

Submission No.			111	
Organisation Name or Name of Submitter			Hampstead Residents CLG	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: Hampstead Residents CLG, Metrolink Submission 22/11/2022 (case number 314724)				
1	Independent Engineering Expert Service	3 and 4	<p>In relation to the current Metrolink project, Local Residents Associations (e.g.:GADRA) requested Independent Engineering Expert Advice at the initiation of the Metrolink Project, however TII/NTA (Transport Infrastructure Ireland and National Transport Authority) did not act! Eventually TII/NTA provided Independent Expert service (RINA). However this expert advice was provided late in the project cycle! This delayed decision by TII/NTA, fundamentally limited the service's usefulness to residents.</p> <p>Additionally, it appears that the 'terms of reference' was provided to RINA exclusively by TII/NTA. Shockingly the public/residents/stakeholders (for whom the service is for) had absolutely no part in developing the terms of reference. This 'anti-inclusive' approach by TII/NTA resulted in the 'Independent expert' advice (when it was eventually provided) -being restricted and limited. Frustratingly, this experience of 'anti-inclusiveness' by our residents persisted throughout the process, and seems to be a mainstay approach by TII/NTA.</p>	<p>Thank you for your submission and for sharing your observations with regards to the MetroLink project to which we have responded below.</p> <p>As presented in the EIAR Chapter 8 (Consultation), in order to ensure the protection of the residential amenities and commercial operations along the proposed route TII have implemented a number of measures to assist residents and business owners during the pre-planning and construction period of the proposed Project, including appointment of an Independent Engineering Expert for the MetroLink Project.</p> <p>Access to the Independent Expert 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 Expert to begin their review of the MetroLink Preliminary Design proposals.</p> <p>Stakeholder groups who may be affected by the construction and/or operation of the proposed Project have been invited to avail of independent engineering advice from the IEE in order to better understand the potential impacts of the project’s design and the reasons behind any design decisions along the proposed alignment. All resident groups on the route were invited to meet with RINA and there has been a strong take up of the invitation.</p> <p>The appointment of the IEE provides a key step in ensuring the independent explanation of the design and its impacts to stakeholder groups. RINA have provided clear information and advice and an understanding of the design, to enable the stakeholder groups to submit an observation to the Board. The IEE has sought additional information from TII following its meetings with the groups and this information has been promptly furnished to them.</p> <p>The appointment of an Independent Engineer to provide advice and guidance to residents groups has been broadly welcomed by Residents Groups route wide. Whilst TII fund the Independent Engineer they act in dependently in accordance with thier scope of works which can be accessed via the following link https://www.metrolink.ie/en/your-property/independent-engineering-expert-rina/.</p> <p>The terms of reference for the Independent Engineer confirm the following "It is imperative that the independent Expert understands that its role is to provide independent, impartial, and objective analysis of the documents provided by the Client.</p> <p>In the administration of thier contract TII have not acted in anyway to affect the independent reporting of RINA and believe this is refected in thier final report which provides a fair and reasonable representation Stakeholder Concnrns and thier own indepedent view any technical shortcomings of the scheme and the overall EIAR.</p>

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2	Independent Engineering Expert Service	4	R.O. Condition - Request 1: - Notwithstanding the damage that has already has been done in relation to our residents confidence and trust in TII/NTA and its agents, we ask that Independent expert advice must be made available to residents and stakeholders, during ALL the upcoming phases of the Metrolink project (enabling works, construction and commissioning). An appropriate government dept should be the sponsor, and definitely NOT the TII/NTA.	<p>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.</p> <p>The EIAR 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 been developed which has guided the frequency and means of communication to date. The proposed Project will continue to progress community engagement by:</p> <ul style="list-style-type: none">▪ 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. <p>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 the EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works. In the case of works required in response to an emergency, the local authority, local residents and businesses will be advised as soon as reasonably practicable. All notifications will include a local helpline number. In addition, information on the works will also be available on the proposed Project website. TII will further develop the Community Engagement Plan to encompass the construction and operational phases of MetroLink.</p>
3	Consultation' process	4	As per TII/NTA recently published 'Introduction letter', and EIAR from the Railway Order application. TII/NTA states "Public participation has been an integral part of Metro Link from the outset" "The consultation of the public and stakeholders ensured the views of various groups, individuals and stakeholders were taken into consideration throughout the development of Metro Link"... "To ensure that the design of Metro Link has been undertaken having regard to the consultation responses received." etc.. Sadly despite this 'theatrical' public rhetoric, the residents of Hampstead Avenue, and many nearby Residents Associations have NOT had such an 'open and inclusive Consultation' experience with TII/NTA and were in general NOT made feel integral to the above mentioned process.	<p>TII have undertaken extensive consultation across the route of MetroLink and has listened carefully to the concerns of stakeholders and the community, as documented by EIAR Chapter 8, Consultation, as well as undertaking a detailed and an extensive Environmental Impact Assessment that identifies and addresses environmental concerns as evidenced by the submitted EIAR, including proposed mitigations to reduce environmental impacts, that accompanies the MetroLink RO application.</p> <p>Consultations took place with residential property/landowners and resident associations in particular which are affected by the proposed Project. Since 2018, members of the MetroLink Engineering and Environment team have continuously engaged with landowners, residential property owners and resident associations potentially affected by the proposed Project. A summary of the main concerns raised at these meetings can be found in Table 8.4 of the EIAR Chapter 8. Two meetings with Hampstead Residents Group representatives took place in 11/11/2021 and 22/03/2021, as presented in Appendix A8.19 of the EIAR Report.</p>
4	Consultation' process	5	The issues raised during this public consultation (from March 26th 2019 to May 21st 2019) having been considered as part of the final PR (Preferred Route) and formed the basis of the design. In this process, and as a consequence of lobbying on the part of the wider GAA community and others, the Metrolink station location originally proposed in Na Fianna GAA grounds (on St Mobhi Road) was moved south to Griffith Park. Note: -many of these respondents were living and based in different counties across the country! As a direct consequence of this station being moved (and only 2 days before closure of consultation) there emerged from TII/NTA 'a hand drawn sketch' of a proposed intervention shaft for Albert College Park. This was the first time our residents heard of a planned intervention shaft in the Park, and absolutely NO consultation took place on this decision! An extension was formally requested by our Residents Associations, in order that basic and reasonable consultation on this proposed new structure could happen. Astonishingly, this very reasonable request by our residents, was refused by TII/NTA.	<p>During the Preferred Route public consultation in 2019 more information was requested on the proposed intervention shaft at Albert College Park. Subsequently, a specific Albert College Park Local Area Consultation was initiated in early 2020 to explain in more detail the function and need for the intervention shaft at this location. The Consultation Report can be found in the EIAR Appendix A8.16. The local area consultation process is detailed in the EIAR Chapter 8 (Consultation), Section 8.7.</p> <p>An extention was not granted as TII considered the configuration appearance and rational for the intervention shaft could be further explained in consultation with residents from the concusion of the second non statutory public consulation (March 2019 and the submission of the Railway Order in September 2023.)</p>

