

Submission No.			118		
Organisation Name or Name of Submitter			HSE National Drug Treatment Centre - Austin Lyons A/Chief Assistant Technical Services Officer HSE Capital and Estates		
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Letter Re: Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022					
1	Letter	2	TII also note in this correspondence that HSE may be an owner, or occupier of the land, or have rights over or an interest in the land, referred in the documents which will accompany the Railway Order application. 30/31 Pearse St. is a HSE property that accommodates the National Drug Treatment Centre (NDTC) and the NDTC Laboratory. Whilst the HSE are supportive of vital infrastructure such as MetroLink we also remain concerned about the potential risks and impacts on our site and service delivery at this location, both during the construction phase and post completion of the Metrolink project. To this end, we attach with this submission a Technical Note from OCSC (dated 21st Nov'22) summarising their findings within the short time frame available for review and outlining the concerns of the HSE regarding the potential impacts on the building and services provided. The HSE requests the Bord to have regard for the general concerns as set-out within the above referenced Technical Note including seeking the Requests for Further Information (RFI's), together with directing the Applicant to agree and incorporate satisfactory mitigation, amend designs and construction proposals accordingly for the MetroLink. We further ask the Bord to include and impose the (non-exhaustive list) recommended conditions also set-out in this Note.	TII note the concerns with regard to 30/31 Pearse Street and responses to the specific issues in the technical note are outlined below.	
2	Letter	2	We further ask the Bord to include and impose the (non-exhaustive list) recommended conditions also set-out in this Note.	Please note, any conditions applied to the application, if granted, are at the discretion of An Bord Pleanála. Whilst TII do not believe the requested conditions are necessary, we are happy to engage further with HSE on the requested conditions in advance of the Oral Hearing.	
3	Technical note Section 3 - 30/31 PEARSE STREET —NATIONAL DRUG TREATMENT CENTRE (NDTC) 3.1 Building Description	7	Building Description (with Plan shown on PDF) 30/31 Pearse St. which is currently occupied by the National Drug Treatment Centre (NDTC) is thought to have been built around 1970's. The building oriented primarily in a North/South direction is a 5 Storey brick clad concrete frame building approx. 40m x 15m (fronting onto Pearse St) as indicated per below extract plan. Of particular note are; a) The National Drug Treatment Centre Laboratory ("NDTC Lab" see 3.2 below) and; b) A new lift enclosure and glazed link, thought to have been built late 2000's to early 2010's, located in the North/East corner and directly above the proposed MetroLink tunnel alignment (see below blue shaded) We understand the ESB Sub-station although feeds the NDTC is not in ownership of HSE	TII appreciate the information provided and are keen to work closely to with the HSE National Drug Treatment Centre to address concerns raised. See below for responses to the specific issues in the technical note.	
4	Technical note Section 3.2 Building Occupancy —HSE National Drug Treatment Centre Laboratory (NDTC Lab)	7	Building Occupancy—HSE National Drug Treatment Centre Laboratory (NDTC Lab) The HSE National Drug Treatment Centre Laboratory (NDTC Lab) is located at 3rd Floor level occupying the northern third of the building as indicated in the extract below. This laboratory is the largest specialist provider of drugs screening for drug treatment services providing an essential nationwide service to the HSE Addiction Services, hospitals, General Practitioners, voluntary organizations, Department of Education (juvenile detention centres), the Probation Service, the Courts Service, the Medical Council, an Bord Altranais and various occupational health departments. The HSE NDTC Laboratory contains much sensitive equipment including Microscopes and High Performance Mass Spectrometers and is accredited by the Irish National Accreditation Board (INAB) to undertake testing in conformity with ISO/IEC 17025:2017 as detailed in Figure 9 above and in the Schedule bearing the Registration number 169T which is available at: <a href="http://www.inab.ie/Directory-of-Accredited-Bodies/Laboratory-Accreditation/Testing/HSE-National-Drug-Treatment-Centre.html">http://www.inab.ie/Directory-of-Accredited-Bodies/Laboratory-Accreditation/Testing/HSE-National-Drug-Treatment-Centre.html</a>	TII appreciate the information provided and are available to work closely with the HSE National Drug Treatment Centre to address concerns raised. See below for responses to the specific issues in the technical note.	
