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Letter Re 314724: MetroLink Railway Order Submission 16th January 2023				
1	Intro	1	From the outset, I must state that I am in favour of the MetroLink project. The North-West of Dublin has, for many years, been overlooked in the allocation of public transport resources. There have been a number of very disappointing false dawns relating to the Metro in the past and it is understandable that people in the area are sceptical that the project will be delivered. It is therefore essential the Government honours its commitment to the project. It is also essential that TII and the NTA work closely with the community to build a level of trust to provide clear and transparent responses to queries raised, respond speedily to problems when they arise and thereby seek to ensure local 'buy in'. While I welcome the publishing of the Railway Order of the Metrolink, there are a number of issues and concerns over some aspects of the project in the Dublin North-West Constituency. I will outline these concerns and questions below.	MetroLink acknowledges your positive support for the scheme and would like to reiterate that our aim is to ensure that this project goes ahead in order to improve public transport for Dublin. TII note the necessity for community relations and will commit to ensuring good communication between the project and the communities impacted.
2	Consultation & Advice	1	Concerns have been raised by Residents' Associations in the Dublin North-West constituency regarding poor consultation and engagement with TII directly, regarding the MetroLink. The Independent Experts, RINA, made themselves available to residents' groups and stakeholders but there was limited engagement with TII directly. Several Residents Associations have noted the benefit of having access to the Independent Engineering Experts, RINA. RINA have met regularly with several Residents Associations and have discussed the plans for MetroLink Stations and works in their local areas. RINA were able to provide answers to many questions from Residents and they were also able to seek further information from TII regarding certain queries and then respond to residents. It should be a condition of the Railway Order to have the Independent Engineering Experts, RINA, retained and be made available throughout all the future phases of the MetroLink, including the enabling works construction phase.	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.
3	Consultation & Advice	1	Furthermore, it should be a condition of the Railway Order to create a Resident-Contact Position within TII to address concerns and provide updates throughout the construction of the MetroLink. There was such a position during the construction of the Dublin Port Tunnel, and this position provided information and reassurance to residents of any issues or concerns they had. A project of this scale will inevitably run into delays, problems and disturbance for the local community over the course of its lengthy construction. It is essential that residents have a "point of contact" person so that such issues can be addressed speedily and effectively. The contact details for this position should be available to local residents' groups and the person holding the position should be able to provide regular updates as well as trouble-shooting issues as they arise.	TII agree that the communication of all things MetroLink will be critical to maintaining community support. There will be a 24 hour phone line that will be made available as an immediate point of contact to ensure good relations between the community and TII. TII will also provide a community liaison officer and the MetroLink website will host up to date progress, news and stakeholder engagement activities.

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4	Monitoring	2	It is important that environmental impacts during the MetroLink construction works are monitored and that residents are kept aware of these. Most notably, noise levels and vibrations, as well as air quality, must be recorded and monitored in residential areas during the construction of the MetroLink Railway. Other impacts must also be monitored such as traffic congestion and construction hours. This monitoring should be conducted by TII and reports made accessible for residents.	As outlined in the CEMP (Construction Environmental Management Plan - A5.1 of the EIAR) a Stakeholder Communications Plan will be developed and implemented by the contractor which will include community engagement prior to works commencing. This will outline a point of contact for issues such as air quality & dust on site. Regular monitoring and inspections of the site will be carried out. The contractor will also prepare a Dust Management Plan which will include mitigation measures that are outlined in Appendix 16.4 of the EIAR. A Noise and Vibration Management Plan (CNVMP) will be formulated for the construction phase and used by all contractors based on the mitigation measures outlined in Chapter 13, Chapter 14 and the outline CEMP (Appendix A5.1). The CNVMP will be a live document. This will involve a detailed investigation of potential noise and vibration impacts associated with each construction compound. The assessment will identify through modelling and calculation, predicted construction noise levels, identification of potential exceedance of Construction Noise Thresholds (CNTs), identification of required noise mitigation measures specific to each work area to minimise noise and vibration impacts so far as is reasonably practicable. The contractor will provide community relations by the following: - Notify the public and vibration sensitive premises before the commencement of any works forecast to generate appreciable levels of noise or vibration, explaining the nature and duration of the works; - The Contractor will distribute information circulars informing people of the progress of works and any likely periods of significant noise and vibration; and - A designated noise liaison officer will be appointed to site during construction works. All noise complaints will be logged and followed up in a prompt fashion by the liaison officer.