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5	Consultation' process	5	Additional to the above, the original twin tunnel alignments suddenly changed to a single bore tunnel. We see no clear information in the Metrolink published documentation outlining exactly why this decision was made. This is unbelievable stuff! The decision by TII/NTA of including the Albert College Intervention shaft emerged as a 'final decision'. Absolutely No consultation, discussion, investigations of other potential options were advanced by TII/NTA to our local residents, or representatives.	<p>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, together with the proposed construction arrangements upon which the EIAR for the RO is based have incorporated feedback, where appropriate, from the consultation process undertaken in 2019 and 2020.</p> <p>The timings and the decision to change from Twin to Single Bore tunnel are set out in EIAR Chapter 8 Consultation, Section 8.4.5 How Public Participation has Informed and Influenced the Project Development Process. See also response (7) below for further details on Single v Twin Bore tunnel.</p> <p>Following a review of the EPR and the issues raised during the EPR Consultation, the Preferred Route (PR) was determined. The purpose of this Preferred Route consultation was to present the Preferred Route and the key changes that were implemented following the consideration of feedback received during the consultation for the EPR, and to receive further feedback from the public on the design development.</p> <p>Beside the distribution of the PR Public Consultation Report, the PR consultation process included: the issuance of a stakeholder email to public representatives and stakeholders who had made a submission to the previous consultation and/or registered their interest in the proposed Project (please refer to EIAR Appendix A8.8), the placement of newspaper advertisements in national and regional newspapers (please refer to EIAR Appendix A8.9), the distribution of flyers with details of the information events, a map of the route and how to make a submission (please refer to EIAR Appendix A8.10), submission forms in both Irish and English language (please refer to the EIAR Appendix A8.12).</p> <p>Five public consultation events were held so that local communities and stakeholders from all areas along the route could participate. Feedback provided to the Project Team during all consultations held for the MetroLink project has added to the knowledge of the Project Team and has informed the decision-making and design processes for the final proposed Project design now being submitted for RO.</p> <p>The PR Public Consultation Document detailed the background to the proposed Project and a station-by-station description of the PR. The document was available to download from the project website and hard copies were provided to attendees at the events. A copy of the Public Consultation Report can be found in EIAR Appendix A8.11. Section 5.3 of the Public Consultation Report included a description of the two tunnel options and the rationale for decision to proceed with the with the single bore tunnel. In addition, section 5.4 of the PR Consultation report included the safety considerations for the Single Bore Tunnel option. With regards to Albert College Intervention shaft, please refer to Section 7.11. Griffith Park of the PR Consultation Report.</p> <p>The PR consultation process is detailed in the EIAR Chapter 8 (Consultation), Section 8.6.</p>

