

Submission No.			012	
Organisation Name or Name of Submitter			Anne Confrey (resident - 1 Fairfield Rd)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: NRA Metrolink-Estuary to Charlemont Order 2022				
1	Observations	1	<p>I refer to the above (NRN Metrolink-Estuary to Charlemont Order 2022) that I am the legal owner/occupier of the above property and in that require I have recieved notification from Metrolink that the tunnel is realigned to go directly underneath my property.</p> <p>I hereby formally and strenuously object to the proposed development on the following grounds: Substantial and permanent damage to the structure and fabric of my house and boundary walls, serious concern that my house (which significantly slopes downwards)/garden/boundary walls will not withstand the construction;</p>	<p>Thank you for your submission and for sharing your concerns/observations related to the MetroLink project. We have reviewed the submission and provided response for the observations/concerns raised in detail below.</p> <p>A comprehensive Settlement Assessment has been undertaken to determine the potential impacts that construction of the proposed Project will have on sensitive receptors such as buildings and infrastructure from the advance of the TBM. The ground movement predictions and the building damage assessment methodology adopted for MetroLink is based on the approach adopted in most tunnel projects around the world, including London Crossrail and High Speed 2 in England. This is described in EIAR Section 5.4.11 (Ground Settlement Monitoring and Mitigation Works).</p> <p>EIAR Appendix A 5.17 Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement on property. Section 5.2 of this report sets out the rationale for the assessment of properties similar to yours. The results of the assessment provided in Table 5.2 shows that representative properties selected similar to your property, has been assessed as falling within the 'Slight' category. This means that there is no structural damage predicted to your home.</p> <p>The Property Owner Protection Scheme (POPS), committed to by TII, allows residential property owners to register with TII if their residential property is within thirty (30) metres of the edge of the MetroLink alignment or fifty (50) metres of station structures. The POPS comprises condition surveys of residential properties along the route of the proposed Project. The purpose of the condition surveys is to ascertain the condition of the properties before, during (if deemed necessary), and after the completion of the proposed Project to determine whether there has been any deterioration of any of the properties surveyed and whether same may be attributable to the proposed Project, and subsequently to recommend repairs as appropriate. Condition survey data gathered pre and post construction, and possibly during construction, will be used to assist the property owner and TII in swift and accurate verification of any property damage claims which may be received from property owners. The POPS is designed to cater for / address repair work which may be necessary for any damage (attributable to the proposed Project) to a qualifying residential property up to a threshold of €45,000. The POPS will be introduced by TII through public consultation and will be formally advised to eligible property owners by the Public Relations Department.</p> <p>Further information on POPS is available in Chapter 11 (Population & Land Use). Useful information can also be found in the MetroLink Frequently Asked Questions document which can be found online at:https://www.metrolink.ie/en/your-property/property-owners-protection-scheme and this is where useful updates will be made available as the proposed Project progresses.</p>
2	Observations	1	Significant concerns that the utilities (water, sewerage, gas, electricity, telephone/broadband) will adversely be impacted upon;	Based on the settlement analysis methods described in Appendix A22.1 and the residual impacts identified in Table 22.12, there are no predicted impacts on utilities in this area.