5	Technical note Section 3.2 Building Occupancy —HSE National Drug Treatment Centre Laboratory (NDTC Lab)	8	The Laboratory also performs an essential trend monitoring role including the first ever back of house drug testing service in Ireland at Electric Picnic Festival 2022 membership and the first Irish Syringe Analysis Project as part of the European Escape Syringe Testing Project 202. The laboratory contributes to Early Warning Emerging Trends Committee and the Working Group set up by HSE under action 1.3.11 under National Drug Strategy 2017-2025 (map as shown on PDF )	TII appreciate the information provided and are available to work closely to with the HSE National Drug Treatment Centre to address concerns raised. See below for responses to the specific issues in the technical note.	

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6	Technical note Section 4 - METROLINK ALIGNMENT under NDTC BUILDING - 4.1 Alignment & Details	9	<p>The proposed MetroLink tunnel alignment will consist of a single bore bi-directional tunnel, approx. 8.5m internal diameter and primarily constructed by means of a tunnel boring machine (TBM).</p> <p>Reviewing the extract below from the proposed MetroLink Alignment drawings, it can be seen that the proposed alignment extends diagonally across the Northeast corner of 30/31 Pearse St, but most particularly under the new lift shaft enclosure as referenced earlier under 3.1 above. Tara Station is also in relatively close proximity to the rear of the building. (map shown on PDF)</p> <p>The depth of the tunnel where it passes underneath 30/31 Pearse St is approx.: The depth of the tunnel where it passes underneath 30/31 Pearse St is approx.:</p> <ul style="list-style-type: none"><li>• c.24m below existing ground/road to proposed track level</li><li>• c.15-16m below existing ground/road to crown of tunnel (map shown on PDF)</li></ul>	The details provided in this submission item are correct.
7	Technical note Section 4 - METROLINK ALIGNMENT under NDTC BUILDING - 4.1 Property Acquisition	10	<p>Property Acquisition Property Acquisition</p> <p>The Railway Order, if granted, will allow the Applicant, TII to proceed with the construction &amp; operation of MetroLink, It also includes powers for TII to acquire compulsorily land or rights in, under and over land or any Substratum of land specified in the order. This will include Substratum lands at 30/31 Pearse St. and TII have forwarded the below relevant extracted drawings indicating the extent of the lands or rights affected as part of the Substratum acquisition relating to 30/31 Pearse St. with a unique land take reference number "ML60-U29". It can be seen that the substratum acquisition includes land both within and outside the building footprint. (See Map in PDF)</p> <p>In the Railway Order, Substratum is defined as;</p> <p>“substratum of land” means any subsoil or anything beneath the surface of land required —</p> <p>a. for the purposes of the authorised works, or</p> <p>ii. for any other purposes connected with this Order;</p>	The details provided in this submission item are correct.
8	Technical note Section 5- Potential Impacts Section 5.1 General	12	<p><b>General</b></p> <p>The Potential for impacts on the Building and its Occupancies are likely to arise under the following significant phases of the MetroLink Project. Whilst it appears that there are no Enabling Works immediately surrounding 30/31 Pearse St., there are significant Enabling works associated with the construction of Tara Station in close proximity.</p> <ul style="list-style-type: none"><li>• Enabling</li><li>• Construction</li><li>• Operation</li></ul>	Noted.

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9	Technical note Section 5- Potential Impacts Section 5.2.1 Settlement	12	<p><b>Impacts During Construction</b></p> <p>5.2.1 Settlement</p> <p>The potential for building settlement to occur during construction will predominantly arise from the tunnel construction (TBM or Blasting) and de-watering proposals.</p> <p>As part of the Railway Order application, the Applicant has prepared a Building Damage Assessment (Appendix A5.17) which has set-out the process for Assessment of Settlement.</p> <p>The methodology used to predict ground movements and assess building damage has been adopted using the well-recognized worldwide Industry Standard three phase ground movement impact assessment, noted to have been undertaken for tunnels and underground projects including the Dublin Port Tunnel, Channel Tunnel Rail Project, Crossrail and High Speed 2 (HS2) with other worldwide examples. Section A5.17 further describes and assesses this approach. In summary;</p> <ul style="list-style-type: none"><li>• Phase 1: Generic assessment of "Greenfield" settlement contours using generic ground parameters, screening of sensitive receptors including building, structures and services</li><li>• Phase 2: Assessment of potential damage to receptors identified from Phase 1 based on standard assumptions and classified into damage categories 0-5, receptors placed in damage category of 3 or greater carried to Phase 3; and</li><li>• Phase 3: Each receptor from Phase 2 considered individually to determine its behaviour using detailed information, refined ground characteristics + modelling together with sophisticated finite element assessment methods. The Applicant notes that this assessment is likely to be carried out by the D&amp;B Contractor.</li></ul>	Any potential ground movements affecting 30/31 Pearse St will arise from TBM tunnelling. - No impacts to this building from blasting and dewatering at Tara Station are predicted. The settlement contours generated at Phase 1 conservatively predict settlement and the Phase 2a assessment has been undertaken on your building. This assessment, still considered conservative, predicts Negligible impacts due to the predicted settlement. No Phase 3 assessment is therefore required.