5	Monitoring	2	A particular concern raised by Hampstead Residents CLG is the baseline monitoring of noise and vibration in relation to Hampstead Avenue. They have queried the accuracy of the data presented as they state that the data is collected by sensors which are not on Hampstead Avenue but are further away and may not reflect the actual noise levels that Hampstead Avenue receives. This matter needs to be addressed to ensure accurate reporting in the future	TII note that noise & vibration is of concern to the residents of Hampstead Residents CLG. This has been assessed in the EIAR and it is noted in Ch13, there was a baseline monitoring point (AT64) which is on the corner of Hampstead Ave providing reliable data for this location. Furthermore, the Contractor undertaking the construction of the works will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a). Additionally, a Construction Noise and Vibration Management Plan (CNVMP) which will be formulated for the construction phase and used by all contractors based on the mitigation measures outlined in Chapter 13 (Airborne Noise & Vibration), Chapter 14 (Groundborne Noise & Vibration) and the outline CEMP (Appendix A5.1). As part of the CNVMP 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.
6	Monitoring	2	Not addressed in the EIAR, is how rodent populations in Albert College Park will be managed in relation to construction works. Over the last number of years, Dublin City Council have requested the HSE pest control team to install and manage numerous pest 'baiting points' in Albert College Park. The MetroLink construction works in Albert College Park will likely disturb rodents and cause them to migrate to other locations. This is a concern especially for residents living on Hampstead Avenue and close to Albert College Park and TII must address the issue and explain how they will monitor any movement or disturbance of rodents.	TII will implement rodent control procedures on the sites. As outlined in the CEMP (Appendix 5.1 of the EIAR) prior to start of construction, any disease protocols and biosecurity measures will be identified and the contractor will be required to comply with these to: (1) protect and prevent the spread of pests and diseases (Table 6.12) and to (2) direct arrangements for regular disposal of food and material attractive to pests (Section 5.4)

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7	Monitoring	2	There should be a similar responsibility on TII to monitor and detail how run-off water, or disturbed underground water will be managed in Albert College Park, and also to detail how toxic fumes will be managed. This of key importance for those living on Hampstead Avenue as it is within 20 metres of the proposed Intervention Shaft	During the Construction Phase, temporary pumping of groundwater will be undertaken to permit construction of underground scheme elements such as the intervention shaft. The discharge of any groundwater to surface water receptors will be subject to consent and controlled to ensure no adverse impact on flood risk. The elevation of the proposed overground infrastructure across the scheme and nature of surface strata as impermeable clay, means the above ground emergence of groundwater is unlikely. There are also no reports of groundwater flooding across the Proposed Scheme (Section 5.7 Appendix A18.5). The risk of groundwater flooding to the scheme is therefore considered to be low and was not considered further in the assessment. During Construction, the contractor will be required to operate in compliance with the CEMP (Appendix 5.1 of the EIAR) and will be required to produce a Water Management Plan which will detail the following: - The activities requiring water and the anticipated peak water demand for each site; - Where the water for each site will be sourced; - Strategies for minimising water use; - Strategies for conserving water; - Treatment of wastewater; and - Means of disposal of wastewater. As per Section 18.6.1.1 of Ch18 of the EIAR, Construction staff will be suitably trained to respond to accidental discharge/leaks and appropriate spill management kits will be in place to allow rapid response on site. An Emergency Incident Response Plan will be in place detailing the procedures to be undertaken in the event of spillage of chemical, fuel or other hazardous substances or wastes, logging of non-compliance incidents and any such risks that could lead to a pollution incident at any point along the proposed alignment. During Construction there is not anticipated to be a particular issue with toxic fumes being emitted from the site, all exhausts will be screened / scrubbed as necessary and TII will ensure that air quality surrounding the site is monitored. In Operation, the materials used in rolling stock and other systems will be designed to comply with strict regulation to avoid emissions of irritating or toxic products. Assessments of the impacts surrounding ventilation shafts have concluded overall Neutral and Not Significant.