3	Observations	1	<p>Serious concern of the depth below ground level of the tunnel and the distance from my house to top of the tunnel (no information has been furnished; essential as I am sloping downwards);</p> <p>Trespass into the subsoil underneath my property;</p>	<p>The TII issued letter ref CAP_ML_0097_04 dated 20th September 2022 to you. This letter contained detailed information of the substratum acquisition. The overall depth from ground level to the top of the tunnel is 12m as shown on drawing ML4L-U42 within the letter pack. The drawing shows your property location relative to the tunnel.</p> <p>EIAR Chapter 21 (Land Take), Section 21.6.1.2, outlines the Compensation for Compulsory Purchase process. Under the Transport (Railway Infrastructure) Act 2001 (as amended) should a Railway Order be granted by An Bord Pleanála and-upon its commencement, TII will be authorised to acquire compulsorily any land or rights in, under or over land or any substratum of land that is specified in the Railway Order. TII will be authorised to serve a notice to treat pursuant to the provisions of the Housing Act, 1966, (including Section 79 thereof) and also have the right to enter onto other lands for the purposes of carrying out the works permitted under the Railway Order. The acquisition of rights and interests in the required land and property, is necessary to ensure the delivery of the MetroLink project in its entirety.</p> <p>Further information can be obtained from the MetroLink Compulsory Purchase Order Guideline document (September 2022) which can be found on-line at: https://www.metrolink.ie/media/0jlpbyso/metrolink_cpoguideline_final_september-2022.pdf</p>
4	Observations	1	Loss of privacy;	The proposed Project may have some impact upon your property and within the local environment generally, there is unlikely to be a loss of privacy specific to your property as a consequence. Local areas in which the landscapes may be altered due to the Project, refer to EIAR Section 27.

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5	Observations	1	Impact on parking and servicing;	<p>As outlined in EIAR chapter 9.5.2.4.5.1 Future Receiving Environment- Parking and Loading, there will be no change to current parking facilities within the AZ4 Northwood to Charlemont areas.</p> <p>As part of the preparation for the construction phase the appointed contractor for the works at both of these stations will prepare a detailed CEMP that will include plans to mitigate construction workers parking locally with the preparation of the Construction Mobility Plan , one of the key aspect of which is to encourage all forms of transport with the exception of car use. This document forms part of the CEMP documentation to be submitted for Dublin City Council approval prior to the Main works commencing at these locations. The Construction Mobility Plan can be found in EIAR Chapters A5.1 and forms part of the outline CEMP.</p> <p>Chapter 5 of the EIAR, MetroLink Construction Phase, explains that traffic management plans for the construction phase of the Project that have been developed to minimise the impact on road users, and to maintain access to businesses and other premises. Prior to implementation, all traffic management measures will be agreed with Dublin City Council and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken.</p>
6	Observations	1	Significant increase in traffic levels;	<p>The Scheme Traffic Management Plan - STMP (Appendix A9.5) provides a summary of the magnitude of the impact of the proposed Project’s Construction Phase on each of the user groups (public transport, general traffic, vulnerable users, parking and loading). Detailed descriptions of the works at each site and the associated HGV routing or each routing are also presented in the STMP, with further details found in Chapter 5, MetroLink Construction Phase. The STMP assessment is based on the current MetroLink Project Design Report and Temporary Traffic Management - TTM designs/layouts, as well as estimates of when the Construction Phase will commence including timescales. The assessment uses 2028 as the most impactful construction year, in terms of construction vehicle numbers.</p> <p>Appendix A9.5 provides the Scheme Traffic Management Plan, for which section 7.5 refers to Griffiths Park and section 7.6 refers to Glasnevin. While the works will attract additional traffic to and from both locations, the assessments of vehicle movement indicates a slight (<10%) traffic flow increase and slight driver delay (<180 seconds) and are not considered likely to give rise to any potential significant effects.</p> <p>In order to distribute construction traffic evenly between these two sites, separates routes to each location have been planned. Within sections of the Scheme Traffic Management Plan (A9.5), Figure 7-18 details the proposed routes to and from Griffiths Park from the M50 (Junction 4) along the R108, while Figure 7-22 details the proposed routes to and from Griffiths Park from the M50 (Junction 5) along the R135. In this manner residual impacts are mitigated in this area.</p>
