

Submission No.			033	
Organisation Name or Name of Submitter			Caitriona and Ciaran Byrne (Saint Anthony's, Seatown West, Swords, Co. Dublin)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: NA29N.314724 - Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin (MetroLink)				
1	Preamble	1	Open space and design (anti-social behaviour) We support in general the concept of the metro scheme, the objectives of the overall scheme and appreciate that the scheme will bring benefits to the wider city and the environment.	TII are grateful for you taking the time to make this submission and confirming your support for the MetroLink project which will deliver the benefits you have noted.
2	Preamble	1	Notwithstanding this, we have concerns regarding elements of the proposed scheme, in particular the lack of privacy to our property, anti-social behaviour and the level of baseline information and assessment carried out in relation to noise and vibration.	We have reviewed your concerns and have provided responses below.
3	1.3, 1.4, 1.5, 1.6, 1.9	2	<p>...the Fingal County Development Plan (the “FCCDP”) which states that ‘Open spaces must be designed to a high specification. Great emphasis must be placed on the quality of open space and details of the proposed landscaping, hard and soft, of these spaces will be required at the planning application stage. Public open spaces should be overlooked and designed in such a way that anti-social behaviour is reduced through passive surveillance [. . .]”.</p> <p>The Open Space proposed ... does not conform to best practice and is contrary to the FCCDP. ...have included mark ups which illustrate: a. The specific Open Space area of concern (area shaded in red, and black dotted line) We are concerned that the current design which has not taken into consideration Best Practice and with the absence of passive surveillance will result in anti-social behaviour. The potential for the proposed Open Space to increase anti-social behaviour and reduce privacy and residential amenity is contrary to the Zoning Objective and Vision set out in the FCCDP for this area.</p>	<p>TII note your concerns, but the design has been developed fully in accordance with best practice and particularly in relation to passive surveillance. The planned outcome of the Metrolink architectural and urban realm design as set out in the EIAR documents supporting the Railway Order has been developed in discussions with Fingal County Council (FCC) to align and compliment the proposed R132 Connectivity Project in accordance with the Fingal County Development Plan. The open space is set 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. TII intentions in relation to the final landscape proposals around your property are further detailed in response number (4) below. Therefore the proposed Project does not contravene the Open Space designation within the FCCDP.</p> <p>More broadly 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.</p>
4	1.3, 1.4, 1.5, 1.6, 1.9	2	<p>The Open Space proposed ... does not conform to best practice and is contrary to the FCCDP. ...have included mark ups which illustrate:</p> <p>b. The location and orientation of adjoining properties, which highlight that this Open Space will not be overlooked, and will instead be exposed to gable walls and rear gardens We are concerned that the current design which has not taken into consideration Best Practice and with the absence of passive surveillance will result in anti-social behaviour.</p>	<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 align with Fingal County Council plans for urban connectivity across the R132 with local residents concerns and hope to reach agreement on these matters ahead of the oral hearing.</p>

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5	1.7	2	<p>Privacy</p> <p>The applicants acknowledge that residents closest to Open Space would view the intervisibility as a reduction of their privacy. Notwithstanding this acknowledgement, no apparent meaningful measures are proposed for residents directly adjoining the proposed open space.</p> <p>It is unclear from the information provided in the planning application and associated drawings, what boundary treatments, if any, are being proposed for the southwest boundary of the Open Space which adjoins our property and rear garden. There is no apparent proposal for screening or fencing. The boundary of our rear garden which directly adjoins the proposed Open Space consists of a dwelling built up against our boundary wall that is under compulsory purchase order for the metro north (is therefore due to be demolished) and hedging.</p> <p>A lack of appropriate screening will result in an unacceptable intrusion of our privacy. The potential for the proposed Open Space to increase anti-social behaviour and reduce privacy and residential amenity is contrary to the Zoning Objective and Vision set out in the FCCDP for this area. Zoning type, Objective and Vision are summarised below.</p> <p><i>Zoning</i> RS’ Residential: <i>Objective</i> Provide for residential development and protect and improve residential amenity <i>Vision</i> Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.</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.•CCTV will be installed throughout the MetroLink system including at station entrances, public realm and on trains to provide general security and surveillance of all the public areas, and to inform, if required, the directing and sending of staff to manage the situation.•There will be a MetroLink staff presence along the route for assisting passengers, security and deterring anti-social behaviour.								
