

Submission No.		165		
Organisation Name or Name of Submitter		KW Real Estate ICAV (represented by Stephen Little & Associates)		
RE: "RAILWAY (METROLINK - ESTUARY TO CHARLEMONT VIA DUBLIN AIRPORT) ORDER 2022" - ABP REF. NA29N.314724, AREA 306 - ST. STEPHEN'S GREEN				
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1	Cover Letter	1,11	The main concern in terms of the Shelbourne Hotel relates primarily to the potential impacts of MetroLink on the ongoing and successful operation of the Shelbourne Hotel during the construction phase of the MetroLink Project. Our Client is seeking to ensure that the construction of MetroLink Project will be undertaken with minimal disruption to the renowned historic Shelbourne Hotel and its guests and visitors.	TII have reviewed your submission and noted your concerns/observations which are responded to below. TII confirm that your property has been included in the assessment of potential construction and operational impacts of the MetroLink Project. The EIAR fully details all impacts to the Shelbourne Hotel during construction and operational phases of the MetroLink. TII will however ensure that all impacts are minimised so far as is reasonably practical.
2	Cover Letter	1,11	It is also incumbent on the TII to ensure that any potential direct or indirect adverse impacts in respect of noise, vibration or pedestrian and vehicular accessibility to the hotel during the construction and operational phase of MetroLink Project is appropriately mitigated through design.	<p>The EIAR fully details the impacts of both the Construction and Operational Phases and proposes appropriate mitigations. Mitigations will be implemented throughout the design and construction phase. Included below is a summary of the impacts and mitigations provided for but reference should also be made to the Outline Construction Environmental Management Plan (CEMP) in EIAR Appendix A5.1.</p> <p>Noise and Vibration Regarding potential direct or indirect adverse impacts in respect of noise and vibration, please refer to Item 5 below. In order to mitigate noise and vibration the CEMP has been prepared and is included as Appendix A5.1. This is a working document that will be updated by the contractor prior to commencement of construction and regularly as the project progresses. Table 6.2 of the CEMP outlines the noise and vibration measures proposed during construction phase of MetroLink Project.</p> <p>Pedestrian and vehicular accessibility Pedestrian and Vehicular access to the Shelbourne is unaffected throughout the main works construction and during the enabling works periods any utility diversion work will be managed to minimise any short term disruption. The construction site does not alter during the main works phase. Only short term, slight negative impacts to traffic flow on St Stephens Green East are noted in the EIAR Chapter 9 (Traffic & Transport).</p> <p>Mitigation measures during the Construction Phase of the proposed Project will be managed through the Outline Construction Environmental Management Plan (CEMP) and Temporary Traffic Management (TTM) Plans for the proposed Project and stations. The contractor(s) are required to implement the measures outlined in Table 6.1 of the Outline CEMP in relation to traffic and transportation during construction. The Traffic Management proposals have been developed to minimise construction impacts on pedestrians, cyclists and on the operation of bus services based on the principles of the road user hierarchy.</p> <p>During operational phase, it is anticipated that, overall, the proposed Project will provide for improvements to the public transport network, resulting in decreases in car usage/trips, increases in public transport usages, and will facilitate walking and cycling to the stations, without significantly impacting on the operation of the networks in the area. The proximity of the station to your hotel will benefit the Shelbourne Hotel hugely in the operational phase.</p>
3	Cover Letter	1	Our Client has made a significant investment in the external and internal conservation, repair and refurbishment of the Shelbourne Hotel in recent years to ensure that it remains an iconic City destination. It would be totally unacceptable to our Client that potential impacts arising during the construction or operational phases of the MetroLink Project would undermine the investment expended to date to ensure that the historic architectural quality of the building is maintained in excellent order and that the best quality experience is delivered to the hotel's local and international guests.	<p>TII recognise the importance of the building and have included for this in the environmental impact assessments, including EIAR Architectural Heritage. (Section 26.4.4.14.2 specifically notes the Shelbourne Hotel building in this Historical Background section of the study area) Further Section 26.5.4.13.2 and 3 note that there will be no impacts on architectural heritage in this section of the study area (where the Shelbourne Hotel is located) during the Construction and Operational phases respectively.</p> <p>The impact of ground movement is discussed below in response (5).</p>

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4	Land Use Zoning	3	Significant investment has been made by the current owner in the conservation, repair and refurbishment of the Shelbourne Hotel as an iconic heritage and visitor destination in the City, in accordance with the aforementioned zoning objectives for this site. Our Client is anxious to ensure that this investment in the Shelbourne Hotel as a successful going concern and local historic landmark is not undermined by the MetroLink Project works or operation.	Refer to Response 3.