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6	Consultation' process - Albert College Park Intervention Shaft	5 to 11	<p>The 'Albert College Park Intervention Shaft Local Area Consultation' was launched by TII on February 12th 2020 and ran for four weeks until March 11th 2020. An Info-leaflet/feedback form including colourful drawings/'artistic impressions' of the proposed intervention shaft plus a freepost envelope, were delivered to approximately 4,250 local residents' homes (4250 homes - as per the TII/NTA). We were also told that these leaflets were delivered in the area surrounding Albert College Park. We, (or our residents association) were not informed of the actual leaflet distribution spread -on a map. In these delivered leaflets. ..residents were asked questions ONLY about the aesthetics/appearance, park amenity (construction phase) etc. of the proposed Intervention shaft and NOT about any other potential options or ideas.</p> <p>We strongly believe that this process was a total 'paper exercise' , misleading , a sham, a waste of tax payers money, an insult to residents intellect, and certainly does not even get close to the meaning of the word Consultation!</p> <p>We are astonished that TII/NTA thus far, have not held open and fair discussion /consultation in relation to this proposal and perhaps other ideas.</p> <p>In Summary: A station would fulfil all of the safety criteria of the shaft, and would meet the zoning requirements, and would benefit the local area. Additionally we believe there is a clear and distinct lack of future planning here. e.g.-: If this 'proposed shaft' was made a station for future use. There is a precedent! - it could act in the manner of Dardistown to remain inactive until these sites are developed.</p>	<p>As stated in Section 8.7.2.2 of the EIAR Chapter 8 (Consultation), the Albert College Park Local Area Consultation brochure was delivered to approximately 4,250 local residents’ homes surrounding Albert College Park. 300 brochures were delivered to local libraries, council offices and local public representatives for display purposes. In addition, an email was sent to 216 public representatives and 6,140 stakeholders who signed up for project updates and thus notifying them of the consultation on the Albert College Park Intervention Shaft.</p> <p>Details of the 'Albert Collge Park Public Consultation 2020' can be found at https://www.metrolink.ie/en/consultations/albert-college-park-public-consultation-2020/, including 'The Albert College Park Tunnel Intervention Shaft Report', which provided more information on the purpose of the shaft.</p> <p>The EIAR Appendix A8.16, Report on the ACP Tunnel Intervention Shaft, explains the need for the tunnel intervention shaft and the rational for its proposed location in the south-western corner of the Albert College Park. The report includes a description of the surface features associated to the tunnel intervention shaft, an explanation of its function, a description of the typical construction methodology and the likely environmental impacts during and post construction.</p> <p>At the PR 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 stage has formed the basis of the EIAR assessment for the RO, noting that the preliminary design was developed with input feedback gathered during the consultations in 2019 and 2020.</p> <p>The requirement for an intervention shaft is a function of the distance between Collins Avenue and Griffith Park stations. It is also noted that this submission proposes that a station is located at this site. Such a proposal would bring with it a greater potential environmental impact during the construction phase to be managed, and therefore many of the observations (objections) to Albert College Park Shaft would apply to a station if constructed at this location.</p>
7	Consultation process	12	<p>R.O. Condition REQUEST 2:</p> <p>- We call on the Inspector to instruct TII/NTA to adhere to the meaning of Consultation. Instruct TII/NTA to formally and openly investigate other potential options other than an Intervention/ventilation shaft for Albert College Park. All respective residents and stakeholders opinions should be part of this process equally and fairly. This should happen using up to date data such as current foot-fall statistics, journey modelling and future proof -projections. We strongly believe this should promptly happen and obviously prior to the Railway Order process advancing any further.</p> <p>- Additionally we ask the Inspector to request detailed information relating to the decision by TII/NTA of changing the proposed Metrolink tunnels from twin bore to single bore. This information should be made public. It has been requested by our residents association some time ago....Sadly, so far we have not attained an answer.</p>	<p>TII would reiterate that adequate consultation has been undertaken and that there is no need to revisit the rationale for the location of the ventilation shaft in Albert College Park as the benefits have been clearly demonstrated in the EIAR. Similarly, there is no need to revisit footfall, journey modelling and future projections as these have been presented in the EIAR and incorporated into the Preliminary Design. With regard to the specific points raised, please see below.</p> <p><u>Albert College Park (ACP) Intervention Shaft Consultation</u></p> <p>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 the EIAR Appendix A8.16. The main topics raised during this consultation related to aesthetics, environment, amenities, and parking. Please refer to the 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.</p> <p>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.</p>

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				<p>The EIAR Chapter 7 Consideration of Alternatives, section 7.7.11.1 explains the location options that were considered for the Intervention Shaft before determining that the south-west corner of Albert College Park was the preferred solution.</p> <p>Single v Twin Bore The EIAR provides the rationale and benefits of a single bore tunnel.</p> <p>A detailed comparative analysis of single versus twin 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:</p> <p>Passenger Evacuation and Incident Management Benefits</p> <ul style="list-style-type: none">• 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. <p>Programme and Cost Benefits - A single bore tunnel can be constructed at lower cost and quicker than a twin bore configuration due to:</p> <ul style="list-style-type: none">• 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. <p>(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.)</p> <ul style="list-style-type: none">• 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. <p>Environmental Benefits</p> <ul style="list-style-type: none">• 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.

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8	In respect to the EIAR - Noise and Vibration	12 to 15	<p>In respect to the TII/NTA published EIAR Vol 3 ENV Baseline noise and vibration, and with particular reference to geographical sections in "Albert College Park" (Section AZ4 assessment zones) Unattended Location Daytime locations UT31 and UT32 (Table 13.30) - These assessment zone locations are not in or next to Albert College Park. Thus there are NO baseline monitoring points which cover adequately the Hampstead Avenue receptors.</p> <p>So in summary:- there appears to be NO baseline noise data in the EIAR, for the entire length of Hampstead Avenue. ..even though the TII/NTA propose that Hampstead Avenue will be within meters of one of the biggest excavations and construction sites on the entire Metrolink line.</p> <p>We find this absence of baseline noise locations, near sensitive receptors, absolutely unbelievable! It is our opinion any serious Noise and Vibration study must have continuous sampling taken over a prolonged time period (e.g., 7 days) and on a 24x7 basis. There should be several sampling sites and they must be positioned close to local noise sensitive receptorsi.e.:- residents houses located on Hampstead Avenue!</p>	<p>The baseline noise readings are suitable and sufficient. Please refer to Figure 13.1 (Sheet 5 of 7) of the EIAR where all baseline monitoring locations are identified. We have a number of both attended and unattended monitoring locations in this area that gives us an excellent understanding of the current baseline noise environment in the area. This includes monitoring point AT64 at the junction of the Ballymun road and Hampstead Avenue, very close the nearest noise receptor on Hampstead Avenue.</p> <p>The assessments combine both MetroLink baselines with baseline data included in published noise mapping. As presented in Section 13.3.1.1 of the EIAR Chapter 13 (Airborne Noise & Vibration), the publicly available baseline data included published noise mapping studies undertaken by CIE, TII and DAA which feed into the strategic noise mapping requirements of the Environmental Noise Regulations (S.I. 549 / 2018), based on noise modelled data from 2016. These are published and available via the EPA geo portal for Noise Maps Round 3 (2016) (https://gis.epa.ie/EPAMaps/). The modelled noise maps include existing sources of major rail, road and aircraft noise within the Dublin Agglomeration area. Since the road traffic along the surrounding road network is the dominant noise source noted across Albert College Park study area, this information provided a useful high-level overview of noise levels in the Albert College Park area.</p> <p>Baseline noise surveys have been conducted at locations representative of the nearest noise sensitive areas which have the potential to be impacted by construction works and/or those likely to be impacted during the operational phase. Baseline noise measurements were made over both long-term (unattended measurements, typically one week in duration) and short-term periods (attended day-time measurements) to supplement the long-term surveys to inform the assessment.</p> <p>Several noise sensitive locations (NSLs) along the Hampstead Avenue (including residential dwellings such us 1-4 Hampstead Avenue, 5-8 Hampstead Avenue, 9-10 Hampstead Avenue, 11-14 Hampstead Avenue, 15-18 Hampstead Avenue), located in the vicinity of Albert College Park compound working areas, have been modelled. These construction noise receiver locations are displayed in EIAR Figure 13.2 (Sheet 19) while the full suite of calculation results are given in Appendix 13.7 Construction Phase Modelling to the EIAR.</p> <p>Additionally, as part of the Construction Noise and Vibration Management Plan prepared by the Contractor (please refer to EIAR Appendix A5.1 Outline CEMP), a baseline noise study will be undertaken prior to the commencement of construction works to characterise the prevailing noise environment at impacted noise sensitive locations (NSLs).</p>
9	In respect to the EIAR - Noise and Vibration	15	<p>R.O. condition REQUEST 3:</p> <p>- It is our opinion the baseline noise environment monitoring readings for Albert College park/Hampstead Avenue are incomplete/missing/fundamentally flawed. Based on this we have NO confidence in the EIAR presented noise and vibration study.</p> <p>- We request that the Inspector instructs that this study must be seriously reviewed/examined and performed again to provide valid and accurate empirical data. We strongly believe this condition s/b imposed as a condition of the Railway Order.</p> <p>- We request that the inspector places a condition in the R.O., that proposed excavation/construction in Albert College Park is a 'dark & quiet' site at night.</p>	<p>The noise assessment process is not flawed and does not need review, please refer to response (8). No condition is required as the RO already includes for further baselining prior to construction.</p> <p>With regard to nighttime working, MetroLink have already considered the receiving environment and will implement measures to mitigate nighttime noise.</p> <p>The EIAR Chapter 13, Airborne Noise & Vibration, Table 13.60 identifies the activities that will have an impact locally, with the mitigation measures proposed detailed in Section 13.6.1 and specifically for night-time works will require all fixed items of plant to be enclosed. 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 CEMP Table 6.2 "Noise and Vibration Measures - Topic: Acoustic Barriers ANV8".</p>