6	2.2 - 2.4	3, 4	<p>Noise and vibration concerns</p> <p>It is our opinion that the EIAR submitted does not identify and describe adequately the direct and indirect significant impacts on the environment. It appears that the document is deficient and inadequate in terms of the statutory requirement for: the description of the likely significant effects of the project on the environment; a description of the required mitigation measures</p> <p>2.2 AT50 Attended Noise Monitoring is the most representative of all noise monitoring locations for our property. AT50 is situated at a Cul-de-sac at end of Seatown West, bordering roundabout linking R132 and R125.</p> <p>2.3 The baseline noise recorded at this location is set out in the EIAR and detailed in the Table below.</p> <p>2.4 It would appear that this attended survey only recorded day-time measurements. There is an absence of information on baseline night-time (2300-0700) levels relative to this location.</p> <table><tr><td>Attended Location</td><td>dB LAeq,15min</td><td>dB LA90, 15min</td><td>dB Lden</td></tr><tr><td>AT50</td><td>59</td><td>61</td><td>62</td></tr></table>	Attended Location	dB LAeq,15min	dB LA90, 15min	dB Lden	AT50	59	61	62	<p>TII would like to provide the assurance that the potential noise disturbance impact on your property as a result of the proximity of the proposed retained open cut section. The impacts has been carefully assessed against an established baseline, as reported in the EIAR and are summarised below, for both construction and operation of the completed MetroLink. Mitigation measures are also described within Chapters 13 & 14, Appendix A5.1 Outline CEMP and Appendix A14.6 TII Airborne and Groundborne Noise Mitigation Policy.</p> <p>Baseline Surveys and Construction Noise Thresholds</p> <p>EIAR Chapter 13.3.1.3, Baseline Noise Environment AZ1: Northern Sections provides details on the baseline noise surveys undertaken in preparing the EIAR for the Railway Order. Table 13.24 further lists the locations of both: the Unattended (Long term – one week) Noise Surveys, of which UT4 to UT7 are representative of the environment of your property; and supplementary daytime Attended Noise Surveys, of which AT3 to AT6 are representative of the environment of your property, with AT50 closest to your property. The noise survey results from these locations are listed in Table 13.25. As referenced in Section 13.2.4.2, 20 long term noise surveys were undertaken along the alignment (in addition to the unattended surveys referenced by UT codes). These surveys lasted approximately 1 week at each location and included night time measurements. These locations include AT4,5,6 and UT7 which are in close proximity to your property allowing us to have excellent daytime and nighttime baseline noise data for your area.</p>
Attended Location	dB LAeq,15min	dB LA90, 15min	dB Lden									
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				<p>As stated in EIAR Chapter 13: Airborne Noise and Vibration, section 13.2.6.1.3, the principles for the management of Airborne Noise & Vibration in the EIAR are based on the BS 5228-1 standard. From these survey results the Construction Noise Threshold (CNT) for daytime and night-time was calculated using this standard for receptors based on existing rounded ambient noise levels. In accordance with this standard, the CNT for all receptors Estuary to Seatown is set at 75 dBA (Days 0700 to 1900) for the Cut & Cover construction, and 55 dBA (Nights 2300 – 0700) for above ground track laying.</p> <p>Before commencing works, Contractors will develop a Construction Noise & Vibration Management Plan. This will involve a detailed investigation of potential noise and vibration impacts associated with each construction compound. The assessment will identify through modelling and calculation, predicted construction noise levels, identification of potential exceedance of Construction Noise Thresholds (CNTs), identification of required noise mitigation measures specific to each work area to minimise noise and vibration impacts so far as is reasonably practicable.