5	Protected Structure	4	The potential significant impact of any proposed MetroLink works on the Shelbourne Hotel (historic building and use) and its setting as a protected structure will need to be taken into account in terms of the construction and operational phases of the MetroLink Project.	<p>The potential construction and operational impacts on the Shelbourne Hotel have been assessed within the EIA. Potential impacts on the Shelbourne Hotel buildings and its use could arise due to settlement, air emissions and dust, airborne and groundborne noise and vibration. The main potential construction and operational impacts are summarised below while the EIA chapters fully details all impacts during construction and operational phases of the MetroLink Project.</p> <p>1. Settlement EIA Appendix A 5.17, Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement on properties. Table 5-2 outlines the results of the Phase 2a Building Damage Assessment conducted on representative buildings along the proposed tunnel alignment, including for Shelbourne Hotel (building reference B-12 and B-13). Table 5-2 shows that assessments to date indicate that the buildings fall into the "Negligible" damage category. As Protected Structures, the Shelbourne buildings are designated as 'special buildings' which means they will be taken forward for a Phase 3 Assessment that will be undertaken by the main works contractor at the detailed design stage of the Project. This is despite the negligible damage predicted. This further assessment will pick up on the building's condition close to the time when the building will be impacted. A detailed survey will be carried out as part of the Phase 3 assessment to provide the necessary additional information to inform this detailed analysis of how the individual elements of the building would be affected by the predicted ground movements. The results of this refined assessment typically show that earlier assessments are conservative and overestimate the likely impact of construction generated ground movements.</p> <p>2. Airborne Noise and Vibration EIA Chapter 13 (Airborne Noise and Vibration) assesses the impact of the MetroLink Project arising from Airborne Noise during the Construction Phase and Operational Phase. The assessment of airborne noise from above ground construction activities at nearby St. Stephen's Green Station is presented in section 13.5.2.6 AZ4: Northwood to Charlemont of EIA Chapter 13. Full calculated results for this work area, including for Shelbourne Hotel, are included in EIA Appendix A13.7. The airborne noise levels at Shelbourne Hotel are predicted to be between 62 - 68 dB LAeq,T depending on the sequence of construction activity, which are below the construction noise threshold level of 75 dB LAeq,T, resulting in a "not significant" impact on the building operation during the MetroLink construction phase. Once operational, the MetroLink will be in tunnel within Northwood to Charlemont section of the proposed Project. The primary operational noise sources in this section relate to station and ventilation tunnel systems. For the ventilation systems, during the detailed design phase, the operational noise level from each surface grill will be calculated to the nearest sensitive area to each and specific attenuation designed for each system to not exceed the relevant design criteria for each location (in line with BS4142).</p> <p>3. Groundborne Noise and Vibration Chapter 14 (Groundborne Noise & Vibration) of the EIA assesses the impact of the MetroLink Project arising from Groundborne Noise and Vibration during the Construction Phase and Operational Phase. The Shelbourne Hotel was assessed for potential groundborne noise and vibration impacts from the construction works (mechanical excavation, blasting, and TBM Passage) and railway operation. The predicted groundborne noise and vibration results for the Shelbourne Hotel are summarised in the EIA Chapter 14, Table 14.29 (Groundborne Noise during TBM Passage), Table 14.31 (Groundborne Noise during Mechanical Excavation), Table 14.32 (Vibration during TBM Passage), Table 14.33 (Vibration during Construction Mechanical Excavation), Table 14.34 (Blasting Vibration Levels), Table 14.35 (Blasting Air Overpressure Levels), Table 14.44 (Groundborne Noise during Railway Operation), Table 14.45 (Groundborne Vibration during Railway Operation). The full suites of groundborne noise and vibration results are presented in Table 14.4 (Section AZ4) of EIA Appendix 14.5. According to the assessment calculations, the noise and vibration levels during construction and operational phases will be below the threshold limits (please refer to EIA Chapter 14.3.1.4 Sensitive Receptors AZ4 Northwood to Charlemont, Table 14.18 for threshold limits applicable to The Shelbourne Hotel) resulting in "no significant" impact on buildings operation, except for TBM Passage where the noise value of 47 dB will be above the threshold limit of 45dB, resulting a "significant" impact on the buildings operation for the limited duration (a maximum of 2 weeks) during TBM passage.</p>

