Submission No.	099
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Metrolink Submission Railway Order (RO) 2022				
1	Introduction	1	We welcome the Metrolink project and have engaged with TII since the start of the project in order to improve the project, minimise the negative impacts on our community and, in particular, to protect the mature trees within our area.	TII acknowledge and thank you for your response in support of the proposed Project. We have reviewed and responded to your observations below, including those made with regards to community impacts and mature trees.
2	Access to Independent Expert Advice	1	Access to Independent Expert Advice: Why wasn't access to an Independent Expert provided earlier on the Project (Example of precedent given MetroLink North and the Madden Report)?.	Access to the Independent Engineer was provided in September 2021, following the appointment of RINA. This appointment coincided with the completion of the preliminary design and was the most appropriate time for the Independent Engineering Expert to begin their review of the MetroLink Preliminary Design proposals.
3	Access to Independent Expert Advice	2	Independence of advice from Independent Expert: Why were the terms of reference for the Independent Experts Advice Brief set by NTA/TII? GADRA referred this to the Minister of Transport and were simply deferred them back to NTA. RINA's (the Independent Expert) final report to residents had to be approved by TII prior to circulating it to the resident stakeholders, and this approval process by TII only serves to undermine independence.	The terms of reference for the independent Engineer were issued to residents groups prior to RINA being commissioned. Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA) recognised that residents groups may find that some aspects of the Railway Order process quite technical and set up Independent Engineering Experts to assist residents groups in interpreting technical designs, drawings etc. and formulating their responses. Following engagement with Resident Groups pre-tender stage to the Independent Engineering Expert contract, it was agreed that the involvement of an independent third party would provide the assurance of the independence of the IEE, rather than involve the residents directly in the tender evaluation process. As such an Engineer nominated by Engineers Ireland formed part of the evaluation team during the tender process. The description of services for the Independent Engineering Expert were published at tender stage and are still available on the MetroLink website. TII and NTA provided free access to an Independent Expert to assist residents associations understanding and responding to the scheme. It was done voluntarily to promote full and effective public participation in the scheme.- The contract scope for RINA states that each report shall be submitted to TII for factual assessment prior to issue, and as such TII made no comments on the content or conclusions of the report nor had any role in approving the final document. Therefore, the independence of the IEE to carry out their role and produce an independent report was maintained. Please note the following extract from the IEE scope, "Each report shall be submitted to the Client's Representative for review. The Client's Representative shall not comment on the content of the report. The Client will only make comments as to the accuracy of facts regarding MetroLink. No comment regarding the analysis of the content will be provided unless it is deemed the Service Provider has provided a report which has not been developed with the reasonable skill, care and diligence of a Service Provider carrying out similar work."
4	Access to Independent Expert Advice	2	Information not provided to the Independent Expert in a timely manner before RO submission: Why wasn't sufficient information provided to the Independent Expert in advance of the RO submission? Prior to the submission of the RO, the appointed Experts appeared to have had difficulty in obtaining information from TII and, indeed, were not even informed of the timing of the application for Railway Order. In the RINA (Independent Experts) Interim Report, it states that for 70% of resident's questions to the TII, an answer was provided that was not comprehensive, nor did it provide as much information as was expected. The Independent Expert did not see any of the EIAR, which contained answers to many of the questions residents raised, ahead of the RO submission, which meant the independent expert report was not available until 6 weeks into the consultation period, giving residents just two weeks to make submissions.	The EIAR is one of the most complex and interconnected EIARs ever produced for an Irish project. It was not finalised until immediately prior to its submission to ABP. Given the pressing need to deliver MetroLink, TII's priority was to lodge the RO and open the public participation process for all affected stakeholders. The public consultation period was also extended in respect of the entire application for a total of 15 weeks, such that there would have been 9 weeks for residents to make submissions based on the observers calculations. It should also be noted that residents groups were issued with RINA's report in draft on the 9th of November and in final form on the 23rd of December providing sufficient time for residents to further expand on their submission during the upcoming Oral hearing. Key aspects of the project were also subject to statutory public consultation in relation to the GDA Transport Strategy 2016-2035 and 2022 to 2042 and non-statutory public consultation in relation to the Emerging Preferred Route (2018), Preferred Route (2019) and the Albert College Park Intervention Shaft (2020).

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5	Access to Independent Expert Advice/Construction Phase	2, 3, 27, 28	That an independent expert is available to residents during the Enabling and Construction Works. Request to ABP that a condition is placed on the granting of the RO that an independent expert advice (free of influence from TII/NTA) is available to residents and stakeholders during the enabling works and the construction phase. GADRA have requested that this aspect of the project is under the ownership of Dept of Finance, Enterprise or Transport and not the NTA.	The services of the Independent Engineering Expert (RINA) are due to be concluded on completion of the Railway Order process (expected in 2024). The continuation of provision of independent engineering advice for residential stakeholder groups throughout the enabling works and main construction stages of the MetroLink project is currently being considered as part of an overall comprehensive community engagement plan, which will include amongst other initiatives, the appointment of dedicated MetroLink liaison representatives and local community forums which will provide detailed updates on construction activities in their areas. TII does not believe it is appropriate to impose conditions requiring the involvement of the Departments cited in this matter, as the construction of railways is outside their statutory remit. TII does not accept that there is a basis to question its bona fides in this regard and points to the ten years of public consultation that preceded the Railway Order application in that regard.
6	Access to Independent Expert Advice and Conclusion	3 & 28	Residents Monitoring Group. GADRA are supporting the call for a Residents Monitoring Group so that Environmental impacts such as noise, vibration, traffic, dust, working hours, timelines etc. and the effectiveness of any construction mitigation measures - Agree monitoring and reporting templates. Reports are available for all residents to review in real time with a role for Independent Experts here also to provide oversight as to completeness of information bring shared.	Chapter 5: MetroLink Construction Phase, section 5.12.4.5 sets out TII Plans for Community and Engagement during the construction Phase. A Stakeholder and Community Engagement Plan has already been developed which has guided the frequency and means of communication to date. The proposed Project will continue to progress community engagement by: ▪ Regularly reviewing and updating stakeholder and community engagement plans; ▪ Actively maintaining partnerships and design focus groups established with the community; and ▪ Communicating in a timely and open manner. Through the ongoing development of this plan, it is proposed that TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in this EIAR, will be informed and consulted in advance of work taking place.
7	Access to Independent Expert Advice and Conclusion	3 & 28	Community Fund. GADRA fully supports the call by associations for Community Fund and Residential Monitoring Group. Similar to the children's hospital fund.	TII intends to establish a minimum of 3 local community liaisons offices along the MetroLink Route. It is proposed to locate these offices in the city centre, Glasnevin and Swords Areas. The offices will be established at least 3 months prior to the commencement of the Major Infrastructure works. TII will work with all established Community Groups through the local community liaison offices along the route to identify projects at local level that would involve the Community in the delivery of MetroLink and its legacy. Such projects might include by way of example: - A local school learning programme. - Enhancement of community amenity within agreed funding limits. - Engagement with final landscape and finishing options.
8	Access to Independent Expert Advice and Conclusion	3 & 30	Stakeholder Engagement (Historic). GADRA believe that so many of the issues that they (we) have today could have been addressed prior to Railway Order. GADRA have engaged with TII since the very start of this project sending their first questions to the TII in 2018. However, despite the early and enthusiastic engagement on their side, they found that TII did not respond.....	While fully recognising that matters of concern have been raised through the consultation process in 2019 and 2020, TII strongly disagree with any suggestion that these matters have not been addressed in advance of the submission of the Railway Order. The process of the Preliminary Design upon which the EIAR for the Railway Order is based, and the proposed construction arrangements, where appropriate, have incorporated feedback from the consultation process undertaken in 2019 and 2020 as set out by EIAR Chapter 8, Consultation.

