Organisation Name or Name of	Vincent Harris and others 2 (represented by Marston Planning Consultancy) [Stephen Smith / Alex Smith / Robin Smith / Lauren Smith, Sheila Boyd / Francis
	Mackey / Jacqueline McElhinney]

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Re: Railway	(Metrolink- Est	tuary to Ch	narlemont via Dublin Airport) Order 2022, ABP Ref. NA29N.314724	
1	Letter	1	This submission should be read as an addendum to our original submission from November 2022 and addresses the noise impact of the construction and operational phases of the proposed development on the Coke Oven Cottages. Our clients concerns relating to all other issues raised in the original submission remain, and this submission should not be considered, in any way, as forming a submission that replaces in any way our original submission.	Thank you for your submission and for sharing your observations with regards to the MetroLink project to which we have responded below. TII acknowledges that this is a standalone submission, and have responded to your original submission (submission no.310) separately.
2	Letter	1	Our clients requested that we review in greater detail the impact of the works to the Maynooth to Connolly station line to the rear of their properties, and how this would impact upon their properties at nos. 1 to 4 Coke Oven Cottages, both during construction and in the operation of this railway both in the short and long term. It was notable that very little detail was provided in terms of the nature and extent of the exact works, with one section provided just to the west of the new station, where retaining works were required adjacent to the Glasnevin cemetery.	With regard to the scope of railway works behind Coke Oven Cottages please refer to drawing ML1-JAI-ARD-ROUT_XX-DR-Y-03081 Royal Canal Way Sheet 4 of 4 included in the Railway Order Plans\Drawings, Alignment Details, Book 2 of 2, DCC; and drawing ML1-JAI-SRD-MS11_XX-DR-Y-01005 Glasnevin Heavy Rail MGWR Long Section in the Structures Details Book 3 of 3, DCC; and drawing ML1-JAI-SRD-MS11_XX-DR-Y-01005 Glasnevin Heavy Rail MGWR Long Section in the Structures Details Book 3 of 3, DCC; and drawing ML1-JAI-SRD-MS11_XX-DR-Y-01005 Glasnevin Heavy Rail MGWR Long Section in the Structures Details Book 3 of 3, DCC; and drawing show the extent of the rail realignment and associated embankment and retaining wall works in proximity to Coke Oven Cottages. These works are wholly contained within the existing railway corridor and will be undertaken from the track level as noted in EIAR Appendix 5.5 – Glasnevin Station Construction Report, section 7. The works will include the start of the lowering and full realignment at the proposed Glasnevin station location. Whilst there will be no direct impact on the cottages, there will be construction noise associated with the works, which will be undertaken on a 24 hour basis in order to limit closure of the railway, to low for more productive work and to shorten the duration of construction impacts. The lowering of the existing track will commence just to the west of the cottages and progress eastwards. The depth of the track will be confirmed at detailed design phase however the lowering adjacent to Coke Oven Cottages will be less than 1m. As presented in EIAR Appendix 13.7 Construction Phase Modelling, the noise level generated by the Track Alignment and Track Lowering Would be above the nighttime threshold of 55 dB, if no mitigation is applied, resulting in an Significant to Very Significant impact during Night-time (23.00 – 07:00). The threshold will be mandated to the contractors and enshrined in the Railway Order. Contractors will then need to provide best practice mitigation t

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			Response (2) continued.	Temporary relocation relates to buildings where isolated floors or façades are impacted by the works and will benefit from temporary relocation of any noise sensitive activities for the duration of the phase of works. Where this option is recommended, a consultation process will be established between TII, the contractor and the building occupants/owners. Following the completion of the detailed design stage and the finalization of the proposed construction methodology and at least 6 months prior to commencement of construction works, TII in collaboration with the scheme contractor will update the EIAR airborne noise modelling predictions to reflect the planned construction methodology and timing of the works. Where the updated predicted airborne noise levels still exceed the trigger values, the owner/occupier of properties in close proximity to the works will be contacted and advised that they are eligible to enter into discussions with TII in respect to further mitigation measures to be put in place. No noise impact during operation of Metrolink is predicted on the Coke Oven Cottages due to their location at more than 300 m distance from Glasnevin Station and tunnel. The impact of train traffic from the Irish Rail network - Midland Great Western Railway (MGWR) is not assessed as part of the MetroLink works.
