ABP-314724-22

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Attachment 1.

Metrolink Oral Hearing Spreadsheet
ABP-314724-22
Submission Number: 169
Module 2

Draft: 11 March 2024

Col.1	Col.2	Col.3	Col.4
Item No	**Submission LIDL**	**Response by TII**	**Lidl Rebuttal to Responses 11 March 2024.**
1	*The Draft Railway Order is silent on the potential for Over Station Development at this location which we consider a missed opportunity but one that can be rectified within the scope of Railway Order process as the key aspects are not policy based but rather technical in nature.* *The problem we foresee at this time is that the opportunity to forward plan now for OSD, if not taken, will close the door to it in future.* *Amongst the challenges identified in the report by the "Centre For London" associated with retrofitting OSD are:* *"Engineering and Operations: Building over operational stations is complex, and this often influences development scale and shape, requiring costly and disruptive possessions of infrastructure".* *The solution to overcome these problems is to design in future OSD.*	*TII thank you for your letter, noting your support for MetroLink. We provide our responses to the matters raised by your representatives below.* *MetroLink will be a catalyst for and provide opportunity for future development and regeneration. While the MetroLink Railway Order does not include for future neighbouring or overhead development, the tunnels and stations are designed to support appropriate future imposed loads.* *TII will be required to make submissions in relation to planning applications for proposed future developments on or adjacent to MetroLink and there will necessarily be some engineering constraints (such as permissible loadings) required.* ***However MetroLink is committed to engaging with known development proposals and new development proposals as they emerge with the intent of facilitating such developments as they emerge to the maximum extent consistent with the safe operation of the proposed Project.*** *Again in common with other existing rail and tunnel projects, following grant of the Railway Order and development of detailed design, TII will produce "Guidance Note for Developers" that will be the subject of bye-laws following the grant of Railway Order and which is designed to facilitate future adjacent or over-site development while protecting the integrity and safety of the MetroLink works and operations.* *Therefore, at this stage TII is dealing with known development proposals on a case by case basis. TII will work with parties in the future to assist with the wider development of sites over and above stations and tunnels. In this context TII has successfully engaged with a number of developers over the last two years to accommodate development over and in proximity to the alignment and there have been no material restrictions on development subject to the implementation of agreed design and mitigation measures and it is not anticipated that MetroLink will have a material impact on the development potential of sites above and in proximity to the alignment in future.*	**(1) MCA to present Proposed Plans.** Verbal Submission with plans. **(2) Tony Bamford Planning Response:** We welcome the acknowledgement by TII regarding the appropriateness of over-station development subject to the requirements for the safe operation of the station. However, the recently published "*Draft Guidance Note for Developers*" (dated May 2023) would prevent high density development on a large portion of our client's site, as demonstrated by the evidence of MCA Architects and Punch Consulting. Metrolink is undoubtedly important, but without current and future high density development at services like Metrolink and BusConnects, the efficiency of the new services are diluted. The "MRE" zoning objective is the only zoning objective in the Fingal County Development Plan 2023-2029 that expressly requires high density/hi-intensity development. The subject site is the only site within the "MRE" zoning located at proposed high capacity/high frequency interchange. We are at the planning stage of Metrolink. It is not acceptable in my opinion to allow the deviations; exclusions and loadings, as prescribed in the above Guide, to dictate future development potential of this important strategic site. The development of the site must be maximised in accordance with National, Regional and Local Policy objectives. From the National Planning Framework, Ministerial Guidelines, Regional and Local Policy, and the planned, high capacity public transport options (Metrolink and BusConnects) at this interchange, there can be little doubt there is an obligation to facilitate the development of the subject site, to its fullest extent, and provision should be made to ensure overstation development is allowed for at the planning stage. The subject site provides an important opportunity for high density, mixed use development in accordance with the underlying zoning, and the recently published guidance: ***Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities* (2024)** which makes provision for the highest density of development at transport interchange.. Table 3.1 at page 22 of the recent guidance relates to Dublin and notes: ***City - Urban Neighbourhoods*** *The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations7, (iii) town centres designated in a statutory development plan, and* ***(iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area****. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.* Table 3.8 defines high capacity public transport node or interchange as: *Lands within 1,000 metres (1km) walking distance of an existing or* ***planned high capacity urban public transport node or interchange****, namely an interchange or node that includes DART, high frequency Commuter Rail11, light rail or* ***MetroLink services****;* ***or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'12 stop.*** ***Highest densities should be applied at the node or interchange and decrease with distance****. 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.*

