METROLINK

Integrated Transport. Integrated Life.

MetroLink Railway Order Statutory Consultation

Response to Submissions Received

Bonneagar Iompair Éireann
Transport Infrastructure Ireland

Údarás Náisiúnta Iompair
National Transport Authority

Rialtas na hÉireann
Government of Ireland

Tionscadal Éireann
Project Ireland 2040

Contents

Executive Summary

Submissions Received

The MetroLink Railway Order Statutory Public Consultation progressed from 30 September 2022 until 16 January 2023. On 9 February 2023 An Bord Pleanála issued 322 documents to TII, of which 317, comprising over 5,000 pages were unique individual submissions containing observations made in response to the MetroLink Railway Order application. TII is cognisant and appreciative of the time spent by all third parties in preparing these submissions. Each submission has been considered in detail and TII has sought to ensure that the issues raised in each are appropriately addressed.

The purpose of this document is to provide both a summary overview of the submissions received, and TII's response to these submissions, as requested by An Bord Pleanála pursuant to Section 47D(1) of the Transport (Railway Infrastructure) Act 2001. An Introduction including the purpose of this document is included in section 1. A reminder of what the proposed Project is about and the benefits it will deliver is contained in section 2. An overview of the issues raised during the statutory consultation is presented in section 3. A summary of TII's responses to the submissions under thematic and geographic area is contained at section 4. Detailed individual responses to all 317 submissions are contained in section 5.

TII reserves the right to further expand on its response to the issues raised, as may be required, at the oral hearing. (Note: On 20 June 2023, TII received a further submission from Fingal County Council via An Bord Pleanála. The response to this submission is included in this document, but it is not included in the numerical analysis of submissions presented by this document.)

To assist with managing and responding to the volume of information received, submissions were grouped geographically in accordance with the Assessment Zone (AZ) structure adopted by the MetroLink Environmental Impact Assessment Report (EIAR), and into five groups: (1) Statutory and public bodies; (2) Residents; (3) Businesses and commercial operations; (4) Government agencies, elected representatives, hospitals, religious groups, theatres, advocacy groups, sports clubs; and (5) Schools and Universities. A qualitative analysis has been undertaken to help understand the types, frequency, and geographic location of observations made. This analysis allowed us to group all submissions thematically and geographically to gain a clear understanding of the observations received (positive and negative). This 'qualitative analysis' has been used to inform the summary of observations and TII responses presented by this document, at sections 3 and 4.

Analysis of Submissions

The submissions received, observations made, and number of individuals represented demonstrates both a strong interest in and a good understanding of the proposed Project. It is of note that 57% of all submissions received expressed support for the proposed Project. While submissions were often qualified with concerns in relation to perceived local issues, there is strong overall support for the proposed Project and the benefits it will deliver. Approximately 9,335 individuals, households, businesses, and organisations have signed, or made a positive statement regarding the proposed Project, although it should be noted that 6 group submissions accounted for over 7,900 of the 9,335.

From the groups described above it can be seen that submissions were received from a wide range of sources, with resident submissions accounting for 180/57% of all submissions received. Of the 317 submissions received, 87 or 27% were related to the proposed Charlemont Station.

Broadly speaking, submissions were either strategic in nature (covering subjects such as transport planning, route selection, options and alternatives, consultation, planning policy, accessibility and climate), or were specific to a location or local community. The latter tended to be focused on specific environmental impacts (construction and operation) that may occur. Examples of subjects raised included programme duration, noise and vibration, air quality, traffic and transport, settlement, land and property acquisition, landscape and visual, amenity, anti-social behaviour and overhead development. There was inevitably a degree of crossover between strategic and specific local observations, for example perceived potential local environmental impacts may be linked to a recommendation of an alternative location.

The most common themes covered by submissions were focused on the consideration of alternatives, particularly for proposed station locations, and the potential impacts arising from the construction phase of the proposed Project.

The construction phase theme also had an overlap with other observations raised in connection with traffic and transport, land take, noise and vibration just by way of example, further emphasising the focus of submissions. When the submissions are examined individually, a picture emerges of a strong focus on perceived impacts and concerns around the construction phase. Unsurprisingly there are more submissions received from the more densely populated areas along the route. Such areas include the residential areas in the vicinity of the R132 in Swords, and residential areas around the proposed station box locations, particularly the section from the proposed Collins Avenue Station to Charlemont Station. The city centre section of the route (AZ4) generated the majority of submissions with 75% or 239 of the 317 submissions relating to this area.

The potential impacts due to the operational phase of MetroLink, while not as prevalent as concerns raised around the construction phase, still generated a substantial number of observations focused on perceived impacts such as long-term nuisance and disturbance. Nearly 60% of submissions received covered both the construction and operational phases of the proposed Project, with the remaining split circa 20% across construction or operational phase only.

TII Responses to Submissions

Each submission and the individual statements and observations contained in it has been reviewed carefully by TII. The main sections of this document provide a summary of TII's response to the issues raised in those observations. This is done by theme and geographic location in section 4. In those summary responses where appropriate, we have cross referenced the application documents, in particular the Environmental Impact Assessment Report (EIAR), to assist the reader. Section 5 contains TII's response to each of the 317 submissions received, comprising some 4,800 individual observations that have been responded to, and so of necessity is very lengthy.

Many observations raised common issues across the proposed Project. These have been grouped and responded to under one of the following headings: Strategy and Decisions, Construction Phase, Operational Phase, Strategic Planning, Railway Order (RO) Process and RO Documentation. Where there are observations that are unique to a particular location/Assessment Zone, a summary response has been provided for that area. To ensure observations particular to a geographic area are addressed with sufficient granularity, AZ1 (Estuary Station to Dublin Airport North Portal) has been subdivided in two, while AZ4 (North Portal to Charlemont) has been subdivided by station and the section of running tunnel to the south of the station.

The summary list below highlights some of the specific observations raised by submissions and TII's response. It is neither exhaustive nor detailed and is only intended to provide a high-level overview of some of the observations covered by the submissions received. For further detail, sections 4.2, 4.3 and 4.4, and section 5 of this document should be referred to. TII would also like to stress that all submissions received in response to the Railway Order application have been treated equally irrespective of the source, or overall number of observations received regarding a particular matter. The summary below should **not** be viewed as an indication of TII's assessed importance of observations raised by submissions.

Summary of Responses to Route Wide Observations:

- **Disturbance and nuisance** from noise, vibration, air quality, and traffic. The EIAR details that nearly all construction impacts will be mitigated to residual levels that will not cause significant impact except for circa 2 weeks of temporary disturbance as the Tunnel Boring Machine passes. Where possible, relocation may be needed for residents of properties at Dalcassian Downs (Glasnevin) and on Dartmouth Road (Charlemont) during peak station construction. All operational impacts will be mitigated to residual levels that are not significant.
- **Construction programme duration and nighttime working.** The 9.25 year programme has been optimised to provide an appropriate envelope to enable construction, noting that heavy civil engineering impacts will be for the first 4-5 years of construction followed by much lighter and quieter fit out works.

