

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
1	Letter	1	Fingal County Council acknowledges the significant contribution that MetroLink will make towards increased transportation network capacity and allow more services to operate across the region, facilitating Fingal's vision for compact growth, sustainable mobility, serving key destinations, and facilitating opportunities along the route for high-density residential, commercial and other development, including mixed-use and employment generating activities.	TII wish to thank you for your submission and statement of support for the delivery of MetroLink.
2	6. Protected Structures, Architectural Conservation Areas etc.	17	The last RPS entry in the above table of RPS No. 953 Santry Lodge, Old Ballymun Road, Santry, Dublin 9 is a new addition to the Record of Protected Structures that was adopted on the 13 February 2023 after a review of the Record went on public display from 11 November to 23 December 2022 proposing new additions and amendments. It is the Protected Structure that will be most affected by the proposal. It was highlighted in consultations on the proposed route of the MetroLink that Santry Lodge as a former 18th century Royal Charter School was a significant historic structure and that it had been a listed building in the past within Dublin County Development Plans prior to the creation of the current three local authorities within County Dublin. It was indicated by the Council that the buiding and its setting should be avoided. In the recent review of the Record of Protected Structures research demonstrated that the building is of Special Cultural, Historical and Architectural Interest that make it of National Significance.	<p>At the time of the Railway Order application, Santry Lodge, its gate lodge and gateway were not designated as a Protected Structure and not included in the NIAH, nor are the grounds of Santry Lodge included in the NIAH garden survey. It is acknowledged that the Board must have regard to the status of this sensitive receptor as at the date of its decision on the Railway Order application.</p> <p>Notwithstanding the lack of statutory protection at the time of the Railway Order application, the EIAR has treated Santry Lodge as a significant structure and has been assessed as level 2 as if it were included in the NIAH at Regional Status (section 26.4.3.2.3 of Chapter 26 (Architectural Heritage). This indicates a medium sensitivity rating. Given that Santry Lodge is now given 'National' status in the NIAH, Santry Lodge would move to Level 1 in the assessment, which indicates a 'High' sensitivty rating. Therefore, on this basis, the significance of the impact would increase from 'Significant' (as stated in Table 26.39 of the EIAR Chapter 26) to 'Profound'. As a result, the mitigation would increase to record to English Heritage Level 3, as opposed to Level 2.</p> <p>All potential significant impacts on Santry Lodge have been identified, described and assessed in Chapter 26 of the EIAR with proposed mitigation measures described in Section 26.7.1, Table 26.66. It is also important to note that the proposed design has been developed to avoid any direct impacts on Santry Lodge itself and while it is acknowledged that the alignment traverses the curtilage of this structure, it is unavoidable in the context of crossing the M50 Motorway at this location. The additional information provided after the submission of the Railway Order will be analysed in advance of the Oral Hearing.</p>
3	6. Protected Structures, Architectural Conservation Areas etc.	17	The proposed route of the MetroLink does avoid the historic building of the Former Charter School but will alter and impact the overall site of Santry Lodge. A large section of the grounds between the building now known as Santry Lodge and the Old Ballymun Road is to be developed for both the metro track and a new access road, the gate lodge is to be demolished, with the gates and gate piers to be moved.	Please refer to Response (2) above in relation to the assessment of impacts on Santry Lodge.
4	6. Protected Structures, Architectural Conservation Areas etc.	17	Attenuation tanks, a pumping station and a relocated telecommunications mast are being inserted within the area between the new access road and the metro track. Tunnel walls are being built on either side of the track line as it descends below ground.	Please refer to Response (2) above in relation to the assessment of Santry Lodge. The telecommunications mast is to be relocated into an area close to the existing location and the other noted works are esential infrastructure associated with the MetroLink development.
5	6. Protected Structures, Architectural Conservation Areas etc.	17	There is a considerable loss of trees and planting within the area.	<p>Please refer to Response (2) above in relation to the assessment of Santry Lodge.</p> <p>An Arboricultural Impact Assessment (AIA) is presented in EIAR Appendix A27.3, which assesses the loss of trees and green spaces at each station, including Northwood Station and Portal. The AIA identifies approximately 33 trees that will be lost at this property. As noted, in Chapter 27 The Landscape (Section 27.6.2) the requirement to fell trees is mitigated through the landscape design development for the proposed Project. Section 10 of this report identifies the loss of trees in this area . Additional mitigation measures include the retention of good quality trees where possible, the further development of landscape plans to enhance tree and hedgerow planing to offset the effects of net loss. However, Table 27.13 of the chapter identifies a a residaul effect of short term significant negative on the landscape and Table 27.14 of the EIAR idenitifies a moderate negative short term impact during the construction phase on the visual amenity due to the effects of the proposals. In the longer term as the planted vegetation re-establishes the impacts on the landscape (moderate impact) and visual (slight negative) will reduce as reflected in Table 27.15 and 27.16 for the operational phase.</p>

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
6	6. Protected Structures, Architectural Conservation Areas etc.	17	All of these works are within the area identified as the curtilage of the newly adopted Protected Structure. The cumulative impact of all of these proposed works within the historic setting of the Former Charter School will likely alter it to its detriment. It is therefore submitted that the proposed route and its associated design be re-examined and redesigned at this location to ensure a more sensitive handling of the historic site, not just the retention of a specific building.	Please refer to Response (2) above in relation to the assessment of Santry Lodge and Response (7) regarding potential for realignment of the route. The proposed Project incorporates landscape proposals to mitigate impacts of the route through this area.