10	Technical note Section 5- Potential Impacts Section 5.2.1 Settlement	12	A marked-up extract (extract Fig 20.16 below) of the Phase 1 assessed "Greenfield" settlement contours relating to 30/31 Pearse St. is set-out below and from this assessment, it can be seen that the MetroLink has the potential to generate settlements of between 1mm to 20mm(plus) across the building footprint. More particularly, the assessment predicts a potential differential settlement varying between the 10mm-20mm contours across the area of the new lift shaft thus rendering vulnerable to out-of-plumbness. Such differential settlements have the potential to cause damage across the building and will thus necessitate the more detailed Phase 3 building damage impact assessment (map in PDF)	<p>The assessment details are given in the Chapter 4 of the Damage Assessment Report of Buildings and Other Assets.</p> <p>The settlement contours shown on Figure 20.16 of Appendix B are based on Phase-1 assessment with very conservative (absolute worst case) tunnelling volume loss parameters and its purpose is to define the boundaries for the buildings for subsequent assessments. However, Phase 2a has been carried with refined (but still conservative) tunnelling volume loss parameters with the consequent reduction in the greenfield settlements. This assessment identified that negligible impacts are predicted for this building.</p>
11	Technical note Section 5- Potential Impacts Section 5.2.1 Settlement	13	Section 4,7 "Settlement Effects Due to De-Watering" (Appendix A5.17) focuses primarily on Station Box construction and indicates that "No external dewatering (outside of the site boundaries) will be permitted during the construction of the station boxes, that increases the impact due to settlement on others, beyond the natural ground water fluctuations. Any settlement due to the short-term lowering of the water table outside the station box will therefore be constrained to within the site boundaries." This needs to be clarified in the context of Tara Station construction which is in close proximity to 30/31 Pearse St.	Tara Street dewatering will be internal to the station box excavation minimising external drawdown and hence there is no impacts on 30/31 Pearse Street predicted.
12	Technical note Section 5- Potential Impacts Section 5.2.1 Settlement	14	The Applicant does not appear to have given any specific consideration to 30/31 Pearse St. building which according to the Phase 1 "Greenfield" assessment seems to have the potential to cause damage which might affect the building, levels of service and its Occupants. As per section 4.1 of Appendix A5.17, 30/31 Pearse St. should be classified as a Type D "Sensitive" building with a Phase 3 damage assessment undertaken.	<p>30/31 Pearse Street has been considered in the EIAR assessments. TII would refer you to the Building Damage Report in Appendix 5.17 of the EIAR. This building is referenced as B49 McCarthy Centre and specifically listed in Appendix B1 of that document. Furthermore, Table 5.2 in the same document presents the results of the Phase 2a assessment and concludes that the building would remain within the negligible damage category and hence does not require a stage 3 assessment.</p> <p>If a Phase 3 assessment is permitted, this will set a precedent for other building owner/occupiers along the tunnel alignment whose buildings have been assessed as being negligibly impacted to request Stage 3 assessments also. Given the extent of time required for these additional building assessments which have been identified as not required, this could represent a risk of programme impact.</p>

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13	Technical note Section 5 -Potential Impacts Section 5.2.2 Noise and Vibration	19	EIAR Chapter 14 "Ground-borne Noise and Vibration" assesses the impact of the MetroLink Project arising from Ground-borne Noise & Vibration during the Construction and Operational Phase. As noted earlier for other aspects and whilst there are references to properties either side, there does not appear to be any specific reference to 30/31 Pearse St.	TII recognises the importance of the National Drug Treatment Centre and the service it provides. Buildings included in the noise and vibration assessment near 30/31 Pearse Street (e.g. 35 Pearse Street) have been included as they are residential buildings and are therefore sensitive to noise and vibration. 30/31 Pearse Street is not referenced as it is an outpatient / non-residential service and therefore less sensitive to noise and vibration. TII are happy to engage further with the NDTC to address their concerns about effects of MetroLink construction or operations on potential sensitive equipment.