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10	In respect to the EIAR - Noise and Vibration	16	<p>R.O. condition REQUEST 4:</p> <p>- We request the Inspector ensures ALL respective residents must also be included in the above described 'report sharing system'. We strongly believe that in respect to mitigation for noise/dust/vibration etc...the paramount mitigation MUST be operational control (hours and periods). Attenuation targets, should aim to go far below 'significant thresholds', and in sympathy with proper baseline noise measurements. Deliveries, traffic movement, etc. should be contained to working hours. It's critical that proper baseline measurements for All times of the day/week should be established. Calibrated and maintained Sensors s/b put in place (permanently -during construction phase) close to sensitive residential zones on Hampstead Avenue, to monitor noise, vibration, light, dust (air) etc. The above mentioned 'alert system' and live data from these sensors should also be made public ...or be freely available to selected residents representatives or independent experts (that the public can access).</p> <p>- An appropriate penalty scheme should be in place in order to ensure contractors proper adherence.</p> <p>- An appropriate fund should be 'ring fenced'... To finance (for example) cleaning of affected residents properties/windows from dust contamination, insulation from noise, cleaning roads, etc. These actions should be included in the Construction Environmental Management Plan (CEMP).</p> <p>- We ask the Inspector that all these conditions s/b imposed as part of the Railway Order.</p>	<p>1. TII acknowledge that there is potential for 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 surrounding Albert College Park during the construction period. 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. However, for the Sprayed Concrete Lining (SCL), 24 hour 7 day a week works are required. It should be noted these works will generally take place underground and any noise emanating from surface activities to support the tunnelling will be suitably attenuated to mitigate the impacts. Deliveries to and from the site will be generally limited to standard working hours. Chapter 5, Section 5.5.17.3 refers.</p> <p>As set out in Appendix 5.1 of the EIAR, the Outline Construction Environmental Management Plan, to be included in the contract documents, will place requirements upon the Contractor undertaking the works to adhere to strict working hours and site conditions to minimise the impacts from the Construction activities. 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.</p> <p>The Outline CEMP also sets out the arrangements for establishing the baseline noise sound study to be undertaken by the contractor prior to commencing construction works. 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".</p> <p>Noise and vibration monitoring at representative noise sensitive locations (NSLs) to evaluate and inform the requirement and / or implementation of noise and or vibration management measures is proposed within the Outline Construction Environmental Management Plan, Volume 5, Appendix 5.1 (please refer to table 6.2: Noise and Vibration Measures, Topic Monitoring Programme ANV 11). The monitoring and auditing programme will form part of the CNVMP which will be agreed with the Local Authorities prior to the commencement of the Construction Phase. As a minimum the monitoring programme will include an alert system for threshold exceedances, remote access, and a platform for sharing monitoring results between the contractor(s), TII, DCC and FCC. The contractor(s) will adhere to any site-specific noise and vibration monitoring-related conditions imposed by the local authority. Monitoring data will be made available to the local authorities at an agreed frequency. TII confirm that monitoring will be undertaken in accordance with the CNVMP. Monitoring and auditing will be transparent. It is envisaged that monitoring data and audit results will be presented and shared in community forums. TII will consider options for sharing that data and results with the public and stakeholders in a timely and transparent way which may include the use of online portals and tools. It proposes that is not fixed by way of condition so that the content and manner of can be adapted to the changing circumstances of the project over time.</p> <p>TII confirm that the results of the monitoring programme will be available to Independent Engineer and Hampstead Avenue residents. The monitoring programme will include for air pollution as well as for noise.</p> <p>2. When appointed by TII the Design & Construction Contractor must adhere to the environmental limits enshrined in the Railway Order, including Noise and Vibration, for this location. The contract documents for the contractor(s) will include penalties and incentives to Contractor to ensure adherence.</p> <p>3. As outlined in the EIAR Appendix 5.1, Outline CEMP, the Contractor will be required to submit a monthly environmental compliance report to TII for review and approval. The report will address the following as a minimum:</p> <ul style="list-style-type: none">• Interpretation of the results of ongoing monitoring;• Summary of compliance with the CEMP(s) including identification of any non-conformances;• Detailed description of any issues and/or non-conformances identified during inspections and/or audits;• Record of incidents and corrective actions (including CARs as appropriate);• Summary of any environmental complaints received and/queries raised by stakeholders; and• Records of environmental training undertaken (as appropriate).

