



**dublinchamber**  
of commerce

**Dublin Chamber of Commerce  
Submission to An Bord Pleanála**

**Irish Rail Railway Order for DART Underground**

**17<sup>th</sup> August 2010**

## **Preface**

Dublin Chamber is disappointed that this submission had to be prepared without sight of the findings of the planning inspector in relation to the Railway Order application for Metro North. It would have been beneficial to assess the Railway Order application for DART Underground in light of the conditions attached to the Metro North works. Dublin Chamber reserves the right to make additional comments once we have had adequate time to review the inspector's report on Metro North.

Many of the issues raised in this submission also concern the delivery of Metro North and Luas Broombridge. Consequently, this submission should be cross-referenced with Dublin Chamber's submission of 29<sup>th</sup> October 2008 to An Bord Pleanála regarding the RPA's Railway Order application for Metro North (see appendix 1), and Dublin Chamber's submission of 13<sup>th</sup> August 2010 on the RPA's Railway Order application for Luas Broombridge (see appendix 2).

## **1. Introduction**

Dublin Chamber supports the Transport 21 programme for the Dublin City Region. DART Underground, Metro North, and the Luas extension projects will play an important role in delivering an efficient, integrated and coherent transport network in the Dublin City Region.

Transport 21 will help to realise Dublin Chamber's goal of transforming Dublin into a modern dynamic competitive City Region, and Dublin City Council's vision to achieve a compact, sustainable and connected city.<sup>1</sup> Furthermore, an integrated transport network in the Dublin City Region that inspires public confidence will help generate a preference for public transport. This will help realise the policy outlined in the NDP 2007-2013 to promote a modal shift from private vehicle to public transport particularly in urban areas. Overall the rail projects proposed under Transport 21 will increase transport options, potentially shorten commuting times and reduce carbon emission levels.

The benefits of the DART Underground project to Dublin and Ireland are quite clear. It will transform Ireland's rail network as it not only increases capacity on the rail network but it also revitalises the existing network by relieving congestion at Connolly Station and integrating all rail lines including DART, Commuter, InterCity, Luas and Metro. When delivered in tandem with Metro North, the synergy created will be one which transforms public transportation in the Dublin City Region and provides a more joined-up rail service nationally.

## **2. Protecting the city centre**

The focus of, and highest priority for, Dublin Chamber and its members continues to be the successful delivery of all the rail projects outlined above with minimal disruption to the commerce of the City Region. Dublin Chamber supports the granting of a Railway Order for the DART Underground project subject to certain conditions being attached so that it is 'business as usual for all businesses' during enabling works, main construction works and when DART Underground is fully operational.

This project crosses the very heart of Dublin city centre, which attracts workers, shoppers and tourists in huge numbers daily. Furthermore, one of the stations must be integrated with, and delivered in conjunction with, the Railway Procurement Agency's Metro stop at St Stephens Green. Dublin Chamber strongly believes that the successful delivery of DART Underground will depend on mitigating the adverse effects during construction so that all businesses can continue to operate effectively and the city remains attractive to all users (workers, shoppers, tourists etc).

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<sup>1</sup> This vision is shared by Dublin City Council ('Dublin 2030' is a compact city, with a distinct character, a vibrant culture and a smart, innovative economy. It's a city of urban neighbourhoods, connected by good public transport and green spaces. In 2030, Dublin is one of the most sustainable, dynamic and resourceful cities in Europe) Draft Dublin City Development Plan 2011-2017, <http://www.dublincitydevelopmentplan.ie/vision.php>

Dublin Chamber participates in a number of the groups set up under the auspices of Dublin City Council to produce and direct a comprehensive contingency and communications plan for the Dublin City Region during the construction of the T21 projects. Dublin Chamber is committed to proactively participating in, and contributing to, these groups; yet despite the work of these committees we have outstanding concerns about ensuring businesses can continue to trade through the construction of these projects.

Dublin Chamber believes special attention on the part of the responsible transport agencies, public authorities, an Garda Síochána and an Bord Pleanála is warranted on:

- 1) The construction period for the three rail projects in the city centre;
- 2) Traffic management, access to premises and the re-routing of traffic in the both short and longer term; and
- 3) Communicating the plans for addressing disruption to all users of the city in a positive way and marketing the city as fully open for business.