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			Response (5) continued.	<p>3. Air Quality</p> <p>Air quality impact was assessed in the EIAR Chapter 16 Air Quality. According to the assessment, following mitigation measures, the likely effects of the emissions from the proposed Project construction, are considered overall Neutral, Not Significant and Medium-Term and fugitive emissions of dust from the site are not predicted to be significant and pose no nuisance, human health or ecological risk to nearby receptors.</p> <p>During Metrolink operation, overall, considering the likely effect of emissions from the Operational Phase of the proposed Project, the likely effects are considered overall Neutral, Not Significant and Long-Term.</p> <p>In conclusion, according to the above mentioned there will be no predicted significant impacts on Shelbourne Hotel operation due to settlement, noise and vibration and air quality, except for the noise generated during TBM Passage which will be of limited duration. Unfortunately, there are no effective methods available to reduce groundborne noise or vibration from TBMs at source but note that the duration of this impact will be in the order of up to two weeks as the TBM passes. TII will liaise with Shelbourne Hotel to ensure the timing of these impacts are known.</p>
6	Conservation Area	4	Again, the potential significant impact of any proposed MetroLink Project works on the Shelbourne Hotel (historic building and use) and its setting as a protected structure in a designated 'Conservation Area', will need to be taken into account in terms of the construction and operational phases of the MetroLink Railway Order application .	Please see responses (5) above and (11) below.
7	Noise & Vibration	8	<p>On review of the mitigation measures set out in the EIAR, noise insulation and temporary re-housing is proposed for all sensitive receptors. The mitigation measures do not differentiate between a residential or a hotel use for example.</p> <p>While the tunnel boring may be temporary as it passes in proximity and beneath the Shelbourne Hotel the 'residual impacts' as set out in the EIAR are naturally a concern for our Client.</p> <p>The mitigation measures set out in the EIAR do not appear to differentiate between the types of sensitive receptors along the MetroLink line.</p> <p>Our Client would have significant concerns in relation to the practical application of the proposed mitigation measures in the context of the Shelbourne Hotel.</p>	<p>Unfortunately, there are no effective methods are available to reduce groundborne noise from TBMs at source. The principal mitigation measures aimed at minimising impacts from groundborne noise are as follows:</p> <ul style="list-style-type: none"> • Advance public consultation and stakeholder engagement can greatly reduce the significance of groundborne noise effects during construction, as building occupants would be prepared for the passage of the TBM and resultant elevated noise and vibration levels. <p>It is important however to note that the advancement of the Tunnel Boring Machine will be for a very short duration over a matter of days and that the noise will be imperceptible to most guests. TII and their contractors will engage with the Shelbourne Hotel regarding the potential impacts of these works and the proposed programme for the same once this information is available.</p>
8	Noise & Vibration	8	Secondary glazing would not be appropriate on the Shelbourne Hotel given that it is a Protected Structure. Such works are likely to significantly detract from the character of the building even in a temporary scenario. Furthermore, such mitigation measures may not be implementable due to the potential impact on the historic protected fabric of the building.	This point is noted, but for clarity please note that secondary glazing is neither proposed nor required at this location.
9	Noise & Vibration	8	Temporary Rehousing is not considered feasible for a hotel of such significance in Dublin City centre. Even if it were, rehousing guests / visitors would have a significant impact on the operation of the Shelbourne Hotel.	Please see response to 7 above.
10	Noise & Vibration	8	Our Client is a Key Stakeholder and early engagement with both TII and future Contractor is requested to ensure the short to medium term operation of the Shelbourne Hotel is not unduly impacted by noise and vibration during the construction phase of the MetroLink Project.	TII will engage with the Shelbourne Hotel as required both in advance of the works likely to impact and throughout the construction phase.