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				<p>The contractor(s) will inform TII of all emergency incidents immediately and prepare an initial report within 24 hours setting out the details and cause (if known) of the incident. The contractor(s) will be required to complete an Environmental Incident Report and any further documentation requested by TII within seven days of the incident occurring. The report will define the scale and effects as well as required corrective actions and mitigation/remediation/compensation measures (as appropriate). In case of any environmental incidents attributable to MetroLink works, remediation works will be undertaken and compensation (as appropriate) will be provided.</p> <p>TII will work with established Community Groups through the local community liaison officers along the route to identify projects at local level that would involve the Community in the delivery of MetroLink and its legacy. Such projects could include:</p> <ul style="list-style-type: none">- A local school learning programme.- Enhancement of community amenity within agreed funding limits.- Engagement with final landscape and finishing options, including aspects of biodiversity. <p>TII are willing to explore mechanisms for investing in local initiatives to support affected communities during the works, such initiatives will be subject to funding being made available.</p>
11	Operational Noise/Vibration and Dust (Air quality)	16	In respect to the proposed 'Intervention/ventilation shaft in Albert College Park", - when the Metro is operational. We understand that attenuators will be employed to mitigate negative noise effects. We believe there is a lack of detail provided in the EIAR in this area, relating to the operational monitoring and management.	<p>The requirements for the selection and attenuation of the Albert College Park Intervention Shaft ventilation systems, will be based on background noise level at the nearest and most exposed NSLs to each fixed item of plant and determined for day and night-time periods, with the methodology described in the EIAR Chapter 13, Section 13.2.5.2.4. All baseline noise values will be confirmed prior to the design and selection of the operational plant items with requisite attenuation determined after the updated baseline noise surveys.</p> <p>Suitable noise attenuation will be provided for the intermittent fan operation and will be developed at detailed design to ensure best practical means and equipment are employed.</p> <p>As presented in the EIAR Chapter 13, Section 13.6.2.3, the following will be considered when designing the equipment:</p> <ul style="list-style-type: none">- Selection of low noise rated equipment;- Reduction of induct flow rates;- Reduction of elements in the airflow;- In duct attenuators;- Orientation of grilles and louvres away from sensitive receptors;- Acoustic louvres; and- Anti-vibration mountings and couplings will be incorporated into the design to control vibration.

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12	Operational Noise/Vibration and Dust (Air quality) - In relation to dust/air emanating from the grilles, at surface level	16,17	In case of normal operation:- in our opinion the EIAR does not provide detail on how the hot air/fumes will be managed, e.g.:- during cold winter months hot air/fumes will meet the cold air outside and may cause plumes of 'smoke'. The air grilles are proposed to be located close to many residential houses and adjacent to a very busy road (Ballymun road). Any potential 'plumes' could be dangerous to traffic. How will this hot air be managed, and will it be monitored using sensors/and filters for potential pollutants?	<p>During normal operations there will not plumes of smoke impacting on traffic or the nearest receptors - there is a negligible impact on all modelled receptors.</p> <p>The Albert College Park Intervention Shaft is required to provide appropriate tunnel ventilation and to comply with tunnel fire safety strategy by providing egress between the tunnel and the ground surface so that passengers can escape, and fire fighters can enter the tunnel.</p> <p>As noted in Chapter 16, Section 16.5.3.11, the main emission of ventilation shafts in normal operation is akin warm air. The street level location of the grilles associated with the ventilation shafts are designed to minimise effects on pedestrians and nearby buildings. Inlet and outlet ventilation grilles are separated in order to minimise the possibility of air recirculation. Consideration is also given to the potential for air pollution to enter from vehicles through the air intake system.</p> <p>Chapter 6, Section 6.6.4 provides an overview of ventilation systems for the proposed Project. It note that fresh air will be provided through ventilation which will be filtered. The air inlets and outlets at surface level shall be sufficiently low so that they do not present a risk to people or surroundings and the position of the inlets and outlets will be such as to prevent recirculation of air or intake of polluted air. Should there be a need to remove heat from the upper levels of the station, which can occur in some peak summer months, the ventilation system can exhaust the hot air. The noise emanating from the ventilation system will also be limited to acceptable values through design.</p> <p>The ventilation shaft contains three reversible axial fans, one of them on stand-by, which can inject air in or extract air out of the tunnel. The fans will be fitted with silencers to attenuate operational noise. The fans in the ventilation shaft are also used for the Over-track exhaust systems (OTE) systems in the tunnels.</p> <p>Temperature sensors in the tunnels and at the underground stations will provide the necessary information to activate the tunnel ventilation system. Anemometers will monitor air flow speeds and in normal operating conditions will adjust the fans if required and in the case of a tunnel fire will confirm achievement of the required air speed in tunnels. Opacimeters will measure the opacity (clarity) of the air and be used as smoke detectors when CCTV is not operative.</p> <p>During normal operation, ventilation will control the difference in temperature between the underground sections and the open air. This control will be based on real-time temperature measurements along the enclosed parts of the track and measures at street level near each station.</p> <p>During a fire emergency mode, if there is a fire on a stationary train in the station, the ventilation system will draw exhaust from above the train and from the platform. It is unlikely for a fire to occur on a stationary train in the tunnel, and the aim would be to move the train to the next station. However, if this happens, the ventilation will draw the smoke in one direction and evacuation should proceed in the opposite direction. With respect to the potential for emissions from the ventilation shafts during a fire, the materials for the rolling stock or other systems such as wiring will be selected to comply with strict regulations to avoid the emission of irritating or toxic products. These materials are chosen in order to ensure conditions remain tenable during evacuation however it will also minimise the potential for toxic fumes being emitted from the ventilation shaft during a fire within the tunnel.</p> <p>The EIAR Chapter 16 (Air Quality), Section 16.6.2 outlines that as all ambient air pollutants will remain in compliance with the ambient air quality standards and the proposed Project has negligible impacts at all modelled receptors, no specific operation phase mitigation measures are required.</p>