3	Letter	1	We noted in our original submission that the interlinked works with the existing main line will require the western commuter line (that backs onto the Coke Oven Cottages) to be closed for a period of 21 months. Section 5.10.6 of the EIAR indicates that the train track will be lowered by c. 2m although the alignment drawings provide no detail as to where and along which stretch of the railway this reduction will occur. A drawing is noted as indicating as proposed earthworks to the rear of the Coke Oven Cottages. No detail is provided as to the nature and extent of these earthworks.	Please refer to Response (2) in relation to the works to the Irish Rail tracks running past the cottages which will be undertaken as part of a full line closure of 21months as noted in EIAR Appendix 5.5 – Glasnevin Station Construction Report, section 1. The reference to the 2m lowering relates to the rail tracks at Glasnevin Station. The track will be laid on a gradient to tie in to the existing tracks just north-west of Coke Oven Cottages as shown on the drawings noted in Response (2) above.
4	Letter	1	We note that the EIAR states that the construction working hours differ at this location due to the interface with existing larnrod Eireann infrastructure and live railway line and will require working to be carried out on a 24 hour a day, seven days a week basis for some activities.	TII confirm that some 24 hour working will be required at this location to minimise the duration of the closure of the railway. Response (2) above describes the work and the proposed mitigation.
5	Letter	2	We respectfully submit that such working hours are completely unacceptable on this stretch of railway to our clients and the need to uphold their residential amenities during the construction process. Whilst the EIAR states that the planning of such works will take consideration of sensitive receptors, in particular any nearby residential areas, there is a lack of clarity provided as to how such intrusive works would be managed to mitigate negative noise impacts in relation to Coke Oven Cottages. This is deeply concerning to our clients.	Please refer to Response (2) in relation in relation to the 24 hour working required at this location and to the proposed mitigation measures for noise impacts during the construction works including EIAR references.
6	Letter	2	The impact of the construction phase of the lowering of the track in terms of the construction phase on Coke Oven Cottages were identified as set out below within Appendix A13.7 of the EIAR. This sets out that the Predicted Construction Noise Level at the Coke Oven Cottages will be 69dB. This Appendix identifies the Construction Noise Threshold at the Coke Oven Cottages as being 65dB between 7am and 11 pm all days of the week, and only decreases to 55dB between 11pm and 7am.	The construction airborne noise Level at the Coke Oven Cottages of 69 dB is the noise level before any mitigation measures are applied, resulting a Moderate to Significant impact during day time and a Significant to Very Significant impact during night time. Please refer to Response (2) in relation to how these impacts will be mitigated.

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7	Letter	2	PDF). it is notable that this survey was not undertaken at the facade of the nearest noise sensitive receptor and therefore is misleading in terms of the existing noise environment of the Coke Oven Cottages that are located in a quiet environment. The only background noise of note is perpetuated by the trains that generally pass in each direction every 30 minutes or so currently apart from at peak commuting times when there are trains every 10-15 minutes for a period of an hour. Current noise levels are therefore considered to be significantly lower than indicated within the EIAR. This is reflected in Table 19 of Appendix 13.1 that sets out in more detail the results of the noise survey, which was undertaken between the 16th May and 22nd May 2019. The correctness and robustness of these survey results must be questioned given the fact that they were undertaken over three and a half years ago. It is notable that background noise levels during the day were generally measured in the range of 40-42dB LA9o,i6hr. It is notable that background noise levels at night were very low at between 37 and 39dB LAso.sht that were reflective of some of the lowest background noise levels surveyed along the project. The predicted noise level impacts of the construction phase are indicated as follows within	Locations, sheet 5 of 7. A photograph of the noise measurement position at Coke Oven Cottages is also presented in Appendix A13.2 Baseline Noise Monitoring Report Appendices. A review of the location and photographs indicates that this measurement position is representative of the location of Coke Oven Cottages. The measurement results presented in Table 13.30 of Chapter 13 (Airborne Noise and Vibration) of the EIAR, and also Table 19 of Appendix 13.1 Baseline Noise Monitoring Report are measurements undertaken in the free-field, that is away from reflecting surfaces, such as a building facade. Measurements undertaken at 1m from the facade of a building would be expected to be +3dB higher. The background noise levels are as presented in the EIAR. The ambient noise environment is influenced by passing trains as noted by the observer. The variation in ambient (LAeq) and background (LA90) noise parameters of this