7	6. Protected Structures, Architectural Conservation Areas etc.	17	It would be preferable for the route to be amended so that it does not enter the overall site at all or that it follows/runs as close as possible to the line of the M50 Junction 4 Exit Road and R108 leading into Ballymun, in the lands to the rear of Santry Lodge.	Please refer to Response (2) above in relation to the assessment of Santry Lodge.  Option consideration for the route alignment across the M50 and the Northwood station location were first considered in the Preferred Route Design Development Report as part of the Preferred Route consultation in 2019 (see https://www.metrolink.ie/en/news/published-reports/preferred-route-design-development-2019/). The M50 crossing and associated Northwood station location is further considered in EIAR Chapter 07 (Consideration of Alternatives), with the preferred location for the station at Northwood selected to incorporate the station at a skew angle under the R108, south of the retail park. The alignment across the M50 was established to provide appropriate clearance to the M50 slip roads whilst providing an acceptable gradient to the Northwood station. Moving the alignment closer to the M50 junction, as suggested, is not possible as it would require a more elevated crossing of the M50 and the resulting increased gradient to Northwood station would then become incompatible with the metro design standards.
8	7. Architectural Conservation Areas	17	There is one ACA located close to the proposed route, namely the Swords - Church Road Historic Ecclesiastical Core ACA. This ACA was proposed and adopted by a Councillor's Motion during the recent review of the Fingal Development Plan and would not have existed during the initial assessments of the proposed route. The boundary for this ACA does not adjoin the proposed route but is to west of Swords Main Street.	As stated in Chapter 26 (Architectural Heritage), in accordance with guidance and best practice, the study area is defined as the area within 100m of the Project Boundary within undeveloped areas and within 50m in urban and parkland areas and it also includes an area 50m on either side of the tunnel. Whilst the Church Road Historic Ecclesiastical Core ACA was not identified in the initial assessments, it falls outside of the study area and therefore will not be significantly impacted by the proposed Project.
9	14. Planning authority view on conditions which should be attached in te event of the Board deciding to make a railway order.	19	The Planning Authority recommends that certain conditions be attached should An Bord Pleanála be mindful to grant permission for this development. [Appendix 2 conditions set out below in items 10 to 44].	Please refer to Responses (10) and (12) to (44) in relation to the requested conditions.
10	15. Planning authority view on community gain conditions which may be appropriate.	19	Fingal County Council recommends that community gain conditions be imposed in order to support sport, recreation, leisure and community development initiatives.  Such conditions should be in the form of direct provision of specific projects and an annual levy towards their on-going maintenance, or, alternatively, a once-off direct capital contribution towards provision of specific projects and an annual levy towards their ongoing maintenance.  A committee comprised of members of the local community, Fingal County Council and the applicant would decide on the nature and extent of the specific community gain projects to be developed.	TII will work with all established Community Groups through the local community liasion offices along the route to identify projects at local level that would involve the Community in the delivery of MetroLink and its legacy. Such projects could include: - A local school learning programme. - Enhancement of community amenity within agreed funding limits. - Engagement with final landscape and finishing options.  However, TII's position is that it is not appropriate to impose significant standalone community gain conditions, given that they will be paid out of public funds to communities that will already enjoy the significant benefits of the operational MetroLink project.
11	Conclusion	20	In conclusion, Fingal County Council welcomes the application for a Railway Order, the consultation stages to date and is confident of the significant benefits it will bring to Fingal and the wider Dublin Region. Fingal County Council acknowledge the MetroLink team's meaningful and constructive engagement with our professional and technical staff over recent months.	Please refer to Response (1). As detailed in Chapter 8 (Consultation), the MetroLink Project Team has at all times endeavoured to ensure the widest possible access for the public, stakeholders and landowners to information about the Project at all stages of its pre-planning development.

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
12	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	The following conditions are recommended in the event of a grant of permission being issued: 1. The development shall be carried out in its entirety in accordance with the plans, particulars, specifications, and information lodged with the application, save as may be required by the other conditions attached hereto. REASON: To ensure that the development shall be in accordance with the permission and that effective control be maintained.	TII agree to this condition, subject to the following.  The Outline Construction Environmental Management Plan (CEMP) (included as EIA Appendix A5.1) describes a range of construction sequences, methodologies and plant and equipment which are likely to be used in the construction of the proposed Project. It is however possible that subsequent design and build contractor(s) propose alternative sequencing and / or methodologies to the benefit of MetroLink and the wider community. The use of alternatives is not precluded so long as the overarching environmental impact of the work is not greater than that assessed and it is accepted by TII. Contractor(s) would need to demonstrate to TII that no material change occurs with any such proposal.  TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.
