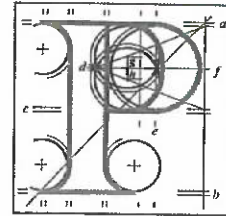


Our Case Number: ABP-314724-22

Planning Authority Reference Number:

Your Reference: An Post



**An
Bord
Pleanála**

RMLA Limited
Unit 3B
Santry Avenue Industrial Estate
Santry Avenue
Santry
Dublin 9
D09 PH04

Date: 07 December 2022

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 submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised, there is no fee for an affected landowner, listed on the schedule, to make an observation on this case, therefore, a refund of €50 will be made to the credit/debit card used to make the online observation.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

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Facs
Láithreán Gréasáin
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Yours faithfully,

PP SM

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

RA05

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Planning Consultants

An Bord Pleanála,
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Dublin 1,
D01 V902.

RMLA Limited,
Unit 3B,
Santry Avenue Industrial Estate,
Santry Avenue,
Santry,
Dublin 9,
D09 PH04

Email: admin@rmla.ie
Date: 25th November 2022

Dear Sir/Madam,

Re: Railway (MetroLink – Estuary to Charlemont via Dublin Airport) Order 2022

An Bord Pleanála Ref. No. 314724

We, RMLA Limited, are acting for our Client, An Post, GPO, O'Connell Street, Dublin 1, in relation to the lodgement of the Railway (MetroLink – Estuary to Charlemont via Dublin Airport) Order 2022 by Transport Infrastructure Ireland (hereafter 'TII').

The payment of €50, being the appropriate fee for making a submission, has been made online. Please note all correspondence in relation to this submission should be sent to the Agents, RMLA Limited, Unit 3B, Santry Avenue Industrial Estate, Santry Avenue, Santry, Dublin 9, D09 PH04. We request that An Bord Pleanála (hereafter 'ABP') keep us informed of any updates relating to this application.

Introduction

An Post welcomes the opportunity to make a submission in relation to the Railway Order application for MetroLink. An Post welcomes the proposed investment in public transport, active travel, and the urban environment of Dublin City, where it is considered that the proposed MetroLink Scheme will greatly improve the way in which Dublin City functions from an economic, social, and environmental perspective.

An Post plays a central role in Irish life and society, providing an essential public service delivering mail and parcels to more than 2.2 million business and residential addresses six days a week. With more than 900 Post Offices, An Post offer a broad range of postal, communication and financial services to upwards of 1.5 million customers every week. The company employs more than 9,000 full-time and part-time staff and operates a number of subsidiary companies including An Post Insurance and Air Business (UK).

An Post owns and operates a significant number of properties throughout the State including 45 directly operated post offices (the remainder are run by independent Postmaster contractors) and small, medium and large scale delivery depots. The efficient operation of these facilities is central to the successful provision of the postal service for business and personal customers. As highlighted above, these facilities are operated by almost 9,000 staff nationwide, who in turn utilise a road fleet of more than 3,000 vehicles.

The purpose of this submission is to positively engage on MetroLink, recognising the importance of the project to the future sustainability and vitality of the Greater Dublin Area, and yet not lose sight of

potential transport issues that may need further consideration through the Railway Order process and at later stages of the project.

An Post

An Post has approx. 46 facilities within Dublin, a number of which are located near the proposed Metrolink route.

- **Delivery Service Unit: Swords Business Park** (distance from proposed *Seatown Station*: c. 900m)
- **Air Mail Unit: Dublin Airport** (distance from proposed *Dublin Airport Station*: c. 1km)
- **Retail: North Circular Road** (distance from proposed *Mater Station*: c. 500m)
- **Delivery Service Unit: Rutland Place** (distance from proposed *O'Connell Street Station*: c. 350m)
- **An Post HQ and Retail: GPO** (distance from proposed *O'Connell Street Station*: c. 280m)

Figure 1 below shows An Post facilities relative to the MetroLink alignment and its stations.