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9	Stakeholder Engagement	3	Risk to Dublin City should project start and then stop for unforeseen circumstances: GADRA raised this issue with the Independent Experts at our first meeting November 11th, 2021, and RINA raised it with TII who confirmed that, at that point, it had not been included it in their Risk Register. TII to confirm whether this risk has now been considered?	TII confirm this risk has been considered. If the works were halted temporarily, for example if monitoring of a particular environmental impact showed results were trending towards a breach of acceptable limits (note the monitoring is designed with pre-determined trigger levels designed to ensure acceptable levels are not breached) or a safety concern was identified, then the area of the works concerned would be secured and temporarily suspended until TII are satisfied the works can resume following an investigation, consideration of lessons learnt, and actions to be implemented to avoid any reoccurrence. Such plans will be set out by the contractor's Monitoring Action Plans (MAPs) and associated contingency plans. If in the highly unlikely event construction must be abandoned, in the first instance, all works would be made safe and secured, and then it would be a decision for Transport Infrastructure Ireland to determine to what extent further work should be undertaken. It must be stressed that abandoning MetroLink main works once underway is viewed as a highly unlikely event. The main works procurement and governance process that will determine whether MetroLink main works should proceed will be rigorous and robust to ensure that a future risk of abandonment of the Project is extremely unlikely / improbable.
10	Specific Issues Being Raised and Conclusion	4, 5 and 29	Please confirm the rationale for the decision to go from Twin Bore to Single Bore and why this was not included in the EIAR? The EIAR is incomplete in relation to the decision to change from Twin to Single Bore, what was the reason for this massive change.	The EIAR provides the rationale and benefits of a single bore tunnel and therefore TII do not consider the EIAR is incomplete. A detailed comparative analysis of twin versus single bore tunnel has been undertaken, that has included consultation with Barcelona Metro that currently successfully operates a single bore configuration. EIAR Chapter 7, section 7.7.2.2.1 Overall Conclusions, notes that this analysis identified that a single bore tunnel option offered significant benefits for the proposed Project when compared to the twin bore solution that was considered at the Emerging Preferred Route (EPR) stage. These benefits include: **Passenger Evacuation and Incident Management** • The single bore configuration enables faster passenger evacuation from the ends of the train directly onto tracks, rather than more challenging lateral evacuation on to an elevated walkway along the sides of the tunnel required for a twin bore configuration. • The single bore provides increased space for emergency services access and working space adjacent to a train in the tunnel. • Conditions can be created within a larger single bore diameter tunnel that facilitates smoke stratification at a high level in the bore for a longer period of time when compared to that in a twin bore configuration. Therefore, the single bore configuration facilitates enhanced evacuation conditions for passengers and provides better tunnel visibility during fire events when compared to the twin bore solution. • The single bore configuration offers a more flexible system throughout the life cycle of the asset in that it allows operational adjustments such as additional track crossovers without the need to build new infrastructure / tunnels. **Programme and Cost** - A single bore tunnel can be constructed at lower cost and quicker than a twin bore configuration due to: • The overall reduced volume of structure to be constructed i.e. twin bore tunnels will require more concrete and steel, and an overall greater volume of excavation. • Not only can the single bore tunnel itself be constructed more quickly, and hence reduce the construction programme as less overall volume of material needs to be excavated, but also there is no requirement for cross-passages, which are slow to construct and need to be mined as separate construction activities after the main tunnel has been built, adding time to the programme and a complex activity dependency to be managed.. • There is no requirement to construct extra mined/cut & cover sections required to accommodate track crossovers since these can be accommodated in the single bore tunnel, that the twin-bore cannot accommodate. (It is recognised that the single bore configuration unlike the twin bore arrangement means there is a need for intervention shafts where the distance between stations is greater than 1000m. This only occurs at one location on the Project between Griffith Park and Collins Avenue stations and overall is offset by the benefits listed.) • As there is only one TBM to drive or pull through stations under construction, the station programme durations are reduced together with schedule interface risks with other programme critical construction activities.

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			Response (10) continued.	**Environment** • The reduction in excavation means spoil quantities, handling and disposal is reduced and hence traffic on the roads and the follow on volume of land fill disposal is reduced. • The reduction in concrete and steel that will be used to manufacture the tunnel lining precast segments will be reduced for a single bore tunnel and will therefore reduce the traffic on the roads. • There is an overall reduced environmental impact since the construction programme is quicker, less materials are needed for construction (reduced use of natural resources and traffic to transport materials to site), less excavation (spoil disposal volumes are reduced resulting in less traffic on the roads and reduced landfill), and an overall reduction in embedded carbon as a result of the reduced volume of material (steel and concrete) required compared to a twin bore configuration. Accordingly, the EIAR complies with the EIA Directive requirement to describe the reasonable alternatives, indicate the main reasons for the chosen option and compare their environmental effects in so far the decision to opt for a Single Bore over a Twin Bore Tunnel.
11	Specific Issues Being Raised and Intervention Shaft and Collins Ave Station position	4, 5 & 6	Specific Issues Being Raised (Assume location as highlighted): Our issues in relation to the Metrolink are as follows: Intervention Shaft (Albert College Park) Issues, including: o The lack of consultation on the shaft position. o The lack of any evidence of an alternative to the shaft. o The lack of evidence supporting the size of the shaft in the EIAR. o The size of the footprint of the shaft in both construction and operation phase. o The withholding of information on the shaft during the consultation on the EPR. o The lack of information in relation to Intervention Shaft within the EIAR especially in relation to construction traffic, base line sound measurements - it appears to not have been included (most like as it appears to have been a late addition to the project). o GADRA's proposal for Dublin Fire Brigade Access ACP Shaft to be outside of the park on Ballymun road rather than be in the park as part of the shaft footprint. o The fact that there are alternatives to the carpark/ emergency vehicle area outside of the park that also comply with industry safety standards has not been shown in the EIAR.	The Public Consultation Document for the Preferred Route, published as part of the public consultation held in March 2019, included reference to an intervention shaft required in Albert College Park (ACP), with the location indicated in Section 10, Appendix B, Sheet 15 ACP Intervention & Ventilation Shaft. However, feedback was received following the PR consultation in 2019 that there was not sufficient information provided on the intervention shaft at ACP. TII thus subsequently held a Local Area consultation solely on the intervention shaft at ACP for 4 weeks in early 2020. This was supported by a detailed report explaining the rationale and construction and operational requirements for the shaft - see EIAR Appendix A8.16. The main topics raised during this consultation related to aesthetics, environment, amenities, and parking. Please refer to EIAR Chapter 8, Diagram 8.10 and Appendix A8.14 and A8.15 for further details. TII would therefore contest that they have not undertaken sufficient consultation or withheld information as suggested by the observation made. The requirement for an intervention shaft is a function of the distance between Collins Avenue and Griffith Park stations. Response (12) explains the rationale for the proposed location of Collins Avenue Station, while EIAR Chapter 7 Consideration of Alternatives, section 7.7.11.1 explains the location options that were considered for the Intervention Shaft before determining the south-west corner of Albert College Park presented the preferred solution: • The Intervention shaft is no more than 1000m from either Collins Avenue or Griffith Park Stations; • The intervention shaft is adjacent to the tunnel on the west side of the park in order to reduce the length of connecting tunnel; • The park area is the only “open space” on the MetroLink route between the two stations and as a result the location of the intervention shaft here avoids the requirement for any demolitions or impacts on private property; and • The tunnel intervention shaft can be accessed easily by emergency vehicles and there is enough area for safely congregating passengers in an emergency. The design for the Albert College Park Intervention Shaft has been developed having regard to the submissions received and further discussions with Dublin Fire Brigade and other stakeholders with the site layout and the landscaping also developed to mitigate the visual impact. The size of the facility has been designed to accommodate the necessary ventilation facilities and access to the tunnels; to provide space for maintenance vehicles; and emergency vehicles space adjacent to the building entry point as required by Dublin Fire Brigade. Summary information is provided in EIAR Chapter 4, Section 4.17.5 Albert College Park Intervention Shaft with full details in EIAR Appendix A8.16. Response (34) below explains the rationale for the construction footprint of the site. Further, as noted by EIAR Chapter 21, Land take, section 21.6.1.5, while temporary and permanent land take at the proposed Albert College Park Intervention Shaft will result in the loss of two 5 a-side soccer pitches and a small portion of one full sized pitch situated in Albert College Park and currently used by a local football club. In mitigation, it is proposed to rotate the existing full-sized pitches 90 degrees and locate them side-by-side to the east of the park, resulting in slightly reduced dimensions. Sufficient area will be available to increase the dimensions of both 5 a-side pitches. Sufficient area will also be available for circulation around the pitches while they are occupied. Loss of habitat and wildlife will also be reinstated after initial construction. Chapters 27 (Landscape & Visual) and 15 (Biodiversity) set out the assessment into the potential impacts at Albert College Park, while Appendix A8.18 details the engagement that has taken place with Dublin Fire Brigade.

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			Response (11) continued.	EIAR Chapter 13 Section 13.3.1.6 notes the baseline noise monitoring results at Albert College Park with two unattended and four attended monitoring locations for this area. Section 13.5.2.6.3 describes the construction impacts on Albert College Park Intervention Shaft. EIAR Chapter 5, MetroLink Construction and Appendix A9.5 Scheme Traffic Management Plan details the impact of the temporary traffic management measures and associated construction traffic. As the Intervention Shaft is wholly located within the Albert College Park, there are no temporary traffic management measures associated with the construction of this site required on the adjacent R108, causing no impact to road users. As shown in Appendix A5.7 Construction Vehicles, Plant and Equipment, there will be approximately 30 to 80 vehicle movements per day associated with the Intervention Shaft, however much of the works will see daily vehicle movements lower than this range. As a result, the impact on traffic at this location will not be significant. The construction of the intervention shaft will also be complete in 2027 (prior to the peak main works construction year of 2028) and therefore the impact of the vehicles associated with the Intervention Shaft have been considered in the cumulative assessment of the enabling works (peak construction traffic generated in 2024).
12	Specific Issues Being Raised and Intervention Shaft and Collins Ave Station position	4	Specific Issues raised in relation to Collins Ave: Please confirm the rationale for the position of Collins Avenue station?	As outlined in EIAR Chapter 7, Consideration of Alternative, section 7.7.10.7, the assessment undertaken for the Emerging Preferred Route (EPR) identified a preferred route option including the proposed Collins Avenue station location. This location for the station provides a number of advantages when compared to other location options, including Albert College Park: (1) It allows the Project to achieve a core project objective of providing public transport that is integrated in the existing and future proposed transport network, providing for interchange between bus routes both on Collins Avenue and on Glasnevin Road. A station location further south at the northern section of Albert College Park would not provide a good level of interchange as there would be over 500m separating potential bus stop locations on Collins Avenue and the MetroLink station. (2) The proposed Collins Avenue Station will have a significant catchment area, noting the analysis undertaken at the Emerging Preferred Route (EPR) stage identified this route option had the highest potential passenger numbers when compared with other route options. (3) During the construction phase, the location of a station within the frontage to Our Lady of Victories means that traffic disruption to Dublin would be reduced when compared to the location of a station within the road corridor (partially or fully). The predicted temporary environmental impacts during construction on the surrounding area, as detailed in the relevant chapters of the EIAR, can be effectively mitigated. Once the station is operational, the location of a MetroLink station here will provide significant positive benefits to the local community in terms of enhanced public transport provision, reduced traffic and the resultant improvements in the environment as a result of reduced noise and air quality pollution.
13	Specific Issues Being Raised and Intervention Shaft and Collins Ave Station position	4	Our issues in relation to the Metrolink at Griffiths Park are as follows: - The rationale for the move to the current position for the Griffith Park Station?	At the Emerging Preferred Route Stage (EPR) stage the Griffith Park station was shown located on the Na Fianna playing pitches. The rationale for subsequently selecting the Home Farm pitches as the location for the Griffith Park Station is described and assessed in EIAR Chapter 7 Consideration of Alternatives, Section 7.7.10.8 Griffith Park, as the least impactful solution to deliver the Proposed Route. Locating the station under the Home Farm sports pitch is more preferable than under the Na Fianna pitches as the main Home Farm pitches are located away from this location whereas the Na Fianna pitches form the clubs principal playing pitches and training ground. The construction impacts would thus be more significant at the Na Fianna location. In addition, the adoption of a single bore tunnel arrangement requires the inclusion of an Intervention shaft between the Griffith Park Station and the Collins Avenue station due to the distance between these stations exceeding the Fire Safety Strategy limit of 1000m. Locating the Griffith Park Station on the Na Fianna grounds would increase the distance from here to the Glasnevin Station to above 1000m and thus require the introduction of an additional intervention shaft along this built-up residential section of the route.

