

Submission No.			210	
Organisation Name or Name of Submitter			Nuala Kelly (64 Shandon Park, Phibsborough)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Case reference NA29N.314724 - Description: Railway (Metrolink Estuary to Charlemont via Dublin Airport) Order [2022]				
1	Letter	1	I welcome the extension of the deadline for making observations to An Bord Pleanála on MetroLink's Railway Order application.	Noted
2	Letter	1	I welcome, also, the principle of developing a high frequency metro railway for Dublin city.	TII wish to thank you for your submission and stated support for the delivery of MetroLink.
3	Letter	1	It makes some sense in the long-term sense to develop a high frequency metro line through the city of Dublin, however, the 'MetroLink' project seems to be one of those projects that keeps being stalled for a variety of reasons and then amended in following iterations in ways that do not always make sense from an environmental, social, cost or design perspective.	<p>Chapter 07 (Consideration of Alternatives) details the decision-making process that has led to the proposed Project. (Old) Metro North identified a preferred route alignment for the Project, and a subsequent Railway Order application was granted in 2011. However, following the economic downturn that commenced in 2008, The Infrastructure and Capital Investment 2012-2016: Medium Term Infrastructure Framework (DPER, 2011) laid out a plan to defer a number of major infrastructural projects including the (Old) Metro North project in order to achieve fiscal consolidation.</p> <p>Through a multi-criteria assessment of alternative transport options, an Optimised Metro North was identified as the preferred option under all relevant headings of Environment, Safety, Economy, Accessibility and Social Inclusion and Integration. This option follows the same alignment as Old Metro North but includes a number of significant variations such as shorter platforms, smaller stations, reduced rolling stock, fewer stations and vertical alignment changes.</p> <p>TII as the Government Agency responsible for delivering MetroLink, are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order.</p>
4	Letter	1	While I have concerns about some of the proposed route plans, e.g. in relation to Phibsborough / Cross Guns area, I want to concentrate in this submission on the proposals for Metrolink route in the vicinity of Tara Street Station.	<p>As noted in response item (3), Chapter 07 (Consideration of Alternatives) details the decision-making process that has led to the development of the proposed Project, including alternative route alignments and station locations.</p> <p>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>
5	Letter	1	In this regard, I wish to note my objection to the proposed demolition of Dublin City Council's Markievicz sport and leisure centre, to facilitate a Tara Street interchange, for the following reasons:	TII acknowledge your concerns around the demolition of Markievicz Leisure Centre. Please refer to the below responses around the proposed mitigation measures for Markievicz Leisure Centre.

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6	Letter	1	<p>Loss of the only publicly accessible swimming pool / leisure centre in city centre</p> <p>The Markievicz sport and leisure centre managed by Dublin City Council is a vitally important facility for local people, for people working nearby, for tourists and more recently for schools and community groups. It is astonishing to think it might be demolished to facilitate a line that could be moved, with some thought and consideration, to a less intrusive or impactful location nearby. If such specific space is required, could a bank or business be removed instead of a community facility and, crucially - many homes?</p>	<p>Please refer to response item (4) above in relation to the strategic need for a station at Tara Street.</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.</p> <p>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 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;* 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.