8	Letter	2		According to EIAR Appendix 13.7 Construction Phase Modelling, the assessed impact is Significant to Very Significant. The Very Significant to Profound magnitude from the EIAR Chapter 13, Table 13.63 relates to the 5dB range quoted in the table of up to 70 dB. The specific impact of relevance to the property, and subsequent applicability of mitigation measures, is based on the specific assessment quoted in Appendix 13.7, which is marginally lower than 70dB. As presented in EIAR Appendix 13.7, the noise value for Track Possession Works is between 67 to 69 dB while the threshold value for night noise is 55dB, resulting 12-14 dB above the CNT (Construction Noise Threshold). As presented in the EIAR Table 13.13 of Chapter 13, the unmitigated impact effect is: Significant to Very Significant if the CNL (Construction Noise Level) is above CNT +5 and below or equal to CNT +15dB; Very Significant to Profound if the CNL is above CNT +15dB. Measures to mitigate airborne noise are outlined in Section 13.6 of the EIAR, and include measures such as noise control at source, site layout and selection of quiet plant. With consideration of the proposed noise mitigation measures residual impacts during the Glasnevin track possession works have been set out in Table 13.88, where it is indicated that Coke Oven Cottages would be eligible for the application of the TII Airborne and Groundborne noise mitigation policy, which is given in Appendix 14.6 Airborne Noise & Groundborne Noise Mitigation Policy. of the EIAR. Please also refer to Response (2) in relation to the proposed mitigation measures.

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9	Letter	2	Appendix A14.6 sets out noise mitigation measures and policy being proposed, that may include additional measures such as noise insulation, temporary rehousing, or soft interventions. We respectfully submit that it is deeply disappointing that for the clarity of our clients, the mitigation measures that will apply to the residents of Coke Oven cottages will only be known 6 months prior to commencement of construction works as set out under section 3.1 of Appendix 1 4.6. This would seem unreasonable that our clients can therefore not comment upon them under this submission.	As presented in EIAR Appendix A14.6, the airborne noise modelling in the EIAR is based on a reasonable worst-case scenario. Accordingly, there is scope to reduce the impact of airborne noise further at the detailed design stage and during the finalisation of the construction methodology for the works. As a result, at this stage, the specific mitigation measures in the case of Coke Oven cottages are not set up and cannot be commented on. Please refer to response item (2) in relation to the proposed mitigation measures. Following the completion of the detailed design stage and the finalisation of the proposed construction methodology and at least 6 months prior to commencement of construction works, TII in collaboration with the scheme contractor will update the EIAR airborne noise modelling predictions to reflect the planned construction methodology and timing of the works. Where the updated predicted airborne noise levels still exceed the trigger values, the owner/occupier of properties in close proximity to the works will be contacted and advised that they are eligible to enter into discussions with TII in respect to further mitigation measures to be put in place.
10	Letter	2	We respectfully submit that given the very significant to profound construction impacts the highest degree of mitigation would be required for the residents of Coke Oven Cottages. It is clear that the proposed night time work will far exceed the 10dB change that is indicated as justification for rehousing and other mitigation measures. The noise impact will be an increase of c. 28-31 dB in background noise levels at night. Such levels of noise generated by the proposed works necessitate the strongest possible construction mitigation measures as it will make living in the cottages, even for a short period of time, during construction, untenable.	Please refer to Response (2), (8), and (9) in relation to the anticipated noise levels, and the proposed mitigation measures.