  Nighttime working will generally only be undertaken for tunnelling and fit out works. Except for Tunnel Boring Machine groundborne noise and vibration, and where there is a requirement for above ground works outside standard working hours for events such as abnormal deliveries or concrete pours, all other nighttime works will be controlled and mitigated under the Construction Environmental Management Plan to maintain impacts below the agreed construction noise thresholds.

- **Excessive land and property take.** The proposed land and property take has been carefully assessed and seeks only to acquire that which is necessary to build and operate the proposed Project. If a smaller land take can be utilised in certain areas, then the land taken will be so reduced. Land acquired temporarily will be returned as soon as practicable to the owner, and compensation will be paid for all land and property take in accordance with the relevant statutory process for compensation.
- **Landscape and visual impact, architecture and amenity.** Site specific proposals for hard and soft landscape works have been developed, including plans for the retention of trees where possible. While the proposed Project will enhance amenity overall, there are some localised impacts resulting in the loss of green space and or loss of amenity during the construction and operational phases including along the R132, Albert College Park, Four Masters Park, and St Stephen's Green. The architectural design assimilates with and enhances the public realm and discourages anti-social behaviour.
- **Impact on ecology and wildlife.** A Site-specific Ecology and Landscape Management Plan, and a Non-Native Invasive Species Management Plan will be adhered to in order to ensure disturbance and damage to areas of conservation interest and legally protected and notable species is appropriately limited.
- **Settlement damage to property.** A conservative settlement impact assessment that has taken account of construction methodology, geology, and building and infrastructure characteristics has been undertaken. All properties have been assessed as falling within the Category 2 'Slight' damage category or less with the exception of two residential terraced buildings on St. Ita's Road and Botanic Avenue, close to the proposed Griffith Park Station, that have been assessed as Category 3 'Moderate' (Cracks may require cutting out and patching. Doors and windows sticking.) for which a Stage 3 assessment will be undertaken at the next stage of design and is expected to reduce the damage category to 2 or less.

Summary of Responses to Location Specific Observations:

- **Requests to move the Metrolink alignment from the verge of the R132 in Swords to the median of the roadway.** A number of alignment options along this section of the proposed Project were assessed including **the** option to have the alignment in the R132 median. Moving the alignment to the median was rejected because the disruption to traffic would be far greater during construction along with additional permanent works required for longer lengths of cut and cover tunnel. In addition, passenger access to stations would be via at-grade crossings over the R132 and thus space will be limited at station entrances with additional costs incurred due to extra ventilation requirements for the longer cut and cover sections.
- **Demolition of Smyths toy store, Airside Retail Park.** This is a significant and regrettable impact that is necessary to avoid additional utility diversions, impacts on R132 traffic for approximately 5 years, poor urban integration of the station, and a track alignment that would require a speed restriction.
- **Provision of an elevated connection between the Airport Station and terminals.** Pedestrian modelling undertaken by TII shows the proposed at-grade connection between the Airport station and terminals will function adequately. The Airport Station design is such that an elevated connection can be provided in the future, if necessary, for example if pedestrian footfall exceeds what is forecast by DAA.
- **Collins Avenue Station moved to Albert College Park, and Albert College Park Intervention Shaft relocated.** The location of this Station is proposed because it is the optimum location for effective interchange between bus routes both on Collins Avenue and Glasnevin Road, and it has the highest potential passenger numbers compared to other route options. It also reduces the impact of traffic disruption during construction when compared to other options assessed.
- **Demolition of the Brian Boru public house, Glasnevin**. This is a significant and regrettable impact that is necessary to accommodate the construction of Glasnevin Station that will provide a key interchange between MetroLink and Irish Rail services. Prior to demolition, the building will be recorded to English Heritage Level 3 standard.
- **Permanent changes to Four Masters Park, Mater**. The Mater Station architecture has been designed to integrate with the park sympathetically, with the Station skylights framed by planting and providing circulation routes through the park. Existing monuments and protected railings will also be retained and located within the park. As a result, no significant long-term impact is predicted on amenity, but this impact is significant during the construction phase.
- **Demolition of College Gate Apartments, Tara.** Tara Station will provide a key interchange with Irish Rail services and will be one of the busiest and most used MetroLink stations. 11 alternative station options were considered. The proposed cut and cover station aligns with the MetroLink architectural vision by providing a high-quality operational station for passengers with a feeling of space and light that can be economically delivered in terms of cost, time and risk. To accommodate the proposed station, regrettably it results in the necessary demolition of the College Gate Apartment complex and the Markievicz Leisure Centre, Dublin City Council housing on Luke Street, two properties on the corner of Luke Street and Townsend Street, and an office block on Tara Street. TII are engaging with owners and tenants affected by the proposed demolition of properties to provide support for rehousing and compensation for the loss of the residential units and have informed DCC of the requirement to demolish properties on Townsend Street as part of the work. TII will work with DCC to provide any assistance necessary in relation to the relocation of affected DCC tenants.
- **Disruption to Trinity College Dublin (TCD)** from groundborne vibration and electromagnetic interference (EMI) generated by passing trains. TII's assessment shows that vibration effects can be mitigated at the vast majority of locations with floating track slab in the tunnel and at all other locations using base-isolated foundation slabs within the equipment rooms (for highly sensitive equipment). While EMI can be mitigated by the installation of Active Cancellation within equipment rooms.
- **Location of St Stephen's Green Station partially in the Park.** 16 station options have been assessed, including mined options (ruled out due to a prolonged construction programme and it not being possible to provide a high-quality station). Environmental impacts, and effects on: the National Monument, amenity, green space and trees, architectural and cultural heritage, buildings, traffic and transport; and critical utilities located under the road in St. Stephen's Green East have been considered and mitigated. The proposed location on St. Stephen's Green East was chosen as it minimises the potential impacts on the Park area (5% during construction and 0.2% when operational) compared to other options, while maintaining St Stephen's Green East road open, and avoiding significant impacts on critical utility infrastructure and buildings along St Stephen's Green East.
- **Request for the Charlemont Station to be relocated.** The Station location at Charlemont was chosen because it provides a short interchange distance to the Luas Green Line; is within a 5-minute walk of BusConnects proposed A Spine and E Spine routes; future proofs the Luas Green Line, bypassing the capacity constrained on-street section; and contributes significantly to the overall benefits of the scheme, reflected by an improved Project Benefit Cost Ration (BCR). Charlemont was first identified as a station location in the Emerging Preferred Route report as the last station prior to the Green Line Luas tie-in. A decision was subsequently taken to terminate at Charlemont based on (a) the additional impacts that would be involved in upgrading the Luas Green Line south of Charlemont; (b) the development of alternatives to accommodate increased capacity on the Luas line south of Charlemont without that upgrade; and (c) feedback received during the EPR non-statutory consultation. It is also supported by Government policy that includes consideration of a possible future metro extension or Luas Green Line upgrade. Alternative terminus options at St Stephen's Green were considered but were either unfeasible or inferior to Charlemont.

