

Submission No.			008	
Organisation Name or Name of Submitter			An Taisce	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: Railway Order Application- Metro North: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin				
1	1 Intro and Overarching Comments	1	We welcome the overall proposal as it is a long overdue strategic priority for the improvement and expansion of the public transport network in and around Dublin	TII welcome your support for the project.
2	1 Intro and Overarching Comments	1	The proposal needs to be integrated with a wider transportation initiative for the catchment area to reduce private car use and dependence, including the promotion of cycle-and-ride to use the Metrolink stations.	As detailed in Chapter 6 (MetroLink Operations and Maintenance), the proposed Project has been designed to ensure maximum interchange with other modes of transport, specifically other sustainable modes of transport such as walking, cycling and public transport. All operational stations will have pedestrian and cycle access, with bus stops located either adjacent to or within the site to facilitate integration with MetroLink. Interchange with Luas and rail/DART has been a key consideration for station locations, as presented in Chapter 7 (Consideration of Alternatives). Station designs include cycle parking provision in the immediate vicinity of stations.
3	1 Intro and Overarching Comments	1	<p>The remainder of our submission concerns options for the Tara Station due to considerations about the loss of community infrastructure and city centre residential accommodation.</p> <p>The applicant, Transport Infrastructure Ireland (TII), in its Preferred Route - Public Consultation Document - March 2019, stated: "<i>Tara is an important station as Metro Link will interconnect with DART and Iarnrod Eireann services here, one of the major strategies behind the new alignment. The Emerging Preferred Route necessitated acquiring and demolishing the College Gate complex and the Sport and Fitness Markievicz centre owned by Dublin City Council. While the site would be available afterwards for new development, the loss of the current apartment block and valued public amenity is a serious impact. As the financial and social costs here are so high, we've spent significant time and resources investigating alternatives. TII have therefore reluctantly concluded that the original proposal remains the most feasible option for construction of the MetroLink station at Tara Street. We realise this has a severe impact and will take whatever measures we can to mitigate the impact on the residents and users of the fitness centre.</i>"</p> <p>The following sections of our submission will focus on engineering project risks and constraints for the selected option for Tara Station, which involves the demolishing the College Gate complex and the Markievicz Sport and Fitness Centre as well as two alternative design options, which would allow for its retention, if deemed appropriate.</p>	See responses below.
4	3 Alternatives to Demolition of the College Gate Building	3	We will now review the alternative designs for Tara Station, which were listed in the Preferred Route Design Development Report (PRDDR),but were not recommended for a variety of engineering based constraints mentioned above, which we recommend be reviewed by the Board. These are a modified version of Option3 Station moved southwards, which we suggest be considered if constructed as per option 4, to mitigate the major concerns outlined in the PRDDR.	Please note that the Option 3a as discussed in the EIAR is a modified version of Option 3 with mining as per Option 4 to eliminate the need to divert the Townsend sewer. The concept design for this option showed that there was insufficient clearance beneath the sewer to allow for the requisite station facilities and hence this option did not work. So, the suggested alternative has been assessed. This is clearly explained in Section 7.7.10.9.1 of EIAR Chapter 7. It is further noted that impacts on the Townsend sewer would remain. Please note the mining would be required to be undertaken 24/7 and hence result in similar impacts as Option 4 as discussed above in Item 5.