7	Observations	1	Overbearing nature of the proposal;	<p>In the context of human health, chapter 10 of the EIAR assesses the impact of the MetroLink Project on Human Health during the Construction Phase and Operational Phase.</p>
8	Observations	1	Loss and damage to trees, shrubs and plants;	<p>TII acknowledge that the loss of trees is unfortunate but have included for suitable mitigations across MetroLink to offset the temporary impacts.</p> <p>The inclusion of measures to avoid, reduce and offset significant adverse landscape and visual effects forms an inherent part of the brief and design thinking of the various disciplines involved in the development of the design for the proposed Project. A major part of the landscape design for the project has therefore involved the identification and retention of valuable landscape assets where possible and feasible, across the proposed Project. This includes existing mature trees, historic paving, railings and street furniture elements. These proposals include for example, the provision of tree and woodland planting which effectively replace trees unavoidably lost as a result of the alignment, design and construction of the proposed Project – this forms part of the embedded primary mitigation included within the landscape design. In most circumstances however, the designed planting as proposed is more appropriately scaled to the pertaining landscape context and is invariably more biodiverse than the baseline planting lost. These aspects of the proposed Project go beyond the requirements of mitigation and are in effect improvements over and above the baseline, which may often be referred to as “enhancements”. Specific landscape and visuals impact areas assessed are described within section 27.5.4 of the EIAR.</p>

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9	Observations	1	Loss of ecological habitats; Impact on wildlife and domestic animals;	EIAR section 15.4.2.2 assesses the potential impact of the proposed Project on habitats. The types of habitats within the boundary of the proposed Project that will be impacted on as a result of direct permanent habitat loss, or temporary habitat loss, in the case of the habitat type canals, are described within Table 15.17. EIAR section 15.1 presents the mitigation measures to avoid or reduce the potential impacts of the proposed Project on biodiversity. Where there are significant residual biodiversity impacts as a result of the proposed Project despite the mitigation measures proposed, compensatory measures are proposed to offset or reduce the predicted impacts as detailed in EIAR section 15.8.
10	Observations	1	Access road safety issues; Traffic generation;	<p>Throughout the construction phase, where necessary, a safe alternative routes will be provided for pedestrians and vulnerable road users, such as children, and persons with restricted mobility, to maintain pedestrian access to premises. Where detour routes are required, these will be kept as short as possible and detour signage will be clear and easy to understand. All construction sites will be designed to be as unobtrusive as possible and traffic management measures will be designed with the safety of all users as a key principle. The EIAR Chapter 9, Traffic and Transport, section 9.7.1.2 includes for a Scheme Traffic Management Plan (STMP) to manage traffic movements during the construction phase to ensure traffic congestion is minimised.</p> <p>Safety has been central to the design development of stations, the P&R and surrounding areas to ensure that they are safe for all users to use. This has been achieved by ensuring that the design is based on the following relevant principles as described in EIAR Section 4.6.3.7.</p> <p>Traffic generation, please refer to response number (6) above.</p>
11	Observations	1	Drainage/flood risk - the area is particularly prone to serious flooding;	There is no additional serious flood risk due to MetroLink works at this location. The design will cater for any local drainage intercepted by the works but note the distance of the stations from your property. A baseline assessment of flooding was undertaken and is included within Appendix A18.5 Flood Risk Assessment. Details of mitigation and management of flood risk, refer to EIAR section 18.6.