13	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	2. The following conditions shall be applied in respect of landscaping: (a) Prior to the commencement of construction works on site, a meeting with the Site Foremen, the appointed Arborist and the Parks Officer from the Parks & Green Infrastructure Division shall take place on site to discuss tree protection measures with details of the arrangements for the implementation, supervision and monitoring of works.	EIA Appendix A5.1 Outline CEMP identifies the minimum requirements with regards to the appropriate mitigation, monitoring, inspection and reporting mechanisms that need to be implemented throughout construction. Compliance with the CEMP does not absolve the contractor(s), and their subcontractor(s), from compliance with all legislation and byelaws relating to their construction activities.  For the duration of the contract(s), the environmental performance of the contractor(s) will be monitored through site inspections and audits by the Environmental Manager. The programme for monitoring, inspections and audits will be specified in the contract and it is likely to be a combination of internal inspections and independent external audits that may be either random or routine. The results of all environmental monitoring activities will be reviewed by the Environmental Manager on an ongoing basis to enable trends or exceedance of criteria to be identified and corrective actions to be implemented as necessary. The contractor(s) will be required to inform TII of any continuous exceedances of criteria.  Detailed monitoring plans will be prepared by the contractor(s), such as an Ecology and Landscape Management Plan, Further details on the documents to be provided by the contractor(s) are contained in Appendix A5.1 Outline CEMP.  Please also refer to Response (17) below in relation to tree protection measures during construction. TII are willing to work closely with FCC personnel to ensure tree protection measures are installed consistent with the consented Railway Order.
14	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(b) All measures outlined in the Arboricultural Method Statement by Dr Philip Blackstock, the Project Consultant Arborist shall be adhered to.	Please refer to Response (12) above in relation to the adherence of specifications in the Railway Order.
15	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(c) A tree and hedgerow bond of an appropriate amount shall be lodged with the Council prior to the commencement of development in order to ensure that the trees and hedgerows along the route of the proposed underground service are protected and maintained in good condition throughout the course of development. This bond shall be held by Fingal County Council for a period of two years post construction which may be extended in the event of a possible construction related defects.	TII has no issue with this condition being applied. TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.
16	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(d) For the tree and hedgerow bond to be released, a post construction report on the condition of the trees and hedgerows to be retained shall be undertaken by the project Arborist and all recommendations made within this report shall be carried out. On completion of this, the report and a Certificate of Effective Completion signed by the the project Arborist shall be provided to the Planning Authority.	TII has no issue with this condition being applied. TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
17	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(e) Any trees that require removal to facilitate the development shall be replaced. Full details of all proposed tree planting shall be submitted to and agreed in writing with the Planning Authority prior to commissioning of the proposed development. This shall include planting and maintenance specifications, including cross-section drawings, use of guards or other protective measures and confirmation of location, species and sizes, nursery stock type. All tree planting shall be carried out in accordance with the agreed plans. Any trees that are found to be dead, dying, severely damaged or diseased within five years of the completion of the development, shall be replaced in the next planting season by specimens of similar size and species in the first suitable planting season. REASON: In the interests of visual amenity.	<p>As noted in Response (5), EIAR Appendix A27.3 presents an Arboricultural Impact Assessment, which assesses the proposed tree loss at each station. In EIAR Chapter 27 (The Landscape), it is noted that the inclusion of measures to avoid, reduce and offset significant adverse landscape and visual effects forms an inherent part of the brief and design thinking in the Project. The proposals include for example, the provision of tree and woodland planting which effectively replaces 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. However, in most circumstances 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 enhancements of the baseline.</p> <p>Secondary measures will include specific proposals to ensure the effective retention of existing mature trees, where such is included within the proposed Project. These would normally contain specific measures relating to the protection and maintenance of tree root zones during construction (robust protective fencing, supplementary watering etc), which may need to be specific to individual trees and relate to the characteristics of the relevant tree species. However, they also generally require designed features incorporated within adjacent proposed hard landscape works area to ensure protection and continued development of tree root systems.</p> <p>Details of the proposed maintenance and management strategy for all planting will be set out, including the proposed initial period of establishment for which the contractor will be responsible. This will also include appropriate parameters for monitoring performance in terms of expected growth and/or rates of cover over the initial establishment period, details of the maintenance operations proposed over the period for each type of planting proposed and a schedule of suggested maintenance operations required in the first 5 years after handover to the maintaining authority.</p> <p>TII will work collaborativlety with FCC sharing plans and method statements for FCC comment in advance of the commencement of construction</p>
18	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	3. Prior to commencement of development, a detailed Construction Management Plan and a Construction Traffic Management Plan shall be agreed in writing with the Planning Authority. This shall address, inter alia:	<p>EIAR Appendix A5.1 presents the Outline Construction Environmental Management Plan, which provides a framework for how contractor(s) working for TII will manage and where practicable minimise potential negative environmental effects during the Project's construction phase. It is intended that this Outline CEMP will be a 'live' document, which will be subject to amendment including the revision and addition of content throughout the works. It will be expanded and updated prior to the commencement of any construction activities on site, including incorporating the requirements of conditions attached to statutory consents granted in respect of the proposed Project.</p> <p>The detailed CEMP will also build upon and further develop the Scheme Traffic Management Plan, and Construction Mobility Management Plan, along with other documents produced for the EIAR. Prior to implementation, all traffic management measures will be agreed with the relevant local authority in line with the T2 approval process, and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken on proposed traffic management.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
19	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(a) All details regarding safety issues including the appropriate signage and traffic management (as required).	<p>Please refer to Response (18) in relation to approval of traffic management measures. Where diversions or closures are required for any mode of transport, appropriate signage will be provided to ensure continued access and movement on the network. Temporary TM signage will be agreed with the Local Authority in advance of work commencing in accordance with the T2 procees.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