### **3. Economic justification for the project**

Iarnród Éireann states that "DART Underground will provide a major economic impetus, bringing jobs to people and people to jobs and will have a central role to play as a driver of economic growth. It will create significant employment, up to 7,000 jobs during each year of construction and thousands more indirectly as a result of the significantly improved access that the project will deliver to retail, commercial, leisure and tourist destinations in Dublin." Colin Buchanan & Partners, the consultants hired to assess the economic impact of DART Underground, have estimated that the project will generate wider economic benefits that will increase GDP by some €450m per annum in 2020, and put the Benefit Cost Ratio at 2.4.<sup>2</sup>

Dublin Chamber believes that major transport infrastructure, such as the DART Underground, will reduce urban sprawl and help concentrate the location of businesses which would improve Dublin's international competitiveness. Mass transport can be used to encourage businesses to cluster together and international studies have shown that doubling employment within an area can lead to productivity increases of 12.5 per cent. In the services sector, the increase is 22 per cent which means Dublin's international service business would be more competitive.<sup>3</sup>

So Dublin Chamber concurs with Iarnród Éireann that DART Underground will provide a major economic impetus and play a central role in economic growth when supported by height and density along the key transport corridors into Dublin and in the Central Business District.

### **4. Period of construction**

The marked downturn in economic activity over the past two years has depleted the reserves of businesses. The Dublin business community have genuine concerns about their ability to remain trading through a protracted period of disruption due to the combined construction works for DART Underground, Metro North and Luas Broombridge. Dublin Chamber is disappointed that a detailed impact assessment of the cumulative impacts of delivering these three projects has never been completed by the RPA and Irish Rail.

Without detailed evidence from the agencies delivering these projects why these projects cannot be delivered concurrently, Dublin Chamber believes the combined construction works should be conducted in as short a period as possible and be completed in a period of no more than five years.

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<sup>2</sup> [http://www.irishrail.ie/news\\_centre/news.asp?action=view&news\\_id=865](http://www.irishrail.ie/news_centre/news.asp?action=view&news_id=865)

<sup>3</sup> "The economic impact of high density development and tall buildings in central business districts", a report for the British Property Federation by Colin Buchanan and Partners, September 2008.

A protracted period of construction could deter existing and potential investment, leading to a sharp and possible irreversible decline in business activity in the Central Business District. As the Dublin City Region competes with other city regions abroad, a decline in investment could lead to a reduction in taxation revenue for both Dublin City Council and the Exchequer. Consequently, a short period of disruption is the only option that should be considered. Dublin Chamber calls for a condition to be attached requiring the main works at St Stephen's Green on Metro North and the DART Underground to be constructed at the same time.

Dublin Chamber is concerned that the DART Underground, Metro North and Luas Broombridge projects are each being treated and managed as separate projects by separate teams. This is not the most effective form of organisation, particularly if the goal is to achieve a short, coordinated construction period. Consequently, Dublin Chamber calls on Iarnród Éireann to:

- Ensure that the winning bidder will work closely with the Railway Procurement Agency and its contractors for Metro North and Luas Broombridge so that appropriate and comprehensive integrated planning takes place;
- Engage openly and extensively with businesses operating in the affected area; and,
- Take full responsibility for the impact on the Dublin City centre environment of delivering their project.

Dublin Chamber expects that as Irish Rail will take responsibility for their actions and those of their contractor, and deal with all other stakeholders in an open manner, then there is no reason why construction of the DART Underground, Metro North and Luas Broombridge cannot be undertaken together and be effectively managed.

## **5. Impact of construction**

Dublin Chamber has many members offering culture, leisure and hospitality services in the city centre. They have strong concerns about the impact of noise, vibrations and dust levels on their premises and the visible impacts on the physical environment adjacent to construction works, in particular in and around the St Stephens Green area. Whilst it is accepted that some disturbance during construction will be inevitable, our members want this to be short lived and properly controlled to ensure it is not at an unacceptable level that will impact on their operations or attractiveness. Of particular concern is the fact that for this project "rock breaking by blasting and/or propellants is likely to be used by the Contractor".