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7	Letter	1,2	<p>Loss of vital homes in the vicinity of Tara Street</p> <p>To demolish seventy-eight housing units in the College Gate apartment block, in addition to a terrace of social housing, is totally unacceptable during a time of severe housing shortage, homelessness and increasing costs of construction. This aspect of the proposal, in my view, runs counter to modern European (and Dublin) urban planning vision to create a thriving, living city with an appropriate housing mix, businesses, shops and social amenities. Notwithstanding the need for an urban Metrolink from the airport, this must be achieved with minimum impact on other human rights provisions e.g. housing, environmental, social and cultural.</p>	<p>Please refer to response item (6) above in relation to the assessment of alternative options, and the reasons why the proposed location has been identified as the preferred option.</p> <p>As noted in Appendix A7.2 Tara Street Report (appendix to Chapter 07 Consideration of Alternatives), one of the reasons, among others, for the selection of the preferred location is that it provides opportunity for future oversight development by others as part of an urban integration plan.</p> <p>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. As noted in Chapter 03 (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>	
8	Letter	2	<p>Environmental, Social and Cultural impact</p> <p>The area around Pearse Street and Tara Street will become impossible for people to navigate as the proposed plans do not seem to have included any measures to facilitate active travel, green space or traffic calming - this is indeed surprising given the stated vision in the Climate Action Plan 2022 to create sustainable, green, and carbon neutral infrastructure and space for communities and visitors in a living city.</p> <p>Instead, the real risk, should the plan go ahead for this section, is that the area will have little commercial or cultural attractions, reduced footfall and loss of amenity for the remaining residents in the area.</p>	<p>Please refer to response item (7) above in relation to the active travel provisions as part of the public realm at Tara Street Station, and the creation of a public plaza at this location.</p> <p>As noted in Chapter 03 (Background to the MetroLink Project), the Project will contribute to the transition to a low carbon and climate-resilient society. Private vehicles are a significant contributor to Ireland's GHG emissions, and providing an alternative to private vehicle-based journeys is a key benefit of the proposed Project. Demand modelling suggests a diversion of 6.8 million private vehicle journeys per annum in the early years of operation and approximately 360 million car trips diverted by 2055. Accordingly, traffic volumes will be greatly reduced, supporting the reduction of GHG emissions which are critical to meeting the targets of the Climate Action Plan 2023 (updated to 2023).</p>	
9	Letter	2	<p>Learn from good practice in other cities</p> <p>In other cities metros have been constructed underground without impacting on the buildings above. It is not too late for underground construction to be considered for at least this section. Local and indeed citywide consultation would have prevented demolition without considering or proposing alternatives.... for example, at minimum, to build and provide an alternative publicly owned and accessible swimming pool and apartment block nearby in the city centre. The proposals for the nearby Georges Dock outdoor swimming pool do not compensate for the loss of an all-year-round indoor facility that people of all ages, abilities, social class can enjoy. In a post pandemic society, this type of facility is essential for health and well-being (in line with Healthy Ireland Strategy) as it requires little other resources or capacities to participate. For me and for the many other diverse users of the pool, it is a lifeline.</p> <p>I hope that my observations will not seem trite. Having witnessed the many able bodied, disabled (intellectually and physically), elderly, young, men, women and children using the pool, it is not imaginable to think that it is dispensable. And Dublin City Council do a wonderful job in managing it efficiently and inclusively</p>	<p>Please refer to response item (6) above in relation to the options considered for Tara Street, and the reasons for the selection of the proposed station location.</p> <p>As part of the options assessed, a mined option (Option 4) was considered. This option would reduce the demolition involved, retaining the College Gate apartment block and the leisure centre, compared to Option 0 (the proposed location). Additionally, the option retains similar benefits to Option 0 in terms of interchange opportunity, traffic impacts, utility impacts, rail alignment and future development opportunities.</p> <p>The mined 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.</p> <p>There are two things in particular note with regard to this alternative (Option 4) :</p> <p>(i) a mined tunnel / cavern of this size would need each advance to be excavated in stages with a combination of side drifts and headings. This is time consuming and costly when compared to cut and cover construction. It is also of note that a mined tunnel option still requires extensive cut and cover works at both ends of the station for vertical access (including emergency access), ventilation and to accommodate necessary back of house plant and equipment, and may require smaller temporary construction shafts constructed initially so that mining of the cavern can be commenced as earlier as possible to avoid delaying the completion of the MetroLink Project.</p>	

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				<p>(ii) the tunnelling operation would need to progress 24 hours a day, 7 days per week. This would be necessary to ensure the safety and security of the works. As the tunnelling would be by "open faced " non pressurised tunnelling techniques (i.e. excavation in advance of the installation of the subsequent sprayed concrete tunnel lining) it would be critical to advance and support the excavated face continuously - particularly as the excavation would be below the water table. If a face was left unsupported for a period, ground movements become more challenging to manage and hence increase the likelihood of tunnel instability and surface settlement. This would add increased risk of damage to third party property. To not mine the tunnel 24 hours day would mean that the face would need to be secured at the end of every day shift, and the timing of blasting would need to adhere to a strict predetermined schedule so that the tunnel face is always secured at the end of each shift. In simple terms if such an approach was adopted, the impact on the programme would more than double the duration of cavern construction as a result of the constraint of day time working together with the inefficiencies in working this way. The sequence of working would also import significant cost escalation. Therefore 24-hour working is essential for constructing the mined cavern.</p> <p>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, noted above, 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 significantly 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>