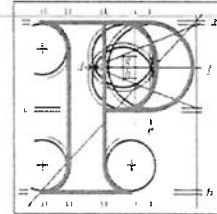


**Our Case Number:** ABP-314724-22



**An  
Bord  
Pleanála**

Estuary Court Residents Association  
16 Estuary Court  
Swords  
Co. Dublin

**Date:** 08 October 2024

**Re:** Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]  
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to  
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in relation to the matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

  
Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

RA03

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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**Lauren Griffin**

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**From:** LAPS  
**Sent:** Tuesday 8 October 2024 14:41  
**To:** Barry Arthurs  
**Subject:** RE: Railway Order (Metrolink) 2nd Public Consultation - Estuary Court RA Observations

A Chara,

The Board acknowledges receipt of your email, official correspondence will issue in due course.

Kind regards,

Lauren

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**From:** Barry Arthurs <barryarthurs@gmail.com>  
**Sent:** Monday, October 7, 2024 5:11 PM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Railway Order (Metrolink) 2nd Public Consultation - Estuary Court RA Observations

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sirs,

Further to the 2nd public consultation for the Metrolink Railway Order, please see attached the Estuary Court Residents Association ("ECRA") submission. The submission relates to additional documents and information submitted during the Oral Hearing.

The ECRA previously made valid submissions on this case so I understand there is no additional fee required for this submission.

If you have any queries on the submission or need any further information please do not hesitate to contact me.

Kind regards,

Barry Arthurs  
On behalf of Estuary Court Residents Association

Railway  
(Metrolink-Estuary to Charlemont  
via Dublin Airport)  
Order 2022  
2<sup>nd</sup> Public Consultation

Estuary Court Residents Association

Observations on Documents  
Submitted During the Oral Hearing

Oct 2024

Prepared by Barry Arthurs on behalf of the Estuary Court Residents Association

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## 1.0 Introduction

We thank An Bord Pleanála for affording us the time to speak at the Oral Hearing in February and March this year. We hope that you found our arguments to be set out clearly and adequately substantiated.

As we set out previously, the residents of Estuary Court **do not oppose the Metrolink project**, however, we believe that not enough consideration has been given to the impact of which the proposed route will have on the residents directly affected by it.

New documents that impact the Estuary Court residents were issued during the Oral Hearing and we would like to submit our observations on them now.

## 2.0 AZ1 Seatown West & Estuary Court Document - Dated 21<sup>st</sup> Feb 2024

A timeframe for the proposed TII compounds in the Estuary Court area was issued on the 21<sup>st</sup> February 2024, a few days after the Oral Hearing started. At the second module of the Oral Hearing, we raised the point regarding the extraordinary length of time that the TII propose to occupy the 2 greens in Estuary Court - 40 months (4 enabling + 36 construction – see Fig 1 below). There is 105 metres of cut and cover tunnelling to be constructed in Estuary Court which is a very small section of the overall project (18.8km).

The TII have set out that they will complete 18,800 meters of the Metrolink in 8 to 9 years however, to complete just 105 metres in Estuary Court they will require full occupation of our greens for approx. three and a half years? Based on these high-level figures, it is clear that it will not take this length of time to construct 105 metres of Metrolink.

**We request that the TII provide a construction programme for the section of cut and cover tunnel in Estuary Court (105 metres).**

If the TII are genuinely concerned about the Estuary Court residents, then surely the occupation of the greens should be minimised and not maximised as it appears to be. At our first online meeting with the TII, the Senior Engineer from Jacobs explained to us that the occupation of our greens would be kept to a minimum and once the cover was constructed on the tunnel, our greens would be restored and handed back. The TII could then continue work down in the tunnel without any further disturbance to the residents.