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13	Operational Noise/Vibration and Dust (Air quality)	17	RO condition REQUEST 5: - Calibrated and maintained Noise/Air/Vibration monitoring sensors should be integrated into the Albert College Park Metro structure at ground level, and constantly operating during the life of Metrolink. Data should be made public. This condition should be included in the Environmental Management Plan (EMP). This condition s/b imposed as part of the Railway Order.	No noise and vibration or air monitoring sensors are currently integrated in the preliminary design for the Albert College Park Intervention Shaft. As noted in Chapter 13, Section 13.5.3.2.3 the specific noise level from ventilation systems will be calculated as part of the further design development. Specifically, the operational noise level from the shaft and surface grill will be calculated to the nearest sensitive areas and specific attenuation designed for each system to not exceed the relevant design criteria for each location. In Chapter 16, Section 16.5.3.11 it is noted that the street level location of the grilles associated with the ventilation shafts is designed to minimise effects on pedestrians and near buildings. They are often situated in slightly elevated median strips (30cm) for drainage purposes or within green spaces, out of the normal transit of pedestrians or other sensitive receptors. Inlet and outlet ventilation grilles are separated in order to minimise the possibility of air recirculation. Therefore sensors are not required post-commissioning of the project.
14	Public liaison	17	RO condition Request 6: - The above 3rd party (a designated noise liaison officer) only 'community relations' is simply NOT good enough! We formally request the TII/NTA are part of this, and they also provide an escalation point within TII/NTA itself. The TII/NTA contact should also be available on a 24x7 basis, and answerable to senior management level within TII/NTA. They should be permanent TII/NTA staff members. A trouble ticket system should be employed that is fully transparent between contractor/TII/NTA and the residents. The trouble ticket system, should be of 'Customer Service industry' standard and ISO (International Standards Organisation) accredited. However, the ultimate overall responsibility must remain with our elected representatives and the appropriate Government department. We firmly believe that a Metrolink 'Residential Monitoring Group', should be set up ASAP, which will have influence and be formally supported by government. Additionally a 'Community fund' must be created in order to give something back! - We request strongly that these condition s/b imposed as part of the Railway Order.	<p>TII staff will remain responsible and will implement a process as described in the EIAR to ensure staff remain accessible. Appendix A5.1 Outline CEMP details the external communication procedures proposed with the public and key stakeholders.</p> <p>TII and the contractor(s) will take all reasonable steps to engage with stakeholders in the local community, especially those who may be affected by the construction works, including residents, businesses, community resources and specific vulnerable groups. The contractor(s) will be responsible for putting in place a Stakeholder Communications Plan which will developed under the consent of a designated Public Liaison Officer appointed by TII. This will provide a two-way mechanism for members of the public to communicate with a designated member of the contractor(s)'s staff, and for the contractor to communicate important information on various aspects of the proposed Project to the general public. A 24 hour helpline will be established.</p> <p>TII will work with established Community Groups through the local community liaison officers along the route to identify projects at local level that would involve the Community in the delivery of MetroLink and its legacy. Such projects could include:</p> <ul style="list-style-type: none">- A local school learning programme.- Enhancement of community amenity within agreed funding limits.- Engagement with final landscape and finishing options, including aspects of biodiversity. <p>TII are willing to explore mechanisms for investing in local initiatives to support affected communities during the works, such initiatives will be subject to funding being made available.</p>

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15	Temporary land take - proposed for Albert College Park	18	<p>Please refer to the construction compound as defined in detail in the Construction Report (page 94 and 95 of Vol. 5, Chapters, A5.3/ <i>Ref the dark blue areas in the three figures from page 18 of the submission/page 20 of the received submission PDF document.</i></p> <p>In respect to these dark blue areas: - they don't just cover 'existing pitches' they also include woodland and hedging (approximately 35 meters deep), which grows north of and adjoins the 'winding footpath' that runs in parallel to Hampstead Avenue. This significant amount of mature trees and hedgerows are clearly NOT part of the current football pitch set-up in Albert College Park, but are obviously included by the TII/NTA in the 'Proposed Temporary site'.</p> <p>We totally reject any aspiration of TII/NTA to incorporate this band of trees and hedging into a proposed new football pitch alignment/reconfiguration.</p>	<p>TII can confirm that the blue areas referred to do not relate to removal of trees and hedges - these are property boundaries. To see the extent of the tree removal please refer to the Aboricultural Impact Assessment in Appendix A 27.3. It should be noted that none of the trees along the Hampstead Avenue boundary are planned to be removed.</p>
16	Temporary land take - proposed for Albert College Park	20	<p>RO condition Request 7:</p> <p>- We believe the Inspector should include an exact condition on this (or any) 'extra land use' in the Railway Order. In this particular instance... this land in the 'shaded dark blue area' in referenced appendix maps above, is specifically allocated for football pitch re-instatement and should not at any stage during the build process be used for temporary construction, storage or support uses for any Metrolink facility in Albert College Park.</p> <p>NOTE: - In the above R.O. condition it must also include:</p> <p>- that any trees and hedging that are within the dark blue areas above (i.e.: areas not currently in football pitch use) should remain untouched, and fully protected.</p>	<p>Please see response (15).</p>
17	Hydrogeology and the management of flood risk	20,21	<p>The EIAR mentions water gathering/holding etc., but lacks detail in exactly how flood water will be managed in the specific area of the currently installed DCC flood drains in Albert College Park and directly adjacent to Hampstead Avenue.</p>	<p>The risk of flooding is minimal and the EIAR includes for provision to manage the risk. Table 18.16 of EIAR Chapter 18, Hydrology provides a summary of the construction and compound sites along the full route together with the planned discharge point (surface water/storm sewer) and the estimated daily rate of discharge to that receiving feature. Including Albert College Park, none of the planned construction or compound sites are located immediately within areas designated as Flood Zone A or B, in accordance with the OPW ‘Planning System and Flood Risk Management Guidelines’ (November 2009). The management of flood risk during construction is detailed in Chapter 18 (Hydrology, Section 18.6.1.3) and in the outline CEMP (Appendix 5.1). Any local drainage impacted will be diverted to suit such that flood risk is managed.</p> <p>In order to manage and mitigate all environmental risk at Albert College Park, and as part of the preparation for the construction phase, the appointed Contractor for these works will be required to set out their proposals in the Construction Environmental Management Plan (CEMP), an outline of which is included in EIAR Appendix A5.1. The Contractors CEMP will include a Construction Flood Protection Plan, with minimum requirements set out in EIAR Appendix A5.1, Table 6.4 Water Measures.</p>

