

Submission No.			090	
Organisation Name or Name of Submitter			Estuary Court Residents Association (16 Estuary Court, Swords), Submission No 1 (prepared by Barry Arthurs)	
Letter Re: Railway (MetroLink-Estuary to Charlemont via Dublin Airport) Order 2022, Estuary Court Submission No. 1- Re-alignment of MetroLink route out of family housing estates onto the R132				
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1	Cover letter	1	We believe our submission sets out a robust argument as to why the Metrolink should be re aligned to the R132 and we would be grateful if you could give it due consideration.	TII welcome your input and responses are provided below.
2	Cover letter	1	We welcome any questions you may have and would also so welcome the opportunity to represent the Estuary Court residents at an oral hearing.	TII are happy to continue to engage with residents up to and during the Oral Hearing to attempt to resolve outstanding issues whilst continuing to progress the MetroLink project.
3	Executive Summary	9	The TII has submitted the Rail Order plans for the Metrolink route to cut through our housing estate and two other housing estates along the R132. They propose to take away our safe open green spaces not just for the construction stage but for good, by subsuming them into a public linear park. The proposed works will have a devastating impact on the residents of Estuary Court, not just with the loss of the open green spaces but with the disruption caused by the construction works.	<p>By keeping within the Local Landscape Character Area (LLCA), the proposed MetroLink landscape reinstatement along the R132 between the Estuary and Pinnock Hill Roundabouts provides an integrated series of small local parks complete with play facilities, seating, and planting, adjacent to the residential areas and which interconnects, encouraging pedestrian and cycle use, to form part of the longer green ribbon connecting the broader Swords community with MetroLink and across the R132.</p> <p>The proposed Project has been designed taking into account the R132 Connectivity Project promoted by Fingal County Council. The R132 Connectivity Project received approval by An Bord Pleanála on 20 January 2022 (planning application reference number JP06F.310145). The R132 Connectivity Project aims to improve the connectivity and safety of pedestrians and cyclists moving along, and across, the R132 and enhance facilities for all road users with particular benefits for those choosing sustainable modes of transportation such as bus users, cyclists and pedestrians. The planned outcome of the Metrolink architectural and urban realm design for this linear park is to discourage anti-social behaviour, through the attractive setting, use of public lighting, open sightlines, and avoidance of areas where individuals and groups of people can hide.</p> <p>Further acknowledging your concerns, TII is committed to working with local resident's groups to address concerns that have been expressed in relation to the loss of green space and the impact on the current boundary wall and will continue engagement with these groups in advance of oral hearing.</p> <p>Across the proposed MetroLink, safety and security is addressed by EIAR Chapter 6, MetroLink Operations and Maintenance. Section 6.6.5.8 specifically addresses managing the risk of "Vandalism or Anti-Social Behaviour on the Trains or within the Stations", and the wider chapter also addresses the broader design proposals for managing security challenges, including:</p> <ul style="list-style-type: none"> •The architectural and urban realm design is designed to discourage anti-social behaviour, for example through the attractive setting, use of public lighting, open sight-lines, and avoidance of areas where individuals and groups of people can hide. •The Operational Control Centre (OCC) will be the central communications and operational hub, located in the administrative building at the Dardistown Depot. The role of the OCC will include monitoring and managing passenger safety and security and antisocial behaviour. The OCC will direct and deploy staff to manage incidents when required. •The access control and intrusion detection (ACID) system will identify intruders trying to enter locations where unauthorised access is prohibited. •There will be a MetroLink staff presence along the route for assisting passengers, security and deterring anti-social behaviour.