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14	Specific Issues Being Raised and Intervention Shaft and Collins Ave Station position	4	Our issues in relation to the Metrolink at Griffiths Park are as follows: - Please confirm that the proximity of the Griffith Park Station to the highly sensitive Tolka river has been considered?	We confirm that the location of Griffith Park Station has considered the proximity of the Tolka River. For the full details of the assessments carried out relevant to the proposed Griffith Park Station, please refer to EIAR Chapter 15: Biodiversity. This has also been considered as part of Chapter 18 Hydrology and Chapter 19 Hydrogeology. Appendix A5.1 Outline CEMP and A5.11 outline construction measures with regards to working near watercourses.
15	Intervention Shaft and Collins Ave Station position:	5 & 6	Intervention Shaft: GADRA object to the positioning of an Intervention Shaft in a public park, which will permanently remove an area of public park from public use. This proposed shaft is a material permanent above ground structure, yet the public were not given any information on this shaft during the consultation phase (2019) and were not given any alternative site rather than in a public park. Indeed, the only consultation that occurred on the shaft was in relation to design, not position. An alternative location well away from homes and not in a public park in an area of Ballymun Library Car Park was not considered.	Response (11) above explains the rationale for the proposed location of the Albert College Park Intervention Shaft. The rationale for the location (including consideration of alternate locations), layout, access provision, finishing and landscaping of the proposed Albert College Park (ACP) Shaft are also provided in the Report on the ACP Tunnel Intervention Shaft, included as Appendix A8.16 of Chapter 8, Consultation of the EIAR. As set out in EIAR Chapter 4, Description of the MetroLink Project, section 4.17.5, and detailed on drawing ML1-JAI-SRD-ROUT_XX-DR-Y-03001 Plan Drawings ML-VT- 304 G-H, the shaft is located on the South West corner of Albert College Park. To address the concerns received from the Preferred Route consultation, the above ground structure will consist of a brick clad building with approximate dimensions 9m by 8m and 3m high at the top of the access shaft, with the remainder of the structure below ground. Access and egress has focused on resident feedback with both provided onto Ballymun Road. As referred to in Chapter 8, Appendix A8.15, the outline details of the proposed shaft were shared during the Local Area Consultation in early 2020.
16	Intervention Shaft and Collins Ave Station position:	5 & 6	Albert College Park: The disruption to nocturnal wildlife at this site will be significant and GADRA are requesting no works on this site at night.	The Pre-Construction planning for the Preliminary Design as assessed under this EIAR has provided for the majority of the works to be undertaken during standard working hours. There are exceptions to this for the reasons explained by responses (28) and (32) below but noting these works will take place underground and be covered so that noise disturbance during the night does not occur, and deliveries restricted. With regards to disruption to nocturnal life, overall, it is not expected that any potential impacts would be of such a magnitude that they would negatively affect the conservation status of the local bat species that have been recorded at this location. This is due to the following reasons: • All bat species present are very common species, that are of "Least concern" in terms of their conservation status, and include Leisler's bat, which is known to tolerate certain levels of light disturbance, consistent with the proposed development at this location, compared to other bat species; • The availability of suitable alternative habitats beyond this location will provide suitable foraging habitat for any displaced bats (e.g. within Santry Demesne, along the Santry River corridor); • The existing levels of light disturbance at this location; • The proposed lighting will be designed such that it is directed towards the construction compound rather than beyond its boundaries and it avoids light spill onto any nearby sensitive features (such as hedgerows and trees used by bats). A Lighting Management Plan will be prepared by the contractor for Albert College Park and this will include details on how the lighting will be managed to avoid light spill at this particular location; • The good practice use of light or lux meters to measure and check actual lighting levels on-site will be adopted. Measured values will be compared with relevant guidance for lighting in the workplace (refer to Appendix 5.18, Construction Lighting of the EIAR). This will ensure that light pollution is mitigated whilst workers are protected with a safe level of lighting. • There will be no significant additional lighting which will increase the baseline light levels along features suitable for commuting and

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				• There will be no significant additional lighting which will increase the baseline light levels along features suitable for commuting and foraging bats at Albert College Park. Low level lighting may be required in these locations to provide a safe environment for security personnel and pedestrians; however, surface works will not be undertaken during night-time hours in these locations. Therefore, there is no potential for likely significant effects to occur. The EIAR has demonstrated that there are no other sensitive nocturnal biodiversity receptors likely to be affected by the works.
17	Intervention Shaft and Collins Ave Station position:	5 & 6	**Zoning:** The area planned for shaft is currently zoned as Z9, GADRA do not believe that a ventilation shaft meets the criteria for this Zoning, but a station would.	The proposed ventilation shaft lies within lands zoned Z9 in the Dublin City Development Plan 2016-2022 (in force at the date of lodgement) and the Dublin City Development Plan 2022-2028 which is now in force. As a structure considered to come within the description of Public Service Installation in the Dublin City Development Plan 2022-2028, it is considered that the Ventilation Shaft is a Permissible Use under the Z9 zoning, and is therefore compliant with the zoning objective.
18	Intervention Shaft and Collins Ave Station position:	7	Modelling: GADRA are of the opinion that the strategic modelling employed does not accurately reflect the future passenger demands in the area (in determining the location of Collins Ave Station).	The NTA's Eastern Regional Model (ERM) has been used to forecast passenger demand for the MetroLink. This model includes for future land use and population changes and is the most appropriate tool available to forecast passenger demand for The Project. GADRA have not identified any aspect of the ERM that supports their conclusion.
19	Intervention Shaft and Collins Ave Station position:	7, 8, 9 & 10	Please note below the argument our colleagues in ACRA and Ballymun Residents Associations have made to the TII and we fully support this. For determining the location of the station at Collins Ave, why were no comparison made between: - the current selected church station location; to either - the location option (option 3 Metro North); or - the GADRA proposed Albert College Park station location, coupled with a ventilation shaft north of Collins Avenue at Ballymun Library.	TII have carefully examined the possible locations for Collins Avenue Station. Response (12) explains the rationale for the proposed location of Collins Avenue Station and response (11) the intervention shaft location requirements. EIAR Chapter 7 Consideration of Alternatives, section 7.7.11.1 explains the rationale that has resulted in the Intervention Shaft being placed in the south-west corner of Albert College Park: • The Intervention shaft is no more than 1000m from either Collins Avenue or Griffith Park Stations; • The intervention shaft is adjacent to the tunnel on the west side of the park in order to reduce the length of connecting tunnel; • The park area is the only "open space" on the MetroLink route between the two stations and as a result the location of the intervention shaft here avoids the requirement for any demolitions; and • The tunnel intervention shaft can be accessed easily by emergency vehicles and there is enough area for safely congregating passengers in an emergency.
20	Intervention Shaft and Collins Ave Station position:	10 & 11	Categories for the Multi Criteria Assessment: Collins Ave. Why was this information only release after the RO submission date? We also note the manner in which Our Lady of Victories School has been treated in this process and would highlight how differently this school has been treated in comparison to the treatment and special allowances made for the Scoil Caitriona and the children in School Mobhi by moving the Griffith Park Station, and we ask why these children and school should not be afforded the same respect and consideration given the similarities in the impacts. See below possible location of station in the park negating need for a shaft	Collins Avenue MCA document is a working analysis that was undertaken for various options that had been identified previously for this location. A draft internal analysis was undertaken to confirm the analysis undertaken in the EPR. Following consultation, TII agreed to share this draft document with the local residents. Due to its draft/working nature it was not required to form part of the application documents. All decisions in relation to the locations of MetroLink infrastructure have been taken on the balance of benefit versus impact, and that impacts need to be mitigated to acceptable levels. As demonstrated throughout the EIAR documents it is simply not the case that TII have prioritised one community group over another in the decisions taken. The rationale for moving Griffith Park Station is explained by response (13) above. TII would further note that impacts to the school, as for any other receptor will be mitigated so that the impacts of MetroLink are not unacceptable which are covered throughout the EIAR. Response (12) above explains the rationale for the proposed location of Collins Avenue Station and thus the need for an intervention shaft between the proposed Collins Avenue and Griffith Park stations.
21	Intervention Shaft and Collins Ave Station position and Conclusion	10, 11 and 30	GADRA highlight how differently the Our Lady of Victories School appear to have been treated in comparison to the treatment and special allowances made for the Scoil Caitriona and the children in School Mobhi by moving the Griffith Park Station, and we ask why these children and school should not be afforded the same respect and consideration given the similarities in the impacts.	Please refer to response (20) above.