What Happens Next?

TII will present the proposed Project at the Oral Hearing (which has not yet been scheduled), provide expert evidence as required by An Bord Pleanála, and respond to questioning from those who make submissions at the Oral Hearing. Anyone who made a submission is entitled to attend at the Oral Hearing and ask the TII team questions. The TII team continues to engage with stakeholders and where agreement is reached regarding issues raised, An Bord Pleanála will be advised of any changes needed to the Railway Order Application in response to those issues.

1. Introduction and Document Purpose

1.1 Submission of the MetroLink Railway Order Application

On 17 September 2022 newspaper notices were published providing notification of Transport Infrastructure Ireland's (TII) intent to lodge the MetroLink Railway Order application on 30 September 2022, along with information on the Statutory Public Consultation process that would follow. This was immediately followed by writing to circa 2,400 property owner/occupiers that had been identified along the proposed MetroLink route that could potentially be impacted by the MetroLink Project, providing information on the proposed Project, information relevant to their property, and a copy of the aforementioned newspaper notice.

On 30 September 2022, TII submitted the MetroLink Railway Order Application to An Bord Pleanála that comprised of:

1. Application (Letter to An Bord Pleanála)
2. Draft Railway Order
3. Railway Order Book of Reference
4. Railway Order Plan / Drawings
5. Environmental Impact Assessment Report (EIAR)
6. Appropriate Assessment Screening Report and Natura Impact Statement
7. Planning Report
8. Miscellaneous:
    a) Pre-Application Consultation File
    b) Materials Palette

This information was also made available on the MetroLink Railway Order website, https://www. metrolinkro.ie, as well as the above items (2) to (7), and (8b) being placed on display in hard copy for public inspection at the locations below for the duration of the Railway Order Statutory Public Consultation:

- An Bord Pleanála's offices, 64 Marlborough Street, Dublin 1
- Dublin City Council office at Civic Offices, Wood Quay, Dublin 8
- Fingal County Council offices at County Hall, Main Street, Swords, County Dublin
- Transport Infrastructure Ireland offices at Parkgate Business Centre, Parkgate Street, Dublin 8
- National Transport Authority offices, Dún Scéine, Harcourt Lane, Dublin 2

The Railway Order Statutory Public Consultation was initially set at six weeks but was further extended on 25 November 2022 to 16 January 2023 due to the submission of information that was inadvertently omitted from the EIAR (Appendix A9-2, A9-2-M Traffic and Transportation Assessment – St Stephen's Green Station). Newspaper notices were also published on 25 November 2022 providing notification that this information was being submitted and was again accompanied by TII writing to the same circa 2400 property owner/occupiers notifying them of this new information.

On 9 February 2023, An Bord Pleanála issued 322 documents to TII, of which 317 were unique individual submissions containing observations in relation to the MetroLink Railway Order application. (The reason for the slight difference between the number of documents issued to TII and number of submissions is a result of 1 document being a property letter written by TII, 2 documents being maps associated with submissions, 1 duplicate submission, and 1 submission that was superseded by an updated submission).

On 20 June 2023, TII received a further submission from Fingal County Council via An Bord Pleanála. The response to this submission is included in this document, but it is not included in the numerical analysis of submissions presented by this document.

1.2 Purpose of Document

The purpose of this document is to provide a summary overview and understanding of the submissions received and observations made in response to the Railway Order application along with TII's responses to the individual submissions made, both in summary by thematic and geographic grouping, and individually. The document has been structured as follows:

i. A summary of the MetroLink Project and its predicted benefits, in section 2;
ii. An overview of the submissions received and key observations, including how they have been reviewed and analysed, in section 3;
iii. TII's summary response to submissions and observations received, based on both thematic and geographic grouping, in section 4;
iv. TII's responses to individual submissions received, in section 5.

Where appropriate, cross reference (in the right-hand margin) has been made to key aspects of the Railway Order Application and the accompanying EIAR, NIS and Planning Report that relate to the responses provided to assist the reader.

1.3 Role of An Bord Pleanála under the Transport Railway Infrastructure Act 2001 (as amended) (the 2001 Act)

As the Board will be aware, applications for a Railway Order ("RO") under the 2001 Act are treated somewhat differently to typical planning applications. Before deciding on an application for a RO, the Board must consider, amongst other things, the following: the application, the draft RO and documents that accompanied the application, submissions received and TIIs response to them, the report of any oral hearing and recommendations (if any) of the Inspector, the likely consequences for the proper planning and sustainable development in the area in which it is proposed to carry out the railway works and for the environment of such works, as well as the matters referred to in section 143 of the Planning and Development Act 2000 as amended.

After considering these matters, having taken into account its reasoned conclusion, and being satisfied it remains up-to-date, then, if it is of opinion that the application should be granted, the Board will make an RO. That RO will authorise TII to construct, maintain, improve and, operate the railway or the railway works specified in the RO in such manner and subject to such conditions (including conditions regarding monitoring measures, parameters to be monitored and the duration of monitoring), modifications, restrictions and requirements (and on such other terms) as the Board thinks proper and specifies in the relevant schedule to the RO. Importantly, the 2001 Act vests a very wide discretion in the Board between the making of the initial application (which also includes the submission of a draft RO), and the granting of an RO. This flexibility and broad discretion is tempered by the fact that the Board must do so in such manner and subject to such conditions (including environmental conditions i.e. conditions regarding monitoring measures, parameters to be monitored and the duration of monitoring), modifications, restrictions and requirements (and on such other terms) as the Board thinks proper and then specifies in any RO granted.

1.4 Privacy and Personal Data

This document has been prepared in accordance with the EU General Data Protection Regulation 2016/679 (GDPR) and Data Protection Acts 1988 to 2018.

1.4.1 Property Details

In order to comply with legal and regulatory obligations in seeking a Railway Order in respect of the MetroLink Project, Transport Infrastructure Ireland was required in accordance with Section 40 of the Transport (Railway Infrastructure Act) 2001 as amended to compile the owners, assumed owners and occupiers of lands impacted by the Project (the "Book of Reference") including by reference to property records (e.g. from the Land Registry and the Registry of Deeds). The Book of Reference is contained in number 3 of the Railway Order Application. This document was required to be displayed by Transport Infrastructure Ireland for the public consultation period. As this public consultation period is now over, Transport Infrastructure Ireland has removed this document from its public display areas (including its website).