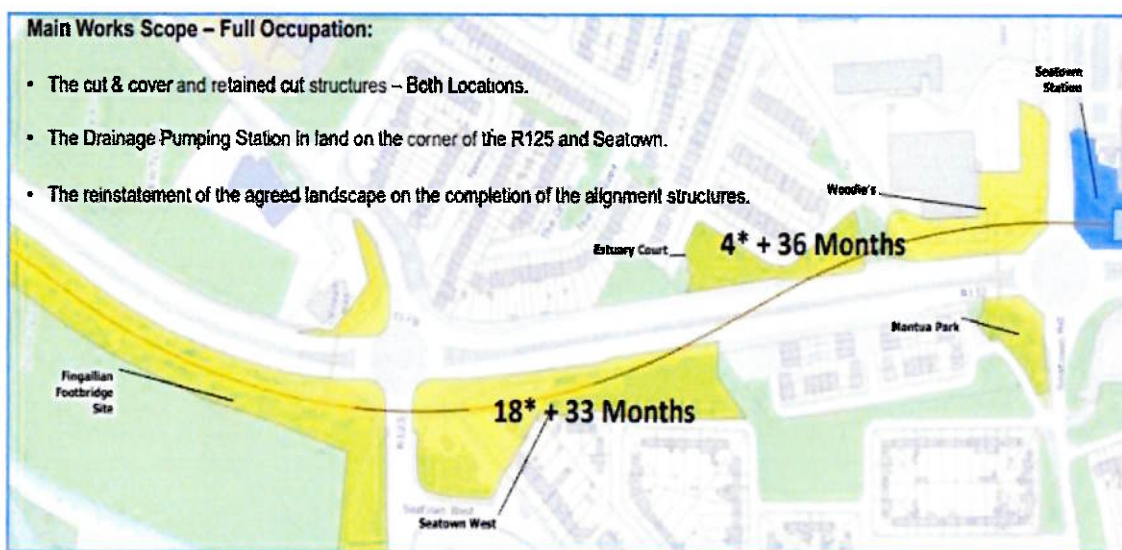
**We request that the TII significantly reduce the occupation time of the South Green to reflect the actual construction time required to this section.** The landscaping should then be restored as soon as the cover is complete on the tunnel.

Also, as there is no construction required in the North Green, we believe it is unreasonable for the TII to take over this green for what is in effect for their convenience (e.g. site offices adjacent to the works).

**We request that the TII withdraw their proposal to occupy the North Green.**

Due to our close proximity of the Metrolink route, the residents of Estuary Court will already suffer a great burden from the construction of it. We do not believe it is fair for the TII to prioritise their convenience over the disturbance and suffering that the Estuary Court residents will have to endure during the Metrolink construction period.

**Fig. 1 Seatown West and Estuary Court Extract - Compounds Timeframe**



**Advance Enabling Works\* - Duration Before Main Worksites are established:**

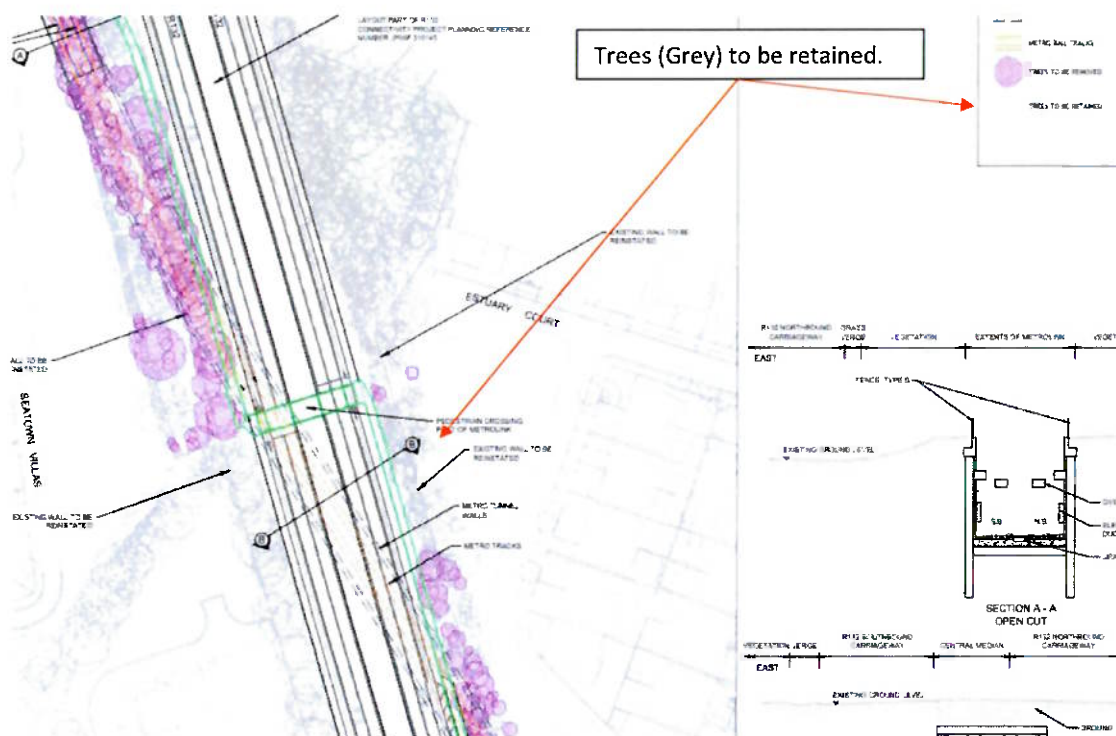
- Seatown West – 18 months: Site Clearance, Surveys, Utility Diversions and Monitoring Work.
- Estuary Court – 4 months: Site Clearance, Surveys, Utility Diversions and Monitoring Work.