20	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(b) All HGV activity associated with the works shall have suitable access to the sites that will avoid the potential for queuing of HGV's on the public road.	<p>The haul routes for construction traffic have been determined based on a review of all potential road crossings/access points for traffic to and from the construction sites/compounds and based on the identification of those road crossings/access points with the potential capacity to accept the expected number of vehicle movements. Appropriate entry to and egress from the specific construction sites has been considered as part of the construction site location and will be further developed then managed by the contractor to ensure safe access to the site is provided.</p> <p>Regional roads, primary roads and sections of the M50 Motorway will be used wherever practical in order to reduce traffic impacts to local roads with reduced capacity. Haul routes to and from the construction compounds are illustrated in Figure 5.2 in EIAR Chapter 5 (MetroLink Construction Phase) of the EIAR. Haul routes have been discussed further in the Scheme Traffic Management Plan (STMP) in Appendix A9.5 of the EIAR and EIAR Chapter 9 (Traffic &amp; Transport).</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
21	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(c) Measures to mitigate the impact of the proposed works on the public road network. All works shall be carried out at the expense of the developer and to the specifications and conditions of the Planning Authority.	<p>As detailed in EIAR Appendix A9.5 Scheme Traffic Management Plan, the traffic management plans for the construction of the MetroLink have been developed to minimise the impact of the Project on road users, and to maintain access to businesses and premises. The temporary traffic management plans have been developed following a hierarchical approach, in line with the road user hierarchy identified in the GDA Transport Strategy. As such, pedestrian and cyclist needs are given priority over public transport, commercial needs provision, and private vehicles.</p> <p>Temporary works impacting the public highway will be undertaken in accordance with the Department of Transport Traffic Management Design Guidance and associated documents with works agreed with the Planning Authority.</p> <p>It is agreed all works of this nature are carried out at TII's expense. TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
22	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	22	(d) Restricted working hours shall be applied through the road opening licence process where deemed necessary.	<p>The terms of works for any roadworks are a matter for the relevant roads authority under Section 101D of the Road Traffic Act 1961. The proposed condition would simply duplicate that, but TII can accept it. TII are happy to engage further with FCC on the requested condition in advance of the Oral hearing.</p> <p>The proposed standard working hours for the construction phase are set out in EIAR Chapter 5 (MetroLink Construction Phase), which also sets out the activities which may require additional working hours. Standard working hours are from 07:00 to 19:00 on weekdays (excluding Bank and Public Holidays) and from 07:00 to 13:00 on Saturdays. This includes standard delivery hours to the construction sites. The standard hours also include a half hour to prepare site at each end of the day. Proposed working hours for each site will be outlined in the Construction Environmental Management Plan, in addition to procedures to extend working hours, should this be required. Any restrictions to working hours associated with major events in the area of works will be agreed with the Local Authorities. The appointed contractor(s) will require staff and sub-contractors to adhere to these standards working hours for each site, insofar as reasonably practicable, unless otherwise permitted by the relevant Local Authority.</p>
23	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	(e) All relevant road opening licences setting out construction working hours, lane closures, road closures etc. shall be obtained within the appropriate time periods prior to the commencement of construction works for the proposed development.	Please refer to response item (22).

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
24	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	(f) Where works are required on the property of third party the applicant shall submit written evidence that it has all the legal consent/rights of way to undertake the works. REASON: In the interest of orderly development	<p>The local authority's functions do not include the protection of third party rights. TII's rights of access to third party properties are provided for in the Transport (Railway Infrastructure) Act 2001 with appropriate guarantees for fair procedures and due process for any affected third parties, including requirements for notice, the right to make submissions on the proposed acquisitions. Ultimately, the protection of third party property rights is a matter for An Bord Pleanála in considering whether the public interest in the project merits the proposed interference with those rights, subject to compensation. The proposed condition introduces an administrative burden without enhancing the protection of third party rights.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
25	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	4. Prior to the commencement of the development, a detailed construction and demolition Resource Waste Management Plan shall be submitted to, and agreed in writing with the Planning Authority. This shall be prepared in accordance with Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects 2021. This Plan shall include details of the various waste streams and expected tonnages which will be generated during site clearance, demolition and construction phases and any proposed exportation or importation of soil and stone material including destination/source locations, quantities and if any material will be assessed under By-Product notification. The RWMP shall also include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times. REASON: In the interests of orderly development.	<p>TII do not believe it is necessary to impose this condition as EIAR Chapter 24 presents an assessment of Resource and Waste Management during the Project. Mitigation measures will aim to minimise the impact to the environment of the proposed Project through good material resource efficiency practices. All materials consumed and waste generated by the proposed Project will be managed in accordance with circular economy principles and the waste hierarchy, with prevention, reuse, recycling and other recovery methods favoured over disposal. As detailed in EIAR Appendix A5.1 Outline Construction Environmental Management Plan, the contractor(s) will be required to develop a Construction and Demolition Waste Management Plan. This will be in accordance with the Best Practice Guidelines on the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects (EPA, 2021), among other guidance documentation of relevance.</p> <p>The Construction and Demolition Waste Management Plan will identify how waste arisings are to be controlled and managed during the course of the proposed Project, in particular how waste prevention principles will be applied and how on-site waste will be minimised.</p> <p>The plan will include the roles and responsibilities with regards to waste management; an analysis of the likely waste arisings; specific waste management objectives for the proposed Project; methods proposed for recycling or reuse of waste; material handling procedures; procedures for keeping records of all waste and materials which are removed from site; and, proposals for training of the workforce in waste management procedures and requirements.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
26	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	5. Where the Developer proposes to connect to a public water/waste network operated by Irish Water, the Developer shall sign a connection agreement with Irish Water, prior to the commencement of the development. REASON: In the interest of proper planning and the sustainable development of the area.	<p>As detailed in EIAR Chapter 18 (Hydrology), all water arising from the construction phase will ultimately be discharged to public foul sewer post treatment under formal consent by Irish Water. No surface water will be discharged to a storm water drainage system or open watercourses during the construction phase. Therefore, water discharges from the construction areas will be released to sewers following effective treatment and attenuation and on the basis of a temporary permit/consent as issued by the relevant Local Authorities, including Irish Water, prior to the commencement of construction works.</p> <p>However, TII can agree to the condition where it is found necessary to discharge to the public water/waste water network. TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>



Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
27	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	6. No additional development shall take place above roof parapet level, including air handling equipment, storage tanks, ducts or other external plant, telecommunication aerials, antennas or equipment, unless authorised by a further grant of planning permission. REASON: To protect the visual amenities of the area.	TII can agree to this condition.