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22	Shaft Consultation	12	Shaft Consultation: GADRA contend that the NTA/TII have not fulfilled the requirements of DPER's "Consultation Principles & Guidance" or their statutory obligations under the Aarhus Convention in terms of the underpinning pillars of access to information and public participation in decision-making in this regard.	TII strongly disagree with the assertion that the requirements of DPER's "Consultation Principles & Guidance" or the statutory obligations under the Aarhus Convention have not been followed. EIAR Chapter 8, Consultation provides details of the consultation process undertaken in 2019 and 2020 in relation to the proposed intervention shaft at Albert College Park. Please also refer to response (15) above.
23	Shaft Consultation	13	Shaft Consultation: There is no need for Fire Engines to turn on this footprint as indicated in the EIAR Section 4.17.5, and as confirmed to GADRA by Dublin Fire Brigade (DFB) and confirmed in the EIAR, DFB have requested a one-way system with two exits - thus negating the need to turn vehicles.	As set out within the EIAR Chapter 4 section 4.17.5, a one way system for entry from and exit to the R108 has been provided for Dublin Fire Brigade, alongside required parking space for vehicles by the intervention shaft, both following discussions with Dublin Fire Brigade regarding their requirements. Further details are provided on slide 84 of 89 on RO Submission: Structures Details Book 3 of 3 Other Line wide Structures Fingal County Council and Dublin City Council. There is no provision for vehicle turnback's at this location. The reasoning supporting the proposed location, layout and operation of the Emergency Shaft at Albert College Park is detailed within Appendix A8.16.
24	Shaft Consultation	13 & 21	Shaft Consultation. Shaft access and parking, confirm DFB have been consulted on the details outlined.	Dublin Fire Brigade have been consulted during the development of the Preliminary Design of the Albert College Park Shaft as detailed within the EIAR and Railway Order documents, and the design accommodates their requirements. Please refer to dates of meetings held with DFB outlined in appendix A8.19.
25	Information Provided during Consultation	15 to 24	**GADRA also contend that :** - A proper consultation process was not followed in 2019. - The decision to put an above ground shaft and emergency vehicle/ maintenance car park in a Dublin city park was taken without discussing the proposal with DCC (as confirmed to GADRA by the Head of Parks) or with the public. - Also note and object to the permanent loss of park lands and we object to any access from Hampstead Avenue as detailed. - Noted allegations of breaches of the Irish Constitution and of the Aarhus Convention, refuted by the NTA. - Request from ABP that this position and size of this shaft is not agreed until an assessment of an alternative to its position and size has been undertaken. - object to the additional emergency exit on to Hampstead Avenue, with the required second exit can be accommodated on the Ballymun Road.	TII do not agree that a "proper consultation process was not followed in 2019" for the reasons set out by response (11) above. TII has carried out three consultations over and above the statutorily require Railway Order consultation. TII would also note that DCC are aware of and have not objected to the Albert College Park intervention shaft proposal. Response (11) also explains the reasoning (and alternatives considered) for the proposed location and size of the intervention shaft. TII can also confirm no access is provided off Hampstead Avenue, with both accesses now provided off the Ballymun Road. (See Railway Order Drawings, Structures Book 3 of 3, ML1-JAI-SRD-ROUT_XX-DR-Y-03001).

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26	Information Provided during Consultation	15 to 24	Preferred Route Albert College Intervention Shaft. Report from 2019. In particular, GADRA highlight the following issues (Summarised below 1 - 9) with the report produced in relation to Albert College Shaft 2019 Report in particular noting the seriousness of points 1 and 2: 1) The option of a station at this site in the EIAR is a fundamental flaw with this assessment. No reason given on why a station was not considered (at this location). 2) An Environmental Impact Assessment Report (EIAR) of the construction stage was not addressed - again a fundamental flaw and a major issue with the current process. 3) Dispute the validity of the statement: this preliminary design was developed from feedback provided during the public consultation process. 4) State that "the details of the proposed shaft were not widely circulated or communicated". 5) Noted "that local public representatives do not support the proposal to put a shaft into a public park preferring the option of a station instead". 6) Provide correspondence on NTA position with the provision of information during the consultation period. 7) Shaft report indicates that the distance from Glasnevin Station to Mater Station is 683m. This shows that a station in Albert College Park would not result in a distance between consecutive stations that is out of line with the distance between other stations on the Preferred Route. 8) "For the tunnel intervention shaft to be no more than 1000m from either Collins Avenue or Griffith Park Stations, it must be situated either immediately north of Hampstead Avenue in the south-west corner of Albert College Park; or within the residential area immediately south of Hampstead Avenue;" GADRA were shocked that a residential area was even considered for a shaft location. 9) Note and object to the permanent loss of park lands and we object to any access from Hampstead Avenue as detailed. Include alternative: DFB have confirmed that they are just looking for best international standards which means a hard standing area for two fire engines be available for emergency vehicles within 20 meters of the shaft- the layby on the Ballymun road satisfies this criteria negating the need for an area of the park to be incorporated into this shaft design thus reducing the permanent land take from the park.	It is important to recognise that the level of detail presented by the Preferred Route (PR) Albert College Intervention Shaft 2019 is commensurate with the level of detail required for the PR stage of the project. However as the design developed and information became available on the proposed intervention shaft, a site specific public consultation was initiated whereby submissions were invited on the proposals to install an intervention shaft at Albert College Park. This consultation occurred between February 12th 2020 and March 30th 2020 and was initiated by the delivery of an information pack to 4,250 homes in Glasnevin and Ballymun from February 12th 2020, in addition to the delivery of brochures outlining the proposals to local libraries and council offices. 195 submissions were received in response to this public consultation including 7 from public representatives and 11 from local organisations. In accordance with the numbered observation points: 1. The rationale for the position of Collins Avenue Station is explained by response (12) above. 2. TII do not agree that this is a fundamental flaw. At the Preferred Route consultation stage the details of the proposal were not at the level of detail to undertake an EIAR, and the subsequent development of the design to Preliminary Design has formed the basis of the EIAR assessment for the Railway Order, noting that the Preliminary Design was developed taking account of the feedback gathered during the consultations in 2019 and 2020. 3 and 4. Response (11) above explains why TII consider they have taken account of feedback provided during the consultation process and adequately circulated the proposals for Albert College Intervention Shaft. 5.While support may not be unanimous for Albert College Intervention Shaft, TII have set out the rationale that has led to the preferred location for Collins Avenue Station and Albert College Park Intervention Shaft in responses (12) and (11) respectively. 6. TII are unsure as to what correspondence the GADRA is referring to but will be happy to provide the relevant resonance if GADRA wish to contact TII directly in advance of the Oral Hearing] 7. The rationale for the preferred location of Collins Station is set out by response (12) above. This means the distance between the proposed location of Collins Avenue Station and Griffith Park Station is greater than 1000m and hence the requirement for an intervention shaft between these stations. 8. The statement explains the constraints that apply to the selection of a location for an intervention shaft. The residential area is also considered a constraint and ruled out early in the design process. 9. Response (11) explains the reason for the proposed land take, including the provision of space for maintenance and emergency vehicles space adjacent to the building entry point as required by Dublin Fire Brigade. The hardstanding area is linked to a maintenance access road which is not only proposed for DFB but also for associated maintenance. TII can also confirm no access is provided off Hampstead Avenue, with both accesses now provided off the Ballymun Road. (See Railway Order Drawings, Structures Book 3 of 3, ML1-JAI-SRD-ROUT_XX-DR-Y-03001). While the objection to Park land take is recognised by TII, it is also noted that this submission proposes that instead a station is located at this site that would bring with it a greater potential environmental impact during the construction phase to be managed, as well as also resulting in permanent land take, and therefore many of the observations (objections) to Albert College Park Shaft would also apply to a station if constructed at this location. (continued below)