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11	Conservation / Architectural Heritage	8,9	<p>The Architectural Heritages Chapter of the EIAR submitted with the Draft Railway Order identifies that there will be a significant indirect impact on the Protected Structures on the northern side of St. Stephens Green (which include the Shelbourne Hotel).</p> <p>It is acknowledged that the 'setting' in the context of the Protected Structures on the northern side of St- Stephens Green (which include the Shelbourne Hotel) will be reinstated. In this instance it is proposed to re- Instatement of protected railing and new tree planting within the northwestern corner of St.Stephens Green.</p> <p>It is incumbent on TII o ensure that during the construction phase of the MetroLink Project at St. Stephen's Green East that the operation of the Construction Compound does not have any adverse impacts on the operation of the Shelbourne Hotel. This would include orderly management of the compound to ensure it remains well maintained and does not detract from the setting of the Shelbourne Hotel whilst present. Our Client is a Key Stakeholder and early engagement with both TII and future Contractor is requested to ensure the setting of the Shelbourne Hotel in architectural heritage terms is not substantial undermined during the construction phase of the MetroLink Project.</p>	<p>According to the assessment, during Construction Phase, an indirect impact on the building will occur due to the presence of the construction site directly in front of the protected structure. On completion of the works the impact will be not significant. This is an indirect impact due to the works to St Stephen's Green. TII can confirm that the protected railing will be reinstated and new trees will be planted as stated.</p> <p>TII will ensure that the site is hoarded and maintained to a standard in keeping with the setting.</p>
12	Traffic	9	<p>The results of the junction modelling set out in EIAR indicate that the main impact of the traffic management measures at St. Stephen's Green station will occur in the Weekday AM Peak Hour. The closure of Hume Street and subsequent diversion via Pembroke Street and Leeson Street (See Figure 6) will impact on the flow of traffic generally in the area.</p>	<p>Correct. For context only slight negative short term impacts are assessed on St Stephens Green East.</p>
13	Parking & Loading	10	<p>During the construction phase St. Stephen Green East will have a temporary layout which may in turn impact on the road layout on St. Stephens Green North once a detailed Construction Management Plan is put in place by the Contractor. The Draft Railway Order sets out in relation to parking and loading area impacts that:</p> <p>"Parking and Loading Impact Temporary management measures have been developed to minimise the impact on parking and loading. Site specific mitigation measures will be developed through consultation with stakeholders, including local authorities, residents and business owners. These impacts should be monitored throughout the Construction Phase to assess if any disrupted bays can be reinstated."</p> <p>Our Client is a Key Stakeholder and early engagement with both TII and future Contractor is requested to ensure that the operation of the Shelbourne Hotel is not impacted by any temporary traffic arrangements implemented during the construction phase of the MetroLink Project.</p> <p>Any amendments to the road layout on the junction of St. Stephens Green North and St. Stephen Green East are likely to have an impact on the operation of the Shelbourne Hotel. This needs to be fully considered prior to the commencements of works of the MetroLink Project at this location.</p>	<p>The traffic management arrangements developed in conjunction with DCC and the NTA are included within the EIAR and have been modelled. The arrangements will not impact upon the operation of the Shelbourne Hotel.</p> <p>TII note your observation and although temporary traffic impacts and arrangements have been fully considered in the EIAR, we nonetheless welcome continued engagement with Shelbourne Hotel with regards to your concerns related to temporary traffic arrangements.</p>
14	Air Quality & Dust	10	<p>The Draft Railway Order sets out that an Air Quality Management Plan shall be prepared and submitted for approval to the relevant Planning Authority. The EIAR describes the impact on air quality during the construction phase as short to medium term, negative, localised and not significant.</p> <p>Our Client is a Key Stakeholder and early engagement with both TII and future Contractor is requested to ensure that the operation of the Shelbourne Hotel is not impacted by dust or air quality arising from the construction phase of the MetroLink Project.</p>	<p>Please refer to response (5) above. Air Quality will be managed to minimise all impacts with details of the proposed mitigations contained in the CEMP.</p>