Dublin Chamber notes that some of our members located along St. Stephens Green North want the proposed tunnel and station box alignment moved to an alignment under the Green; an option which Irish Rail has previously considered and one which is possible from an engineering point of view. These members are especially concerned about the alignment and the cumulative impacts of the three T21 projects on the 750 jobs in hotels, restaurants and private clubs located in the immediate vicinity of the works.

### **5.1 Property protection scheme**

Dublin Chamber welcomes Iarnród Éireann's decision to put in place a 'Property Protection Scheme'. This pre-assessment of the condition of property near the tunnel will offer a valuable benchmark post construction if claims arise that structural damage has occurred. The scheme offers property owners reassurance that the condition of their building is being monitored and the ill-effects of vibration controlled, and offers Iarnród Éireann the opportunity to support their claim that "it is not envisaged that any structural damage will be caused to properties during the construction of DART Underground".

However, Dublin Chamber is concerned that the specific details of this scheme have not been disclosed. Questions regarding how claims might be processed; which type of damage would be covered; when remedial and other works could commence; and when payments might be made if

insurance claims were relied upon, remain outstanding. Furthermore, it appears that this scheme will only cover minor cosmetic damage as repairs up to a limit of €30,000 will only be permitted. Dublin Chamber submits that no ceiling on the maximum amount of available funding for remedial works should be set and that full details about the operation of the scheme be published as a matter of priority.

## **5.2 Noise and Dust**

Dublin Chamber believes the property protection scheme will positively go some way to addressing the concerns that property owners have regarding vibrations. Dublin Chamber submits that in addition to this scheme a condition must be attached to the Railway Order to the effect that Iarnród Éireann should continue to liaise with all occupants of the buildings that are close to the works – particularly those sectors identified above - during the course of the enabling and construction works to ensure their concerns regarding noise and dust are addressed and questions on rock breaking by blasting are answered. In particular, Dublin Chamber calls for Iarnród Éireann to fully disclose the buildings they are referring to in the EIS when discussing excessive noise disruption: “A small number of properties are predicted to experience a slight to moderate or a slight to major exceedance of the criteria during the early construction phase during which site preparation and piling activities are taking place.”

Furthermore, Dublin Chamber calls for the contract to include for the periodic cleaning of the outside of buildings in close proximity to the works – including the facade, windows, entrance area and doors - at intervals to be agreed between the parties.

## **5.3 Hours of construction**

Dublin Chamber supports the proposal to proceed with tunnelling works 24/7, as it is outlined in the EIS that the impact of tunnelling on buildings directly overhead as the machine moves along will only be for 8-10days if this option is selected.

Furthermore, on the condition that Iarnród Éireann continues to liaise with all occupants of the buildings that are in close proximity to the works – particularly those sectors identified above - during the course of the enabling and construction works to identify a suitable compromise on work hours, Dublin Chamber submits that where possible all construction should proceed 24/7 and that at a minimum the proposal in the EIS to proceed with construction weekdays 7am-11pm and weekends 7am-3pm be included the Railway Order. We firmly believe that any reviews to 24/7 construction must be location and building specific.

## **5.4 Management of construction traffic**

Dublin Chamber welcomes the proposal to have wheel washing facilities at exits from the DART Underground work sites, and the proposal to limit site construction traffic during peak commuting periods. However, Dublin Chamber is concerned that one of the steps being proposed to manage construction traffic volumes will hinder, rather than help traffic management and business in and around construction sites. Iarnród Éireann proposes that “there will be minimal site parking with no permanent site car parking provided for employees and visitors at the work sites, except at the Inchicore and Docklands tunnel portal sites”. The issue of placing traffic cones on the street, taking up parking spaces and blocking roads and access to premises temporarily by the contractors are negative issues that Dublin businesses have had to tackle during past periods of construction in the city centre. By offering no off-site car parking for employees, the business community fears that the above scenario will play out even worse during this period of construction.

