

Submission No.			160	
Organisation Name or Name of Submitter			Kathleen Shields (21 Palmerston Place, Broadstone)	
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Re: Case reference NA29N.314724, Description: Railway (Metrolink Estuary to Charlemont via Dublin Airport) Order [2022]				
1	Letter - introduction	1	<p>While I welcome the idea of a new metro for Dublin, especially from the Airport to the city centre, I do have concerns about the line after it reaches the city centre and continues south using the already existing Luas Green line. I outline some of these below.</p> <p>As a regular user of the Dublin City Council Markievicz sport and leisure centre I would like to make some observations on the proposed Metrolink Line particularly in relation to the section of the line at the Tara Street station.</p>	<p>TII wish to thank you for your submission and stated support for the delivery of MetroLink.</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. A station at Tara Street provides good interchange opportunities, serves important key trip attractors 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>As Dublin’s public transport network grows through the implementation of higher capacity bus routes, more frequent heavy rail services and coverage, and the expansion of the light rail network it is critically important that to achieve the full benefits and capitalise on these investments that they are integrated fully where appropriate to attain “the network effect”. 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> <p>Please refer to response (7) which details the alternative options that were considered for this location, and outlines the reasons why this location (involving demolition) was ultimately identified as the preferred option.</p>
2	1. Loss of amenity	1	<p>The Markievicz sport and leisure centre is a publicly owned facility managed by Dublin City Council. The pool and gym are used by people of all ages from all over the city as well as by visitors to Dublin. The pool is extensively used by schools and other groups for swimming lessons, by older people for exercise, by city centre workers. The health and wellness benefits that this facility provides cannot be overstated. This planning application envisages the complete demolition of the Markievicz centre without proposing any alternative in the city centre. I note from the railway drawings that the statue of Countess Markievicz is to be removed and stored for safe keeping while the works are being undertaken and then returned to its site. One wonders what Countess Markievicz would have to say about the destruction of the centre.</p>	<p>Mitigation for the loss of the Markievicz leisure centre is not addressed as part of the RO proposal and ABP is being asked to consent MetroLink acknowledging that this is a significant, unmitigated adverse impact on population and land use. However, Dublin City Council's functions include "the provision (both indoor and outdoor) of playing fields, athletic tracks, swimming pools and other bathing places, sports centres, gymnasia and other facilities and the holding of sporting events." 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>
3	2. Environmental impact	1	<p>The area around Pearse street, Trinity College, Tara Street and Townsend Street is already an environmentally hostile one for pedestrians and cyclists. It will become even more so if this section of the metro is completed. There is no green infrastructure, pedestrian spaces or traffic calming proposed in the Metrolink plan. In addition, the complete demolition of a fully functioning sports centre and 78 apartments in good condition that were built twenty years ago comes with its own embodied carbon cost.</p>	<p>TII disagree with the statement that the area will become more hostile once the Tara Street Station is in place. As detailed in Chapter 04 (Description of the MetroLink Project), as part of the station and urban realm design, Luke Street will be converted into a shared space for cyclists and pedestrians, including provision of a two-way cycle track between its junctions with Poolbeg Street and George's Quay. Poolbeg Street will be reduced to one lane to accommodate more space for pedestrians and cyclists, and reduced space for general traffic. This newly created public realm will consist of outdoor seating and scope for ephemeral events, with the possibility of retro-fitting the adjacent rail arches to provide retail or food and beverage opportunities. High quality natural stone paving, seating used as directional wayfinding and space-making devices and large mature tree planting are used to create open space and enhance green infrastructure within the city centre.</p> <p>EIAR Chapter 17 (Climate) presents the proposed Project's carbon emissions during both the construction and operational phase. During the construction phase the embodied carbon assessment includes for construction materials such as concrete or steel, excavations, waste, transportation of materials and waste, power usage and water usage. Full details are available in Section 17.5.2.1 of the EIAR.</p> <p>As calculated using the TII Carbon Tool (v2.1) the proposed Project will result in total Construction Phase GHG emissions of 1,017KT CO2eq over the 9.25 year period, equivalent to an annualised total of 0.32% of Ireland's non-ETS 2030 target. Over the predicted 60-year lifespan the annualised emissions due to the initial Construction Phase and ongoing maintenance of the Proposed Project will reach at most 0.044% of Ireland's non-ETS 2020 emissions target, or 0.24% of the 2030 transport sector carbon budget. Section 7.5.2.1 Construction Phase Carbon Calculations refers.</p> <p>In order to minimise, control and mitigate carbon emissions, monitoring and reporting of the embodied carbon in the Construction Phase will be conducted, as set out in section 17.6.1 Construction Phase. The aim of the monitoring will be to see further ways to minimise climate impacts. Monitoring will include contractual obligations, in line with the most recent Climate Action Plan and sectoral targets. Commitments to monitor GHG emissions during the construction phase will also be secured through the outline CEMP (Appendix A5.1). Monitoring will include; embodied carbon of construction materials, water usage, power and fuel usage and waste generation (including reuse and recycling rates). A Waste Management Plan for Construction and Demolition Waste will also be implemented.</p>
4	3. Damage to community	1	<p>In relation to quality of life in Dublin the demolition proposed at this site is one more example of loss of community space for residents, workers, and visitors in the city centre.</p> <p>No alternatives are proposed in this plan.</p>	<p>As noted in response item (7) below, the proposed option does not preclude future adjacent or oversite development following the demolition of the College Gate apartments and the Markievicz Leisure Centre. Please refer to response item (3) above in relation to the creation of a public plaza at this location as part of the proposed Project.</p>