14	Technical note Section 5- Potential Impacts Section 5.2.2 Noise and Vibration	19	From a Noise perspective and using No. 35 Pearse St by way of a benchmark reference (Noise only), the assessed impact is described in table 14.28 as "Noticeable to all and disturbing to some over a number of days" This is a matter of some concern to the HSE and the NDTC occupancies.	TII understand your concern regarding ground borne noise during the TBM passage, however this would only be for a short period of time, of up to 2 weeks. Noise and vibration levels will not be evenly distributed over that period as it would peak for 2 to 3 days when the TBM is closest (Section 10.5.1.3 Chapter 10 Human Health)
15	Technical note Section 5 - Potential Impacts Section 5.2.2 Noise and Vibration	19	Similarly, the rear of 30/31 Pearse St is not too far away from parts of the proposed Tara St station for which as described in section 14.4.1.10, "Blasting" may be used for excavation at underground stations. Table 14.14 "Construction Activities Considered" notes "Effects on highly sensitive laboratory equipment could occur at up to 1000m if not mitigated." The Applicant should assess the effect of Construction activities (including TBM passage & "Blasting") on the NDTC building and its occupancies for Vibration & Noise.	Where blasting is necessary, the blasts will be designed by a specialist contractor to avoid significant effects. If this cannot be achieved, an alternative to blasting will be employed (Section 14.6.1.3 Chapter 14). The effects of blasting will be mitigated. As Dublin Fire Brigade HQ (nearby building) is a sensitive receptor, minimisation of the maximum instantaneous charge weight or alternatives to blasting will be used.  TII are happy to engage further with the NDTC to address their concerns about effects on construction on sensitive equipment.
16	Technical note Section 5 - Impacts During Operations Section 5.3.1 Noise & Vibrations	19	Noise & Vibration EIAR Chapter 14 "Ground-borne Noise and Vibration" assesses the impact of the MetroLink Project arising from Ground-borne Noise & Vibration during the Construction and Operational Phase. As noted earlier for other aspects and whilst there are references to properties either side, there does not appear to be any specific reference to 30/31 Pearse St.	Please refer to response item (13).
17	Technical note Section 5 - Impacts During Operations Section 5.3.1 Noise & Vibrations	19	From a Noise perspective and using No. 35 Pearse St by way of a benchmark reference, the assessed impact is described in table 14.43 as "No significant impact".	In this instance 'no significant impact' means that during the operational phase, there will be no predicted negative effects from ground borne noise on this building or its occupants.

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18	Technical note Section 5 - Impacts During Operations Section 5.3.1 Noise & Vibrations	19	From a Vibration perspective, there doesn't appear to be any appropriate impact assessment for 30/31 Pearse St. The closest similar comparison would relate to some of the buildings and occupancies assessed within the TCD building stock, with description in table 14.46 of potential impact as "Potential impact on sensitive equipment"	30/31 Pearse Street has been considered in the assessments carried out to date. We would refer you to the Building Damage Report in Appendix 5.17 of the EIAR. This building is referenced as B49 McCarty Centre and specifically listed in Appendix B1 of that document. Furthermore, table 5.2 in the same document presents the results of the Phase 2a assessment and concludes that the building would remain within the Negligible damage category and hence does not require a stage 3 assessment.  TII would also like to note that they have previously engaged in consultation in 2019 by means of a sensitive receptor/equipment questionnaire. Following initial issuing of the questionnaire and subsequent follow up a response was not received and therefore was not included. However, TII are happy to engage further with the NDTC to address their concerns about effects on construction and operations on potential sensitive equipment.
19	Technical note Section 5 - Impacts During Operations Section 5.3.1 Noise & Vibrations	19	Due to the very sensitive nature of the NDTC Lab located within 30/31 Pearse St. consideration shall be given to installing a "floating slab" anti-vibration system within the tunnel for a distance either side under this building to reduce and mitigate the impacts of vibrations on the Occupancies & Equipment— All as described in section 14.5.2 "Operational Phase" & Table 14.47 for sensitive receptors and similar to that proposed for buildings in close proximity i.e. TCD.	Please refer to response (18).