			In particular they point to the need for **the highest density on the subject site given its location at a planned, high-capacity, urban, public transport interchange** alongside the BusConnects Ballymun (Finglas) to City Centre Core Route which commences at the entrance of Northwood, with stops on either side of the Ballymun Road. The Guidelines also allow for higher densities above 300 dph. Section 3.3.6 includes the following: *(a) There is a presumption in these Guidelines against very high densities that exceed 300 dph (net) on a piecemeal basis. Densities that exceed 300 dph (net) are open for consideration on a plan-led basis only and where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan.* *(b) Strategic and sustainable development locations of scale (described in section 4.4.4 of the Development Plans Guidelines for Planning Authorities 2022) will be capable of defining densities or density ranges across different neighbourhoods on a plan led basis, based on considerations such as proximity to centre, level of public transport service and relationship with surrounding built form. Densities within strategic and sustainable development locations may therefore, exceed the ranges set out in Section 3.3 on a plan-led basis.* The site, we expect, should accommodate higher density above 300dph (net). Indeed, we expect the Height Strategy and Density Study (which is to be prepared by the Planning Authority within the life of the current Development Plan) to identify the subject site as a location for densities above 300 dph net, given its specific locational characteristics and the weight of wider national, regional and local planning policy, including the underlying zoning. It is our submission that the site should be developed to its fullest extent, in an over-station configuration. Appropriate loadings should be accounted for at the planning stage. Punch Consulting will speak to the technical details of this in a later statement. To this end, I note the recently published agreement between TII and DAA (dated 23 February 2024) wherein condition 2 states: ***Future potential development: The Metrolink <u>structures shall be constructed so as to accommodate future development above the station and tunnels</u>.*** The emphasis of this condition clearly suggests that the tolerances of the stations and tunnels will be adjusted to allow for loadings in respect of future potential development within Dublin Airport. **Punch Consulting will set out the technical specifications required.** **(3) PUNCH Response:** On the Lidl Ballymun site, from a planning perspective residential development up to 15 stories is permissible – Refer to MCA scheme for details . It is the intention of Lidl to develop a scheme of this height, which will include a basement and a Lidl retail store at ground floor level. Therefore, from a Structural Engineering perspective the station building and tunnels, on the Lidl Ballymun site, must be designed to support the loads from such a development, both on top of and adjacent to the station and tunnel. These loads will be calculated based on Eurocode 1 "Actions on Structures" and "Building Regulations" current at the time of the station/tunnel design. On a preliminary basis, we have calculated these unfactored loads as follows: A. Uniformly distributed unfactored vertical load on the station/tunnels of: (i) 165 kN/m² Dead Load (ii) 45 kN/m² Live Load B. Lateral loads at ground level associated with the above vertical loads (surcharge) plus additional lateral wind loads which will be determined based on Eurocode 1 and the final building geometric design. C. Additional concentrated point loads of: (i) 7,950 kN Dead Load (ii) 2,200 kN Live Load Based on an 8m x 6m grid. D. Additional concentrated line loads of: (iii) 1,320 kN/m Dead Load (iv) 360 kN/m Live Load Based on apartment walls at 8m centres. Additionally, the station and tunnels will need to be designed to take full account of the following: 1. Deflections/settlements/differential settlements in line with current Eurocodes for building design and informed by appropriate site investigations. 2. Operational MetroLink Noise and Vibration limits to comply with Eurocodes and all relevant environmental standards, so as not to limit or prohibit any future use of the buildings on the site. We note the above loads are significantly higher than those permitted within the "protection zone" as set out in the TII "Draft Guidance Note for Developers", which was issued following the commencement of the current ABP Oral Hearing. Additionally, and as set out further in this document, the above loading assumes overstation development is permitted and hence the "exclusion zones" are assumed not to apply to this site. **Please refer to the Punch's Statement.**
2	*The submitted Planning report sets out a comprehensive response to various policies and objectives contained in National, Regional and local planning documents. The*	*Please refer to response item number (1) above.*	Tony Bamford Planning Response: As 1 above