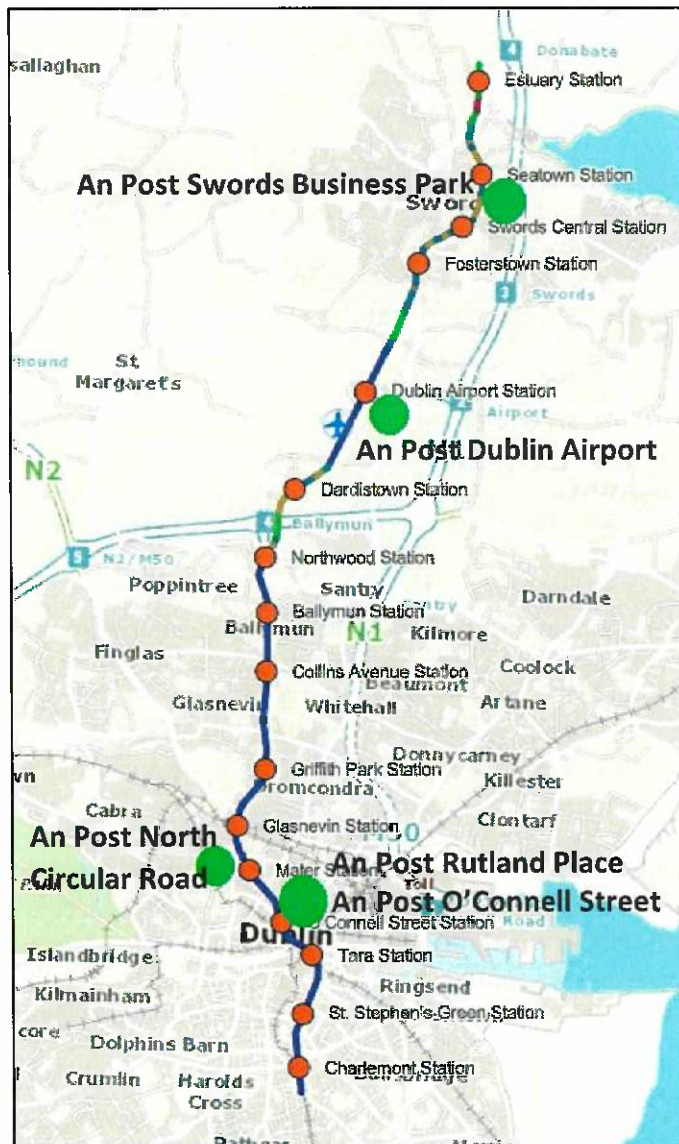


Figure 1: An Post Facilities in proximity to the Proposed MetroLink

An Post, operates two distinctive businesses in an increasingly digital environment: i) An Post e-Commerce (Mails & Parcels), providing world class national and international mails and e-commerce parcel logistics services; and ii) An Post Customer (Retail), providing a growing range of Financial Services in an omni-channel environment, including Ireland's largest retail network of more than 900 Post Offices.

An Post's postal facilities have relatively specific requirements, primarily with regards access and deliveries. Access is typically required to premises on a 24-hour basis, although early morning deliveries and late evening collections are of particular importance to ensure mail can be delivered onward to catchment areas in a timely manner. In this regard, the guaranteed provision of those deliveries/collections to/from An Post facilities is of strategic importance for An Post to ensure the ability to meet the postal needs of the public and the agreed service legal agreements with the State.

Potential Impact to An Post

An Post recognises the extensive work undertaken by MetroLink's Project Team to prepare and submit the Railway Order Application and has reviewed certain documentation submitted with the application to understand the potential impact on its operations during the construction and operational stages of MetroLink.

Construction/Operation Impact on Deliveries/Access

As per the application documents submitted, construction of the MetroLink is anticipated to last up to 10 years and is programmed as four main works packages: Enabling Works Central and South; Enabling Works North; Main Works Central and South; and Main Works North. An Post acknowledges some disruption is likely to occur given the scale and complexity of MetroLink's construction, however it is respectfully requested that An Post's specific operational requirements are recognised in relation to its various post offices and mail sorting offices. These facilities are central to the operation of a reliable public postal service, and it is imperative that their operational viability be protected.

It is evident that there will be a number of temporary traffic management measures, as well as permanent alterations to the transport network in order to facilitate the MetroLink Project that may materially impact accessibility for An Post deliveries and access for staff and customers. Any impact on An Post's ability to operate its essential public service during the construction stages of MetroLink, including permanent road alterations and/or temporary traffic management measures such as the addition of construction haulage volumes that might materially affect the capacity of the existing road network, could have a serious impact on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State. It is requested that the proposed works do not directly affect An Post's ability to operate under normal conditions. Furthermore, in relation to the operational phase of MetroLink, An Post wishes to ensure the level of traffic, including the high proportion of Heavy Goods Vehicles expected, is safely accommodated on the road network and strategic junctions along the planned route.

Potential Land Acquisition

The GPO has been identified as '**Substratum land which may be acquired**' for the MetroLink Project. The GPO serves as the Headquarters for An Post, as well as being the location of a strategic postal retail unit for the public and as a visitor experience centre. In this regard, An Post, as the licensee of the GPO, wishes to highlight potential concerns around the provision of the MetroLink route below the GPO via tunnel.

The GPO is a Protected Structure (under Ref. 6010) and is also located within a Conservation Area and the O'Connell Street Architectural Conservation Area, which is subject to a Scheme of Special Planning

Control. The GPO is also considered as a building of national importance by the National Inventory of Architectural Heritage (Ref. No. 50010528). As such, the GPO plays an important archaeological and architectural heritage role within the Dublin City landscape, being one of the most important architectural landmarks on O'Connell Street and must be recognised as part of the provision of the MetroLink.

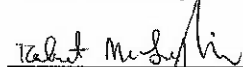
In this regard, any potential disturbance which the boring of a tunnel underneath this Protected Structure must be fully assessed in terms of the archaeological and architectural significance of this building, as well as from a user operation perspective during such construction works.

Conclusion

An Post wishes to reiterate its broad support of the MetroLink Project notwithstanding the potential for strategic operational impacts, and recognises the important role MetroLink plays in delivering greater accessibility and connectivity for the Greater Dublin Area. An Post further acknowledges that its staff and customers will also benefit from attractive sustainable travel choices which the MetroLink will provide.

We trust that the points raised in this submission will be considered by An Bord Pleanála as part of the assessment of this application. As a Semi-State authority, An Post wishes to be continuously consulted on the MetroLink Project. We are available for discussion on any of the matters referred to below and would also appreciate if you could confirm receipt of this submission by return.

Yours Faithfully,



Robert McLoughlin

Managing Director

For and on Behalf of RMLA Limited