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27	Information Provided during Consultation	15 to 24	Preferred Route Albert College Intervention Shaft. Report from 2019. In particular, GADRA highlight the following issues (Summarised below 10-18) with the report produced in relation to Albert College Shaft 2019 Report in particular noting the seriousness of points 1 and 2: 10) Drilling and blasting appears to be the intended method by which this shaft will be constructed (Section 5 of shaft report). The impact on Human health impact was not considered in the as part of an EIA and note our opposition to the plan, asking that VBM is used. 11) Baseline sound monitoring from this location, was omitted and this also must be addressed prior to RO. 12) The report does not contain the impacts on this structure (Underground plant and fan room) as part of the build. 13) the report states that shaft is a significant construction - so we ask again why this significant construction was excluded from consultation on the Preferred Route and was omitted from the EIAR- this needs to be addressed prior to granting RO. 14) Object to the plans for a temporary construction compound (see Section 5.1 of shaft report below) and we object to the loss of the park for the duration of 3 years - noting that this does not include the length of time required for the park to recover and be available for public use. In contrast to the shaft report the EIAR says the construction will take 5 years. 15) The report does not contain any assessment of the short medium- and long-term effect of the proposal. As previously stated, a major flaw. 16) Review of Section 6.1 of shaft report there is no assessment of the impacts on the residents living less than 20 meters from this site - although the report does make reference to the impact on the playing pitch. 17) Request that a precast roof be used during the construction of the shaft to mitigate impact on residents. 18) Request that this site is a dark quiet site at night with no works taking place on it given that this site is adjacent to the main tunnels and its proximity to home and the flora and fauna of the park.	(continued from above) 10. The Human Health assessment is presented in Chapter 10 of the EIAR. As stated in section 10.5.1.1.2 and 10.5.1.1.3 of this chapter the human health effects of airborne and groundborne noise & vibration have been considered. The health effects are associated with exceedances in criteria set out in Chapter 13 Airborne Noise and Vibration, and Chapter 14 Groundborne Noise & Vibration. It should be noted that blasting and its potential for health effects is specifically referenced in section 10.5.1.3. Section 10.7 of the chapter identifies that blasting could cause a significant effect which will be temporary or short-term (at locations identified as exceeding criteria in Chapter 14). However, there are no exceedances of criteria for blasting at sensitive receptors in the vicinity of Albert College Park as identified in Chapter 14. 11. Baseline monitoring was undertaken in the vicinity of Albert College Park (AT25, AT26, AT27, AT28, AT64, UT31 and UT32) . Refer to Table and Figure 13.1 (sheet 5 of 7). 12. Please refer to the EIAR prepared for the project where all potential effects arising from the project during both the construction and operational phase have been presented. 13. As outlined above, this location was consulted on separately to the Preferred route. 14. Response (11) above explains the rationale for the land take, noting that there will be no loss of pitches during the construction phase. The estimated construction period as stated by EIAR Chapter 5, MetroLink Construction Phase, Table 5.15, is 63 months. This period allows for the removal of the compound and landscape reinstatement. Once the main civils works are complete, for the MEP installation at this location, it is possible for the compound footprint to be reduced to the permanent footprint of the facility shaft area with the park reinstated as proposed. 15) The assessment presented in every chapter of the EIAR is based on a comprehensive assessment of potential effects during the construction phase and the operational phase. This is in line with best practice and guidance. 16) The Albert College Park Report notes that all impacts would be assessed within the EIAR in necessary detail. Please refer to the EIAR prepared for the project where all potential effects arising from the project during both the construction and operational phase have been presented. 17) Please refer to section 13.6.1.2.4 of Chapter 13 and 14 of the EIAR where it is proposed that at Albert College Park, during night-time support works for sprayed concrete tunnelling, surface activities will be enclosed within an acoustically clad steel framed building to control airborne noise breakout to surrounding sensitive properties. 18. Response (16) above explains the proposed management of night-time lighting, noting that lighting will be designed such that it is directed towards the construction compound rather than beyond its boundaries and it avoids light spill onto any nearby sensitive features. Response (28) explains the proposed approach to required night-time working, noting an acoustically clad steel framed building will be used within the compound to control airborne noise breakout to surrounding properties. Deliveries to this compound at night will be limited to concrete supply for the sprayed concrete tunnelling works only and these will be scheduled to occur over limited delivery periods to minimise impacts on surrounding properties.

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28	Construction	24 & 25	Construction: Requesting daytime standard working and delivery times (table 5.3) only, including SCL (Section 5.5.11.)	The shaft at Albert College Park will require two 23m long connection tunnels from the shaft, connecting to the main tunnel (see the general arrangement of the shaft in Diagram 5.27). Both tunnels will be constructed using the Sprayed Concrete Lining technique (SCL which consists of cycles of excavation followed by the application of shotcrete (sprayed concrete), rockbolts and steel girders. The final connections will then be made from the main running tunnel (See Diagram 5.28). Owing to the nature of the tunnelling works and to ensure a safe and stable method of excavation, the SCL tunnel construction will be undertaken 24 hours per day, seven days per week. It is proposed that during SCL night-time support works, an acoustically clad steel framed building will be used within the compound to control airborne noise breakout to surrounding sensitive properties. Refer to Outline Construction Environmental Management Plan (CEMP) Table 6.2 "Noise and Vibration Measures - Topic: Acoustic Barriers ANV8". The structure will achieve a minimum sound reduction index of 24dB Rw with acoustic internal lining of the structure to reduce reverberant noise build up. The enclosure design will be such that openings are sited away from Noise Sensitive Location (NSL) boundaries as far as practicable. Deliveries to this compound at night will be limited to concrete supply to the SCL works only and these will be scheduled to occur over limited delivery periods to minimise impacts on surrounding properties.
29	Construction	24 and 25	The ground water level at this shaft site is high and much grouting works will be required. Confirm that this matter has been fully assessed in the design and particularly in the choice of construction for the shaft (secant piling - Section 5.5.2.1)?	Groundwater levels have been considered in the design of all of the deep structures along the route, including the Ventilation Shaft at Albert College Park. EIAR Chapter 19 (Hydrogeology) presents the assessment of groundwater in relation to the project. The water tightness of the internal structure of the shaft will be achieved through specification to minimise water ingress through the secant walls. In addition, an allowance has been made for the inclusion of internal walls inside the secant piles to accommodate an internal drainage system for water management within the completed shaft, as is normally provided, but noting that there will be no significant drawdown of groundwater levels.
30	Construction	24	Please confirm that base line noise monitoring will be a requirement under the RO.	Baseline monitoring has been completed at this location as part of the EIAR. Furthermore, it is a requirement of the Outline Construction Environmental Management Plan (EIAR Volume 5 Appendix 5.1) for the appointed contractor to undertake further baseline noise monitoring in advance of the commencement of works at all construction compound locations. Please refer to table 6.2: Noise and Vibration Measures, Topic Monitoring Programme ANV 11.
31	Construction	25	A request that NTA uses a Vertical Shaft Machine for the construction of this shaft which makes vertical holes.	The EIAR assessment is based on the proposed construction of this shaft using secant piling as the method of construction. When appointed by TII the Contractor can choose an alternative method to construct this shaft while adhering to the environmental limits, including Noise and Vibration, for this location.
32	Construction	25	Object to plans to avoidable night-time works at both Collins Avenue Station and Griffith Park Station, specifically in the context of the proposal in Section 13.5.2.6.4 to night-time strip and clean via Griffith Park in the interests of time efficiency and ask that the Inspector add as a condition that strip and clear is carried out at a station that is situated away from residents. We note the EIAR give no traffic impact at the Griffith Park site for this strip and clean activity. All plans for will be detailed in the Construction Noise and Vibration Management Plan.	All planned night-time work activities will have to be undertaken, controlled and mitigated under the detailed Construction Environmental Management Plan to maintain impacts below the agreed construction noise thresholds. Examples of mitigation measures that can be used to reduce impact are detailed within Chapter 13, section 13.6, including the use of enclosure structures for planned activities outside of the standard working hours. The rationale for all 24/7 working on activities such as MEP, TBM strip out and clean and track laying, is that they can be managed underground without causing disturbance at night. While activities below ground are progressed on a 24/7 basis or undertaken within an acoustically clad steel framed building enclosure at site level to mitigate potential noise levels, while site level activities such as deliveries etc will be limited to standard working hours (Chapter 5, Section 5.5.17.3 and Chapter 13, section 13.6.1.2.4 refers). As presented in Appendix A9.5 Scheme Traffic Management Plan Table 2-2, construction activities which occur at night-time or on weekends have only been assessed as part of the Stage 1 assessment, as they are of low potential magnitude and duration. As such, these impacts have been removed from any further assessment and deemed not to require a Stage 2 Assessment or any further mitigation measures.