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4	Executive Summary	9	<p>The residents of Estuary Court do not oppose the Metrolink project, however, we do not believe that anything like enough consideration has been given to the impact of which the proposed route will have on the residents and that the decision has been largely based on cost and other engineering grounds. To date the TII have not provided us with a definitive or conclusive reason as to why the Metrolink cannot be re-aligned onto the R132, especially as this road median alignment was the proposal for the previous concept, which was elevated.</p>	<p>Preferred Route Consultation. Having previously consulted with stakeholders along the R132 in 2018 and again in 2019, TII strongly believes that thorough consideration has been given to the impact of the proposed route on residents.</p> <p>In the decision-making process selecting the current route inside the R132 eastern verge, TII would like it noted that in terms of a decision based solely on cost and engineering, the original elevated option in the central median (previously consented under the Metro North Scheme) was the preferred solution to deliver the MetroLink through Swords. However, stakeholder feedback on the visual impact of such an option during the consultation in 2018, prompted TII to find the best below ground economical solution, an open structure, within the business case justifying the MetroLink Route through Swords.</p> <p>The Below Ground Alternative Following feedback received from stakeholders along the R132 during the Emerging Preferred Route consultation in 2018, objecting to an elevated structure in the median, TII considered a number of alternative options for the Preferred Route, including a retained open section proposal in the median of the R132. However, following an options appraisal, a retained open section option in the median was not brought forward into the Preferred Route Consultation in 2019 and for the following reasons:</p> <p>Permanent Impact of the retained open section in the median:</p> <ul style="list-style-type: none"> - An increase in permanent landtake along the R132 corridor verge and outside the boundary of the R132 to facilitate the final road alignment past the MetroLink open retained structures and stations. - As traffic will be closer to receptors, traffic noise impact would likely increase post construction. - Reduced ability to replace amenity loss on completion. - Replacing existing verge and greenspace along the R132 with pedestrian and cycle lanes to deliver this option would impact on a greater number of residents. - Stations provided in the median at roundabouts would require additional landtake to provide similar at grade access. - Stations in roundabouts would provide less opportunity for landscape upgrade. - Stations positioned in roundabouts would have less opportunity to achieve an open plaza design concept while ensuring that the station platforms are straight for passenger access operation and control. - Utility diversions to achieve a median delivered solution would increase. <p>Temporary (Construction Phase) Impact:</p> <ul style="list-style-type: none"> - Increase in traffic disruption and traffic noise impact during construction. - Increase in temporary landtake required to facilitate access for construction, diversions of traffic with the assumption that the two-lane c/way and pedestrians and cycle routes would be maintained in both directions. - Similar loss of amenity and green landscape during construction. - Temporary Property landtake requirements both in the existing road verge and outside the R132 boundary to deliver this option would impact on a greater number of residents. - The duration of construction for a median option scheme was longer, impacting further on all receptors along the R132.
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5	Executive Summary	9	The R132 Connectivity Project is changing the nature of the R132 road, and this provides a huge opportunity for the MetroLink to be re-aligned onto it. Based on TII's Decision Report and other available documents at the time, there is no evidence that the Connectivity Project was considered when choosing the preferred route option. We believe at a minimum this needs to be re-visited in detail. As such we believe that the EIAR cannot, at this time, be considered a complete document.	<p>A Median Alignment and the R132 Connectivity Project. A similar open retained structure solution in the Median to the one considered in 2019 but aligned to Fingal County Councils R132 Connectivity Project, consented in 2022 would result in the relocation of the proposed stations away from the new junctions at Seatown and Malahide Roundabouts. For an alignment option in the Median, this change would result in similar impacts as described above (response number (4)) together with the following permanent impacts: - An increase in landtake to divert the R132 around these stations. - Less favourable pedestrian at grade access into the stations positioned in the Median.</p> <p>While TII were aware of Fingal County Councils (FCC) intention to urbanise the R132, as set out in the Fingal County Development Plan 2017-2023, the R132 Connectivity plans were only fully materialised on the selection of the MetroLink Route inside the Eastern Verge of the R132, which followed the consultation on the Preferred Route Option in 2019.</p> <p>Subsequently, the plans for which FCC have now received consent involve the upgrading of three existing roundabouts to signalised junctions, the creation of cycle and pedestrian routes in both directions, while maintaining a two-lane c/way incorporating a dedicated bus lane, a reduction to the speed limit and retaining the existing central reserve.</p> <p>Both schemes are key to the development of the Swords area, but as detailed are not mutually dependent on each other for delivery.</p>
6	1. Introduction	12	With the TII's proposed plans, our housing estate will no longer be child friendly, and this will ultimately ruin the little community that has been established here over the last 30 years. This has already caused great stress and anxiety to many of the residents in Estuary Court. While the residents of Estuary Court do not oppose the MetroLink project, we strongly believe that the MetroLink route does not need to come through our estate. We have engaged with the TII over the last 2 years and to date they have not been able to provide a definitive answer as to why the MetroLink needs to come into our estate instead of following the R132 road.	See response numbers (3), (4) above and (7) below.