1.4.2 Submissions to An Bord Pleanála

As part of the statutory public consultation process, submissions and/ or observations to An Bord Pleanála were furnished to Transport Infrastructure Ireland for its response. Certain personal data has been voluntarily provided by those individuals who lodged submissions to An Bord Pleanála in accordance with Railway Order Application process. In preparing documentation for the oral hearing, Transport Infrastructure Ireland is required to show that it has responded to any submissions and observations to An Bord Pleanála. Transport Infrastructure Ireland has had to refer to the name and address of persons making submissions and other personal data in their submission in order that An Bord Pleanála can identify which of TII's responses relate to each submission.

Transport Infrastructure Ireland confirms that the legal basis for processing this data is pursuant to Article 6(1)(e) of GDPR is where such processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Transport Infrastructure Ireland. Under section 11(1)(a) of the Transport (Railway Infrastructure) Act 2001, Transport Infrastructure Ireland's functions include the provision of light railway and metro railway infrastructure. Ongoing stakeholder engagement is essential to the successful delivery of such metro railway infrastructure.

For further information on how Transport Infrastructure Ireland collects and processes personal data and how it is used, please refer to MetroLink's Data Protection Notice. [1.1]

[1.1] *Data Protection Note*

2. The MetroLink Project

2.1 Need for the Project

MetroLink, a key component of the Greater Dublin Area Transport Strategy 2022-2042, as proposed, is a modern and high-capacity, high-frequency rail line with 16 new stations, a Park & Ride and a depot running from Swords to Charlemont, linking Dublin Airport, Irish Rail, DART, Dublin Bus, and Luas services, creating a fully integrated transport network for the Greater Dublin Area.

A metro railway has been proposed to link Swords to Dublin City Centre via Dublin Airport for over 20 years, starting with 'A Platform for Change in 2001'. Figure 1 provides an overview of the history of this long-awaited and critically needed infrastructure for which approval is now being sought. The proposed Project will make a significant contribution to solving the challenges summarised below that face the Nation and the Dublin area whilst at the same time providing significant beneficial outcomes that go beyond just the proposed Project that will leave a legacy for the future.

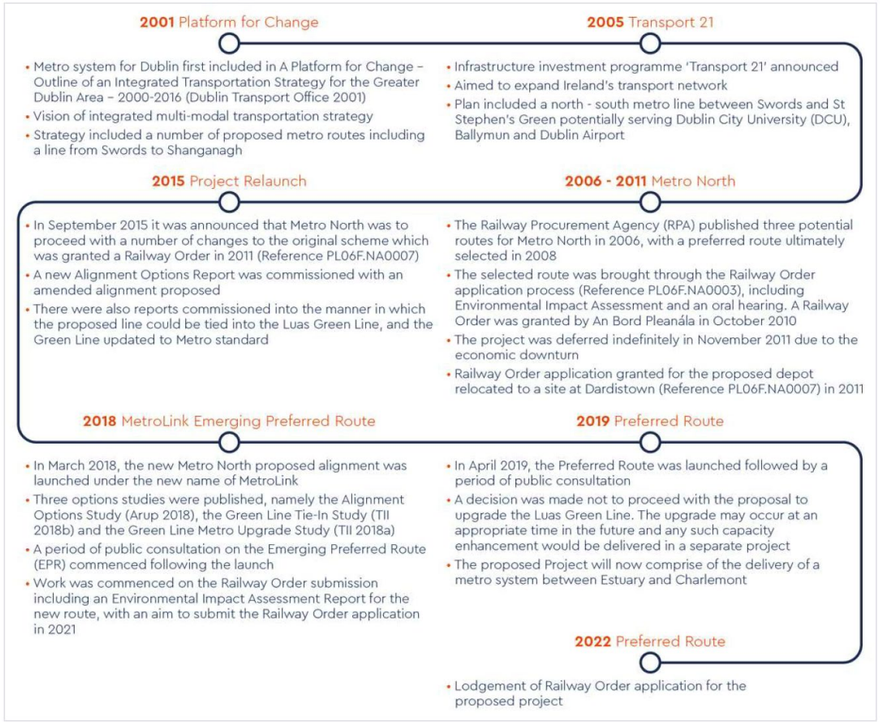

Figure 1 – Project History Overview

Dublin and Ireland face a number of significant challenges moving into the future, most of which are associated with the growth and success of the Irish economy over the last few decades. These challenges are becoming more significant as the need to transform to a carbon neutral economy continues.

Ireland is outgrowing its current transportation infrastructure. In 2021, Dublin ranked as the 35th most congested city in the world (an improvement from 14th in 2018)[2.4]. A single Dublin commuter will, on average, spend over 213 hours a year stuck in traffic (28 extra minutes each rush hour). Economists estimate that, without intervention, congestion and lost time will cost the Irish economy over €2 billion per annum in 2033 (EFEU, 2017).

At the last census in 2022, Ireland's population stood at 5.1 million, an increase of 8% from the 2016 Census[2.1]. By 2040 the Central Statistics Office (CSO) estimates that the population of Ireland will grow by an additional one million people. According to the 2022 Census the number of people who drove to work increased by 4% to 1.2 million between 2016 and 2022. There was a 7% increase in the number of people who cycled to work, bringing the number to more than 60,000, and 4% fewer people commuting to work by train, Luas or DART.

MetroLink will carry up to 53 million passengers in its first year (2035), cutting journey times from Swords to the city centre to 25 minutes[2.2]. By meeting the future demand for sustainable public transport in the capital, the population will benefit from this new high quality, high frequency sustainable mobility option that it is predicted will result in a significant "modal shift". As a result, MetroLink will help Ireland meet its climate change targets in line with Climate Action Plan 2023 (see 2.3 below)[2.3], make Dublin a more liveable and sustainable city, and will have a transformational impact on Dublin and Ireland. Further details of the benefits the proposed Project will deliver are set out by 2.4 below.

2.2 Project Overview

The proposed MetroLink Project is shown by Figure 2. It is a fully segregated and automated railway, mostly underground and approximately 18.8km in length. It has 16 stations running from north of Swords at Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and the city centre to Charlemont in the south of Dublin city centre.

It includes a 9.4km section of single bore tunnel running beneath Dublin city centre from Northwood Station to Charlemont Station, and a 2.3km section of single bore tunnel running beneath Dublin Airport. Tunnel sections include intervention access facilities for emergency services at the Dublin Airport South Portal, Albert College Park and just south of Charlemont Station. Tunnel portal structures will be provided at Northwood, Dardistown and Dublin Airport. North of Dublin Airport the alignment will emerge from tunnel and will run at surface level, in cut and cover and on elevated structures to Estuary Station. A new 99m long viaduct will be constructed over the M50 Motorway and a 261m long multi-span viaduct over the Broadmeadow and Ward Rivers.