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33	Construction	25	We would request that the inspector request as a condition monitoring of construction noise at Collins Ave and Griffiths Park Stations and removes all but essential night-time works from these locations as time efficiency is not an acceptable reason to justify the impact that will arise.	Monitoring is proposed within the Outline Construction Environmental Management Plan, Volume 5, Appendix 5.1 refers. The baseline noise study forms part of the Construction Noise Vibration Management Plan (CNVMP) to be prepared for each construction compound. Refer to Outline CEMP Table 6.2 "Noise and Vibration Measures - Topic: Method Statement ANV2 & 3". The rationale for all 24/7 working on activities such as MEP, TBM strip out and clean and track laying, is that they can be managed underground without causing disturbance at night. While activities below ground are progressed on a 24/7 basis, site level activities such as deliveries etc will be limited to standard working hours (Chapter 5, Section 5.5.17.3 refers).
34	Construction	25	Why is the ACP shaft a Main Construction Compound (Section 5.10) and we query the size of the compound Table 5.6, which is similar to the Station compounds.	EIAR Chapter 5, Table 5.6 provides a summary of the proposed size of the compound at ACP of 6,000m^2, with the adjacent main station compound sites of Collins Ave comprising 9,000m^2 and Griffiths Park 11,700m^2 respectively. ACP has been designated as a main compound site because it serves a key construction component of the MetroLink, the ventilation shaft, and has been sized accordingly.
35	Construction	25	Safety concerns raised (Section 5.10.4) that the planned construction route for traffic leaving the site is a U turn on the Ballymun Road, given its proximity to a primary school.	No u-turning of MetroLink vehicles will be permitted. The planned route for construction traffic following a left turn out of the site, will be to proceed southbound on the R108 Ballymun Road keeping right and turning right onto Griffiths Avenue, keeping right again before turning right onto the R102, travelling northbound keeping left to merge onto the R108 Ballymun Road towards the M50.
36	Construction	25	Section 5.10.5 refers to an additional site being required as a lorry holding area to control the flow of HGVs into the site. This site has not been identified and we are asking the Inspector to set as a condition that the residential street of Homefarm/ Walsh/ Island Roads are not used for this activity, and that waiting trucks are required to turn off engines to ensure they do not continue to cause emissions while idling.	We confirm that Homefarm/ Walsh/ Island Roads will not be used for the purpose of providing an additional site for lorry holding at Griffith Park. The contractor will be required to plan the logistics of deliveries to site utilising the areas provided to them, mainly at Northwood, or finding additional lorry holding areas limiting impact on local traffic in accordance with the Scheme Traffic Management Plan (STMP).
37	Construction	26	The schools within the area have requested separate protected entrances to their schools throughout construction Section 9.4.5 Table 9.5.	It is not anticipated that the MetroLink works will have a direct impact on any school entrances. However, if works are required past school entrances (Utility diversion works for example) these will be scheduled in discussion with the schools to provide alternative means of safe segregated pedestrian and vehicle access as required during school opening times.
38	Construction	26	Although we have fully read the Metrolink EIAR and Ballymun CBC EIAR, we cannot understand if it is intended that both projects would occur at the same time. We suggest that it would be foolish to proceed with the CBC construction only, to then close it off again to rip it up for Metrolink, and we are appealing to the Inspector to delay the felling of trees within the Na Fianna fence (section 17.3.4.1.2) until after the construction of the station box, to prevent the loss of the carbon sink that these tall mature provide. The trees will also help in sound mitigation, will be dust limiting and will help offset CO2 emissions, so we are asking that this tree felling is delayed.	Both the proposed MetroLink and BusConnects are NTA governed schemes. Dependent upon the timing of the relevant schemes and their statutory approvals, the works will be coordinated so far as possible to ensure cumulative impacts as a consequence of concurrent activities are minimised. The MetroLink proposals will unfortunately result in the loss of trees inside the boundary wall and within the Home Farm site that runs along the east side of Mobhi Road to facilitate construction of Griffith Park Station. It is not possible to delay the removal of these trees until after the construction of Griffith Park Station. Please refer to drawing ML1-JAI-SRD-ROUT_XX-DR-Y-02051, sheet 15 of 61 from Railway Order Plans\Drawings, Structures Drawings: Book 2 of 3 MetroLink Stations Dublin City Council. The impacts of tree loss is considered in Chapter 15: Biodiversity section 15.8.1. Habitat Loss, with replanting proposed in the landscape design to compensate for habitat loss by providing new areas for trees. The landscape plan includes for the planting of 3,444 individual trees which will be organised in small copses, lines of trees and within woodland habitats. The planting of these new trees will compensate for the loss and will not result in significant negative residual effect on treelines at any geographic scale. The timing for the commencement of both scheme is dependant on the timing of when each scheme will be granted their respective planning permissions.

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39	Construction	26	We do ask though that (Section 10.3.5.1.2) Schools are not rated higher than residences who may have people present in them 24 hours a day with many people still working from home, and we would not support a decision for night-time works at this site justified on the basis of facilitating the schools, which could be temporarily relocated.	The approach to night-time works has been covered by the responses (28), (32) and (33) above. TII acknowledge that there is potential for significant environmental effects on the surrounding area due to the proposed MetroLink station if not mitigated effectively. However, as detailed in the relevant chapters of the EIAR, TII's assessment shows that it is possible to mitigate the potential impacts identified for all potential sensitive receptors at Collins Avenue, Albert College Park, Griffiths Park and Glasnevin during the construction period. Once the construction phase is completed and the MetroLink is operational, the location of Collins Avenue Station will provide significant positive benefits to the local community in terms of enhanced public transport provision, reduced traffic and the resultant improvements in the environment, with reduced noise and air quality pollution.
40	Construction	26	Concerns raised in relation to Aspergillus and Immunocompromised residents (10.3.6.6.1) and would like this monitored closely, given that the current Pandemic has left increasing numbers of people with compromised immune systems in many cases unbeknown to themselves.	Aspergillus is ubiquitous in the environment. Every day activities such as disposing of organic waste into brown bins, composting garden waste or event grass cutting generate Aspergillus. - As outlined in Section 16.5.2.12.1 of Chapter 16 of the EIAR, research has found that dust suppression techniques also prevent the suspension of aspergillus successfully. A competent contractor will be appointed in advance of the construction phase to prepare an Aspergillus Prevention Plan taking into account the National Guidelines for the Prevention of Nosocomial Aspergillosis (HSE 2018). This document provides a risk assessment for aspergillus and preventative dust mitigation measures and in Appendix B of the document pre-project planning and contractor advice. Survey and prevention works with respect to Aspergillus will take place before construction commences by a competent contractor in proximity to any sensitive buildings. If the pre-construction surveys indicate that Aspergillus is a risk, mitigation works will be implemented in line with the Aspergillus Prevention Plan to ensure the prevention of Aspergillus spores spreading.
41	Proximity of the Griffith Park station to the highly sensitive Tolka river	27	Proximity of the Griffith Park station to the highly sensitive Tolka river As indicated earlier, we cannot see in the EIAR evidence in relation to the decision to move the Na Fianna Station to Homefarm Football Club (HFC). We note that the EIAR states that the Hydrology is not as favourable at the new Homefarm site, and it is a more sensitive site from a heritage point of view (7.7.10.8). Indeed, it seems to imply that the station position on the Emerging Preferred Route (EPR) was preferrable to that on the Preferred Route (PR). Given the extremely close proximity of the Griffith Park Station to the River Tolka, 25 meters away, in an area that has previously flooded (section 18.4.3.4.2), we can see no technical reason for the move of station in the EIAR. It does imply in the EIAR that the reason for the move is that the impacts of the station at Na Fianna would be bigger on the Club than a station on Homefarm pitches would have on the Homefarm Club (section 7.7.2. 1). We are asking ABP to be fully satisfied that this station is in the right position from a technical point of view, in the context of the risk of flooding and the potential for significant impact should a flooding event occur.	As noted above, the tunnel fire safety strategy requires intervention points along the tunnel. A station positioned within the Na Fianna Site would necessitate another shaft then required before Glasnevin Station within a congested residential area. EIAR Chapter 18 Hydrology, section 18.3.4, makes note of the concerns raised during consultation of the potential flood risk at the proposed location of Griffiths Park Station next to the Tolka River. Section 18.4.9.4.2 makes reference to historical flooding of the Tolka River and notes that the areas that have previously flooded are outside of the study area and therefore unaffected by the proposed project. Information provided from the Office of Public Works and their National Flood Hazard Mapping indicates that there is no risk of flooding at this location. Please refer to Table 18.14 Summary of all Construction and Contractor Compound Sites (including bulk fuel storage areas) - Flooding Potential.
42	Proximity of the Griffith Park station to the highly sensitive Tolka river	27	We note the impact that this move of station is to bring the tunnels under more homes, especially in the Prospect ACA area who need to be afforded extra protections given the nature of their shallow foundations and age of their homes.	TII have assessed the impact of construction generated ground movements on the properties in the Prospect ACA and these are documented in EIAR Appendix 5.17. This includes for residential properties on St Theresa Place and along Prospect Avenue that are within the potential ground movement zone of influence. Table 5.2 specifically lists the predicted impacts on these properties. For reference, building numbers B120, B139, B140 and B141 apply. Each of those assessed falls within the Negligible damage category (see Table 4-4). The assessment undertaken is considered conservative and has taken into account the type of building and the shallow foundations noted. No additional extra protections are predicted to be required.