</p> <p>As part of the CNVMP a further baseline noise study will be undertaken prior to the commencement of construction works to characterise the prevailing noise environment at impacted noise sensitive locations (NSLs). This information will be used to inform the relevant CNTs. Given the extensive nature of the proposed Project and the number of construction sites and sensitive receptors, the CNT will vary across the project on a site by site and receptor by receptor basis. If the Contractor is unable to reduce the impacts sufficiently, and the residual levels are such that widespread community disturbance or interference with sleep is likely to occur, TII will consider whether the provision of further Noise Insulation (NI) or Temporary Rehousing (TRH) would be appropriate at locations where eligibility for either has been established. Please refer to the TII Airborne and Groundborne Noise Mitigation Policy (Appendix A14.6). Night time baseline noise mesuares have been also concluded and they are provided in Appendic A 13.1 table 7</p> <p>Construction Phase – Airborne Noise and Vibration Airborne noise impacts will occur along sections of retained cut section during the day time. Tracklaying activities within cut and cover sections will be enclosed with minimal noise emissions at either end of the section opening. This activity will take place typically one-night duration at any one location resulting in a brief to temporary duration of effect. EIAR Chapter 13 Airborne Noise and Vibration, Table 13.39 summarises the potential significant noise impacts from the construction of the proposed alignment cut and cover and retained sections, which includes receptor 16 for Seatown West. The predicted impact without additional noise mitigation is Significant to Very Significant during some of the work phases. Noise mitigation measures are detailed in section 13.6.1 and include for plant selection, reduction of noise at source and a proposed 4m enhanced construction hoarding at the Seatown West construction boundary. With these mitigations, the construction impacts are reduced to below significant.</p> <p>Construction Phase – Groundborne Noise and Vibration EIAR Chapter 14 Groundborne Noise and Vibration, Section 14.4.1.1 indicates that there are not predicted to be any significant impacts for the Seatown West buildings.</p>

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				<p>Noise Mitigation Plans Approval</p> <p>The use of a standard 2.4m high construction site hoarding will be used as standard around all construction compounds including linear work areas along the R132 during the construction of the above ground rail and retained cut stations. The use of enhanced construction hoarding, acoustic screening or enclosures will be required at a number of construction compounds across the proposed Project. Use of 4m hoarding have been identified at you location as a primary noise mitigation measures together with other noise control at source options.</p> <p>Nevertheelss, prior to the commencement of the construction works at each compound, the Contractor will conduct an individual site assessment as part of the CNVMP to verify the height and position of screening to control noise impacts based on the most up to date construction methodologies and input data TII's appointed contractor(s) will prepare for Fingal County Council consultation and approval a Construction Noise and Vibration Management Plan (CNVMP) for the proposed Project as referred to in EIAR Appendix A5.1, Outline Construction Environmental Management Plan (CEMP). The CNVMP will be a live document and will include a full monitoring and auditing programme which will be agreed with Fingal County Council prior to the commencement of the Construction Phase, including predetermined monitoring trigger levels to ensure noise and vibration limits are not breached. Table 6.2: Noise and Vibration Measures of the Outline CEMP outlines the monitoring programme requirements.</p> <p>The Transport Infrastructure Ireland (TII) Airborne Noise and Ground-borne Noise Mitigation Policy (Appendix A14.6 of EIAR Chapter 14) also sets out the construction noise insulation and temporary rehousing measures to be implemented where required.</p> <p>Operational Noise and Vibration</p> <p>EIAR Chapters 13 and 14 present a comprehensive and detailed assessment of operational ground borne and airborne noise and vibration. No residual noise impacts are identified at this location during operation. The calculated rail noise levels across the proposed Project are not significant in terms of any widespread community disturbance and results in a not significant to slight impact when added to the prevailing noise environment (Please refer to "Baseline Surveys and Construction Noise Thresholds" above).</p>