As noted above, there will be a total of 16 stations, including:

- 11 underground stations at Dublin Airport, Northwood, Ballymun, Collins Avenue, Griffith Park, Glasnevin, Mater, O'Connell Street, Tara, St Stephen's Green and Charlemont;
- 4 retained cut stations at Seatown, Swords Central, Fosterstown and Dardistown; and
- 1 at grade station at Estuary.

A multi-storey 3,000 space Park & Ride (P&R) close to the M1 Motorway will be provided at Estuary Station, and a maintenance depot is proposed at Dardistown (adjacent to the station). The depot will house all the facilities required for the maintenance and operation of MetroLink, its rolling stock and the Operational Control Centre.

The construction and delivery of the MetroLink Project will include civil engineering; tunnelling; railway signalling; command and control and communications systems; provision of electrical substations and other electricity infrastructure to power MetroLink; establishment of new and realigned access routes and road junction improvements; diversion of existing utilities; provision of new drainage infrastructure; provision of environmental mitigation measures; and other infrastructural modifications to facilitate the overall delivery of the proposed Project.

[2.1] *EIAR Chapter 3, Section 3.3.2.5*

[2.2] *EIAR Chapter 3, Section 3.3.2.5*

[2.3] *EIAR Chapter 3, Section 3.3.2.5*

[2.4] *EIAR Chapter 3, Section 3.3.2.5*

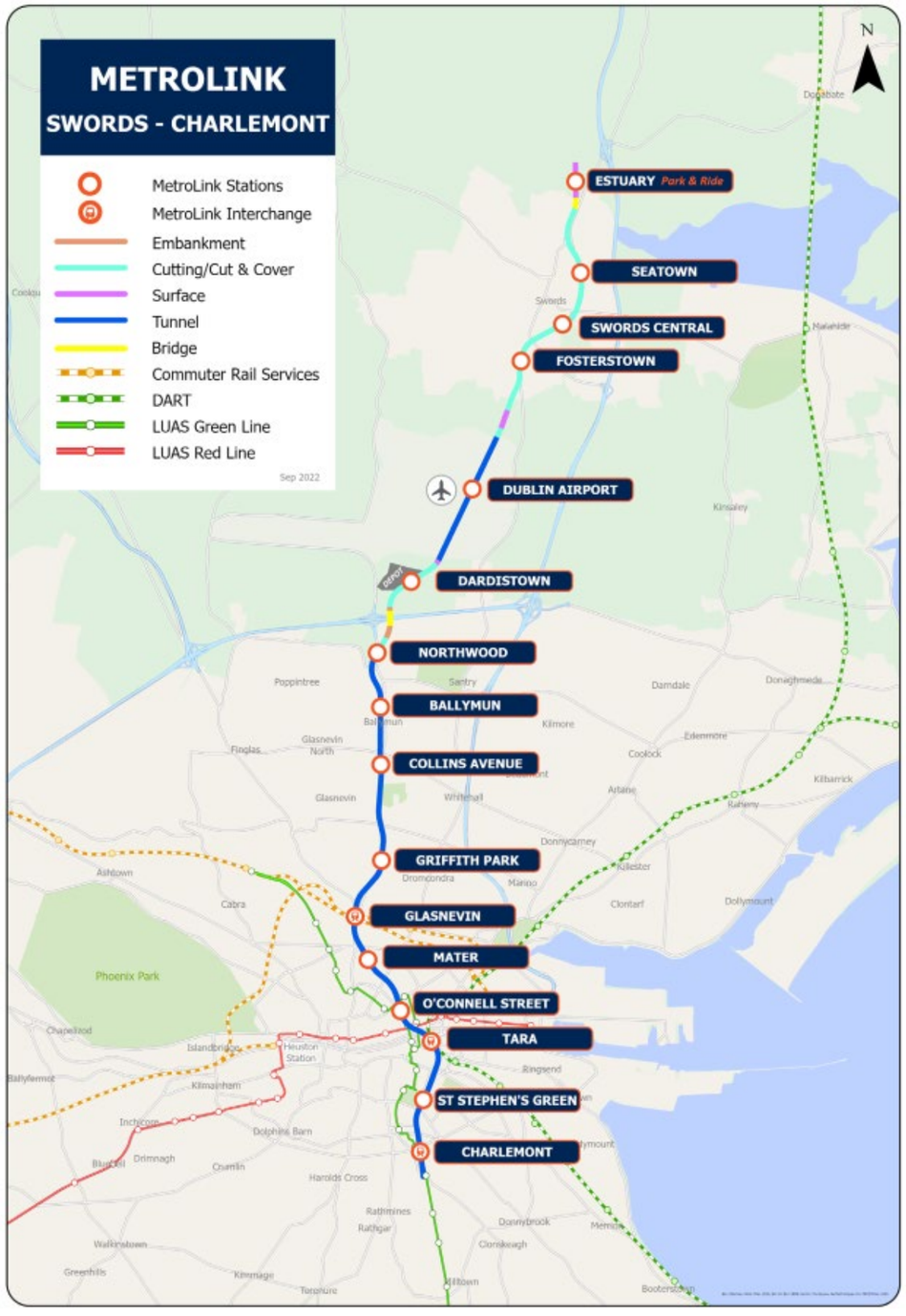

Figure 2 – The MetroLink Project

2.3 Climate Action Plan 2023

Since the Railway Order application was made in 2022 the second annual update to Ireland's Climate Action Plan 2019, the Climate Action Plan 2023 has been published. That Plan implements the carbon budgets and sectoral emissions ceilings and sets a roadmap for action to halve emissions by 2030 and reach net zero no later than 2050.

Climate Action Plan 2021 targets have been revised to meet this higher level of ambition, including a 20% reduction in total vehicle kilometres, a reduction in fuel usage, and significant increases to sustainable transport trips and modal share. This further emphasises why the MetroLink Project needs to be realised. TII will present at the Oral Hearing to demonstrate further why the proposed Project is consistent with then applicable Climate Action Plan, bearing in mind it may be updated prior to the Oral Hearing.

The actions identified by the Plan extend to all sectors of the economy including transport, aiming to transform Ireland into a low carbon nation over the next three decades. The Plan emphasises the need for a "modal shift" from the private car to a more sustainable form of transport and enhancing active travel networks. A key goal of the Plan is to provide citizens with reliable and realistic sustainable transport options.

> *"Modal Shift in Transport and Fleet Electrification: Policies providing the infrastructure and incentives to use public transport, coupled with changes in behaviour are required to reduce passenger car use. This will require a 20% reduction in vehicle kilometres travelled, and significant increases to the level of additional public transport and active travel journeys per day……"*

MetroLink has a critical role to play in achieving the objectives of the Plan noting that one of the actions identified to achieve the above-mentioned modal shift is "TR/23/36 Advance Metrolink planning pending ABP approval".

