Submission No.	181
Organisation Name or Name of Submitter	Senator Marie Sherlock

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: MetroLink Railway Order Application submission REF - 314724				
1	1 Construction Management:	1	Construction of the three stations which are planned for Dublin 9 and 7 will have enormous impacts on the traffic flows in the area. Traffic management plans must be published, and consultation must take place with the local communities well in advance of any works commencing	Chapter 5 of the EIAR, MetroLink Construction Phase, explains that traffic management plans for the construction phase of the Project have been developed to minimise the impact on road users, and to maintain access to property. Prior to implementation, all traffic management measures will be agreed with DCC and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. The design of traffic management measures and highways works is based on achieving the key objective of maintaining continual access to all properties during the works. Where necessary, a safe alternative route will be provided for pedestrians and vulnerable road users, such as children, and persons with restricted mobility, to maintain pedestrian access. Where detour routes are required, these will be kept as short as possible and detour signage will be clear and easy to understand. All construction sites will be designed to be as unobtrusive as possible. EIAR Appendix A9.5, Scheme Traffic Management Plan (STMP) also describes the methodology used to assess the impact of the construction of the Project on all transport users and provides details of mitigation techniques and the types of measures to be employed to minimise the impacts generated by the Project during the Construction Phase. TII confirm that traffic management plans will be published, and consultation will take place well in advance of any works commencing as noted in Chapter 9 Traffic and Transport and Appendix A5.1 Outline CEMP of the EIAR. TII's contractor(s) will be responsible for putting in place a Stakeholder Communications Plan which will be developed under the consent of a designated Public Liaison Officer (or equivalent officer) appointed by TII. This plan 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(s) to communicate important information on various aspects of the proposed Project to the public. Prior to the commencement of construction, a comprehensive publicity and information campaign will take place.
2	1.1 Glasnevin Station	1	During the peak construction period of year 3 and year 4, there will be up to 200 construction vehicles travelling in and out of this area on a daily basis. This is going to have dramatic and enormous implications for traffic flows in the wider Phibsborough area. In particular there is a specific concern regarding the ability of Cross Guns bridge to take such high volumes of plant and machinery.	Traffic impacts have been assessed and included within EIAR Chapter 9, Traffic and Transport. During the main works at Glasnevin Station, as the construction site boundary is located away from the traffic network, there is expected to be no significant impact on traffic flows throughout the Construction Phase while temporary traffic management (TTM) is implemented. Average lorry movements during the main works are 50 - 100 movements. The maximum number of daily movements of 200 vehicles only occurs for two days as per Appendix A9.5 STMP. Analysis shows that construction traffic movements will likely result in a minor impact on the nearby signalised junctions and on Prospect Road, however traffic flow will generally be unaffected. There will be some impact on Prospect Road where site vehicles routing from the north to the site will be required to take a right turn into the site, leading to an increase in HGVs in the area. TII and their contractor(s) will monitor the traffic flows during construction to ensure no undue disruption occurs. With regards Cross Guns Bridge there are no traffic restrictions on this currently. It should be noted that HGV haul routes are located from the M50 to Glasnevin Station so there is no current requirement to cross Cross Guns Bridge. In the event that MetroLink abnormal vehicle loads are required to pass through Cross Guns Bridge, TII will consult with the DCC and make necessary arrangements.
3	1.2 Griffith Park Station	1	Local residents will also need a very clear picture of the traffic management system here, given such high levels of heavy plant and machinery that will be in the area on a daily basis over an extended period.	Please refer to response (1) above. TII will implement signage strategies for access traffic and through traffic, the public will be provided with advanced warning of any proposed diversions and disruption, and there will be continuous updates on construction progress on the project website and through various social media outlets. These measures, and others, are detailed in EIAR Appendix A 9.5 Scheme Traffic Management Plan.