7	2. Impact of MetroLink Route Cutting Through Estuary Court	13	The current proposed MetroLink route cuts through the top green of Estuary Court. However, the TII plan to take both of our green spaces for the duration of the construction works. The top green for constructing the cut and cover tunnel through it, and the bottom green for a site compound. They also plan to demolish our boundary wall along the R132 and cut down the mature trees and landscaping along it. At a high level the three the main impacts for Estuary Court of the proposed TII preferred alignment are as follows: <ul style="list-style-type: none"> • Loss of open green space • Loss of mature trees, landscaping and boundary wall • Disruption from construction works 	<p>See also response numbers (3) and (5) above.</p> <p>Details of the requirements and provision of Construction Compounds are given within section 5.3 of the EIAR Chapter 5: MetroLink Construction Phase. Volume 4 Figures, Chapter 5, MetroLink Construction Figure 5.1 Construction Compounds provides details of all the proposed sites along the alignment, noting that the vast majority, with two exceptions, are positioned in "commercial/industrial" designated land.</p> <p>The Satellite compound designated at Estuary Court, opposite the residents will be required for 36 months to undertake the main MetroLink works within the boundary of the site at this location, including: - The cut & cover and retained cut structures. - The reinstatement of the permitted landscape on the completion of the alignment structures. Note that locations of construction compounds proximate to the workforce site are essential to achieving the projected programme for the works.</p>

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8	2.1 Loss of Open Green Space	14 and 15	<p>The loss of open green space will have a devastating effect on the young children in the Estate. With very small back gardens, the young children will have no green space to play ball games or even run around. The only place the children will have to play is on the road, raising safety concerns. The original timeframe provided to us by the TII for using the greens was:</p> <ul style="list-style-type: none"> • 2 years for the top green; • 6-12 months for the lower green. <p>When considered with the actual cut and cover and open cut construction, the estimated duration through this area is between 51 and 69 months. Given that construction programmes often over-run for projects of this size, we envisage the length of time could easily extend to be a lot longer.</p> <p>This also doesn't allow for the time it would take for the new grass to get established and be suitable for playing on. This would take another year. It is very probable that our top green would be unavailable to the kids for 5/6 years and the bottom green 4/5 years. This might not seem like a long time to an adult but for the young kids under 10 in our estate, this could be half of their lives and a pivotal time for their growth and development. This will have a significant impact on their young lives.</p>	<p>See response number (7) above.</p> <p>Chapter 11 Population and Land Use Section 11.6.1 also notes the following:</p> <p>Community Relations Officers (CRO's) will be employed during the construction of the proposed Project and contact details will be provided on the proposed Project website so that stakeholders and communities can make contact as required. The CRO's will be responsible for maintaining open, transparent and positive relationship with members of the public, local businesses, groups and organisations affected by the works. Specifically, the CRO's will work closely with Transport Infrastructure Ireland and the appointed contractors to ensure that all effort to address public concerns are made, and to ensure that information on the nature and duration of all works is provided; and ♣ Reinstate all land as quickly as possible following construction so as to expedite any local disruption and return to existing surface land uses that can be used by the surrounding residents, businesses and communities.</p>
9	2.1 Loss of Open Green Space	15	<p>To make matters even worse, the TII do not even intend to give us back what we currently have. After the construction works are complete, the TII want to develop our open greens into a linear park to run up along the R132. Please See Submission No. 2 - Submission 089 for more detail on this.</p> <p>On our first call/meeting with the TII in February 2021 , they presented their plan and informed us that they would be taking over both of our greens. It was evident from this call that no consideration was given to the impact this might have for the residents of Estuary Court. When the question was put to them about where our children could play safely, they had no answer other than to confirm there was no alternative green area proposed for us (See Fig 2.1 - section 3.3 of the submission).</p>	<p>See response number (3) above</p>
10	2.2 Loss of Mature Trees and Landscaping and Boundary Wall	15 and 16	<p>There are mature trees and landscaping along the boundary wall with the R132. The R132 is a very busy road and the mature trees provide a visual and noise barrier. They also aesthetically enhance the estate and provide a secure and pleasant feel. TII's plan is to remove all these trees. Even if the TII replaces these with semi-mature trees it will take 20 years to get back to what we have now. The estate will lose the visual amenity we currently have.</p>	<p>The proposed Project will provide an integrated series of small local parks complete with play facilities, seating and planting, adjacent to the residential areas and which interconnect to form part of the longer green ribbon proposed alongside the Fingal County Council's R132 proposals. The extensive landscaping is proposed for over the cut and cover sections and linking around open cut sections, following the alignment but also extending into existing open spaces as appropriate in order to provide a comprehensive recreational facility for the adjacent residential communities. The nature of the proposed planting is biodiverse and will mature to provide a much more valuable, connected landscape than is currently the case. The proposed tree planting will be much more appropriately scaled to the adjacent residential open spaces than the existing predominant tall roadside trees. This proposed section of the R132 extensive landscaping, which is being included as an integral part of the proposed Project within this Local Landscape Character Area (LLCA), will beneficially transform the interconnectedness of this area, across and along the road and with the range of local communities and facilities around the eastern side of Swords. This is particularly so for pedestrians and cyclists. It will represent a significant positive effect of the proposed Project in respect of its broader landscape context and in terms of social and cultural amenity for the town of Swords and its environs. It also represents a major enhancement of the existing landscape condition.</p>