## **6. Traffic Management**

DART Underground will bring construction right through a central, congested corridor within the city which has high traffic flows of business vehicles, private vehicles, taxis and public transport. Road space will be lost and traffic disruption is inevitable as roads are closed, traffic is re-routed and construction traffic is brought into the mix. Thus, during enabling works and the main infrastructure works, effective traffic management will be required to ensure that businesses can continue trading successfully.

### **6.1 Catering to the needs of all transport users**

Both the Department of Transport and Dublin City Council<sup>4</sup> have a vision to get a greater number of people to move onto public transport, and these rail projects are a critical element in realising this vision. Whilst Dublin Chamber supports the promotion of sustainable travel through effective integration of land use and transportation, we are concerned at the possibility that Dublin city may become a "donut-shaped city" that is deserted after commuters leave work. Indeed Dublin Chamber believes that the "strengthening the city as the national retail destination" element of strand two of the draft Dublin City Development Plan's core strategy is not in keeping with their stated priority to "restrict through traffic and calm traffic generally within the city centre and to give increased levels of priority for pedestrians, cyclists and public transport", nor with their policy "to ensure adequate but not excessive parking provision for short term shopping, business and leisure use; and to control the supply and price of all parking in the city in order to achieve sustainable transportation policy objectives."

As Dublin City Council will be central to agreed traffic management plans, Dublin Chamber calls on the Council and the transport agencies delivering the T21 rail projects to properly acknowledge and subsequently cater for the role that car based shoppers, diners, tourists, concert and theatre goers play in the economic life of the city. They must recognise that shopping is a discretionary activity, and any perception of inconvenience caused by disrupted travel patterns due to restrictions placed on private vehicles will simply result in individuals selecting alternative locations to shop rather than promote a move to public transport. The consequences for the city's rate base will be detrimental if agreed traffic plans are not amended to include ones that are good for commuters, bus access, cyclists, pedestrians, business traffic and private vehicle users alike.

Thus in order to keep the city alive during construction, shoppers, tourists, workers and residents need to know that the city centre and all the companies located there are 'Open For Business'. They need to be clearly informed as to how current capacity - people, business traffic, public transport - into the city will be maintained at all times, including an outline as to how access to specific buildings, businesses and car parks will be maintained. Some of Dublin Chamber's members located in the Stephens Green area remain concerned about the lack of clarity in relation to the positioning, and indeed the very availability, of permanent loading bays and drop off points for customers during and after construction works. Thus, Dublin Chamber is calling for all traffic and pedestrian plans to be drawn up in conjunction with the business community. In addition, Iarnród Éireann and the construction contractor must ensure they remain flexible so they can respond to, and cater for, problems that businesses within the construction vicinity experience as they arise during construction works, e.g. cash deliveries for banks.

Furthermore, Dublin Chamber believes that the contractor should not be responsible for traffic management at each site. An Gardaí Síochána in association with Dublin City Council must be fully responsible for traffic management at each site, including the making of contingency plans when emergency vehicles need access or when routes surrounding a site are closed off due to unforeseen circumstances. A 24/7 contact number must be made available to businesses in the area to ring if there is a problem with traffic in their vicinity.

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<sup>4</sup> Dublin City Council's draft Dublin City Development Plan 2011-2017 seeks to achieve modal share targets crossing the canals of 55% for public transport, 15% for cycling, 10% for walking and 20% for private car use by 2017.

## **6.2 Public and private bus operators and taxis**

The issue of bus rerouting is one that needs to be appropriately managed as the bus will play a central role during the construction of DART Underground, Metro North and Luas Broombridge. Bus operators and taxis companies need to be consulted so that they can continue to offer their services and compensate for the loss of access for private vehicles at certain locations. The answers to important questions relating to taxi ranks, bus layover, dwell time, bus stop location and re-routing of buses must be fully addressed in consultation with the operators, and then fully communicated to users of the system, in particular businesses who can communicate with their staff. The business community needs to be guaranteed that the public bus operators in particular, and private operators accessing the city centre collecting/ dropping off commuters and tourists, are able to continue to offer high levels of frequency and quality services.