20	Technical note Section 6 - Monitoring and Liaison 6.1 General	20	Apart from reference under Property Acquisition & Ownership, we have not encountered any other specific reference to this property at 30/31 Pearse Street in the more Technical Sections of the Application which might suggest that the Applicant is not aware or familiar with the sensitivity of the building and most particularly, some of the activities undertaken within, namely the NDTC Lab	Please refer to response item (18).
21	Technical note Section 6 - Monitoring and Liaison 6.2 Monitoring of Building & Equipment	20	Monitoring of Building & Equipment It is recommended that settlement, noise and vibration monitoring equipment be installed at and within 30/31 Pearse Street building to; i. Assess current background levels to inform appropriate "Trigger" levels ii. Monitor during the Construction Works iii. Monitor during Operation Appropriate "Trigger" levels on a Traffic Light system basis should be established based on background levels together with Best Practice and Industry Standards referenced and predicted within the EIAR.	As outlined in table 5.2 of the Building Damage Report (EIAR Appendix 5.17), the building would remain within the Negligible damage category having regard to settlement and hence does not require a stage 3 assessment. TII are happy to engage with the NDTC to agree appropriate noise and vibration monitoring at locations of sensitive equipment within the building.
22	Technical note Section 6 - Monitoring and Liaison 6.2 Monitoring of Building & Equipment	20	We would suggest (as non-exhaustive) the following instrumentation as a Minimum: Settlement monitoring points, Movement Targets &Tape Extensometer points, Crack Gauges, Electrolevels & Tiltmeters Vibration Monitoring Sensors (Internal & External) Noise Monitoring  The instrumentation should be logged in "real-time" basis and if/when trigger levels are exceeded, ALL Stakeholders are contacted and pre-agreed mitigation proposals implemented.	Please refer to response item (21).
23	Technical note Section 6 - Monitoring and Liaison 6.3 Liaison - 24- Hour Emergency Contact Services	20	Liaison — 24 Hour Emergency Contact Services A 24-Hour Emergency Contact should be available for relevant Stakeholders (building Owners, Occupiers & Professionals) where cause for concerned arises.	Details of an emergency response plan are outlined in Section 5.10 of EIAR Appendix A5.1 (Outline CEMP). The contractor(s) will be required to develop an Emergency Response Plan and to detail emergency incident response procedures in the detailed CEMP. The Emergency Response Plan will contain emergency phone numbers and the method of notifying local authorities, statutory authorities and stakeholders. Contact numbers for key personnel will also be included therein.

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24	Technical Note Section 7 - PROPOSED RFI's & SUGGESTED CONDITIONS 7.1 General	20	As referred earlier and whilst it is noted that other buildings and properties along Pearse St. (some being further away from the proposed tunnel alignment than the NDTc) are referenced and assessed for Impacts throughout the Application, the HSE as owners of 30/31 Pearse St does not appear to have been consulted to an appropriate level of detail for a building subject to such potential for impact, nor indeed does the building appear to have been given due consideration. As a consequence, the HSE and its Advisers has had little time to consider the possible implications and to review these in advance with the Applicant. We suggest & recommend that particular consideration is focused on this building due to the Sensitivities and Occupancies and propose the following RFTs & Conditions are imposed on the Applicant.	Please refer to response item (18).
25	Technical Note Section 7 7.2 Proposed requests for Further Information (RFIs)	20	Proposed Requests for Further Information (RFIs) We understand that an Oral hearing is likely to be conducted into this Application. We would propose the following non-exhaustive series of RFI's are forwarded to the Applicant for immediately addressing with responses returned well in advance of any Oral hearing.	TII have provided responses to the Requests for Further Information (RFIs) below, however are happy to engage further with HSE with regard to the outputs of the EIAR and other RO documentation.
26	Technical Note Section 7 - 7.2 Proposed requests for Further Information (RFIs)	20	RFI 1 Apart from proximity to the proposed Tara Street Station, it appears that no Enabling works or ground level works are proposed in the immediate vicinity of 30/31 Pearse St. building. The Applicant should confirm that this is the case.	This is a correct assumption. There may be Instrumentation and Monitoring as outlined in response to item (21). These details will be agreed with the building owner.