28	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	7. The following shall be complied with in full: (a) During the construction phase no heavy construction equipment/machinery (to include pneumatic drills, construction vehicles, generators, etc) shall be operated on or adjacent to the construction site before 8.00am or after 7.00pm, Monday to Friday, and before 8.00am and after 1.00pm on Saturdays. No activities shall take place in site on Sundays or Bank Holidays. No activity, which would reasonably be expected to cause annoyance to residents in the vicinity, shall take place on site between the hours of 7.00pm and 8.00am. No deliveries of materials, plant or machinery shall take place before 8.00am in the morning or after 7.00pm in the evening.	TII do not agree to this condition. Please refer to Response (22) above in relation to the proposed working hours. As noted, activities which may require additional working hours are detailed in EIAR Chapter 5 (MetroLink Construction Phase). These include: tunnelling, excavation in rock, large concrete pours, dewatering excavation, track bed and track laying, mechanical electrical and plumbing fit out at stations, utilities and roadworks, and special/abnormal deliveries. An inability to carry these out outside working hours will prejudice the safe and efficient delivery of the project and result in longer construction periods that have not been assessed in the EIAR.  TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.
29	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	(b) If there is any occasion when works must be carried on outside daytime hours, the Environmental Health Department of Fingal County Council, local residents and businesses in areas which are likely to be affected by noise from the proposed works should be notified in advance e.g. in letter or leaflet or advertisement form, of: * Name, address and telephone number of the company carrying out works * Nature of and reason for works * Likely duration and times of work	TII do not believe it is necessary to impose this condition because as detailed in EIAR Chapter 5 (MetroLink Construction Phase), abnormal deliveries are to be agreed with An Garda Síochána and the Local Authority, such as FCC. Deliveries required for large concrete pours, roadworks and works done during weekend possessions are to be defined with the Local Authority.  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. The principal component of a Stakeholder Communications Plan will include: <ul style="list-style-type: none"><li>• Procedures to inform members of the community directly affected by the Construction Phase on schedules for any activity of a particularly disruptive nature which is likely to impinge on their person or property e.g. blasting, demolition, pile driving and any mitigating actions that are being taken (shielding, restriction on work hours) to minimise such disruption.</li><li>• For the tunnel boring, TII will establish a website to provide information on the forecast and actual passage of the tunnel boring machine. The contractor(s) will distribute leaflets to properties and affected parties, giving such notice along the tunnelling alignment, along with details of the first point of contact for any queries.</li><li>• The contractor(s) will coordinate preconstruction defect surveys for identified properties, liaising (in conjunction with the employer) with the building surveyor employed to carry out the surveys and maintaining a dialogue with the relevant property owners throughout the duration of the works.</li><li>• Details of contact names and number for any complaints that may arise during works.</li></ul> TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
30	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	23	(c) All construction work carried out on site shall have regard to B.S,522 8: 2009+A1:2014 Noise and vibration control on construction and open sites to minimise noise from construction operations. All equipment used on site shall be fitted with effective silencers and/or sealed acoustic covers. Noise attenuation measures such as shrouding and/or the use of acoustic enclosures shall be implemented for noisy construction activities. The mitigation measures outlined in 6.7 of the CEMP shall be adhered to in full.	<p>TII do not believe it is necessary to impose this condition because as detailed in EIAR Chapter 13 (Airborne Noise and Vibration) and Chapter 14 (Groundborne Noise and Vibration) outline the baseline and expected noise and vibration levels and proposed mitigation measures required to mitigate impacts. In addition, the contractor(s) will prepare a Construction Noise and Vibration Management Plan (CNVMP) for the proposed Project which will be a live document.</p> <p>There are no statutory standards in Ireland relating to noise and vibration limit values for construction works, however the contractor(s) will adhere to best practice noise measures for construction activities, including the (BS) 5228 (2009 +A1 2014) Code of Practice for noise and vibration control of construction and open sites, and other identified best practice guidance. EIAR Appendix A5.1, Outline CEMP, details the proposed mitigation measures for noise and vibration, including the selection of plant equipment. The potential for any item of plant to result in exceedance of construction noise thresholds will be assessed prior to the item being brought onto the site. The least noisy item of plant will be selected wherever practicable (e.g plant items with sound attenuation incorporated). Noise control equipment such as shrouds, hoods, jackets and doors will be used, ensuring they are closed to minimise noise levels, in addition to acoustic barriers and screening at construction sites.</p> <p>The Outline CEMP identifies the minimum requirements with regards to the appropriate mitigation, monitoring, inspection and reporting mechanisms that need to be implemented throughout construction. Compliance with this document does not absolve the contractor(s) or their sub-contractor(s) from compliance with all legislation and byelaws relating to their construction activities.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>



Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