Dublin Chamber accepts that there will be a need to prioritise and improve those modes of transport that are capable of carrying significantly more people within the limited road space, particularly during rush hour. Therefore in principal, Dublin Chamber supports the prioritisation of buses on the road network during rush hour provided it can be demonstrated that this improves traffic flows across the city centre network and is needed to maintain an efficient, frequent and reliable service to passengers, and does not unduly disadvantage the movement of private vehicles for shopping and business related travel.

Overall if the vitality and economy of the city centre is to be maintained throughout and beyond the construction phase for the DART, Metro and Luas projects, there is a need to bring coherence, understanding and certainty to long-term traffic routing for the city which will inspire confidence and ensure reliability of access for all.

## **6.3 Pedestrians**

Unimpeded pedestrian access is essential for many businesses. It is therefore imperative that their movement is not impaired in and around the construction sites, for example, by optimising pedestrian signals and providing for generous space between shop fronts and hoardings. The Railway Order should attach conditions that ensure the maximum flow of pedestrians that is consistent with the health and safety of the sites under reference.

## **6.4 Park and ride facilities**

Dublin Chamber submits that more park and ride facilities are fully operational before enabling works for DART Underground and Metro North get underway. A measure of creative thinking is needed. For example, and for the duration of the construction works only, the Phoenix Park could be used, as could the RDS, Fairview Park and other locations owned by the State and the Dublin local authorities including Springfield in Leixlip, Spawell at Tallaght, Malahide Castle at Malahide and Loughlinstown at Shankill.

## **7. Communications & Marketing Plans**

As the construction of the DART Underground is proposed in tandem with the Metro North - two of the largest infrastructure projects ever undertaken in the state - an effective, intensive and coordinated communications campaign which has the support and active involvement of all stakeholders - the business community, local authorities, transport agencies, NTA, Department of Transport, an Garda Síochána - will be fundamental to the successful implementation of a citywide transport plan.

This communications plan must clearly and honestly communicate to the general public, businesses and the media, the scale, short term construction impact and long term benefits of the Transport 21 rail transport projects. Recognising - and operating within - the limits the tender process puts on

disclosing sensitive financial information, Dublin Chamber calls for this communications plan to include information on the economic benefits of this project of Dublin businesses (particularly those in the vicinity of the works) and economy. Due to the absence of this critical analysis, the true impact of this project on the workers, traders and employers in Dublin is not fully understood.

Furthermore, a comprehensive marketing plan should be implemented that clearly informs all investors, workers, shoppers and tourists planning on travelling into the Dublin City Region that the city centre remains fully accessible and open for business. This will be vital for businesses, particularly those in the cultural, leisure and hospitality sectors. The message that construction is being managed and that access to all of Dublin's excellent offerings is still being maintained must be conveyed successfully. Hoardings around the construction sites should be fully utilised to this positive messaging and information across to passer-bys.

## **8. Utilities**

Water, telecommunications, waste water, electricity and gas utilities are the lifeblood of the daily operations of any business. Any disruption to the supply of a business's utilities is detrimental to a business' commercial viability. Thus, businesses operating in the vicinity of the tunnelling for DART Underground must be informed of the work which needs to be carried out by utility companies and when they are permitted to carry out such works. Furthermore, a condition should be attached to the effect that a comprehensive risk management plan be put in place by Iarnród Éireann for the prevention, monitoring, control and remediation of risks of disruption of electricity, gas, water and waste water and telecommunications services along the route.

Overall, a programme of utility works must be created in consultation with businesses which includes a risk management plan. This programme must be in place before enabling works begin.

## **9. Oral Hearing**

This project is one of the largest infrastructure projects ever built in the State, and will potentially be delivered concurrently with Metro North and Luas Broombridge. The potential disruption to the city during delivering of this project is high.

Dublin Chamber notes that an Bord Pleanála has discretion to hold an Oral Hearing into Iarnród Éireann's Railway Order application for DART Underground. Acknowledging this, the business community strongly urges an Bord Pleanála to hold an Oral Hearing so that all stakeholders views and concerns can be presented and considered prior to the granting of the Railway Order.