2.4 Benefits of MetroLink

The objective of the MetroLink Project, as established by the National Transport Authority (NTA) and TII and as informed by the planning policy context is ***'To provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre.'***

The proposed Project will deliver economic, environmental and social benefits, including physical and psychological human health benefits, whilst making a significant positive contribution to reducing environmental emissions. It will offer:

- High frequency services.
- Connect seamlessly with all public transport modes.
- Be fully segregated from all other road users.
- Be a fully automated train service.

State of the art technology, including the provision of a fully automated service, will provide a dynamic world class service with the highest safety standards that will:

- Provide high performance levels and greater capacity through:
  - Improved train punctuality as the automated system calculates exactly by how much and at which point a train has to accelerate and brake for it to arrive punctually at the next station.
  - Trains that can travel at shorter intervals (headways) one after another.
  - Greater flexibility and resilience. If passenger volume is high, additional trains can be deployed independently of the regular timetable and can be automatically sent into operation direct from the depot.
- Consume less energy, as a result of optimised acceleration, traction and braking processes with follow-on maintenance benefits for example through reduced wear and tear; and
- Require shorter platforms lengths and thus smaller station sizes.

Other particular benefits, as noted in the EIAR[2.5], and the published MetroLink Preliminary Business Case[2.5] for both Dublin City and Ireland, will include:

- **Sustainable Mobility**

MetroLink will provide over 1 billion carbon neutral, fully electrified, passenger trips by 2050, encouraging some 700,000 people within a 10-minute cycling distance from a station to undertake 20,000 cycling trips per day and 120,000 walking trips per day.

Over 60 years of operation, **MetroLink** will save the equivalent of almost 3,000 lifetimes of time spent sitting in traffic congestion.

- **Transition to Low Carbon Future**

MetroLink will create the opportunity for the diversion of 6.8 million private vehicle journeys per annum in the early years of operation (growing to 12 million by 2045), and approximately 360 million car trips diverted by 2055.

- **Compact Growth**

MetroLink will provide the planning nodal structure to almost 9,500 hectares of land that comes within a 2.5 kilometre radius of its 16 stations that are spaced out along the 18.8 km route. This will encourage compact growth development in housing, helping to address housing market challenges.

- **Enhanced Regional Connectivity**

MetroLink will facilitate, for the first time, the ability for anyone to complete a journey from their point of origin to Swords and Dublin Airport using existing rail, Luas and MetroLink services. In addition, travellers and commuters arriving on Iarnród Eireann services from all parts of Ireland will be able to access MetroLink via existing Luas services or existing rail services at Glasnevin and Tara Street Stations.

- **High Quality International Connectivity**

MetroLink will support the efficiency and growth of Dublin Port and Dublin Airport by creating additional passenger access opportunities and allow for optimisation of surrounding road and public transport networks.

TII analysis demonstrates that the M50 / M1 Motorway system adjacent to Dublin Airport can at times experience unstable traffic flow patterns or a complete breakdown of flow. The proposed Project will reduce private vehicle journeys to and from the airport by between 10,200 and 13,200 per 12-hour period. Tourists will be able to arrive at Dublin Airport and then access the rest of the rail network efficiently and effectively, while business travellers will be able to access Dublin City more easily, increasing the likelihood of making Ireland their European base of operations.

- **A Strong Economy Supported by Enterprise, Innovation and Skills**

MetroLink will help to stimulate economic activity. It will support between 7,200 and 9,100 direct construction jobs for each year of construction activity, and a further 2,500 to 3,000 indirect supply chain and support related jobs each year. After construction, MetroLink operations and maintenance will provide over 300 permanent skilled jobs.

MetroLink will connect people to 127 schools, three third level institutions and five hospitals.

[2.5] *EIAR Chapter 3*

[2.6] MetroLink Business Case

3. Overview of Submissions and Observations Received

Important: *The observations quoted or represented in this document represent the views of persons and organisations who have made submissions, and do not necessarily reflect the views of Transport Infrastructure Ireland (TII) or imply that TII agree or disagree with submissions or observations made, except where a response is provided to an observation made. TII would also note that they do not attest to the accuracy of the details provided by submissions but have responded to observations made in good faith.*

3.1 Introduction

Through non-statutory public consultation meetings in March 2019 and 2020 and individual stakeholder consultation meetings, Metrolink has engaged with the majority of impacted parties along the route and has complied with the Aarhus Convention.

During the non-statutory public consultation on the Emerging Preferred Route in March 2018, over 8,000 submissions were received from affected parties, a further 2,000 submissions were received following the second non-statutory public consultation on the Preferred Route in March 2019. In March 2021 a further non-statutory public consultation was convened to address stakeholder concerns regarding the siting of an Intervention shaft in Albert College Park. After each of these non-statutory consultations a 'consultation feedback report' was published along with supporting documentation [3.1, 3.2, 3.3] and the design was reviewed and refined. The EIAR Chapter 8 provides further detail with regards these consultations [3.4].

www.metrolink.ie/en/consultations/emerging-preferred-route-2018

www.metrolink.ie/en/consultations/preferred-route-2019

www.metrolink.ie/en/consultations/albert-college-park-public-consultation-2020

The purpose of this section is to explain the approach and methodology adopted to analyse the submissions received and provide an overview of what that analysis is showing. Section 4 provides a more granular level of detail in terms of the specific observations raised and TII response, whilst section 5 provides TII's specific responses to the issues raised by each of the individual submissions received.

At the conclusion of the Railway Order Statutory Consultation, the MetroLink Project received 317 submissions, of which some were one or two pages long while some submissions included more than 150 pages of text, maps, and drawings. Over 5,000 pages were received, read and analysed, with approximately 9,335 individuals confirmed as being represented by the submissions received. (3.3.2 explains how this number was derived).

Considering the scale of the proposed Project, and that circa 2,400 property owner/occupiers along the proposed route were written to notifying them of TII's intention to lodge the MetroLink Railway Order application, it is perhaps noteworthy that 317 submissions received in response to the Railway Order application is a relatively small number.

This is further put into context in terms of scale by the fact that 87 of the submissions related to the proposed station at Charlemont, accounting for 27% of all submissions received, 11 submissions were received in relation to the position of the proposed MetroLink alignment along the R132 and or its impact on green space, and 28 individual submissions were received from the Office of Public Works (OPW) in relation to individual properties, including St. Stephen's Green Park.

Whilst considerably fewer submissions have been received in response to the Railway Order application when compared to the non-statutory consultation process, it is recognised that as the proposed Project has progressed, individuals have organised themselves into groups resulting in single submissions representing multiple individuals.

Overall, submissions received showed general support for MetroLink as a solution to Dublin's traffic congestion and public transport capacity issues, while demonstrating a high level of awareness of MetroLink and its benefits and potential impacts. However, some submissions were more critical, questioning the justification for the scheme, its current alignment and concerns regarding the local environmental impacts during both construction and operation.