11	Letter	2	In addition it is clear that due to the very nature of the night works they would also require floodlighting that will result in light pollution of the Coke Oven cottages. This is again completely unacceptable. We would request that, if night time works are required, due to the operational nature of the railway line, then it is inherently required that the strongest mitigation measures are employed. The use of acoustic screens during construction will not adequately address our clients concerns.	As presented in EIAR Appendix 5.18 Temporary Lighting Approach, light pollution can be a particular problem on construction sites, where new or temporary lighting may be installed and large areas flood-lit, causing over-illumination and nuisance. Guidelines for construction lighting include the Society for Light and Lighting's Code for Lighting (published by the Chartered Institution of Building Services Engineers-UK) and the Health and Safety Executive's Lighting at Work (UK) (HSG38). These suggest that construction light nuisance can be reduced by screening, effective programming of work, directional lighting and using the correct type of lights. The lighting provided to light up each site will be designed by the contractor or their representative to suit the construction methodology and equipment used at that site/location. It would provide a safe working environment within the construction site, without blinding or obstructing traffic, pedestrian, cyclists nor impact environmentally sensitive areas or residences around the site. The lighting towers and equipment would be designed and positioned to illuminate within the working area only and with minimum impact on surrounding receptors. The contractor will design the lighting to meet the environmental requirements. The CEMP developed by the Contractor will include a Lightying Management Plan (ref EIAR Appendix A5.1 CEMP, section 5.7).
12	Letter	2	Our clients are also concerned in relation to the vibration impacts of the construction phase as a result of the construction works immediately adjacent to their property boundaries. Our clients are concerned in relation to the impact of this on the structural integrity of their properties and would request that irrespective of all other matters raised in this submission that a full structural survey, by a mutually agreed third party, of each of their properties is undertaken prior to the undertaking of works adjacent to their properties.	As presented in EIAR Chapter 14 (Groundborne Noise and Vibration), the sources of vibration from the MetroLink Project are Tunnel Boring Machine - TBM Passage, Mechanical Excavation and Blasting. Due to the distance of the Coke Oven Cottages from the Glasnevin Station, no impact is predicted from the TBM Passage vibrations. Regarding vibrations from Mechanical Excavation from the Track Possession Works, as presented in the EIAR Chapter 14, the calculated vibration levels are below the threshold for structural damage for any building type. Structural surveys are therefore not required.

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13	Letter	2	We request the Board, to attach suitable conditions, irrespective of other issues raise in this submission, to address our clients reasonable concerns in relation to noise and vibration impacts as a result of both the construction and operational phases of the proposed development.	Please refer to the response items above in relation to the anticipated noise and vibration levels anticipated, and the mitigation measures proposed.
14	Letter	2	It is incumbent that the highest possible noise attenuation standards are applied at each of our clients' properties to ensure that they are not disenfranchised in terms of their residential amenity during the construction process.	As presented in EIAR Chapter 13 (Airborne Noise and Vibration), the main principals and standards required for noise mitigation are 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 85 5228–1 (BSI 2014a); • The selection of plant items will be required to comply and 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 this chapter, in 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 wibration 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 CNVMPP 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 principals 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 at Roeeiver: Noise Insulation (NI) and Temporary Rehousing (TRH). The impact assessment has identified that mitigation measures are required across the proposed Project to control construction noise impacts. Please refer to respons

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15	Letter	2	Operational phase - it is notable that no assessment of the implications of the change in the operational phase from a cumulative impact perspective was undertaken in relation to the Coke Oven Cottages. The new station will generate and has the potential to increase train traffic and certainly train speeds incurring different noise levels to the rear of Coke Oven Cottages as they brake to stop and accelerate away from the new station.	The cumulative impact of MetroLink with other projects during construction and operation has been assessed and presented in EIAR Chapter 30 (Cumulative impacts of interaction between other projects and MetroLink). The Metrolink project does not result in any additional train movements along the surface railway. All rail movements associated with the MetroLink project are within the tunnel below ground level. The cumulative impacts identified between MetroLink and NTA/larnród Éireann - DART+ Programme during the operational phase are positive and significant on traffic and transport due to the provision of high capacity and high frequency public transport services, encouraging a modal shift from private vehicles to public transport. There will be no cumulative negative noise impact on the Coke Oven Cottages as no noise impact during operation of Metrolink is predicted on the Coke Oven Cottages due to their location at more than 300m distance from Glasnevin Station and tunnel, ref EIAR Chapter 13, section 13.5.3.7. The impact of train traffic from the Irish Rail network - Midland Great Western Railway (MGWR) is not assessed as part of the MetroLink works. See also Response (2).
16	Letter	3	The change in noise levels will have a long term and negative noise impact on the residents of the Coke Oven Cottages and has failed to be adequately considered or mitigated for by the applicant. As outlined above the level of train services will likely increase as a result of the new Glasnevin station, and would result in noise levels being more noticeable to residents.	Please refer to Response (2) and (15) in relation to the anticipated noise levels during the operational phase.