12	Observations	2	Disturbance and health risks from smells/odours/noxious fumes;	<p>Due to the distance of your property to the nearest station compound at Griffith Park (within approximately 300m), there is little to no risk to your property. The proposed Griffith Park compound location is shown on EIAR diagram 5.49. and the general arrangement drawings ML1-JAI-ARD-ROUT_XX-DR-Y-03074 & ML1-JAI-ARD-ROUT_XX-DR-Y-03073 within alignment Details Book 2 of 2 Dublin City Council.</p> <p>The EIAR has fully assessed the potential impacts on the local population generally, summarised below:</p> <p>Chapter 16 - dust and other air quality emissions impact assessment and proposed mitigation measures. The potential risk from dust emissions has been reviewed for the critical activities at each of the construction areas. The Construction Environmental Management Plan (Appendix A5.1) will be used to manage the construction phase dust emissions. In addition, before commencing works, an Air Quality Management Plan shall be prepared and submitted in advance to the relevant planning authority. The plan will include all appropriate dust and emissions mitigation measures applicable to the circumstances of the relevant site, based on the local authority requirements and industry best practices.</p> <p>As detailed in section A5.15 Waste Management, all contractors will maintain their duty of care to protect the interests and safety of others from the potential effects related to waste and ensure that waste generated during the Construction Phase is handled in accordance with the relevant legislation governing its storage, transfer, treatment and disposal. All necessary measures will be taken to ensure that waste management is carried out without endangering human health and without harming the environment, and in particular:</p> <p>- Without risk to water, air, soil, plants or animals; - Without causing a nuisance through noise or odours; and - Without adversely affecting the countryside or places of special interest</p>

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13	Observations	2	Noise pollution;	<p>Potential impacts associated with airborne noise and vibration during the construction phase of the proposed Project are addressed in Chapter 13 (Airborne Noise & Vibration). As this location is approximately 300m from construction activity at surface level, no airborne noise or vibration impacts are expected as indicated in Appendix A13.7. A13.7 details the predicated construction noise impact at the receptor locations in the vicinity of Griffith Park Station.</p> <p>Chapter 14 considers Groundborne Noise and Vibration, the Appendix 14.5 Groundborne Noise and Vibration Blasting Modelling Results presents predicted groundborne noise and vibration levels during the construction and operation phase of the project for 1 Fairfield Road.</p> <p>The predicted level of groundborne noise during TBM passage in proximity to your property is anticipated to be 50 dB LASmax, which is above the 45 dB LASmax threshold, resulting in a significant impact as the TBM progresses by your property in a matter of days and no more than two weeks.</p> <p>The predicted level of groundborne vibration during TBM passage is 0.295 ms-1.75, which is lower than the VDV Threshold Level of 1.0 ms-1.75, resulting in a not significant impact on the building.</p> <p>Unfortunately, there are no effective methods available to reduce groundborne noise from TBMs at source. The principal mitigation measures aimed at minimising impacts 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.• TII will accept and consider applications for additional measures on a case-by case basis, in accordance with its Noise and Vibration Mitigation Policy (see Appendix A14.6). <p>The Transport Infrastructure Ireland (TII) Airborne Noise and Ground-borne Noise Mitigation Policy (Appendix A14.6 of Chapter 14) sets out the construction noise insulation and temporary rehousing measures to be implemented where required.</p>
14	Observations	2	Dust and dirt pollution;	Please refer to response number (12) above.
15	Observations	2	Significant and substantial vibration during construction and in the aftermath when the project is complete - I request that meters be installed in my property to measure levels;	As described in EIAR section 14.4, the predicted level of groundborne vibration during TBM passage is 0.295 mms-1.75, which is lower than the VDV Threshold Level of 1.0 mms-1.75, resulting in a not significant impact on the building. Similarly, in operation, no significant impacts are predicted with vibration levels at 0.010 mms-1.75 (worst predicted case) , hence monitoring is not required.
19	Observations	2	Right of support to my property from soil/earth is being interfered with serious risk of collapse, given the age of my property (circa 100 years), resulting from excavation interference with right to natural drainage;	Please refer to response numbers (1) and (2) above.