3.2 Analysis Methodology

This section summarises the approach taken to help analyse and understand the submissions received.

3.2.1 Geographic Division of the MetroLink Route

The analysis of the submissions received parallels the structure of the submitted Environmental Impact Assessment Report (EIAR), both in terms of **thematic** analysis, namely the EIAR Chapters (see 3.2.3), Planning Report, Natura impact Statement (NIS) and Appropriate Assessment Screening Report; and **geographic** division of the route as defined by the EIAR 'Assessment Zones'. This is to ensure that the review and analysis of submissions received is aligned with the submitted Railway Order application and the analysis presented in the EIAR, whilst also helping to improve the understanding of the locations where there were objections and/or support for the proposed Project along the alignment.

These assessment zones (AZ) are illustrated and summarised below by Figure 3 and Table 1, noting that AZ1 and AZ4 have been further subdivided for the purposes of this document to ensure observations are addressed with sufficient granularity for their respective geographic locations. For AZ1, the area has been split in two recognising that north of Swords Central Station it is predominantly residential, while south of, and including Swords Central Station itself, to the Dublin Airport North Portal it is predominantly commercial. It is acknowledged there are exceptions in terms of commercial and residential in both areas and these are taken into account. For the city centre section AZ4, the area has been sub-divided into stations and an associated section of running tunnel.

3.1 *MetroLink Emerging Preferred Route Consultation*

3.2 *MetroLink Preferred Route Consultation*

3.3 *Albert College Park Consultation*

3.4 *EIAR Chapter 8, sections 8.4, 8.6 and 8.7*

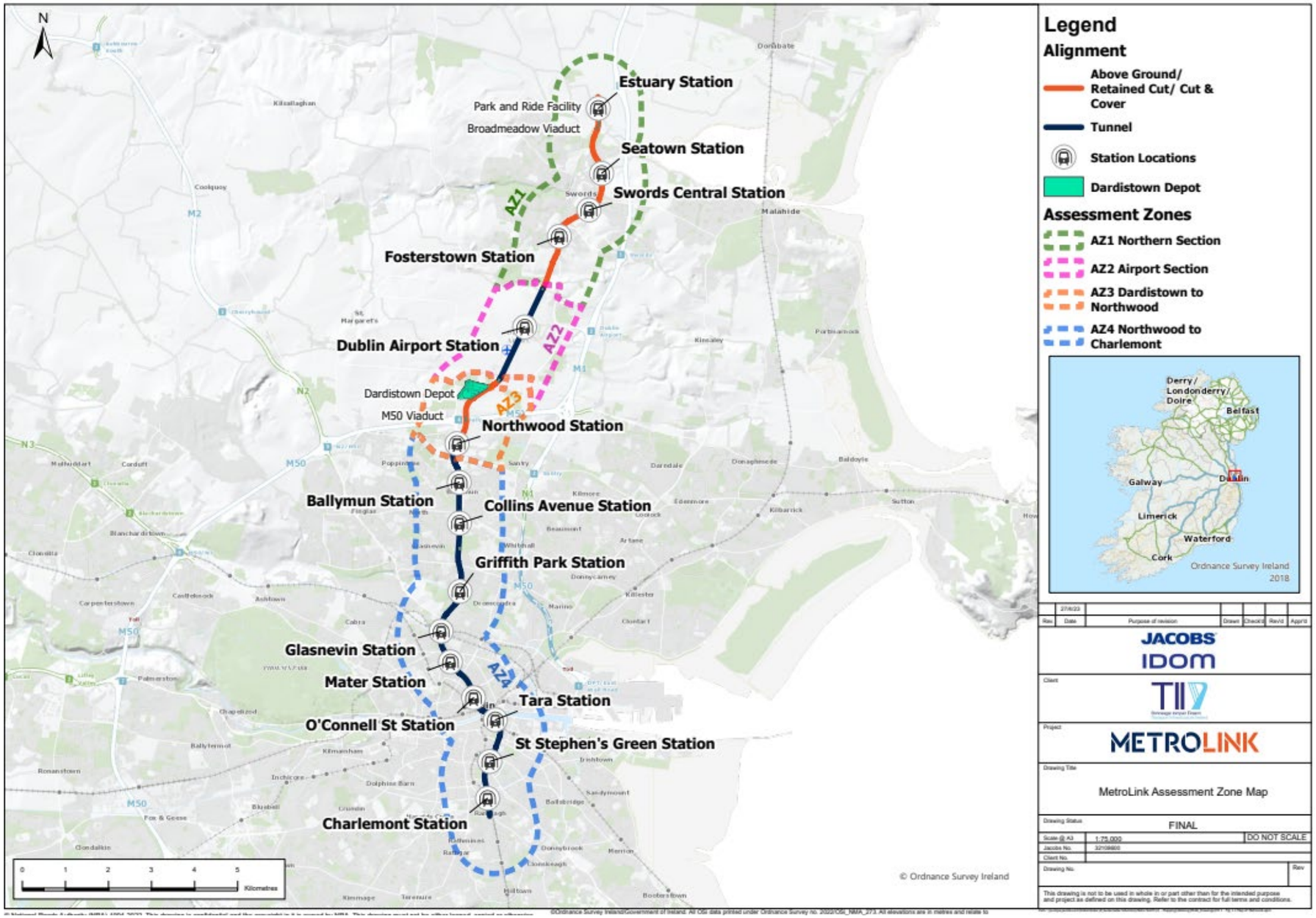

Figure 3 – Map Showing Metrolink Assessment

Zone	Geographical Section	Geographical Section Description
AZ1	Estuary Station to Dublin Airport North Portal (DANP).	Section includes at-grade, embankment, open and retained cut, and cut and cover alignment sections, as well as a railway viaduct crossing over the Broadmeadow and Ward Rivers and associated flood plains, Park & Ride facility at Estuary Station, plus stations at Seatown, Swords Central and Fosterstown.
	AZ1(a)	Estuary Station (including Park & Ride facility) to Seatown Station to northern end of Swords Central Station.
	AZ1(b)	Swords Central Station to Fosterstown Station to Dublin Airport North Portal (DANP).
AZ2	Airport Section	Section AZ2 includes the ESB Networks connection and new substations, the Dublin Airport North Portal (DANP), the tunnel running beneath Dublin Airport lands, Dublin Airport Station and Dublin Airport South Portal (DASP) and associated intervention and ventilation tunnels.
AZ3	Dardistown to Northwood	Section includes embankment, elevated, open and retained cut, and cut and cover sections of the alignment. AZ3 extends from south of Dublin Airport South Portal (DASP) to the Northwood Portal, and includes Dardistown Station, the Dardistown Depot, ESB Networks connection and substations, the M50 viaduct crossing, Northwood Station and the TBM launch site at Northwood.
AZ4	Northwood Portal to Charlemont	AZ4 extends from south of the Northwood Portal in bored tunnel to just beyond Charlemont Station, and includes ten underground stations, and the Albert College Park Intervention Shaft.
	AZ4(a)	Northwood Portal to Ballymun Station, Ballymun Station and running tunnel to Collins Avenue Station.
	AZ4(b)	Collins Avenue Station and running tunnel to Griffith Park Station, including Albert College Park Intervention Shaft.
	AZ4(c)	Griffith Park Station and running tunnel to Glasnevin Station.
	AZ4(d)	Glasnevin Station and running tunnel to Mater Station.
	AZ4(e)	Mater Station and running tunnel to O'Connell Street Station.
	AZ4(f)	O'Connell Street Station and running tunnel to Tara Station.
	AZ4(g)	Tara Station and running tunnel to St. Stephen's Green Station.
	AZ4(h)	St. Stephen's Green Station and running tunnel to Charlemont Station.
	AZ4(i)	Charlemont Station and tunnel turnback south of the Station.