11	2.2 Loss of Mature Trees and Landscaping and Boundary Wall	16	<p>The TII originally proposed not to reinstate our boundary wall. They wanted to take over our green spaces as part of a linear park. We have engaged with them on this over the last two years and the proposed plan in the Rail Order now includes for wall type H (not defined). However, they have included access gaps in the wall which makes it ineffective for security and the safety of our children playing on the green. Please see our Submission No. 2 - Submission 089 for further detail on this.</p>	<p>See response number (3) above</p>

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12	2.3 Disruption from Construction Works	16 and 17	There will be significant disruption to the residents caused by the construction works. The hoarding will line one side of the road into our estate. The large plant will operate on the other side of the hoarding and in some places could be as close as 10m to the houses. It will be akin to living on a building site every day for a minimum of three years. There will be major disruption such as noise pollution, vibration, dust, piling slurry wash off, traffic restrictions, visual impact and increased vermin. Every resident in the estate will be impacted by the construction works in some form. The first row of houses will be most severely impacted, along with the elderly, people who work night work or shift work and those who work from home. Please see Submission No. 2 - Submission 089 for more detail on this.	As noted here the other submission from Estuary Court residents (#89) raises the same issue. Please see the text within submission response #089 to item numbers: (19) to (25), where the issue raised here is addressed in detail.
13	3. Discussion with the TII	18	We engaged with the TII over the last few years and had calls and meetings with them. We raised the question on numerous occasions about why the Metrolink can't go on the R132 roadway instead of cutting through our estate. We only ever received short dismissive answers and they never wanted to go any further with it. None of the answers provided gave a satisfactory reason as to why the Metrolink could not be re-aligned onto the R132. The following answers were provided: <ul style="list-style-type: none"> • The R132 is not wide enough for a cut and cover construction • Decision not to go on the R132 following previous public consultation • There are utilities in the way 	See response number (4) above
14	3.1 The R132 Road is Not Wide Enough	19	The TII raised the point that even if the road was wide enough for the cut and cover tunnel, it wouldn't be wide enough to allow the construction of it. We don't accept this point. If the construction was to be carried out as a "top down" construction, there is very little extra width required. For example, during the construction of the Port Tunnel, the traffic lanes were reduced to the minimum on both sides. It did disrupt and slow down the traffic flow during the construction period however, this does demonstrate what can be done, if required. As a comparison the width of construction area for the Port Tunnel was approx. 35m, the width required for the Metrolink with top-down construction would be approx. 14m. The full width of the road (i.e., from boundary wall to boundary wall) at that section of the Port Tunnel is 42m. This is the same width as R132 at the Swords bypass section (i.e., Estuary Court to Pinnock Hill Roundabouts).	Further to response number (4) above. Please note: TII's position on an alignment anywhere in the Median of the R132 is for the alignment to be in a fully open retained structure as there is no engineering reason for it to be covered over in the R132 with the exception of crossing points. Construction of the MetroLink in the Median. An open retained structure for the MetroLink alignment is 12m normal alignment and 25m for each of the open station stations. To deliver such a structure in the Median of the R132, requires a site width of 32m generally longitudinally and 45m for each of the stations, noting that the existing c/way is approximately 26m wide, with the R132 corridor including verges approximately 42m, and explains some of the summary of impacts highlighted in response number (4) above. Traffic Diversions Two options for creating R132 traffic diversions past the 2km long construction site would then be required: 1. Maintaining the existing c/way complete with footpaths and cycle routes in both directions would likely require temporary land take outside of the existing boundary of the existing R132, impacting on more residential receptors along the route (amenity loss and traffic noise impacts). 2. Working within the confines of the existing R132 Corridor, either: <ul style="list-style-type: none"> • Maintain 2 lanes of vehicular traffic in both directions within the space available between the existing boundary walls of the R132 and the construction site, with any existing pedestrian, cycle ways or bus stops along the R132 then suspended throughout the construction phase, or • An alternative would require a reduction of vehicular traffic to one lane in both directions with cycle/Pedestrian/Bus stops now accommodated. • Both of these options would impact traffic locally across the whole Swords locality and would also increase traffic noise impact with all residential receptors along the R132.