## 2.1 Book of Updated Railway Order Drawings

The extract below from Drawing ML-RO 301 H-J S1 shows that the existing trees and vegetation along the R132 on our north green are to be retained. We would very much welcome this and we request the TII now commit to not occupying our north green as a construction compound.

As mentioned in our previous submission and our presentation at the Oral Hearing, the greens are invaluable to the residents of Estuary Court and especially for the children living in this estate. They are the only open green spaces available to play on in the estate.

**Fig 2 Extract ML-RO 301 H-J S1 General Arrangement Seatown**



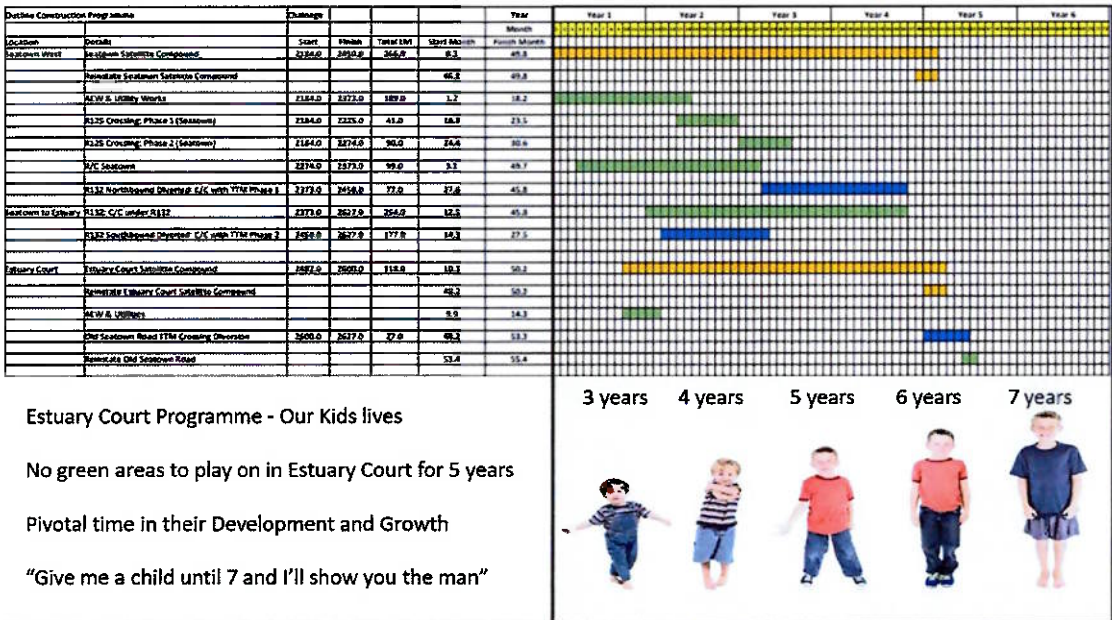


## 2.2 EIAR Biodiversity Update by Andrew Speer 7<sup>th</sup> March 2024

We attended the Oral Hearing for Module 2 on the 7<sup>th</sup> March. One of the speakers that morning was biodiversity expert Mr Andrew Speer. Mr Speer provided a Statement of Evidence on the AA/NIS and EIAR Biodiversity update. He confirmed that the biodiversity impact assessment of the Metrolink project was extended out to include species and qualifying interests in the Wicklow mountains and down as far as the Saltee Islands off the coast of Wexford. It would appear that the TII have gone to great lengths to ensure that the impact assessment of the Metrolink has accounted for all species that may be affected by it.

We request that the TII provide an impact assessment on the species that we regularly see using the greens (i.e. our kids) and how the loss of open green space for 5 years (40 months + time for new grass to establish) will affect their development at a young age.