31	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	24	(d) During the construction phase all necessary steps shall be taken to contain dust and airborne pollutants arising from the site and to prevent nuisance to persons in the locality. This shall include i) covering skips, ii) covering slack heaps, iii) netting of scaffolding, iv) regular road and pavement damping and sweeping, v) use of water spray to suppress dust, vi) proper paved or hard stand access for trucks and vehicles to and from the site to prevent dirt and dust from the site being carried from the site on to public roads etc. Where dust levels become excessive, steps shall be taken by the contractor to review the works and implement further mitigation measures.	<p>TII do not believe the suggested condition is required as the impact on dust and air quality has been assessed and presented in EIAR Chapter 16 (Air Quality) and Chapter 17 (Climate). Before commencing relevant works, a detailed Dust Management Plan will be prepared by the contractor(s) and submitted for approval to the relevant planning authority. The Plan will be based on the draft Dust Management Plan (in EIAR Appendix A16.4) and must include all appropriate dust and emissions mitigation measures including for asbestos and aspergillus, applicable to the circumstances of the relevant site, based on the local authority requirements and industry best practices.</p> <p>In order to ensure that no dust nuisance occurs, a series of measures will be implemented by the contractor(s), as detailed in Appendix A16.4 of the EIAR. The measures to be implemented will include:</p> <ul style="list-style-type: none"><li>• Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods;</li><li>• Any blasting will be completed by specialised contractor(s) with a specific Blasting Dust Management Plan;</li><li>• Liaison with local authorities and community groups;</li><li>• Hoarding will be provided around the construction compounds; and</li><li>• Methods of collecting rainwater and recycling for general site use will be adopted where practical. Requirements for dewatering installations at deep station and tunnel portals can also provide a valuable source of water for general site use.</li></ul> <p>Strict dust prevention will be in place at all times, to minimise any potential emissions. These procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.</p> <p>Mitigation measures are required for the control of dust with respect of HGV moments on site and deliveries to/from the site:</p> <p>* HGV traffic leaving site will pass through a wheel wash;</p> <p>* Public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary. If public roads are deemed to require additional cleaning where possible a suction device for road cleaning will be utilised which can access spaces around cars and other street furniture more effectively; and</p> <p>* During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
32	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	24	(e) All site activities during the construction and operational phases shall be carried out in such a manner to ensure that air emissions and/or odours do not result in significant impairment of, or significant interference with amenities or the environment beyond the site boundary. The mitigation measures in 6.12 of the CEMP shall be adhered to in full.	<p>TII do not believe it is necessary to impose this condition because as detailed in EIAR Chapter 16 (Air Quality), before commencing relevant works, an Air Quality Management Plan shall be prepared and submitted for approval to the relevant planning authority. The Plan must include appropriate dust and emissions mitigation measures including for asbestos and aspergillus, applicable to the circumstances of the relevant site, based on the local authority requirements and industry best practices. The Plan will be developed by the contractor and for each worksite shall include:</p> <ul style="list-style-type: none"><li>* An inventory and timetable of activities which may give raise to emissions or dust;</li><li>* Alert levels;</li><li>* Alert system to be used (including notification process);</li><li>* Details of control measures;</li><li>* Details of dust monitoring arrangements, including the location of sensitive receptors, monitoring locations, and monitoring equipment to be used; and,</li><li>* Details of the air quality reporting requirements.</li></ul> <p>Overall, the assessed residual impacts on air quality and emissions during both the construction and operational phases are not significant.</p> <p>Additionally, TII are obliged to ensure that the mitigation measures in the EIAR are adhered to in full.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
33	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	24	(f) The cumulative noise contribution from the development once it is in operation shall not cause significant impairment of, or significant interference with amenities or the environment beyond the site boundary. Once the site is operational, the cumulative noise emissions from te site shall not exceed 55 db (A) LAeq 30 minutes between the hours of 0800-2200 and 45db(A) LAeq 15 minutes at all other times - as measured 1 metre from the nearest noise sensitive location. Clearly audible and impulsive tones at noise sensitive locations during evening and night shall be avoided irrespective of the noise level. REASON: In the interest of public health.	<p>TII do not believe it is necessary to impose this condition as detailed in EIAR Chapter 13 (Airborne Noise and Vibration) and Chapter 14 (Groundborne Noise and Vibration), the assessment indicates that there will be no significant impacts on noise and vibration levels during the operational phase. TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
34	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	24	8. All necessary measures shall be taken by the applicant/developer to prevent the spillage or deposit of any materials including clay rubble or other debris on adjoining roads during the course of development. In the event of any such spillage or deposit, immediate steps shall be taken to remove the material from the road surface at the applicant/developers own expense. The applicant/developer shall be responsible for the full cost of repair in respect of any damage caused to the adjoining public road arising from the construction work and shall either make good any damage upon issue of such a requirement by the Council. REASON: To protect the amenities of the area.	<p>TII do not believe the condition is necessary for the reasons set out below. TII are happy to engage further with FCC on the requested condition in advance of the Oral hearing.</p> <p>Please refer to Response (31) in relation to the management of dust and debris on the road network.</p> <p>With regard to management of waste materials and dust on construction sites, as detailed in EIAR Chapter 24 (Resource and Waste Management), a number of waste management practices wil be implemented by the Contractor(s) in order to manage waste arisings in an orderly fashion to minimise the impact in so far as is practicable. These include:</p> <ul style="list-style-type: none"><li>* A regular programme of site tidying will be established to ensure a safe and orderly site;</li><li>* Debris netting will be erected to prevent materials being scattered by the wind;</li><li>* In the event of any litter or debris escaping the site, it will be collected immediately and removed to storage on site, and subsequently recovered/disposed of in the normal manner;</li><li>* Waste receptacles such as skips will be secured so as to minmise impact from fly-tipping; and,</li><li>* Waste will be collected in a timely fashion so as to prevent overly large volumes of waste accumulating.</li></ul>