4	1.3 Mater Station	1	Along with the problems associated with construction traffic, there is also a very significant concern here about parking in the area, this and other issues will need to be considered in advance of construction.	TII confirm that parking has been considered as part the MetroLink environmental impact assessment. TII will work with the local community to mitigate so far as is reasonably practicable impacts on parking. EIAR Appendix A9.5, Scheme Traffic Management Plan, section 7.7, assesses that there will be a moderate impact to designated on-street parking due to the removal of parking bays on Eccles Street and Berkley Road. TII will seek to ensure parking bays are not used by construction staff and operatives by implementing the Construction Mobility Plan to ensure that numbers of employee vehicles travelling to and from construction sites on a daily basis will be managed through transporting workers to site via buses/mini-buses from designated collection points (such as Luas and DART stations or other appropriate locations).The full list of Mitigation Measures in the Construction Phase are summarised in EIAR Chapter 9, Traffic & Transport, Table 9.147.

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5	2. Community Liaison	2	Given the major noise and physical impacts on the area, along with the high levels of plant and machinery that will be in the area, it is vital that there is a 24 hour help/liaison line put in place for the whole duration of the construction period.	As noted in Appendix A5.1 Outline CEMP, a Stakeholder Communications Plan will be developed under the consent of a designated Public Liaison Officer (or equivalent officer) appointed by TII. This will include for a 24 hour phoneline during construction.
6	3. Vermin Control	2	Given that the works are in such close proximity to the Royal Canal, we ask that specific measures for vermin control are undertaken during construction works.	TII and their contractor(s) will implement rodent control measures. 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. With additional rodent control policies in place as a result of MetroLink it is possible that there will be a reduction in the level of rodents. Mitigation measures are outlined in A5.1 Outline CEMP - Table 6.6
7	4. Noise Protection	2	Given the significant levels of noise, we ask that there is greater detail given to residents living in Shandon and Dalcassian areas, along with those living along 'Berkeley Road, with respect to the construction of the Glasnevin and Mater stations.	Full noise assessments have been undertaken and presented in EIAR Chapters 13 and 14 that cover airborne and groundborne noise and vibration respectively. Chapter 13 considers noise impacts from above ground working, with some significant impacts remaining for receptors, that include some on Berkeley Road, adjacent to the construction of Glasnevin Station (Table 13.87 and 13.88 of the EIAR) and Mater Station (Table 13.89 of the EIAR) during piling works and track possessions at Glasnevin station and several work phases at Mater station. Chapter 14 considers groundborne noise and vibration identifies there will be exceedances of groundbourne noise thresholds for receptors closest to the tunnel route during the TBM passage. There will be no other exceedances of groundborne noise or vibration thresholds for receptors on Berkeley Road during construction. Unfortunately, there are no effective methods available to reduce groundborne noise or vibration from the TBM at source, but noting that the duration of this impact will be temporary and of the order of up to two-weeks as the TBM passes. TII will undertake advanced consultation and stakeholder engagement to prepare people for the passing of the TBM and ensure the timing of these impacts are known. TII's contractor(s) will prepare a Construction Noise and Vibration Management Plan (CNVMP) for the proposed Project as referred to in the EIAR Appendix A5.1, Outline Construction Environmental Management Plan (CEMP). The CNVMP will be a live document and will include a full monitoring and auditing programme which will be agreed with the Local Authority prior to the commencement of the Construction Phase, including predetermined monitoring trigger levels to ensure noise limits are not breached. The Transport Infrastructure Ireland (TII) Airborne Noise and Ground-borne Noise Mitigation Policy (Appendix A14.6 of EIAR Chapter 14) also sets out the construction noise insulation and temporary rehousing measures to be implemented where required. TII and the contractor(s) will engage further 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. This will include residents in Shandon, Dalcassian and on the Berkely Road. The contractor(s) will be responsible for putting in place a Stakeholder Communications Plan which will be developed under the consent of a designated Public Liaison Officer (or equivalent officer) appointed by TII. This plan 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(s) to communicate important information on various aspects of the proposed Project to the general public. Prior to the commencement of the Construction Phase, a comprehensive publicity and information campaign will take place.
8	5. Property	2	We wish to raise concerns about the limited nature of the POPS (Property Owner Protection Scheme) and the restriction of this to buildings within 30m - we believe that is overly restrictive and that other property owners who believe they will be affected should be allowed into the scheme.	TII do not consider that the POPS is overly restrictive. The 30m zone is designed to encompass the zone within which construction generated ground movements might be expected to occur that could have an impact on property. To provide further assurance, TII and their contractors will be undertaking comprehensive ground movement and vibration monitoring that will provide the data, that in the event a property owner considers their property may have been impacted by Metrolink construction, to determine whether that is the case.