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20	Observations	2	Impact on the environment/ecology/heritage of my property and the general area;	<p>The potential impacts associated with the construction phase activities of the proposed Project on the residences (including this property) and businesses are addressed in Chapter 11 (Population & Land Use) of the EIAR, with mitigation measures proposed where required. This includes potential noise and vibration impacts from construction activities as detailed in Chapter 13 (Airborne Noise & Vibration) and Chapter 14 (Groundborne Noise & Vibration), disturbances to the local road network as detailed in Chapter 9 (Traffic & Transport), and dust risk as detailed in Chapter 16 (Air Quality).</p> <p>The EIAR Chapter 15, Biodiversity, describes and assess the likely direct and indirect significant effects of the proposed MetroLink Project on Biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC. This Chapter also provides a characterisation of the receiving environment within the proposed Project and within a wider study area in the vicinity of the proposed Project and the proposed mitigation measures to ameliorate the predicted impacts.</p> <p>Measures to mitigate and monitor the predicted impacts as a result of construction activity across the proposed Project are also detailed in Chapter 5 (MetroLink Construction Phase) and summarised in Chapter 31 (Summaries of the Route Wide Mitigation & Monitoring Proposed).</p> <p>Furthermore, a Project Conservation Architect (PCA) has been engaged to oversee the implementation of the Project. Prior to the establishment of construction compounds, the Project Conservation Architect (PCA) will undertake Structural and Condition Surveys of any built and cultural heritage constraints that will require removal to secure storage (followed by conservation and reinstatement) or protection in-situ. The PCA will also prepare specifications for these works. A specialist Heritage Works Contractor will be appointed to remove, store and conserve these constraints. The Main Construction Works Contractors will appoint Consultant Conservation Architects to implement required preservation of in situ works. Refer to EIAR Section 5.4.4</p> <p>Additionally, the POPS scheme, through which condition surveys of private properties and other selected properties along the route of the proposed Project will be commissioned. Your property will qualify for this scheme as it is located within 30m of the tunnel alignment. Please refer to response number (1) above.</p> <p>EIAR Section 4.6.3 describes the implementation of sustainable policy areas within the Project design. This includes several initiatives in order to meet the project sustainability aims outlined in TII's Sustainability Implementation Plan. Some of theses initiatives include Climate Change Mitigation, Biodiversity, Heritage, Skills and Learning, health and wellbeing amongst other items. The operational impacts on human health are described in section 10.5.2 in which the potential for positive impacts are described.</p>
21	Observations	2	Significantly interfering with and diminishing my right to extend/expand my property; Very substantial devaluation of my property; Interfering with my right to dispose of my property at full market value; Postponing my right to sell/dispose of my property until construction is complete;	<p>TII have confirmed that your property may be subject to substratum acquisition. Drawing no:ML4L-U42 confirms the proposed tunnel alignment and the extent of the proposed acquisition which is 12m below ground level. A substratum acquisition can proceed without affecting the above ground property and therefore this should not preclude any intentions to dispose. There are no restrictions to altering or extending the property with or without the need for planning consent. Where a planning permission is required, all applications along the alignment will be referred to TII.</p> <p>Regards devaluation, there is evidence to suggest that property values will in fact increase in close proximity to public transport infrastructure and that local residents will greatly benefit from having a world class Metro system providing access to the city centre, airport and north city at their doorstep. The benefits of the project for all communities along the MetroLink route are described in Chapter 3: Background to the MetroLink Project, section 3.4 MetroLink Response to Challenges.</p>
22	Observations	2	Serious impact on the alignment of my doors and windows;	Please refer to responses (1) and (20) above.

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23	Observations	2	Attack on my constitutional right to the quiet and peaceful enjoyment of my property; Interference with the use and enjoyment of my property by dust, dirt, noise, sewerage, damage to Tree roots, noxious smells, vibration during and after, etc.;	Please refer to response numbers (1)(13) (15) and (20) above.
24	Observations	2	Disruption and loss of business in the area;	The potential impacts associated with the construction phase activities of the proposed Project on the residences and businesses are addressed in Chapter 11 (Population & Land Use) of the EIAR, with mitigation measures proposed where required.
25	Observations	2	The area is adequately serviced by public transport;	The need and background to the Proposed Project are set out in full in EIAR section 3 of Chapter 3: Background to the MetroLink Project and outlines the anticipated Environmental, Economic and Social benefits that the Proposed Project will bring to Swords, Dublin Airport and City Centre Corridor and the Greater Dublin area.
26	Observations	2	No protections have been put in place to compensate me and protect my position.	Please refer to response numbers (1) and (21) above.