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				A programme of environmental monitoring will be undertaken, that will include ground movement, with predetermined monitoring trigger levels set to ensure that environmental limits are not breached. TII would also note 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. 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.
43	Proximity of the Griffith Park station to the highly sensitive Tolka river and Conclusion	27 & 29	We also note the very large plaza in front of the Griffith Park station, right to the river's edge. Given that the Valley of the river Tolka is a conservation area, although non statutory, area (27.4.2.18), we would request that the plaza is made smaller, and we would be fearful of anti-social activities at this site. Indeed, we can see no evidence as to why the stations have such large concrete plazas throughout this project and feel all should be reduced in size. It appears designers saw space and decided to use it, rather than trying to limit the above ground impacts throughout - we again mention the car park /Maintenance area put into Albert College Park for the shaft even though the hard shoulder on Ballymun road is within 20 meters of entrance and satisfies best international standards.	The risk of anti-social behaviour has been considered by the Project and is addressed by EIAR Chapter 6, MetroLink Operations and Maintenance. Section 6.6.5.8 specifically addresses how this will be managed, including how 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. CCTV will also be installed throughout the MetroLink system, including at station entrances and the public realm to provide general security and surveillance of all the public areas. Regards "car park / maintenance area put into Albert College Park" please refer to response (11) above.
44	Other Considerations	27	We note the planned establishment of a project construction traffic Forum with representatives from key stakeholder groups, including residents. This forum must be set up with clear terms of reference with binding authority (refer Section 9.7. 1,2)- we would again feel that the role of the Independent Experts needs to be included here. We find it unacceptable that the contractor will be responsible for informing stakeholders of works - Section 11.6.1.2. This responsibility remains with the NTA, and residents should not have to deal with multiple contractors. In addition, we are unsure of how the CRO will work which was not clear in the EIAR.	TII confirm that the forum will be set up with a clear terms of reference (ToR) and that the attending representatives will be consulted with regards these terms of reference. See response (5) in relation to the role of the Independent Engineer. TII do not agree that it is 'unacceptable' for the contractor to be responsible for informing stakeholders, particularly given they are managing the works day-to-day. However this does not mean that TII will abdicate responsibility, and TII will play a key role in making sure this forum operates effectively and in accordance with the agreed ToR. TII also confirm that the forum will not be dealing with multiple contractors, and that the contractor will be required to coordinate their attendance and communications with the forum. The purpose of the CRO as noted by the EIAR Section 11.6.1.2 is that CRO's are responsible for maintaining open, transparent and positive relationship with members of the public, local businesses, groups and organisations affected by the works. Specifically, the CRO's are not the appointed contractor but they will work closely with Transport Infrastructure Ireland and the appointed contractors to ensure that all effort to address public concerns are made, and to ensure that information on the nature and duration of all works is provided". Further information, including contact details will be provided closer to the time construction is scheduled to commence.

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45	Other Considerations	28	The EIAR refers to construction workers using sustainable transport to work (9.7. 1.1) - we also feel that surrounding roads may need pay and display or resident only parking- indeed Hampstead residents have already documented issues with parking for agents of the NTA in their submission. We would ask where these workers will live, if, as expected, many workers from abroad will be required for the Metro. We also ask as to where all these workers will be sourced, as it is likely that there will be a shortage of qualified workers available.	The STMP include details of the proposed Mobility Management Plan (MMP), which supports and promotes sustainable travel for construction staff and constrains the use of private cars to access work compounds. TII therefore do not envisage MetroLink impacting local existing parking arrangements or there being a requirement to change the local parking regime, but noting this is a matter for DCC rather than TII. The identification and sourcing of appropriately skilled workers for the construction works is outside the scope of the railway order and will be the responsibility of the appointed contractors.
46	Other Considerations	28	We note the request in relation to limits of deviation (Chapter 6 pg. 17) where there is a request for 15 meters laterally with station boxes, which we feel is too great and much larger than was requested or granted in Metro North. - Please provide justification within the EIAR for this proposal. - The Inspector should set tight levels of deviation. - The zone of influence moves accordingly. - A Construction limit of deviation of one meter sideways and vertically as any greater than this will impact on settlement calculations. - Highlight the need for Independent Experts throughout construction.	The design includes for a limit of deviation which is required to allow for unforeseen obstructions and construction tolerances which may necessitate a change to the alignment. In the highly unlikely event that this were to occur, any resulting environmental impacts will comply with the limits set by the enforceable Railway Order. Limits of deviation have been set for the proposed Project and this is addressed by Appendix A5.19, Wider Effects Report. The LODs are not 15m laterally for stations as stated, but only 2m. TII has carried out a comprehensive set of ground investigations in accordance with relevant guidelines and best practice. It has a high confidence that MetroLink can be constructed along the proposed alignment without requiring vertical or horizontal adjustment. However, in order to guard against rare and undetectable subterranean conditions that might interfere with construction, the Railway Order provides for limits of deviation (as have other railway authorisation since at least the 1840s). The impacts of potential changes within the Limits of Deviation are considered in the Wider Effects Report (Appendix A5.19). TII will employ contractors with the necessary industry recognised skills to deliver MetroLink. TII will also have an 'Expert Panel' in place that will comprise of internationally recognised experts covering the fields of expertise required to design, construct and bring in to operation a metro system. These experts will provide advice to TII and assist with providing oversight of the organisations contracted to deliver and operate MetroLink. Independent Industry Experts throughout the construction phase specifically to help assure that the potential impacts of construction are known, assessed, monitored and mitigated so far as is reasonably practical.
47	Other Considerations	28	EIAR Chapter 9 omits the shaft from its scope assessment of road transport and impacts on pedestrian and cyclists.	EIAR Chapter 9 does not omit the shaft from its scope assessment of road transport and impacts on pedestrian and cyclists. EIAR Chapter 9: Traffic and Transport includes Albert College Park within the Outline Project Description, provided in Table 9.1, with a summary of existing cycling provision provided in Table 9.60. The baseline conditions around Collins Ave Station (including Albert College Park) are referred to within the Overall Traffic and Transport Assessments (TTA's) and the station specific TTAs, contained in Appendix A9.2 - C (TTA - Collins Ave Station). Furthermore section 9.6.1 sets out the predicted impact assessment to be provided by the STMP. As detailed within sections 9.8.1.3 (Pedestrian Impact) and 9.8.1.4 (Cycling Impact) the traffic management measures adopted will seek to minimise impact and ensure quality and ease of movement through the works areas. The hierarchy of local impact mitigation is prioritising Pedestrians and Cyclists (Vulnerable Users) for protection above other road users. EIAR Chapter 5: MetroLink Construction Phase, Figure 5.1 Sheet 16 of 26 shows the ACP construction site located within the existing park boundary, clear of the existing Ballymun Road. Section 5.10.4 describes access to the ACP construction site. This anticipates that the southbound bus lane would be used by construction vehicles to provide a left turn in/left turn out arrangement to minimise traffic impact, with control of vehicles crossing the pavement to ensure pedestrian safety as the existing footway would remain open to pedestrians. No other works are envisaged on the R108 at this location during the main construction works. See also Response (11) regarding construction traffic.

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48	Other Considerations	28	**Glasnevin Station:** The proposed station building is not in keeping with the area in either style or size and this needs to be addressed before the granting of the RO.	Regarding the design of Glasnevin being out of character TII disagree and believe the commissioning of internationally renowned architect Nicholas Grimshaw and Partners, has delivered a contemporary station design which is appropriate for a state of the art metro system such as MetroLink. Appropriately, significant emphasis is placed on the public spaces. Where feasible, the station concourse is a soaring space illuminated from above with natural light. Dublin's rich architectural heritage has been respected, but not copied in a pastiche imitation. In accordance with best conservation principles, as set out in the ICOMOS Venice Charter of 1964, the stations are architecturally distinguishable so as not to falsify the existing historic context. Reference and due respect to that context is made through the choice of high quality and appropriate materials and the scale of the interventions. The Project will deliver a robust and authentic design with a strong metropolitan identity, unique and sympathetic to Dublin. Concepts such as singular station volumes, use of natural light, intuitive wayfinding, robust and long-lasting materials, and contextual placemaking will be followed through all stages of development and construction, combining to form the very best in architectural vision. The 'Materials Palette' that has also been included with the Railway Order application further confirms the 'MetroLink Design Vision Principles', including the principle of achieving a 'Sense of Place' that reflects the local area, that is appropriate to the City, and the local context / character. Further information on the MetroLink Design Principles can be found in section 4.5 of Chapter 4 (Description of MetroLink Project).
49	Other Considerations	28	**Glasnevin Station:** We feel this is an extremely ambitious plan involving many different organisations and construction teams, and the overall ownership of this needs to be clarified - it was not made clear in the EIAR.	The design and construction of Glasnevin Station is undoubtedly complex. Both the proposed MetroLink and Dart Plus upgrades at Glasnevin Station are NTA governed schemes. Site works will commence and be undertaken under the control of a single controlling entity, with agreed staged handovers where necessary between TII and IE. This management of complex programmatic interfaces is not uncommon and is well within the skillset of the construction industry.
50	Other Considerations	28	Glasnevin Station: Concerns that the canal will be drained for such a long period and fear that it will not recover for years, if at all.	TII have carefully considered the potential impacts on the canal, explained below, and are satisfied that the canal will not be irreparably damaged. EIAR Chapter 15, Biodiversity provides details of the mitigation measures that will be implemented during construction and operation to minimise habitat loss, reduce the potential for impacts on vegetation, reduce the potential for impacts to water quality in receiving watercourses, protect groundwater quantity and quality, and to control and prevent the spread of non-native invasive plant species. As otters are listed on Annex II and Annex IV of the EU Habitats Directive they are strictly protected under the Birds and Habitats Regulations. Based on the findings of the field surveys carried out, as there were no otter breeding or resting places, holt or couch sites present within the footprint of the proposed Project boundary, there will not be any loss of holt or couch sites as a result of construction works. As otters could potentially establish new holt or couch sites within the zone of influence of the proposed Project in the future, a pre-construction check of all suitable otter habitats will be required within 12 months of any construction works commencing. The presence of any new holt/couch sites will be treated and/or protected in accordance with the Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes. EIAR Chapter 26, Architectural Heritage details the mitigation that will be implemented where there are predicted effects on architectural heritage. A Project Conservation Architect (PCA) will be engaged to oversee the implementation of the Project. Prior to the establishment of construction compounds, the 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.