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15	3.2 Decision Made Not to go on the R132 based on the Public Consultation	20 and 21	<p>One of the original proposals for the Metrolink was for it to run on an elevated structure along the median of the R132 (See Fig 3.3 of the submission). At the public consultation stage there was a lot of negative feedback about this and the visual impact it would have along the route. Following this, it was decided by the TII not to pursue this option.</p> <p>The negative feedback related to the visual impact of the elevated structures (which we agree with) and not the alignment of the Metrolink along the R132. Therefore, we don't believe this is a justified reason as to why the Metrolink cannot be aligned on the R132 with a cut and cover option.</p>	Please refer to response numbers (4), (5), (13) and (14).
16	3.3 Utilities in the Way	21	<p>Another reason that the TII gave to us was that there are utilities running in the central median of the R132 road and these would be in the way of constructing a cut and cover tunnel. There may be utilities in the central median however we don't believe this is a good enough reason to not consider putting it there. Although it may cause inconvenience and additional costs, utilities can be diverted or relocated. This is common for any cut and cover construction in a built-up area and was carried out extensively in Dublin City for the LUAS works.</p>	Further to response number (4) above, as you state utilities can be relocated and diverted to suit the construction in the Median. The main utility diversions required to do so are anticipated to be just as complex when compared to other options. However, services running along both verges and in particular a gas main, currently located in the southbound (eastern) verge will likely have to be relocated with the change in highway alignment anticipated around the completed structures. All achievable, but very likely to prolong the works duration and therefore the impacts to residents. Thus this option is much less favourable for utility diversions.
17	4. The Principal Reasons for the Choice of the Preferred Route	22	<p>The Preferred Route Design Development Report (March 2019) set out the following principal reasons for choosing the Open cut on the east side of the R132.</p> <ul style="list-style-type: none"> * Lower overall construction costs ◆ Lower impacts on the landscape and visual amenity • Lower potential impacts on traffic along the R132 during the construction phase • Improved access to stations. <p>We set out our comments on these reasons as follows:</p> <p>4.1 Lower Overall Construction Costs The construction costs may be lower however, the option of open cut on the east side of the R132 now cuts through three established housing estates. We do not believe lower costs' are a good enough reason to offset the impact that this route will have on all the residents of Estuary Court, Seatown Villas and Ashley Avenue.</p>	Please refer to response number (4) paragraph 2.
18	4. The Principal Reasons for the Choice of the Preferred Route	22	<p>4.2 Lower Impacts on the Landscape and Visual Amenity As the route along the R132 (Estuary Roundabout to Pinnock Hill Roundabout) is now all below ground there certainly will be a lower impact on the landscape and visual amenity. We agree that the cut and cover / open cut option is much better than elevated or on the surface. However, this would also apply to a cut and cover option on the R132 and far less loss of our direct visual amenity, especially if the road is narrowed as part of the R132 proposals (see below).</p>	See responses numbers (4), (5), (13), (14), (15) and (16).