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
35	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	24	9. All public services to the proposed development including electrical, telephone cables and equipment shall be located underground throughout the entire site where possible. REASON: In the interest of visual amenity.	<p>TII do not believe this condition is necessary as the design calls for all public services to be located beneath ground, and as such there is no need for this condition. TII are happy to engage further with FCC on the requested condition in advance of the Oral hearing.</p> <p>As detailed in EIAR Chapter 27 (The Landscape), the design rationale and detail employed across the proposed Project seeks to mitigate potential negative effects on the landscape character and visual amenity of the area by incorporating measures such as:</p> <p>* The insertion, positioning and detail of the various elements of the proposed Project, in order to create a unified and harmonious whole for each Local Landscape Character Area; and to assist in appropriate visual assimilation within the fabric of the respective subject sites; and</p> <p>* Rationalisation of all services elements and any potential visual clutter and its incorporation underground, in ducts (as far as is practicable), in order to reduce visual clutter and to prevent/reduce the potential for disruption of surface finishes in the future.</p> <p>The provision/location of temporary service connections to support construction sites will be agreed with the utility providers. These shorter term requirements may thus be a mixture of overground or underground connections to suit availability or location of supply and the need to avoid construction works.</p>
36	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	24	10. The following shall be complied with in respect of surface water management: (a) No surface water/ rainwater shall discharge into the foul water system, under any circumstances. (b) The surface water drainage arrangements shall be in compliance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 FCC April 2006. REASON: In the interests of public health.	<p>TII do not believe it is necessary to impose this condition for the reasons set out below. TII are happy to engage further with FCC on the requested condition in advance of the Oral hearing.</p> <p>Please refer to Response (26) above in relation to surface water management during construction.</p> <p>During operation: a) Surface water / rainwater will not be discharged into the foul water system. EIAR Chapter 18 (Hydrology), section 18.5.4.1 Overall Design Criteria, sets out the principles of the track and surface water drainage systems. b) Surface water drainage arrangements during operation have taken cognisance of the Greater Dublin Regional Code of practice (as noted in EIAR Chapter 18 (Hydrology), section 18.4.8).</p>
37	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	24	11. The following requirements shall be complied with: (i) The Developer shall engage the services of a suitable qualified, experienced and licence eligible archaeologist to carry out archaeological monitoring of all groundworks at the site. No sub-surface work shall be undertaken in the absense of the archaeologist without his/her express consent.	<p>TII will agree to this condition. TII are happy to engage further with FCC on the requested condition in advance of the Oral hearing.</p> <p>Chapter 25 of the EIAR presents an assessment of the impact of the Project on archaeology and cultural heritage. As detailed, all archaeological investigations, including test excavations, preservation by record (excavation) and archaeological monitoring, will be undertaken by a suitably qualified archaeologist in accordance with Section 26 (2) Excavation Licence of the National Monuments Act 1930 (as amended).</p>
38	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	25	(ii) The archaeologist shall notify the Department of Culture, Heritage and the Gaeltacht in writing at least four weeks prior to the commencement of site preparations.	<p>TII do not believe the suggested condition is necessary as presented in Appendix A5.1 Outline Construction Environmental Management Plan, Table 6.8, appropriate consultation will be undertaken with the Department of Culture, Heritage and the Gaeltacht prior to the commencement of works. TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
39	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	25	(iii) Where archaeological material is shown to be present, avoidance, preservation in situ, or preservation by record (excavation) may be required. Works may be halted pending receipt of advice from the National Monuments Service, Department of Culture, Heritage and the Gaeltacht which will advise the Applicant/Developer with regard to these matters.	<p>TII do not believe the condition is necessary for the reasons set out below. TII are happy to engage further with FCC on the requested condition in advance of the Oral hearing.</p> <p>Please refer to Response (38) above in relation to consultation with the Department of Culture, Heritage and the Gaeltacht.</p> <p>All archaeological consultants appointed by the proposed Project shall comply with the Code of Practice and shall liaise directly with the TII Project Archaeologist in relation to all archaeological requirements. Mitigation measures will seek to preserve in situ any achaeological or cultural heritage constraints which may be impacted by the proposed Project. Where this is not possible, a hierarchical range of mitigation measures will be implemented in advance of and during construction phase which will aim to ameliorate all impacts. Mitigation measures which may be undertaken prior to and during the Construction Phase include:</p> <ul style="list-style-type: none"><li>* Full measured, written, drawn and photographic surveys;</li><li>* Detailed construction methodology (demolition, removal, storage, relocation/reinstatement, rebuilding, repair and rehabilitation of archaeological and cultural heritage monuments; appropriate screening; monitoring of vibration);</li><li>* Dive, underwater and wade surveys (including metal detection);</li><li>* Geophysical surveys (including Ground Penetrating Radar (GPR));</li><li>* Archaeological test excavations;</li><li>* Archaeological monitoring; and,</li><li>* Preservation by record (archaeological excavation).</li></ul> <p>Where a constraint has been subject to extensive archaeological test excavations either as a component of Old Metro North works or the proposed Project, no further test excavations will be proposed. Where extensive test excavations have taken place and no sub-surface archaeological stratigraphy has been identified, or where a constraint has been fully preserved by record within the proposed Project boundary, no further mitigation measures will be proposed.</p>