27	Technical Note Section 7 - 7.2 Proposed requests for Further Information (RFIs)	21	RFI 2 The Applicant should prepare a more detailed Phase 3 Building Subsidence & Damage Assessment specific for this building at 30/31 Pearse St, having specific regard for the more sensitive areas of the building.	Please refer to response item (12).
28	Technical Note Section 7 - 7.2 Proposed requests for Further Information (RFIs)	21	RFI 3 Section 4.7 "Settlement Effects Due to De-Watering" (Appendix A5.17) focuses primarily on Station Box construction and indicates that "No externa/ dewatering (outside of the site boundaries) will be permitted during the construction of the station boxes, that increases the impact due to settlement on others, beyond the natural ground water fluctuations. Any settlement due to the short-term lowering of the water table outside the station box will therefore be constrained to within the site boundaries."This needs to be clarified in the context of Tara Station construction in close proximity to 30/31 Pearse St.	Please refer to response item (11).
29	Technical Note Section 7 - 7.2 Proposed requests for Further Information (RFIs)	21	RFI 4 The Applicant should carry-out and prepare a detailed Vibration Assessment specific for this building at 30/31 Pearse St, for both the Construction & Operation Phases, having specific regard for the more sensitive activities undertaken within this building together with inclusion of appropriate mitigation measures.	Please refer to response item (18).

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30	Technical Note Section 7 - 7.2 Proposed requests for Further Information (RFIs)	21	RFI 5 Section 14.2.1.3of Chapter 14 references "Especially Sensitive Receptors-Construction and Operation" and describes such receptors as "Receptors with particularly sensitive to vibration include laboratories containing sensitive equipment such as electron microscopes, buildings containing fragile artefacts". The NDTC Lab located within the 3rd floor would fall within this categorization and therefore should be assessed accordingly. 30/31 Pearse St does not appear to have been included by the Applicant as falling within this category and should be assessed accordingly.	Please refer to response item (18).	
31	Technical Note Section 7 - 7.2 Proposed requests for Further Information (RFIs)	21	RFI 6 Section 14.4.1.10 of Chapter 14 references "Blasting" to be used for excavation at underground station and Table 14.34 assess impact of same at Dublin Fire Brigade HQ as "Significant" describing as "Blasting would be noticeable to people within the building and just above threshold for structures". The rear of 30/31 Pearse St is not too much further away from parts of the proposed Tara St Station. Table 14.14 "Construction Activities Considered" notes "Effects on highly sensitive laboratory equipment could occur at up to 1000m if not mitigated." The Applicant should assess the effect of Blasting on the NDTC building and its occupancies for Vibration & Noise and present the findings with appropriate mitigation measures (if necessary) well in advance of an Oral hearing.	Please refer to response item (15).	
32	Technical Note Section 7 - 7.2 Proposed requests for Further Information (RFIs)	21	RFI 7 The HSE request confirmation to be kept informed throughout the remainder of the An Bord Pleanála process and reserve the right to seek further information on the Construction & Operation of the MetroLink. In addition, the HSE requests that if an Oral hearing is to be conducted into the MetroLink project that they will be invited to attend and reserve the right to make a further submission at this Oral Hearing stage.	Please refer to response item (25).	
33	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	21	Suggested Conditions to be Applied to Application Having regard to the potential for Impacts on 30/31 Pearse Street and the very sensitive nature of its Occupants, namely, the National Drug Treatment Centre Laboratory, we recommend the following conditions be applied to the Application unless clearly demonstrated that no negative impacts will arise from the Construction and or Operation of the MetroLink.	Please note, any conditions applied to the application, if granted, are at the discretion of An Bord Pleanála.	
34	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 1 Building Settlement The maximum allowable differential settlement under the NDTC Building at 30/31 Pearse St. shall be limited to avoid any Structural Damage or Interruption to service delivery. The Applicant does not appear to have given any specific consideration to 30/31 Pearse St. building which according to the Phase 1 Generic Assessment Based on "Greenfield" Settlement Contours seems to have the potential to cause damage which might affect the building, levels of service and its Occupants. As per section 4.1 of Appendix A5.17, 30/31 Pearse St. shall be classified as a Type D "Sensitive" building with a more detailed Phase 3 Building Subsidence & Damage Assessment undertaken. Appropriate mitigating & remediation shall be implemented where damage of a "Cosmetic" nature might arise.	TII do not believe the requested condition is necessary. Please refer to response item (12) in relation to the assessment of building damage at this property within the EIAR. TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.	