Submission No.			008	
Organisation Name or Name of Submitter			An Taisce	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: Railway Order Application- Metro North: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin				
5	3.1 Option 4 Mined Station at the Preferred Location	5	<p>The PRDDR states in Section 4.2: "Option 4 involves the mining of a cavern below the existing College Gate building, which carries substantially more safety risks during its construction than all the other options. Whilst the initial construction cost would be slightly more than Option 0, the potential for additional risk and cost associated with mining could easily lead to increased costs during construction and it could be expected that the tendered cost would make allowance for such risk. While Option 4 would retain the College Gate building there would be significant disturbance to residents because of the shaft construction directly adjacent to the building and the mining of the tunnel directly underneath part of the building. These construction activities are estimated to take up to 2 years. During this period there would be risk to the building from the mining activities including potential for structural damage, and significant construction disturbance, including noise and vibration, such that it is envisaged that this would require moving everyone out of the building during construction for a period of up to two years." TII state that for the above reasons Option 4 is not recommended. However, the listed Project Risks and Constraints have been successfully mitigated on other underground metro stations, in other jurisdictions, where similar construction techniques were utilised, where it was required to retain specific structures. We would suggest that Option 4 for Tara Station could be successfully implemented, once again here. We would therefore recommend that Option 4 be considered, if An Bord Pleanála deem that the College Gate building should be retained.</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>Chapter 07 (Consideration of Alternatives) details the decision-making process that has led to the development of the proposed Project, including the route alignment and station locations. Appendix A7.2 Tara Street Station Report presents in detail the various options that were considered by TII for this location.</p> <p>Concerns had been raised during the public consultation on the Emerging Preferred Route (EPR) regarding the demolition required for the station in the location proposed, and concerns were again raised during the consultation on the Preferred Route. A number of alternative station locations were considered to try and address these concerns. Option 0 is the proposed station location, with a further 11 options assessed. Three options as submitted by College Gate residents, with the station relocated either to the north or south of the EPR proposed location, have been reviewed in detail. In addition, other options developed through the Preferred Route design process including a mined option and realignment of the route to the east of Tara Street Station have also been reviewed. All were assessed against the EPR proposed station location (Option 0) as a base case, adjusted to suit the single bore and reduced station box length.</p> <p>The various options were taken through a Mutli Criteria Analysis to compare aspects of each different option. Assessment of options considered the viability of the rail alignment, the quality/ease of interchange with Tara DART Station (a key requirement given that this will be one of the busiest stations on MetroLink with high passenger interchange with the DART), demolition/construction impacts (including minimising impacts on the existing DART infrastructure/operations), other environmental and planning issues, including traffic and utility impacts, and urban integration, health and safety issues, and potential construction costs.</p> <p>A mined station option at Tara was considered as a solution to avoid the demolition of the College Gate building. The option comprises the construction of two deep shafts either side and immediately adjacent to the College Gate apartments to provide construction access for mining the tunnel under College Gate apartments and to subsequently provide permanent access, ventilation and back of house facilities for the operation of the station. It was established that 24 hour working would be the only realistically feasible approach to construct the cavern. Therefore, the nature of the work, drill and blast and mechanical excavation would generate a level of groundborne noise and vibration that would mean it would not be reasonable to inhabit the College Gate apartment block due to the disturbance caused, leading to a relocation of residents for a minimum of two years. However, there are possible risks that could extend the duration further, and therefore this option has a similar impact on College Gate residents as the cut and cover preferred option. TII consider that when balanced against the significant direct construction cost increase compared to the preferred cut and cover option, that demolition and redevelopment of the area around the site of the proposed Tara Station as part of the wider integrated development and regeneration of the site provides a better option. The mined option also performs wors economically with a much greater risk allowance required compared to the preferred cut and cover option, and the preferred proposed cut and cover station provides a higher quality operational station that is consistent with the MetroLink architectural vision and operational and maintenance strategy.</p> <p>This assessment has identified that for a number of reasons including constructability, cost, and retention of a good interchange facility, that Option 0, including demolition of College Gate and Markiewicz Centre, remains the preferred station location: * This location retains a good interchange facility with Tara DART Station; * It reduces risk to the overall construction programme; * It offers cheaper overall construction cost; * It retains opportunity for future adjacent development by others;</p>

Submission No.			008		
Organisation Name or Name of Submitter			An Taisce		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Letter Re: Railway Order Application- Metro North: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin					
			(5) continued	TII will continue to work with DCC in relation to the development of an alternative sports and recreational facility to replace the Markiewicz 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.	