17	Letter	3	There is a need to erect suitable acoustic screens above the existing boundary wall, to mitigate noise during the operational phase of the proposed development, along the length of the boundary with the Coke Oven Cottages.	Please refer to Response (2) and (15) in relation to the anticipated noise levels during the operational phase. As noted, the proposed Project will not create additional operational noise at the cottages.
18	Letter	4	Reduction in property values - We respectfully submit that the land subject to the application, and our clients lands that are negatively impacted should be considered in terms of any potential mitigation, or any future potential CPO procedure as being zoned for residential purposes.	There is no evidence indicating that property values will be negatively impacted as a consequence of the MetroLink proposed works.
19	Letter	4	For all the reasons as outlined above, the material reduction in our client's residential and visual amenity and the profound negative impact of the proposal on their properties, we respectfully submit that the subject proposal would have a material and significant reduction in the value of property adjoining and close to the application site both in the short and medium term during construction but in the long term also.	As presented in the EIAR Chapter 27, Landscape & Visual, no visual impact on the Coke Oven Cottages will occur during MetroLink construction or operation. Regarding property value reduction. see Response (18).

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20	Letter	4	During the construction phase our clients concerns, is that any permitted development unless the proposed development is managed in a controlled and reasonable manner will have a profoundly negative impact on their residential amenity. This is compounded by the fact that a number of residents are over 70, and that one of the daughters of the residents, who is 16, and is on the autistic spectrum disorder and therefore is more susceptible to noise impacts.	TII intend to control the works and mitigate impacts such that residual impacts are acceptable. As presented above in Response (2) and (14), mitigation measures will be in place to ensure that the residents of Coke Oven Cottages will not be subject to any profound impact. Regarding residents susceptible to noise impacts, as presented in the EIAR Chapter 10, Human Health, Section 10.3.4 Sensitive Receptors, some human beings are more sensitive than others, due to their age, health status or other reasons and in order to be conservative, and in keeping with the worst-case approach it has been assumed that there are vulnerable individuals at every receptor. In addition, the assessment is aided because Health Based Standards are derived to protect the vulnerable and not the robust. For reasons of consistency, sensitive or vulnerable receptors are looked at in terms of their importance and sensitivity. In terms of Human Health, all human beings are considered to be equally important. (The use of the term 'importance' in this context refers to areas or buildings occupied by people). The importance of the receptor building/area is considered to increase as the number of people increases and the duration of time spent there increases. Residential areas, public and rivate health facilities, workplaces, hotels and educational facilities are considered to be 'very important' areas because a number of persons usually spend a substantial amount of time at these locations. The sensitivity of an area or building in this context refers to the vulnerability of the population. Reasons for this include inherent vulnerability such as is the case for the very young or old. Residences, schools, workplaces, commercial areas and places of worship are considered 'highly sensitive'. This is because these areas will include populations of elderly, young people and people with health conditions. In conclusion the health impact assessment was done considering the most sensitive receptors and not the most healthy and fit adults. Ill ha
21	Letter	4	The current proposal does not achieve any of these aims and there is a need to significantly control construction times and noise levels, with suitable noise monitoring, with absolutely no night time works. We believe this is a reasonable and considered approach to managing the construction phase of the development.	Please refer to Response (2) and (9) in relation to the anticipated noise levels and working hours during the construction.
22	Letter	4	respectfully request that suitable acoustic screening is provided to mitigate the operation phase of the main line trains accelerating and breaking out of and into the new proposed station. Without such screening it will have a profound negative effect on the residential	Please refer to Response (2) and (15) in relation to the anticipated noise levels during the operational phase. As also noted in Response (2), works to the rail tracks in this area are wholly contained within the existing railway corridor and will be undertaken from the track, so existing trees/vegetation outwith the railway cutting will not be impacted.
23	Letter		It is incumbent on the MetroLink project and An Bord Pleanala to review precise noise and vibration mitigation for Coke Oven Cottages prior to making a decision on the Metrolink proposals.	Please refer to Response (2), (8), (9) and (15) in relation to the anticipated noise levels, and the proposed mitigation measures. Please refer to Response (12) in relation to anticpated vibration levels.