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18	Hydrogeology and the management of flood risk	22	R.O. condition Request 8: - We believe the Inspector should request TII to include a condition in the R.O. detailed plans on how run-off water, or disturbed underground water (pools/streams/rivers), will be managed in the area as specified above, and in consideration of the serious flood risk to residential properties.	Please refer to response (17) above.
19	Management of potential Rodent infestation	22	Due to planned Metro link activity in the park (including potential football pitch 're alignments'), substantial soil and clay and hedgerow will be disturbed and moved during excavations. All this will likely disturb the local rodent population. The EIAR lacks detail in exactly how TII/NTA proposes to monitor and manage potential rodent 'migration' due to the major earth works proposed for Albert College Park.	As is standard practice vermin control will be implemented on all MetroLink sites. Chapter 10, Section 10.5.1.10 notes that while rodents will be temporarily displaced as a result of initial construction activities, there is nothing in the Construction Phase which would lead to an increase in the number of rodents. It could be argued that with the rodent control policies in place, there will be a reduction in the level of rodents and the subsequent risk. Because there will be no increase in vermin numbers and more likely a decrease because of vermin control measures there will be no increase in vermin transmitted disease over and no significant adverse effect on human health.
20	Management of potential Rodent infestation	22	R.O. condition Request 9: - We believe the Inspector should request TII/NTA to include a condition in the R.O. requiring TII/NTA to detail plans on rodent management.	Refer to Response (19).
21	Fire, emergencies and drills	23	In our opinion:- the EIAR does not provide details on what mitigation measures will be taken in respect to toxic smoke/fumes. e.g.: - How will such toxic fumes be managed/filtered? The EIAR does not provide details on how a fire situation or emergency would (or may be) managed, e.g.: - could local residents be evacuated from their homes, or what is the procedure for fire drills, etc.?	<p>The construction contractor and MetroLink operator will prepare and implement an Environmental Management Plan and a Health and Safety Plan to protect workers, control environmental pollution, and protect members of local communities from construction and operational activities.</p> <p>An Emergency Response Plan has been developed as part of the Outline Construction Environmental Management Plan (please refer to the EIAR Appendix A5.1). This will be further developed by the Principal Contractor, in consultation with the emergency services and other relevant third parties and will be submitted to TII for approval. The Emergency Response Plan will contain incident response procedures which will outline the detailed procedures for dealing with any potential emergency.</p> <p>In the event of a fire during operational phase, the MetroLink ventilation system will be capable of exhausting the smoke without affecting adjacent station platforms or the following tunnel sections. The tunnel emergency exits and the firefighting accesses to tunnels will be over-pressurised to create safe paths for evacuation of passengers and entry of the emergency services.</p> <p>Should a fire break out on a stationary train in the station, the ventilation and Over-track exhaust (OTE) systems will exhaust smoke from above the train and from the platform. It is unlikely for a fire to occur on a stationary train in the tunnel, and the aim would be to move the train to the next station. However, if this happens, the ventilation system will draw the smoke in one direction and evacuation should proceed in the opposite direction.</p> <p>Fire systems will be installed in compliance with all relevant legislative requirements. A Fire Safety Strategy for the proposed Project has</p>

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				<p>been developed in liaison with Dublin Fire Brigade, as detailed in he EIAR Chapter 6 (MetroLink Operations & Maintenance).</p> <p>Safety, Security and Emergency Evacuation Processes applicable to MetroLink operational phase are detailed in Section 6.6.5 of the EIAR Chapter 6 (MetroLink Operations & Maintenance).</p> <p>Access and egress to the evacuation shaft at Albert College Park is provided from the R108 Ballymun Road and in an emergency it is not anticipated that Hampstead Avenue would be impacted or closed, nor residents requested to evacuate from their homes.</p>
22	Fire, emergencies and drills	23	R.O. condition Request 10: - We believe the Inspector should request TII to include a condition in the R.O. requiring TII/NTA to detail plans on toxic fumes management, and fire/emergency/evacuation procedures and plans.	Please refer to response (21) above.
23	Construction Traffic and Parking	23	Residents are concerned that any Metrolink construction site will compound the parking problem, as workers/agents/visitors etc, who do not or cannot use public transport, will look locally to park. The EIAR is very weak on how these situations will be managed, and to be honest very gullible in proposing that all folks that work or want access to an Albert College Park Metrolink site, will use public transport.	<p>The Scheme Traffic Management Plan (STMP) (Appendix A9.5) of the EIAR includes 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. This will be a contractual requirement that the appointed contractor will have to comply with during the Construction Phase. TII therefore do not envisage MetroLink impacting local existing parking arrangements or there being a requirement to change the local parking regime.</p> <p>In order to manage and mitigate all environmental risk at Albert College Park, and as part of the preparation for the construction phase, the appointed Contractor for these works will be required to set out their proposals in the Construction Environmental Management Plan (CEMP), an outline of which is included in EIAR Appendix A5.1. The Contractors CEMP, submitted to Dublin City Council for approval will include plans to mitigate construction worker parking locally with the preparation of the Construction Mobility Plan, one of the key aspect of which is to encourage all forms of transport with the exception of car use.</p> <p>Chapter 5 of the EIAR, MetroLink Construction Phase, explains that traffic management plans for the construction phase of the Project that have been developed to minimise the impact on road users, and to maintain access to businesses and other premises. Prior to implementation, all traffic management measures will be agreed with Dublin City Council and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken.</p>