19	4. The Principal Reasons for the Choice of the Preferred Route	23	<p>4.3 Lower Potential Impacts on Traffic Along the R132 During Construction While the option of moving the route to the east of the R132 will potentially have a lower traffic impact, there still will be impacts where the metro crosses the R132 and at the junctions. The R132 Connectivity scheme has plans to change the nature of the R132, from a fast-moving distributor road to one which functions as an urban street with defined crossing points, which are safe and convenient for all road users. The traffic will be reduced to 50km/h, and we believe this is an opportunity for the traffic routes to be re-configured to minimise the impact that the construction of the Metrolink might have.</p>	As indicated in Appendix A9.5 Scheme Traffic Management Plan, the model scenario used for the assessment of the impact of Project construction works on traffic included the completion of the junction upgrades under the R132 Connectivity Study prior to the commencement of the MetroLink construction works. Temporary traffic management measures for the construction of MetroLink have been developed to minimise the impact of the Project on all road users, and to maintain access to businesses and other premises. A hierarchical approach to traffic management has been adopted with pedestrian/cyclists, public transport and commercial needs provision taking preference over private car usage.

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20	5. Opportunity from R132 Connectivity Project	24	Fingal Co. Co. have been granted permission to proceed with the R132 Connectivity Project. Fingal Co. Co. plan to proceed with these works before the Metrolink works start. The construction of the Metrolink will significantly impact the new proposed R132 where it transverses the road from Seatown Villas into Estuary Court (see Fig 2.0 of the submission) and also at the junctions along the R132. The newly laid road pavement will have to be dug up and reinstated again after the Metrolink works. We believe it illogical for one Public Authority to proceed with the R132 Connectivity Project while a 2nd Public Authority is planning a major Metro project that will cut through the R132 and have a major impact on it. Surely a joint approach would be the best way forward.	Chapter 30 of the EIAR describes the cumulative impacts of MetroLink and other projects, including the R132 Connectivity Project. Where possible, MetroLink contractors will work with other contractors to minimise impacts but due to different programme pressures this is not always possible. As previously stated in response number (5) above, neither project is mutually dependent upon each other. However, should the opportunity arise after an Enforceable Railway Order be granted by An Bord Pleanála, MetroLink will consult with FCC on the timing, interfaces, and management of the delivery of both schemes.
21	5. Opportunity from R132 Connectivity Project	24 and 25	We believe it would make more sense for the Connectivity Project be completed in 2 phases: <ul style="list-style-type: none"> Phase 1 - Temporary layout to change the nature of the road to one which functions as a urban street while also facilitating the construction of the Metrolink; Phase 2 - Final layout after the Metrolink cut and cover has completed. This will allow for the permanent reinstatement works to be completed just once. We understand that once the cover has been installed on the rail tunnel, the metro works can continue below in the tunnel while the R132 Connectivity works can be completed in tandem above the ground. 	See response (20)
22	5. Opportunity from R132 Connectivity Project	25	The Preferred Route Design Development Report (2019) goes into a lot of detail and sets out the positive and negative impacts of each option and the reason why it has chosen option 3 - open cut along east of R132. However, in this report and other TII documents available from that time, there is no reference to the R132 Connectivity Project. This would lead us to believe that either the TII were not aware of this proposed project or else they didn't consider it in their decision making. We believe the R132 Connectivity Project is a game changer for choosing the best option. By changing this road from a fast-moving dual carriageway to a road that functions as an urban street, this offers a massive opportunity for installing the Metro (cut and cover) the whole way around this section of the road. The width required for the new proposed urban street type road is greatly reduced. There is no requirement for a central median, hard shoulder and the grass verges on either side could be reduced in width. The urban street type road could fit in approx. 2/3 of the road and the metro tunnel and construction of it could easily fit in the other 1/3. Please see Fig 5.1 of the submission.	See response number (5) above
23	5. Opportunity from R132 Connectivity Project	26	The R132 is approximately 42m wide from boundary wall to boundary wall. Based on standard road lane widths, this could easily accommodate a new urban street type road on one side (approx. 2/3 of the road) and the construction of the Metrolink on the other side (approx. 1/3 of the road). The Metrolink is planned to be cut and cover for most of the R132 so by keeping to this method on the R132, this would provide an ideal route above for cycle lanes / pathways / landscaping all along the R132. We believe that the R132 Connectivity Project should be considered in full as part of the decision making for the best option. There are opportunities for both projects to work together and achieve a better and sustainable solution that does not need to disrupt and destroy the safe family environments in the three different housing estates along the route. None of the construction works have started on either project so it's not too late for the relevant design teams to come together and redesign the section of R132 that will provide the optimum solution for both the Metrolink and the Connectivity Project.	As stated above in response number (4) TII have reviewed many options for the delivery of the MetroLink through Swords with the option presented in the EIAR the least impactful to the stakeholders along the R132, while resolving the visual impact objection to the elevated alignment and ensuring that the scheme remains economical for delivery under the business case. Alternative Residents Solution. As with all of the options considered, the solution proposed on Fig 5.1 to effectively build the MetroLink Alignment under the existing R132 Southbound c/way is of course possible. However, we would offer the following initial observations in addition to those previous stated in response number (4) above: <ul style="list-style-type: none"> This alternative scheme assumes a full cut & cover solution, which is not the scheme proposed under the EIAR, nor was it ever TII's intention to provide such a scheme when moving away from the initial preference for an elevated alignment. See response number (13) above. In its current layout, this alternative scheme would be unworkable in delivering the R132 Connectivity Scheme with an open retained MetroLink alignment. However, it is potentially feasible to have an open retained MetroLink with a full R132 Connectivity configuration running alongside it but pushed into the northbound verge. Further impacts of such a solution are outlined below.