6	3.2 Option 3 Station Moved Southwards	5	Here, it is proposed to move the station box towards the south and amending the station box alignment to be parallel to the overhead train infrastructure, which would be result in minor, re-alignment of the Metrolink route. Open box construction (similar to Option 0) was to create the station shape and all properties on the station footprint would need to be acquired. The PRDDR states: “Agreement and design details would need to be finalized with adjacent property owners to integrate the station box and above ground elements in the development, including access points, emergency exits and ventilation shafts... Passenger transfer to the DART Tara Street Station would use the existing southern access, which would need to change from a peak hour access to a permanent access.” Once again Tara Station will act as a multi-modal interchange station between Metrolink and DART railway line. The main point of interchange between the two stations will be via the southern entrance to Tara Station.	No response required.	
7	3.2.1 project Risks and Constraints	5	As stated in the PRDDR: “Buildings at Townsend Street and Spring Garden Lane would need to be demolished with Townsend St. and Spring Garden Lane closed during construction. Agreement and design details would need to be finalised with adjacent property owners to integrate the station box and above ground elements in the development, including access points, emergency exits. Passenger transfer to the DART Tara Street Station would use the existing southern access, which would need to change from a peak hour access to a permanent access. Townsend St. and Spring Garden Lane closed during construction. Significant impact on East/ West cycle movements. This option would also directly impact existing large sewers along Townsend Street (including a 2.4m circular brick foul sewer and 1.2m circular concrete foul sewer) which would require diversion. TII deemed this diversion unlikely to receive approval from Irish Water. In the PRDDR Assessment Summary, TII deemed option 3 not recommended due to traffic disruption during construction, this utility diversion and significant property entire city block between Tara Street and Corn Exchange Place.	No response required.	

Submission No.			008		
Organisation Name or Name of Submitter			An Taisce		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Letter Re: Railway Order Application- Metro North: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin					
8	3.3 Option 3A. Suggested alternative to Option 3 (using impacts to the construction techniques of option 4)	6	By adopted same construction methodology of option 4 construction and the major disruption with the diverting of mains sewers, the closing of Townsend Street to traffic during construction and the building on Spring Garden Lane needing to be demolished could be mitigated. Also, as per options 0 and 4, Tara Station will act as a multi-modal interchange station between Metrolink and DART railway line. The main point of interchange between the two stations will be via the southern entrance to Tara Station, with MetroLink access remaining as per option 3. Although the same construction methodology of option 4 would involve mitigating similar engineering related constraints and risks as per this option, but as per our comments on option 4, these Project Risks and Constraints have been successfully mitigated on other underground metro stations, elsewhere, and we would therefore recommend that Option 3A be considered, as an alternative to Option 4, if An Bord Pleanála deem that the College Gate building should be retained.	Refer to Item 4.	
9	4. Replacement of Community Infrastructure	7	Should the subject project proceed as proposed in the application, it is submitted that the Markievicz Sport and Fitness Centre should be replaced elsewhere in the local area as part of the Metrolink project, given the Centre's importance as a community resource. It also submitted that further consideration is required regarding the loss of the substantial number of city centre residential units in the College Gate building.	As noted in Chapter 21 (Land Take), TII will offer compensation to property owners for land that is deemed to be acquired land in accordance with the general compulsory purchase code. Compensation will be provided through the Compulsory Purchase Order (CPO) process. In recognition of the impact on residential cases where properties are to be acquired and given the unique circumstances surrounding the proposed impacts to College Gate apartment complex, TII will engage the services of a property advisory company to engage directly with property owners who are impacted by the MetroLink proposals. Property owners will be invited to participate in a discretionary scheme which provides an opportunity to negotiate and reach a 'Pre-Agreement' on both a baseline residential unit price and other matters of compensation that an owner would normally be entitled to under the compensation code. This will provide the parties with as much certainty as possible at an early stage. As noted above TII are engaging with DCC in relation to the Markiewicz Leisure Centre.	