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5	4. Demolition of housing during a housing emergency	2	It is proposed to demolish seventy-eight housing units during a major and unprecedented housing and construction crisis. There are more than seventy-eight residents living above the sports centre. Where are these residents to live and how are they to find new homes?	<p>TII acknowledge the concerns you have around the demolition of College Gate. Mitigation for the loss of the College Gate apartments is being addressed as part of the Project with the support of Dublin City Council. In particular, TII, in consultation with DCC, will support rehousing and provide compensation for the loss of the residential units.</p> <p>By way of support, as noted in Chapter 21 (Land Take), section 21.6.1.2 Compensation for Compulsory Purchase, 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. Property owners will be invited to participate in a Discretionary Scheme. The Discretionary Scheme will offer property owners the 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 stage. This will provide the parties with as much certainty as possible at this early stage.</p>
6	5. Economic loss	2	Metrolink have stated that they can sell the land above the completed metro line and once the underground Tara station is built. This financial consideration purely benefits Metrolink at a cost to others. In a broader sense this area of Dublin will become a non-economically viable dead zone with no commercial or cultural attractions whatsoever, reduced footfall and loss of amenity to the remaining residents in the greater TCD and Pearse street vicinity.	<p>Please refer to response item (3) above in relation to the creation of a public plaza at this location as part of the proposed Project. As noted in Chapter 3 (Background to the MetroLink Project), MetroLink will provide a high-quality urban environment at station locations that will benefit the community as a whole by enhancing the urban realm directly and also by encouraging further high quality development which will stimulate the local economy. This will provide an opportunity for the development of a sustainable high quality urban environment along the alignment of the proposed Project.</p> <p>The business case for MetroLink, approved by Government in 2022, did not include for any benefit arising from the sale of lands above the station. TII have no plans for development of lands above the station. Should such a development take place an financial benefit will accrue to the State.</p>
7	6. Alternatives - metro construction in other cities	2	While it might be financially expedient for Metrolink to acquire land, demolish the existing buildings and then sell it off again, it is not necessary to do so. In other cities (e.g. Paris) metros have been constructed underground without impacting on the buildings above.	<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 Multi 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 with mechanical excavation, would generate a level of groundborne noise and vibration would mean it would not be possible 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 economically performs worse 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:</p> <ul style="list-style-type: none">* 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;* 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 units;* Mitigation for the loss of the Markievicz leisure centre is not addressed as part of the RO proposal and ABP is being asked to consent MetroLink acknowledging that this is a significant, unmitigated adverse impact on population and land use. However, Dublin City Council's functions include "the provision (both indoor and outdoor) of playing fields, athletic tracks, swimming pools and other bathing places, sports centres, gymnasias and other facilities and the holding of sporting events." TII understands that Dublin City Council is investigating whether it is feasible to provide a facility at Sean Moore Park, Irishtown

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8	7. Lack of consultation with stakeholders	2	The public consultation process was not respected and from the very beginning Transport Infrastructure Ireland were determined that this section of the city would have to be demolished without considering or proposing alternatives.	<p>TII disagree that the public consultation process was not respected. 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 particular, and as a result, ongoing engagement and negotiation was undertaken to allow these stakeholders time to consider the proposals. Significant consultations took place with all owners of properties and lands which are affected by the proposed Project. In cases where properties or land is acquired to facilitate the construction of MetroLink, the discussions were of a sensitive nature and required one-to-one meetings.</p> <p>Appendix A8.19 notes that 5 meetings were held with Townsend Street DCC tenants throughout 2019. 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.</p> <p>Please refer to response item (7) above in relation to the alternatives considered for Tara Street Station, and the reasons for the identification of the proposed location as the preferred option.</p>