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Organisation Name or Name of Submitter			Estuary Court Residents Association (16 Estuary Court, Swords), Submission No 1 (prepared by Barry Arthurs)	
Letter Re: Railway (MetroLink-Estuary to Charlemont via Dublin Airport) Order 2022, Estuary Court Submission No. 1- Re-alignment of MetroLink route out of family housing estates onto the R132				
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
				<p>Additional Construction Impacts Further to response number (4) above, an alternative open structure solution running alongside a reconfigured R132 Connectivity project would have the following additional impacts:</p> <ul style="list-style-type: none"> • To make a space for construction access to the works would require the relocation of 4 lanes of traffic towards the northbound verge of the R132. The consequence of this is to push cumulative traffic noise towards more residential receptors on a temporary basis during construction. • While 2 lanes of vehicular traffic can be accommodated in both directions within the space available between the existing boundary walls of the R132 and the construction site. However, any existing pedestrian, cycle ways or bus stops along the R132 would have to be suspended throughout the construction phase. (See also response number (13) above. • An alternative would require a reduction of vehicular traffic to one lane in both directions with cycle/Pedestrian/Bus stops accommodated. See also response number (13) above. • Working space inside of the structure would also require land take on the eastern verge along the whole route, including part of the park at Estuary Court and potentially the gardens at the rear of The Crescent. • To create access to build the stations will require temporary landtake outside of the existing boundaries of the R132 to divert traffic to provide. For Seatown Station, this has the potential to impact on residential, commercial, and school (St Colmcille's) receptors close to Seatown Walks. <p>Additional Permanent Impact Whilst not an issue in terms of operational noise or vibration impacts, an open retained alignment would be located along the eastern verge of the R132 and at the rear of the park at Estuary Court and The Crescent.</p>
24	6. Conclusion	27	<p>The residents of Estuary Court do not oppose the Metrolink project, however, we do not believe enough consideration has been given to the impact on the residents and to other alternative routes along the R132. It seems like the TII have gone with the easy option to cut through our family housing estates.</p> <p>The R132 Connectivity Project is changing the nature of the R132. There is a huge opportunity for the Metrolink and R132 Connectivity Project to work together and drive synergies from each project. It seems impractical to shoehorn the R132 Connectivity Project in ahead of the Metrolink project, when both projects will require significant works on the R132, causing major disruption and having a major impact on the traffic. Surely a joint approach would be more beneficial to all parties including the road users and the local residents.</p> <p>We believe it is worth taking a step back and consider how these two projects could be carried out together, saving time, disruption and potentially cost. It is not too late for the TII to re-align the Metrolink onto the R132. We would urge you to compel the TII to revisit the proposed route with a view to re-aligning it onto the R132. If this doesn't happen, it will be us, the residents of Estuary Court and the two other housing estates that will be impacted long after the ribbon is cut.</p>	<p>As already stated above, response number (4) and (21), TII strongly disagree with this statement and consider that the option selected to deliver Metrolink through Swords has been fully considered. While acknowledging that the completion of the works through the park at Estuary Court will have a short-term impact with local residents, TII have provided residents with a commitment that the park will be fully reinstated at completion, and with the alignment in cut & cover past their estate is of now of no significant impact to the residents in operation.</p>