Fig 3. TII Compound Timeframe V's Young Kids Development

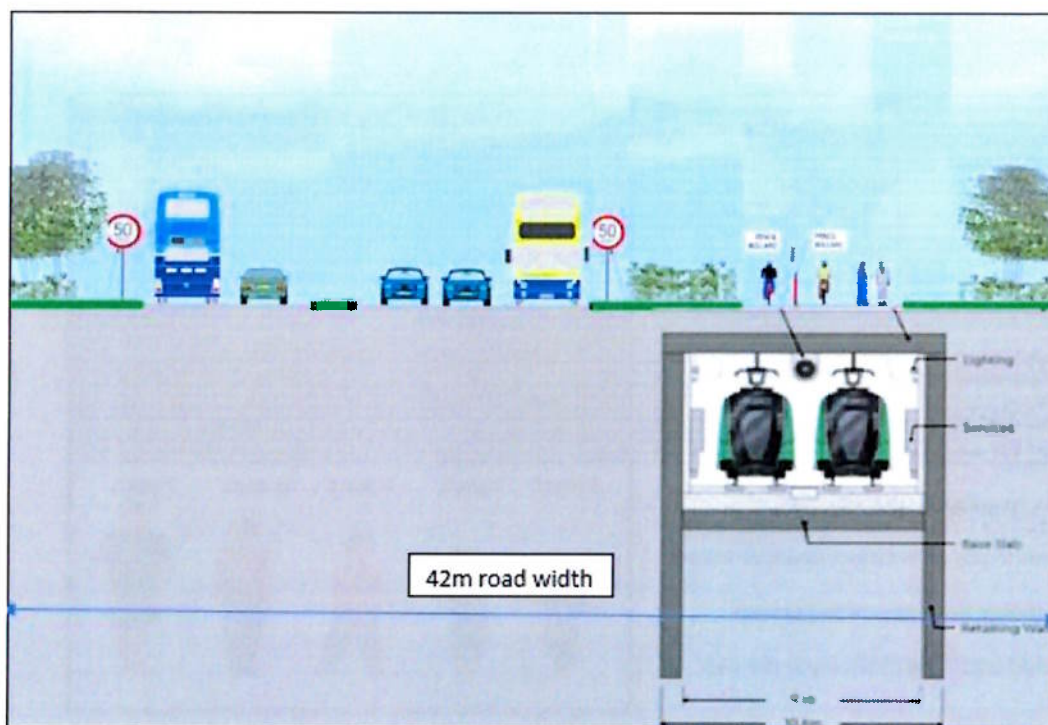


## 2.3 Proposed Re-alignment Opportunity on the R132

Of course, the points / requests raised above would not be required if the TII adopted our proposal for an alternative re-alignment.

At the Oral Hearing we presented what we believe to be a viable alternative re-alignment of the Metrolink onto the R132. Fingal Co Co's R132 Connectivity Project is changing the nature of the R132 to an urban type street. This will reduce the width required for the traffic lanes and if designed proficiently, this will allow enough space for the Metrolink to be built in cut and cover to one side of the R132. The Seatown Station will remain in the same location on the east of the R132 and any open areas on the east side of the R132 can still be used as originally proposed by the TII. The cut and cover on the R132 will only be necessary where there are pinch points along the route (i.e. Between Seatown Villas and Estuary Court Housing Estates).

**Fig 4. – Re-designed R132 with cut and cover Metrolink (at pinch points - minimum width of R132 – 42 metres)**



By realigning the Metrolink route onto sections of the R132, this straightens the route and there is a straight section from the Balheary pitches all the way to the Seatown Station (see Fig. 5 below). This opens the possibility of constructing this section (and others) of the cut and cover tunnel with precast concrete.

**Fig 5. TII proposed curved route V's alternative straight-line route on R132 (in red)**



The precast concrete method has been tried and tested in tunnels all over Europe (e.g. 170 metres of Hollingbourne tunnel (UK) completed in just 4 weeks) and has numerous advantages over in-situ construction which the TII are proposing. The advantages include:

- Significantly reduced on-site construction programme
- Less cost than the traditional in-situ concrete method
- Less workers required on site -
  - Less welfare / offices required on site for workers
  - Less workers car parking required
  - Less compounds / land take required
- Safer method of construction
- Less dependency on weather
- Less construction traffic / noise / dust
- Less on-site waste
- Less carbon footprint

At the Oral Hearing the TII acknowledged that our alternative re-alignment looked like a good proposal however, they then dismissed it and said it wouldn't work, without offering any reason as to why.

**We now request that the TII provide us with a substantiated reason (technical or otherwise) as to why they believe our proposal will not work.**