturbance which the boring of a tunnel underneath this Protected Structure must be fully assessed in terms of the archaeological and architectural significance of this building, as well as from a user operation perspective during such construction works.</p>	<p>TII have assessed the potential impact of MetroLink construction on property, including the GPO, to ensure impacts are mitigated wherever possible and that this important building is not damaged. This includes the impact of noise and vibration from the tunnel boring machine (TBM), and construction generated ground movements leading to settlement and possible building and property movement. All of which have been assessed and reported in the EIAR, and are summarised below.</p> <p>EIAR Appendix A 5.17, Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement on property. Table 5.2 of this reports shows that the GPO has been assessed as falling within the 'slight damage' category currently, an explanation for which can be found in T.4-4 of the aforementioned report. Recognising the cultural and historical significance of the GPO, the building has been designated "special" and hence a further Stage 3 refined assessment will be undertaken that will take account of final design and construction methodology details, most likely utilising advanced numerical modelling techniques, and further surveys of the building that will be undertaken by structural, conservation and architectural specialists experienced in this type of building. The results of this refined assessment typically show that earlier assessments are conservative and over estimate the likely impact of construction generated ground movements.</p> <p>As is the case with several building along the MetroLink route the GPO is of critical national importance, TII will implement building monitoring regime to monitor building settlement affects pre during and post construction. The monitoring regime will be agreed with An Post in advance of construction commencement.</p> <p>EIAR Chapter 14.4.1.8 AZ4, Groundborne Noise during Construction. Table 14.29 presents the predicted noise levels during TBM Passage compared to the acceptable noise threshold values for the GPO. The results of the calculations presented in Table 14.29 show the L_{Amax} for TBM Passage at the GPO has a value of 50 dB, while the acceptable Threshold Level for this building is 45 dB, resulting in a significant impact on the buildings operation for a limited duration during TBM passage. Unfortunately, there are no effective methods available to reduce groundborne noise or vibration from the TBM at source, but noting that the duration of this impact will be of the order of up to two-weeks as the TBM passes. TII will liaise with An Post to ensure the timing of these impacts are known.</p> <p>EIAR Chapter 14.4.1.9 AZ4, Groundborne Vibration during Construction. Table 14.32 presents the predicted vibration levels during TBM Passage compared to the acceptable threshold values for vibration for the GPO. The predicted vibration presented in Table 14.32 shows the VDV (Vibration Dose Value is a parameter that combines the magnitude of vibration and the time for which it occurs) for TBM Passage at the GPO has a value of 0.269 m/s-1.75 which is lower than the VDV Threshold Level for this building of 1.6 m/s-1.75, meaning there will be no significant impact on the building’s operation.</p> <p>The GPO will be a property where pre-construction condition surveys will be undertaken, subject to the property owners permission, and any required pre-construction repair work identified and undertaken. Monitoring instrumentation will also be used throughout the works to monitor potential environmental impacts, including those discussed above to ensure that acceptable limits are not breached, noting that groundborne noise generated by the TBM will be of a temporary limited duration that will be managed through close liaison with An Post. TII also confirm they will continue to liaise with An Post to ensure disruption is kept to a minimum.</p>
6	Conclusion	4	<p>As a Semi-State authority, An Post wishes to be continuously consulted on the MetroLink Project. We are available for discussion on any of the matters referred to below and would also appreciate if you could confirm receipt of this submission by return.</p>	<p>TII will update An Post with developments during the Project and will continue to ensure that impacts are minimised during and post construction in accordance with the above responses.</p>