7	2.5 - 2.6	3	<p>2.5 Having regard to the location of our property in proximity to the above ground section of the Metro Scheme, and taking into consideration the proposed operating hours of the Metro (05:30 and 00:30 for 365 days per year), it is not acceptable to carry out a noise assessment for properties in this location without the appropriate baseline information for the operating hours associated with the development.</p> <p>2.6 Furthermore, it is stated in the EIAR that ‘Due to the nature and duration of the proposed Project, even where all reasonable measures have been taken to reduce noise levels, at some locations residual levels mean widespread community disturbance or interference with sleep is likely to occur. In such circumstances, TII will consider whether the provision of further Noise Insulation (NI) or Temporary Rehousing (TRH) will be appropriate at locations where eligibility for either has been established.’. It is imperative that residents who are likely to be subject to interference with sleep must be identified at this stage of the planning process. It is also submitted that definitive satisfactory mitigation measures to reduce any identified significant impact are set out as this stage. It is unacceptable that such assessment and mitigations measures are detailed after an EIA has been carried out.</p>	<p>EIAR Chapter 13.3.1.3, Baseline Noise Environment AZ1: Northern Sections provides details on the baseline noise surveys undertaken in preparing the EIAR for the Railway Order. Table 13.24 further lists the locations of both: the Unattended (Long term – one week) Noise Surveys, of which UT4 to UT7 are representative of the environment of your property; and supplementary daytime Attended Noise Surveys, of which AT3 to AT6 are representative of the environment of your property, with AT50 closest to your property. The noise survey results from these locations are listed in Table 13.25. The baseline noise surveys results have been used to model the potencial operational noise impact. Please refer to section 13.2.5.2 of the EIAR in relation to noise where the operational hours are referenced including nighttime hours which are Monday to Sunday 05:30 to 00:30.</p> <p>The impact assessment has been carried out as part of the EIAR and can be seen within Chapters 13 & 14. This assessment provides an identification of anyone who is affected with residual noise impacts and are eligible to apply for the noise mitigation policy. This results of this assessment within your area is in Section 13.7.1.1.1 of Chapter 13. As stated within Appendix A14.6 TII Airborne & Groundborne Noise Mitigation Policy, there will be additional assessments carried out following the completion of the detailed design stage and finalisation of the proposed construction methodology. Where the updated predicted airborne noise levels still exceed the trigger values as presented in Appendix A, the owner/occupier of properties in close proximity to the works will be contacted and advised that they are eligible to enter into discussions with TII in respect to further mitigation measures to be put in place. This will be at least 6 months in advance of the commencement of construction works.</p>

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8	2.7	4	2.7 It is also stated in the EIAR that ‘The outline CEMP will encompass a Noise and Vibration Management Plan (CNVMP) which will be formulated for the construction phase and used by all contractors based on the mitigation measures outlined in this chapter, in Chapter 14 (Groundborne Noise & Vibration) and the outline CEMP (Appendix A5.1). The CNVMP will be a live document. This will involve a detailed investigation of potential noise and vibration impacts associated with each construction compound. The assessment will identify through modelling and calculation, predicted construction noise levels, identification of potential exceedance of CNTs, identification of required noise mitigation measures specific to each work area to minimise noise and vibration impacts so far as is reasonably practicable’. It is again unacceptable that such assessments and mitigation measures are proposed to be carried out post-consent.	TII disagree with the statement that assessment and mitigation measure are left post consent. The detail of the assessments and mitigation proposal within the EIAR supporting the Railway Order have been outlined in response number (6) above.
9	Final Paragraph	4	<p>Closing Statement</p> <p>We respectfully request that An Bord Pleanála request Further Information from the applicant which would:</p> <p>1. Provide for revised plans and particulars in relation to the Open Space referred to above, ensuring that a safe-by-design approach is taken to avoid anti-social behaviour and to ensure residential amenity is not negatively affected.</p> <p>2. Provide revised noise and vibration surveying and assessment to ensure that all potential significant effects of the Metro Scheme are addressed during the planning process and appropriate mitigation are detailed in the EIAR for any such significant impact, such as interference with sleep, as referred to by the applicant.</p> <p>Yours faithfully,</p> <p>Caitriona and Ciaran Byrne</p>	See response numbers (1 to 6) above.