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51	Other Considerations	29	Glasnevin Station: Note that no night-time above groundwork occurred on station boxes or shafts in the building of the Milan metro and: - Are requesting this for all the stations and shafts. - That the mainline rail realignments also occur by day only given their proximity to homes at the Glasnevin station.	The schedule of proposed working hours at each construction compound across the project is set out on Table 5.5. At Glasnevin Station standard working hours will apply with the following exceptions: - 7 day working, days only: Station works during TBM stoppages; Station south end works; Critical Civils works; Architectural fit out. - 7 Day, 24 hour working: Track possessions works and blockades on GSWR and MGWR; MEP Station Works. This is proposed to enable efficiency and safety of construction activities and to minimise the overall programme impact of Irish Rail line closures/blockades. Please also refer to responses (28), (32) and (33) above that explains TII's proposed approach to night-time works. Appropriate mitigation of impacts associated with out of hours work will be taken in accordance with the EIAR to ensure the stipulated environmental threshold levels are not exceeded. Appendix A5.1 Outline CEMP denotes mitigation measures for night-time works such as advanced communication with local authorities and residents, activities with highest noise emissions will be carried out during the day time as far as practicable, acoustic enclosures will be in place
52	Other Considerations	28	Support to Prospect Lodge ACA: - These Victorian homes are on very shallow foundations. - This area need extra attention, which is not apparent in the EIAR. In addition, - The Zone of Influence needs to be extended to a wider area and to include all homes in a terrace. - That this extended zone be further extended if level of deviation increases.	Please refer to response (42) above. Additionally, please note that the zone of influence is the area that may be subject to construction generated ground movements and is taken to be the area bounded by the 1mm settlement contour. It is not necessary to "extend" the zone of influence as this zone is calculated taking into account the ground conditions and the depth of tunnelling. Please refer to response item (46) in relation to limits of deviation.
53	Conclusion	29	The Fire/emergency safety issues associated with a single bore tunnel have not been addressed properly with in the EIAR. - DFB have confirmed that they have had no input into the design of the project or the shaft - this has been confirmed to RINA and GADRA by TII. - It is only at the very late stage of this project (just a couple of months before RO application) that Atkins were brought on as consultants in this area, and therefore rather than designing safety into the project at the design stage, it is being addressed retrospectively on an already designed project. The Atkins report is not part of the EIAR.	This observation is incorrect. TII have undertaken extensive engagement with DFB as noted by responses (10) and (11), and DFB have been consulted on all aspects of fire and life safety for the MetroLink project. TII would also refer to response (10) above that explains the rationale, including reference to the EIAR, for the selection of the single bore option, noting that TII would not be proposing an option that they consider unsafe. TII do not accept or agree with the observation that safety is being designed retrospectively into the Project. The proposed single bore tunnel configuration, design of tunnel ventilation, station layouts and facilities, and the intervention shaft, considers the safety requirements as set out in design codes and standards. Proposed strategies, designs and safety arrangements have been shared and discussed with Dublin Fire Brigade to support and inform the development of the Preliminary Design. There appears to be a misunderstanding with regards the role of Atkins. DFB have employed Atkins as their technical adviser to assist them with their engagement with TII.
54	Conclusion	29	The increase in settlement from a single bore rather than twin bore has not been addressed in the EIAR and we would be requesting an appropriate increase in ZOI in relation to settlement and all monitoring and mitigants to be employed.	Settlement was considered as part of the Twin Bore vs Single Bore assessment and can be seen within the Preferred Route Preliminary Design Report 2019. The EIAR has assessed the impacts of settlement as a result of tunnelling which can be found within EIAR Volume 5 Appendix A5.17 Building Damage Report. This provides full details of the settlement methodology and assessments undertaken along the route for the single bore tunnel adopted as part of the proposed Project. The ZOI is taken account of as part of the ground movement predictions and is illustrated by the settlement contour drawings contained in Appendix C. The movement monitoring regime and any requirements for mitigations will take account of these ground movement predictions.

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55	Conclusion	29	We have concerns in relation to the change of the Griffith Park Station position. Given its proximity to the high value Tolka river, the poorer hydrology at the new site, and the settlement issues being more significant for the Prospect ACA as the Victorian housing has shallower foundations. We do not feel that the EIAR has shown evidence supporting this move in the station position, nor has it fully addressed the increased mitigations required following this change.	TII do consider the EIAR has addressed the observations raised and refer to above responses (13), (14), (41), and (42) above.
56	Conclusion	29	We have throughout objected to the use of a public park zoned Z9 to house an Intervention Shaft and parking area and asked for this to be either changed to a station or the position of Collins Avenue Station be moved to avoid the need for this shaft in its current position. We will never have an increase in parkland within this area, so to give away a park that has been protected for hundreds of years when there are realistic viable alternatives is not good practice. RINA have confirmed that it is not common to put a shaft into a park and have not been able to give us an example of a shaft in a park on another metro as they are usually placed beside buildings. The EIAR does not show any evidence the TII /NTA seriously looked at any alternatives to this current option - it looks like they were reacting to the unexpected request to move the station from Na Fianna site. The EIAR is lacking in all aspects and all chapters in relation to the Shaft - scoped out of noise vibration traffic air quality - it looks like these baseline monitoring had been completed prior to the TII decision to put the shaft in ACP and baseline monitoring was omitted from the site. It would be remiss to proceed until all the baseline monitoring has been completed in relation Hampstead homes.	Please refer to responses (13, 17, 26 and 27 above), dealing with alternatives, zoning, impact assessments and baseline monitoring. Please refer to response (17) regards the zoning use. Response (12) explains TII's rationale for the proposed location of Collins Avenue Station. Response (11) explains the rationale for the proposed location of Albert College Park Intervention Shaft, including the reasons for the proposed land take, and the mitigation of the impacts to the playing pitches, so that all playing pitches while reorientated are retained. Response (13) explains the rationale for the proposed location of Griffith Park Station Responses (26) and (27) address the points raised in respect of the EIAR.
57	Conclusion	29	We do not believe that Albert College Park with the current Z9 zoning supports the shaft location, which is adjacent to the tunnel and not integral to the tunnel and cannot in itself be considered green transport.	Please refer to response (17) above.
58	Conclusion	29	The Z9 zoning does not in any way support a car park or maintenance depot in the publicly owned park. Any requirement for a hard standing area is satisfied by the existing hard shoulder on the Ballymun Road, which is within 20 meters of the shaft entrance and therefore the proposed hard standing area should not be approved in its current position	Please refer to responses (17) and (11) above regards 'zoning' and the reason for provision of the hardstanding area within the site of the proposed intervention shaft respectively, noting that the latter complies with the zoning description of "Public Service Installation".
59	Conclusion	30	GADRA are asking that the Collins Avenue Station is moved into the park, negating the need for a shaft in the park- the decision to position this station at Our Lady of Victory Church is not supported in the EIAR. The drip feeding of information in relation to this site and decision-making process clearly indicates major issues in the decision making process.	Response (12) and (11) above explain the rationale for the proposed location of Collins Avenue Station and the intervention shaft.

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60	Conclusion	30	In relation to the Shaft, GADRA are requesting: (1) • That ABP makes it a condition of RO that the shaft footprint is reduced, and parking for emergency vehicles is positioned outside of the park on Ballymun Road, which satisfies requirements of a hard standing area within 20 meters of entrance to shaft (2) • The Shaft is daytime works only and it is a dark quiet site at night (3) • No strip and clean at night via Griffith Park station (4) • No night-time works above ground on station boxes (5) • No mainline rail realignments work at night unless absolutely necessary, and local residents to be relocated during this work (6) • Zone of influence to increase in areas where homes have shallow foundations and mitigants be employed (7) • Role of Independent Experts to be extended into phase two -enabling works and construction and to include oversight of multi-agency construction sites - Glasnevin and Charlemont. (8) • Ownership of project needs to be defined legally, with clear dispute mechanism (9) • Clearly defined actions should the project have a protracted term, stall or be stopped completely to reinstate areas to former conditions and make them safe during delays [Observation bullets numbered to assist with referencing corresponding response]	Bullet 1 - please refer to response (11). This condition will result in a significant impairment to the functionality of the shaft and should not be imposed. Bullets 2, 3, 4 and 5 - please refer to responses (28), (32) and (33). This condition will compromise the deliverability of the project without reducing the impacts of the construction on night time noise, as this noise will be mitigated to levels consistent with the amenity of residential area. Bullet 6 - please refer to response (54). This condition would be unworkable as it is based on a misunderstanding of the Zone of Influence concept. Bullet 7 - please refer to response (2). TII does not consider that this condition is necessary and the measures proposed in the EIAR provide for best practice community engagement during the construction phase. Bullet 8 - The ownership of the project is outside the scope of the railway order process. ABP's role is to satisfy itself that the Railway Order and conditions provide for a project that will be consistent with proper planning and sustainable development and with acceptable environmental impacts regardless of who owns it. Bullet 9 - please refer to response (9). TII have no difficulty with a condition requiring appropriate measures to be particularised before the TBM commences operation and adhered in the very unlikely event that the project stalls. It is not appropriate to require reinstatement due to delays. TII note that the draft RO requires further consent from ABP in the event that the construction period exceeds 10 years.