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35	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 2 Construction Methods in Rock The method of construction in rock shall be appropriate to avoid damage and noise impacts to the NDTC building and its Occupants. No Blasting shall be used until demonstrated that it will have no negative impacts on the NDTC building and its Occupancies.	TII do not believe the requested condition is necessary. Please refer to response item (15) in relation to blasting during construction. TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.
36	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 3 Ground-borne Vibrations, NDTC Lab Due to the very sensitive nature of the NDTC Lab located within 30/31 Pearse St. this building & the NDTC Lab shall be considered as an "Especially Sensitive Receptor" and assessed accordingly for Ground-borne vibrations both during Construction & Operation. Where necessary, appropriate Mitigation measures shall be implemented prior to the occurrence of any detrimental impacts	TII do not believe the requested condition is necessary. Please refer to response item (13) in relation to the sensitivity of the building. TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.
37	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 4 Ground-borne Vibrations— Operation, NDTC Lab Due to the very sensitive nature of the NDTC Lab located within 30/31 Pearse St. the Applicant shall install a "floating slab" anti-vibration system within the tunnel under this building to reduce and mitigate the impacts of vibrations on the Occupancies— All as described in section 14.5.2 & Table 14.47 for sensitive receptors and similar to that proposed for buildings in close proximity i.e.. TCD.	TII are happy to engage further with the NDTC to address their concerns about effects of operations on sensitive equipment.
38	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 5 Ground-borne Vibrations, Building related The Ground-borne vibrations in the vicinity of 30/31 Pearse St. building shall be limited to ensure that there will be a "Low probability of adverse comment from the building Occupants" and no damage to the building.	TII do not believe the requested condition is necessary. Please refer to response items (12) and (15) in relation to the assessment this property within the EIAR. TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.
39	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 6 Monitoring A comprehensive suite of Monitoring Instrumentation shall be installed both on and within the building at 30/31 Pearse St. in advance of any works and shall remain in place for an agreed period of time post Operation.	TII do not believe the requested condition is necessary. Please refer to response item (21) in relation to monitoring at this location. TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.



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40	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 7 Noise, Dust & Dirt From a Noise perspective and using No. 35 Pearse St by way of a benchmark reference, the assessed impact during the passage of the TBM is described in table 14.28 as "Noticeable to all and disturbing to some over a number of days" is a matter of some concern to the HSE and the NDTC occupancies and appropriate mitigation shall be incorporated. 30/31 Pearse St. building is in close proximity to the location of Tara St. station. As part of the nuisance related matters including the Minimization Plans, the Properties and Streets in the surrounding areas shall be kept clean and clear at all times.	TII do not believe the requested condition is necessary. Please refer to response item (14) in relation to the passage of the TBM.  Pearse Street will remain accessible during the construction and operation of the proposed Project (Section 9.6.1.2.4.2 Chapter 9). As outlined in EIAR Appendix A5.1 (Outline CEMP), working areas will be kept clean and clear. Additionally, public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary (Table 6.3).  TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.
41	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	22	Condition 8 Emergency Contacts A 24-hour "manned" Emergency Contact person & facility should be made available to contact should relevant Stakeholders (building Owners, Occupiers & Professionals) become concerned or where cause for concern arises. This facility should be operated and manned by Technically Competent Personnel capable of dealing with such matters as are likely to arise.	TII do not believe the requested condition is necessary as, as detailed in Appendix A5.1 Outline Construction Environmental Management Plan, the Stakeholder Communications Plan, prepared by the contractor(s), will include details of contact names and numbers for any complaints that may arise during the works.  TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.
42	Technical Note Section 7 - 7.3 Suggested Conditions to be Applied to Application	23	Condition 9 Consultation The HSE shall be kept informed throughout the course of the project (Construction & Operation) by TII or their Agents of any identified Risks to Service Delivery (Building + Occupancies) and any proposed mitigation measures shall be agreed well in advance with the HSE or Agents acting on behalf of HSE.	Please refer to response item (25).  TII are happy to engage further with HSE on the requested condition in advance of the Oral Hearing.