8	Rationale for Selection of Station Locations	2	The proposed location of the Collins' Ave station and the associated Intervention Shaft in Albert College Park has caused concern among some residents in the Dublin North-West Constituency. In the original Metro North project, there were plans for a Metro station to be placed in Albert College Park. In the current MetroLink Railway Order, the closest station to Albert College Park is the Collins Avenue station, necessitating an Intervention Shaft located in the southwest comer of the park. Some residents have been querying why the original location of the Metro station in Albert College Park was abandoned. What was the rationale for selecting Collins Avenue as the location for the Metro Station?	As outlined in section 7.7.10.7 of Chapter 7 of the EIAR, the assessment undertaken for the Emerging Preferred Route (EPR) identified a preferred route option including the proposed station location in front of Our Lady of Victories Church. This location for the station provides a number of advantages when compared to other location options: (1) It allows the project to achieve a core project objective of providing public transport that is integrated in the existing and future proposed transport network, providing for interchange between bus routes both on Collins Avenue and on Glasnevin Road. A station location further south at the northern section of Albert College Park would not provide a good level of interchange as there would be over 500m separating potential bus stop locations on Collins Ave and the MetroLink station. (2) The proposed Collins Avenue Station will have a significant catchment area, noting the analysis undertaken at the Emerging Preferred Route (EPR) stage identified this route option had the highest potential passenger numbers when compared with other route options. (3) During the construction phase, the location of a station within the frontage to Our Lady of Victories means that traffic disruption to Dublin would be reduced when compared to the location of a station within the road corridor (partially or fully). The predicted temporary environmental impacts during construction on the surrounding area can be mitigated effectively as detailed in the relevant chapters of the EIAR. Once the station is operational, the location of a MetroLink station here will provide significant positive benefits to the local community in terms of enhanced public transport provision, reduced traffic and the resultant improvements in the environment as a result of reduced noise and air quality pollution.

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9	Rationale for Selection of Station Locations	2	-There is local concern that placement of the Metro Station on Collins Avenue, beside Our Ladies of Victory Church, is likely to pose a number of challenges. There are two primary schools located opposite the proposed location of the Collins Avenue Station: Our Lady of Victories Girls School and Our Lady of Victories Boys School. It is feared that the location of the station could pose safety concerns for children accessing the schools as well as difficulty for parents dropping their children off at school as parking spaces will be reduced due to construction works.	Providing MetroLink in a safe manner is critical to the success of the Project. TII will focus on both construction worker safety but also critically on vulnerable road users and the communities within which we will work including the staff and pupils of Our Lady of Victories Girls and Boys Schools and churchgoers. Prior to the enabling works and the main construction phase a Traffic Management Plan will be developed by the contractor (Refer to Appendix A9.5 of the EIAR). The contractor will be legally required to adhere to the requirements of the plan on a day by day basis and so any such measures will be implemented with a focus on managing traffic movements to ensure that there are no accidents. It should also be noted that as outlined in Table 9.64 in Chapter 9 of the EIAR, enabling works in this area will be undertaken such that 1 lane of general traffic and 1 bus lane in each direction will remain open. Dedicated cycle lanes will also be provided during the construction phase. Furthermore, as outlined in EIAR Appendix A9.5 section 2.5.2.2, construction vehicles will be controlled in terms of the hours of operation (i.e. construction traffic will be prohibited during periods of very heavy traffic and during school drop off and pick up periods). Also outlined in EIAR Appendix A9.5 Section 7.4.6.3.6, during both the Advanced Enabling Works and Main Works, the signalised pedestrian/toucan crossing outside of the front of the school will be retained during all works and will continue to allow safe access for pedestrians and vulnerable users. Additionally, there will be controls at the entrance and exits of sites for construction vehicles in order to ensure the safety of other road users.