40	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	25	(iv) On completion of monitoring of groundworks, the archaeologist shall submit a written report to the Planning Authority and to the Department of Culture, Heritage and the Gaeltacht for consideration. REASON: To ensure the continued preservation (either in situ or by record) of places, caves sites, features or other objects of archaeological interest.	<p>TII do not believe this condition is necessary because as detailed in EIAR Chapter 25 (Archaeology and Cultural Heritage), in order to fulfil licence conditions, a preliminary report and a final report on the archaeological findings are required. Details of the reporting requirements are contained within the Draft MetroLink Cultural Heritage Strategy (2021) provided in EIAR Appendix A25.1 and further detail as to the content required for each report will be outlined in the individual contract documentation, as produced by the TII Project Archaeologist. All reports will be produced in accordance with government guidelines.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
41	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	25	12. Prior to commencement of development the developer shall pay to the planning authority a financial contribution towards expenditure that was and/or that is proposed to be incurred by the planning authority in respect of public infrastructure and facilities benefiting development in the area of the Authority, as provided for in the Contribution Scheme for Fingal County made by the Council. The phasing of payments shall be agreed in writing with the planning authority prior to the commencement of development. REASON: It is considered reasonable that the payment of a contribution be required in respect of the public infrastructure and facilities benefiting development in the area of the Planning Authority and which is provided, or which is intended to be provided by, or on behalf of the Local Authority.	<p>MetroLink is outside the scope of the local authority's development contribution scheme. There is no explicit provision for development contribution conditions in the Transport (Railway Infrastructure) Act 2001. TII's position is that this condition should not be imposed. TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>

Submission No.			N/A	
Organisation Name or Name of Submitter			Fingal County Council	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: ABP-314724-22 MetroLink Railway Order 2022				
42	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	25	<p>13. Prior to commencement of development, a community liaison committee shall be established to liaise between the applicant and the local community.</p> <p>The membership of this committee shall reflect membership of the local communities of Swords and Santry and shall include representatives from Fingal County Council and the applicant. Full details of the committee shall be agreed between the planning authorities and the applicant prior to the commencement of development.</p> <p>The committee and the applicant will decide on the nature and extent of specific community gain projects to be developed with by the applicant either in the form of direct provision of specific projects and an annual levy towards their on-going maintenance, or alternatively, a once-off direct capital contribution towards provision of specific projects and an annual levy towards their ongoing maintenance.</p> <p>Fingal County Council shall have responsibility for the administration of a community gain fund account and the amount of contribution and the arrangements for payment shall be agreed between the developer and the planning authority or, in default of agreement shall be referred to the Board for determination.</p> <p>REASON: To provide for the allocation of reources from the community gain fund in accordance with the requirements of the local community and to provide for appropriate ongoing review of operations at the site in conjunction with the local community.</p>	<p>Please refer to Response (10) in relation to the establishment of community liaison groups, community gain and the annual levy.</p> <p>As noted in EIAR Appendix A5.1. Outline Construction Environmental Management Plan, TII and the contractor(s) will take all reasonable steps to engage with stakeholders in the local community, especially those who may be affected by the construction works including residents, businesses, community resources and specific vulnerable groups. The contractor(s) will be responsible for putting in place a Stakeholder Communications Plan which will be developed under the consent of a designated Public Liaison Officer appointed by TII. This will provide a two-way mechanism for members of the public to communicate with a designated member of the contracting team. TII and its appointed contractor(s) will ensure that local authorities and all relevant stakeholders affected by the proposed works will be informed in advance of works taking place.</p> <p>TII will control the community gain fund if one comes into effect.</p> <p>TII are happy to engage further with FCC on the requested condition in advance of the Oral Hearing.</p>
43	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	25	<p>14. A community gain fund shall be established to benefit the community in the general catchment area. Details of the management and operation of the community gain fund, which shall be lodged in a spacial community fund account, shall be submitted to, and agreed in writing with the Planning Authority prior to the commencement of development. In default of agreement, the details shall be determined by An Bord Pleanála.</p> <p>REASON: It is considered reasonable that the operators of the facility should contribute towards the cost of environmental, recreational or community facilities which will be of benefit to the community in the area.</p>	<p>Please refer to Response (10) in relation to the establishment of a special community fund.</p>
44	Appendix 2: Example of SID Conditions to be attached to Grant of Permission	26	<p>15. At the detail design stage and prior to commencement of the development, details of the proposed public spaces in front and around the proposed Stations including the final geometry and layout as well as details of materials, finishes, fixed furniture, bicycle parking, lighting, wayfinding, boundaries, paving and any ancillary structures should be provided for consideration and agreement with the Local Authority.</p> <p>Particular attention to be paid to the design of the approach the Stations including the treatment of the exclusion zones around the structures supporting the overhead canopy as well as the overall functionality of the public spaces that are well connected to the surrounding context.</p>	<p>TII do not believe the condition is necessary. However, TII confirm that all designs to be finalised in the detailed design stage will be provided to the local authority for consideration. TII will consult extensively with FCC during future design stages to ensure that public spaces, material finishes, and urban realm features are acceptable to FCC.</p>