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24	Construction Traffic and Parking	25	R.O. condition Request 11: - We strongly believe the Inspector should include a condition in the R.O. requiring TII/NTA to detail plans of any potential traffic restrictions/management at the Hampstead Ave intersection with Ballymun road, and provide a realistic solution to how parking will be managed for those Metrolink workers (visitors or associates) that do not use public transport. - Additionally we strongly object to any Metrolink emergency exit or any proposed site access onto Hampstead Avenue. - We believe that the inspector must also include the following condition in the R.O. The Ballymun road hard shoulder must be used as an emergency vehicle parking area, for any Metrolink structure placed in Albert College Park, and thus eliminate the need for a 'car park'/emergency vehicle parking - within the park.	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). The planned work at Albert College Park will have limited impact on the existing junction of Hampstead Avenue with the Ballymun Road. For the construction phase, the EIAR Chapter 5 (MetroLink Construction) and Appendix A9.5 Scheme Traffic Management Plan details the potential impact of the temporary traffic management measures and associated construction traffic. As the Intervention Shaft is wholly located within the Albert College Park, with the exception of access and egress points into the construction compound, there are no temporary traffic management measures on the R108 Ballymun Road associated with the construction of this site, causing no impact to road users.
25	Non disclosure of information and enforcement	25 to 29	Throughout the life of Metrolink project thus far, there are many examples where we feel the TII/NTA have behaved poorly, were very slow at providing information (until forcefully requested under FOI), and had in fact shown some indifference for our residents. 5 examples are presented on pages 25 and 26 of the submission (pages 27 and 28 of the received submission PDF document). Please see an exact copy of two emails (on pages 27 to 29 of the submission/pages 29 to 31 of the received submission PDF document) sent to TII/NTA (Tom Manning) requesting an explanation and extension of 25th November deadline, in order this new information can be reviewed by the public/residents. No reply from TII/NTA received (at time of posting submission). As from the above email examples we hope the inspector can get a sense of our difficulty attaining, basic and reasonable information, understanding/flexibility, in a timely manner from the TII/NTA (and their agents).	TII has at all times sought to engage regularly with affected stakeholders. TII note that it has conducted three non-statutory consultation events and has also met with the Hampstead Residents group twice in this time. The Railway Order Statutory Public Consultation was initially set at six weeks but was further extended on 25 November 2022 to 16 January 2023 due to the submission of information that was inadvertently omitted from the EIAR (Appendix A9-2, A9-2-M Traffic and Transportation Assessment – St Stephen’s Green Station). Newspaper notices were also published on 25 November 2022 providing notification that this information was being submitted and was again accompanied by TII writing to the same circa 2400 property owner/occupiers notifying them of this new information.
26	Non disclosure of information and enforcement	29	R.O. condition request 12: - We request that the Inspector should include a governing clause in the R.O. on how the conditions themselves will be monitored and enforced.	TII do not agree that the conditions requested are appropriate]
27	Submission Closing statement	30	Our residents (most with fulltime jobs and other commitments) had an arduous task of trying to read through the Metrolink project 1000's of online pages (many technical). Our residents found it extremely stressful to try and understand exactly the implications of this highly technical and intrusive project, is going to have for their quality of life and that of their children and indeed their property, in the coming approx. 10 years.	TII note difficulties encountered by Hampstead Avenue residents in reading the full RO documentation and inform you that a Non-Technical Summary has been included as part of the Environmental Impact Assessment Report (EIAR). Please refer to Volume 1, Book 1 of the Railway Order (RO) documentation.

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28	Submission Closing statement	30	The independent expert (RINA), while helpful, was provided far too late in this project phase. Disappointingly, residents involvement was excluded from the "Scope of work' that the TII/NTA provided to RINA. Thus, the overall benefit of RINA to our residents was much subdued. As clearly outlined in the initial pages of this submission, we strongly believe that TII/NTA have failed in delivering proper "consultation" in respect to the proposed Metrolink structure planned in our area.	<p>The appointment of independent expert engagement (RINA) coincided with the completion of the preliminary design and was the most appropriate time for the Independent Expert to begin their review of the MetroLink Preliminary Design proposals.</p> <p>TII does not agree with the assertion that a proper consultation has not been delivered. The 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. Also please refer to responses (3, 4, 5, 6 and 7) above.</p>
29	Submission Closing statement	30	In addition we believe that the EIAR is incomplete and lacking in several aspects such as, noise sampling, reasoning for moving to single bore tunnel, reasoning for use of Z9 parkland for an intervention shaft/ car park, lack of proper definition of problem management, flood mitigation, emergency parking located within a public park, ...etc.	Responses to the concerns noted here are contained within the responses above.
30	Submission Closing statement	30	<p>Thus, we believe the assigned Inspector will be burdened unduly with the addition of many conditions to the R.O. and ensuring fairness for all citizens equally, while trying to expedite the planning process at the same time.</p> <p><u>However, we formally ask the Inspector to include all our conditions into the R.O. However first of all, address the key issue of lack of "consultation" visited on our residents by the TII/NTA</u> and thus ensure our residents are treated as equal, to other groups on the Metrolink route. It is with this objective that the 'Hampstead residents CLG' was formed!</p> <p>The "Hampstead residents CLG", Mission statement:- the main formal objective of our Company is to achieve for our residents, the same basic right of consultation, as afforded to many other citizens/groups in the vicinity and along the Metro link line.</p>	TII regret that residents feel that there has been a lack of consultations however TII would note that as noted previously, three non-statutory consultation events were conducted along with two direct meetings held with Hampstead Residents.