	emphasis in our position is how the applicant is responding to the content of these. In particular what does the applicant propose as their position in respect of Over Station Development?		PUNCH Response: As 1 above.
3	*The position in respect of Northwood station, where the applicant is silent on Over Station Development, is contrasted with responses inrespect of the Dublin City Development Plan. In response to Dublin City Development Plan MTO 1, as referred to page 77 of the Planning Report, highlights that:* *'It is an objective of Dublin City Council to encourage intensification and mixed-use development along existing and planned public transport corridors and at transport-nodes where sufficient public transport capacity and accessibility exists to meet the sustainable transport requirements of the development, having regard to conservation policies set out elsewhere in this plan and the need to make best use of urban land. Dublin City Council will seek to prepare SDZs, LAPs or other plans for areas surrounding key transport nodes, where appropriate,in order to guide future sustainable development.'* *The response of the applicant at page 77 of the Metrolink Planning Report is as follows:* *The proposed Project will facilitate intensification and mixed-use development along its corridor, subject to the policies of the DCDP. I n particular, the proposed Project, where possible, facilitates the development of the station sites themselves for oversite development, on those station lands and over the tunnel alignment that are zoned for such development. The future development of land above or surrounding the station sites, station lands or over the tunnel alignment will be subject to separate planning, assessment and consultation processes.*	*Please refer to response item number (1) above.*	Tony Bamford Planning Response: As 1 above PUNCH Response: As 1 above.
4	*The interesting aspect of this is that MTO1 as an example indicates, like the objective for the Metro Economic Corridor Zoning, the need for high density, mixed use, development along existing and planned public transport. However, the report we believe omits reference to overstation development for our client's site at Northwood, which is not explained or justified.* *The obvious question therefore is why in the specific case of the Northwood station is there not the same emphasis. We assume that this is an omission from the Planning Report that could be easily rectified.*	*Please refer to response item number (1) above.*	Tony Bamford Planning Response: As 1 above
5	*• We would therefore ask that over station development is specifically recognised in the Railway Order.* *• We also refer to the attending report from Transport Insights which sets out additional technical queries that need to be addressed during the application process.*	*Please refer to response item number (1) above.*	PUNCH Response: As 1 above.
6	*Our client would wish to maximise the usable area of their site and would ask that the proposed Northwood station design/ layout be reconsidered to ensure it does not restrict development of the areas to be handed back and that over station development be considered further on the subject site.*	*Please refer to response item number (1) above.*	PUNCH Response: As 1 above.
7	*As part of a potential future mixed-use development of the subject site, our client, would look to provide a discount Food store on the site.* *The MetroLink proposals indicate two areas for potential development adjacent to the proposed station but other sections, such as the northern portion of the site (which the track alignment passes through) do not indicate potential for future development. Vehicle access and car parking provision is an important consideration for a discount Food store (in conjunction with sustainable modes of travel). Vehicle access to the site would likely have to be taken from the Old Ballymun Road positioned towards the northern end of the site (as proposed in the 2013 planning application, see Figure 2), given the layout of the surrounding road network. In turn, this*	*MetroLink public realm has been designed in consultation with Lidl by taking Lidl's future development plans into consideration. As discussed in several consultation meetings, the proposed Northwood Station construction works will require the acquisition of the entire site on a temporary basis and the acquisition of the western part on a permanent basis as shown on the RO property plans.* *Upon completion of the MetroLink construction works, the retained lands in consultation with TII, can accommodate development in line with zoning objectives, proposed development plans. However, design for any future building or structure immediately adjacent to MetroLink station and tunnel must take cognisance of the MetroLink structures and avoid impact, with the intention of preserving and optimising the scale and value of the Adjacent Site Development recognising that the operational requirements of the station are the overarching priority.*	Punch Response: As 1 Above

	would predetermine access requirements for the car parking layout (both at surface and underground level) and the location of the loading servicing/ delivery facilities for a potential discount food store. As such, ABP in their consideration of the MetroLink proposals should seek to enable a larger area of the subject site be utilised for future development, allowing for the provision for a high-density mixed-use development.		
8	*The MetroLink proposal indicates access to the station is to be facilitated by two main entrance points, one on either side of the Ballymun Road, as well as separate emergency access points. It is unclear from the proposal drawing if there are other access requirements to the station or track which our client would have to consider when planning future development. As such, further consideration should be given by ABP at this planning stage, and if necessary, consultation undertaken with our client.*	*There are two main pedestrian entrances to the station. There are additionally lift locations either side of Ballymun Road each comprising 2 lifts with one for Dublin Fire Brigade. There are additionally surface penetrations for, inter alia, smoke, ventilation and draught relief. TII will require maintenance access to these locations.* *With regard to development adjacent to the station please refer to Item number (1) above.*	MCA Response: Proposed scheme does not overlap with pedestrian entrances or lift locations, based on the metro background information provided to Lidl to date. Any metro services penetrations that may coincide with the proposed scheme are proposed to be engineered so as to allow access for TII where required. It is assumed that a plenum zone below the Lidl store (between the Lidl store and metro station) will allow this measure of flexibility.
9	*As set out in chapter 5 of the EIAR MetroLink Construction Phase, the Northwood station box and track alignment in its vicinity is proposed to be constructed using a cut and cover approach. Our Client would seek further consultation and input at this planning stage to better understand the potential limits construction using cut and cover methods may place on the future development potential of the subject site. Considerations such as (not exhaustive):* *o Maximum loadings (permanent and temporary) that can be imposed on the cut and cover.* *o Maximum excavation depths over and adjacent to the cut and cover, and Northwood station structure.* *o Minimum working clearances allowed from the proposed land acquisition extent.* *o How the station would be supported against external loads, would ground anchors be required.*	*The station structure and retaining walls, as well as the tunnels are designed and constructed to support future imposed loads. Please refer to response item (1).*	PUNCH Response. As 1 above.
10	*To construction and facilitate eventual operation of the MetroLink the subject site is to form part of one of the projects main construction compounds. The extent of temporary and permanent land take has been indicated in the proposals. Our client seeks further information on the condition to which area(s) of temporary land take are to be returned following completion of construction. Considerations such as (not exhaustive):* *o Contamination* *o Drainage* *o Site level* *o Boundary conditions such as fencing, walls etc.* *o Service connections (whether original or newly created during construction)*	*TII will consult with the landowner prior to land hand back to optimise the land hand back process. TII will (if no subsequent local agreements are reached) hand back land in the same condition in which it was received unless specified demolition works are undertaken. This will include removal of any surface treatments, temporary facilities and hoardings / fencing. A condition survey will be undertaken to record the existing condition prior to MetroLink occupancy of the land.*	