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10	Rationale for Selection of Station Locations	3	There is a high proportion of older residents in the constituency, most notably in the two senior citizen complexes in the Albert College estate. This accommodation is located right beside the proposed Collins Avenue Metro Station and these residents are concerned about noise and vibrations from the construction work and loss of parking spaces. The issues affecting these residents must be addressed and their concerns addressed.	TII note that noise & vibration are of concern to the residents of Albert College Estate and in particular the senior citizens complexes therein. This has been assessed in the EIAR and it is noted in Ch13. The assessment showed that impacts, with the proposed mitigation measures outlined in Section 13.6 of Ch13 of the EIAR, the noise levels will be below the Construction Noise Threshold and/or below the upper construction limit of 75dB LAeq,T. The main principals and standards required for noise mitigation are outlined as follows: - The Contractor undertaking the construction of the works will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228–1 (BSI 2014a); - The selection of plant items will be required to comply with the European Communities Noise Emissions by Equipment for Use Outdoors (Amendment) Regulations 2006 (S.I. No 241/2006); - The outline CEMP will encompass a Noise and Vibration Management Plan (CNVMP) which will be formulated for the construction phase and used by all contractors based on the mitigation measures outlined in Chapter 13 (Airborne Noise & Vibration), Chapter 14 (Groundborne Noise & Vibration) and the outline CEMP (Appendix A5.1). The CNVMP will be a live document. This will involve a detailed investigation of potential noise and vibration impacts associated with each construction compound. The assessment will identify through modelling and calculation, predicted construction noise levels, identification of potential exceedance of CNTs, identification of required noise mitigation measures specific to each work area to minimise noise and vibration impacts so far as is reasonably practicable; and - As part of the CNVMP a baseline noise study will be undertaken prior to the commencement of construction works to characterise the prevailing noise environment at impacted NSLs. This information will be used to inform the relevant CNTs. The key principles relating to noise mitigation will be applied across all construction areas for the proposed Project: - Noise control at Source: Selection of quiet plant, site layout, attenuation at source, operational control (hours and periods); - Noise Control along Pathway: Localised screening to plant items on site, enclosures, site buildings, site hoarding and noise barriers. The measures discussed above will effectively reduce noise levels from construction to below the CNT. As outlined in EIAR Chapter 10 (Human Health) Table 10.14, following mitigation, construction may cause annoyance to users but no residual health effects are predicted. It should also be noted that the contractor will: - Notify the public and vibration sensitive premises before the commencement of any works forecast to generate appreciable levels of noise or vibration, explaining the nature and duration of the works; - Distribute information circulars informing people of the progress of works and any likely periods of significant noise and vibration; and - Employ a designated noise liaison officer who will be appointed to site during construction works. All noise complaints will be logged and followed up in a prompt fashion by the liaison officer. With regard to the loss of parking it should be noted that the parking at this location is not residential permit parking and removal of the parking will not directly impact on residential parking in this area. The closure of these spaces will be monitored throughout the construction phase to identify if spaces can be reinstated temporarily throughout the works.

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11	Rationale for Selection of Station Locations	3	There have been suggestions from residents to move the Collins Avenue Station to Albert College Park, as originally planned in the Metro North project. Given the requirement for an intervention shaft in Albert College Park, it is argued that it would be less disruptive overall to locate a station there rather than at the proposed Collins' Avenue location. TII should provide their reasoning for locating the station at Collins Avenue and if this is to go ahead, they must work closely with residents to address their concerns and minimise the negative impacts.	Please see above response to Query no. 8
12	Albert College Park Intervention Shaft	3	In the event that the Collins' Avenue station remains as part of the scheme, we are told that the Intervention Shaft is a necessary part of the project. Its function is to allow emergency services to access the underground system in an emergency situation and to provide a safe route for passengers to escape from the tunnel in the event of an emergency. However, regarding the current plans for the intervention shaft in Albert College Park, it appears that the scale of the structure need not be as large as required. The shaft footprint includes an emergency service parking area, but this could be accommodated outside of the park on the Ballymun Road.	A maintenance access road from the R108 Ballymun Road and associated hardstanding area are provided at the intervention shaft in Albert College Park. An additional emergency exit to the R018 Ballymun Road is also provided to allow for a one-way system as requested by DFB. TII will continue to work with DFB to minimise footprints where possible but currently it is not possible to agree to road side parking. The structure itself is sized to suit operational requirements.
13	Albert College Park Intervention Shaft	3	Furthermore, the sections of the park that are being temporarily acquired under the Railway Order for the relining of the football pitches should only be for the duration of the relining works and not for period of the construction of the Intervention Shaft nor for the placement of spoil. It is imperative that both the community and local sports groups not lose access to these sports pitches for any longer than absolutely necessary.	TII will minimise disruption so far as is reasonably practical and will optimise the occupation timescales during the detailed design phase with the contractor. However, TII acknowledges the impact of the proposed Projects construction phase on the sports pitches at Albert College Park. As noted in Ch11, Table 11.64 Land take required for the Albert College Intervention shaft will result in the loss of both of the existing 5 a-side pitches and a small portion of one of the full-sized pitches which is noted as a negative, significant, short-term effect. However, to maintain the existing facilities, it is proposed to rotate the existing full-sized pitches 90 degrees and locate them side-by-side to the east of the park, resulting in slightly reduced dimensions. Sufficient area will be available to increase the dimensions of both 5 a-side pitches. Sufficient area will also be available for circulation around the pitches while they are occupied. The impacts will be reduced to negative, slight, short-term.