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9	6. Ecological Protection and damage mitigation measures on the Royal Canal	2	It is extremely important that the impact of construction on wildlife habitats and on the biodiversity of the Royal Canal be minimised. We would like to see an ecological management plan in place for the period of construction to mitigate these risks.	EIAR Chapter 15, Biodiversity, Table 15.24 shows the residual impact significance on habitats and biodiversity for the Royal Canal (proposed Natural Heritage Areas, (pNHA)) and Canals (habitat type canals, FW3). Following mitigation this results in no likely significant residual effect. For the construction phase the contractor will be required to develop a site-specific Ecology and Landscape Management Plan, and a Non-Native Invasive Species Management Plan. The contractor will be legally obliged to ensure that procedures are implemented to control and minimise disturbance and damage to areas of conservation interest and legally protected and notable species, in accordance with the mitigation and control measures referred to above and as set out by Chapter 15.
10	7. Commitment to restoration of green space and planting:	2	In addition to the concerns about wildlife, we also want a commitment to ensure that any trees removed due to construction works will be replaced appropriately and any green space disturbed be re-planted.	TII and the MetroLink project are committed to minimising impacts on wildlife habitats and on biodiversity more generally. Proposals include for example, the provision of tree and woodland planting to replace trees unavoidably lost as a result of the alignment, design and construction of the proposed Project – this forms part of the embedded primary mitigation included within the landscape design. In most circumstances however, the designed planting as proposed is more appropriately scaled to the pertaining landscape context and is invariably more biodiverse than the baseline planting lost. These aspects of the proposed Project go beyond the requirements of mitigation and are in effect improvements over and above the baseline, and would therefore be considered “enhancements” as outlined in Chapter 27 Landscape & Visual. TII would also note that an Arboricultural Impact Assessment has been carried out (EIAR Appendix 27.3). This contains information on the existing tree conditions and the arboricultural impact of the proposed Project. EIAR Chapter 27 Landscape & Visual, Section 27.6.1 includes for a number of mitigation measures to reduce the impact of MetroLink, including: • Identification and retention of existing mature trees of good quality, through the adjustment of the alignment, location of structures/buildings and the outline design of the proposed Project; • Comprehensive proposals for hard and soft landscape works, including tree and hedgerow planting to offset the effects of net loss due to the proposed Project; • Where cut and cover sections of track and/or station boxes underground are to be planted over, the inclusion of sufficient appropriate substrate and adequate drainage to allow tree planting and growth for posterity. There is a general requirement for a minimum depth of 1.5m growing medium in such circumstances. • To improve biodiversity, the inclusion of species rich planting and wildflower meadows of primarily native species (and pollinator friendly plant species where deemed appropriate) as part of the planting strategy; • A detailed design of the incorporated biodiverse planting that will be developed with the project ecologist; • In sensitive locations, residual landscape and visual effects will be significantly reduced through the inclusion in the proposed planting of relatively mature specimen trees.
11	8. Station design	2	Given the high profile of the location of the Glasnevin station, we believe the opportunity should be taken to incorporate an eco-friendly, sustainable and imaginative design for the station, and that it be built on green building principles with consideration given to solar thermal systems, green roof and living walls.	TII confirm they are aligned with the observation made and this is enshrined in the overall project objective, as established by Transport Infrastructure Ireland (TII) and as outlined in the National Development Plan 2021-2030 (Government of Ireland, 2021a):‘*To provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre.’*. To achieve this ambition TII will procure the contractors to deliver the design based on specified environmental criteria and in line with TII’s Sustainability Implementation Plan – Our Future (TII 2021), that sets out the vision to lead in the delivery and operation of sustainable transport, strengthen resilience to climate change, and maintain commitment to the environment. The Plan recognises the need to rethink, reimagine and redesign approaches to ensure sustainability is at the heart of everything that TII does, requiring it to be the leading provider of sustainable infrastructure. These provisions are contained within the EIAR Chapter 4 and specifically referenced in Section 4.6 Sustainable Design. The delivery of the Glasnevin Station design will follow these principles.