Table 1 – Geographical Division of the MetroLink Route by Assessment Zone (AZ)

3.2.2 Grouping of Submissions by Type or Organisation

To assist with managing and understanding the number of submissions received, interpretating the analysis and ensuring the necessary technical experts were deployed to review submissions, the submissions were categorised into one of the five groups below:

- Group 1 – Statutory and public bodies.
- Group 2 – Resident associations and groups, community groups, residential property owners, residents and their representatives.
- Group 3 – Businesses and commercial operations.
- Group 4 – Government agencies, elected representatives, hospitals, churches, religious organisations, theatres, advocacy groups, leisure centres and sports clubs.
- Group 5 - Schools and Universities.

3.2.3 Qualitive Analysis

A 'Coding' methodology was used to analyse the qualitative data contained within each submission to help with identifying the overall frequency, types, and geographic location of observations made, and thus their grouping thematically and geographically.

Every individual submission has been carefully read and examined and coded against the themes of the EIAR chapters and associated Railway Order documentation, and the geographic areas described in section 3.2.1. It is common for several different codes to be assigned to a single submission reflecting that a submission will often make observations on a number of matters. This approach has enabled TII to complete a thematic and geographic analysis of the submissions received to develop an in depth understanding of the observations made and to enable detailed responses to individual submissions.

As noted previously, a large volume of written qualitative information has been received (over 5,000 pages) and thus the analysis of this information does present some challenges since it is not exact and precise in nature. For example, it is not uncommon for a sub-theme to appear across several headline themes. Therefore, it is important to consider what the data is indicating holistically across the whole analysis. Quoted numbers should therefore be viewed in this context, recognising they are not generated by exact data and should be considered in terms of scale, in aggregate and relatively.

It is also important to remember that by way of example, whether we have three observations concerning one subject, and in excess of 100 with regards to another subject, irrespective, both observations sets are treated with equal importance by TII. Therefore, while an indication of consensus or scale of views is of interest, it does not influence how TII deals with the matter. All observations are treated equally.

3.2.4 Submission Representation

The number of individuals who have either signed or are represented by a submission has been counted and recorded.

3.2.5 Reviewing and Responding to Individual Submissions

All 317 submissions have been reviewed and statements identified and extracted into a tabular format against which TII have provided a specific response to each observation made (see section 5). In total across the 317 submissions received a response has been provided against approximately 4,800 individual observations.

It is important to appreciate this when reading sections 4.2 and 4.3 which seek to summarise TII responses to observations received. The purpose of the summary is to provide the reader with an overview of the observations made and TII's response, but it is important for the reader to note that there are also individual specific responses to each of the submissions and their associated observations contained at section 5.

3.2.6 Combining Qualitative Analysis with the Responses to Individual Submissions

Both the 'Qualitative Analysis' (see 3.2.3) and the 'Reviewing and Responding to Individual Submissions' (see 3.2.5) have provided important and critical insight into the submissions received. The submission observations reported in 3.3.5 and 3.3.6, and the responses provided in section 5 take account of the understanding and knowledge gleaned from both these work streams.

3.3 Analysis of Submissions and Observations

This section analyses the submissions received, and the subjects covered by the observations made within these submissions. To assist with understanding what the submissions received are showing, the information received has been presented in several ways: grouping of submissions by type / organisation; number of individuals represented by submissions; submission categorisation by Project phase (construction or operation); support for MetroLink; submission themes; and submissions by geographic area.

3.3.1 Number of Submissions Received by Type or Organisation

Figure 4 below summarises the split of the 317 submissions received across the five groups.

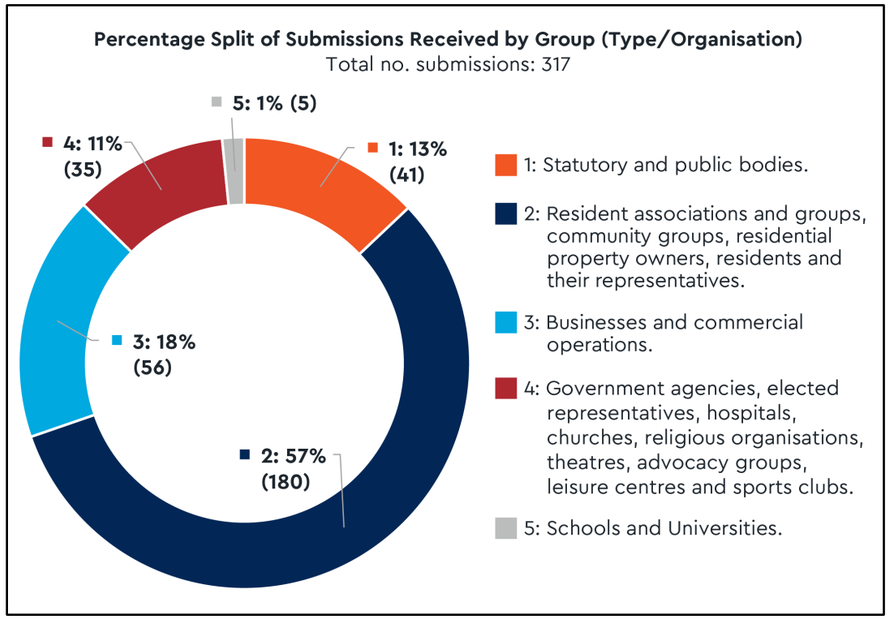

Figure 4 – Percentage Split of Submissions by Group (Type/Organisation)

Approximately 75/42% of the Group 2 resident submissions received related to the proposed station at Charlemont.

3.3.2 Number of Individuals Represented by Submissions

Approximately 9,335 individuals, households, businesses, organisations have signed a submission, or a positive statement is made in the submission regards the number of individuals represented. Figure 5 shows the split of individuals represented by each Group.

It is of note that of the 9,335 individuals, 7,900 or 85% are accounted for by 6 submissions as shown by Table 2.

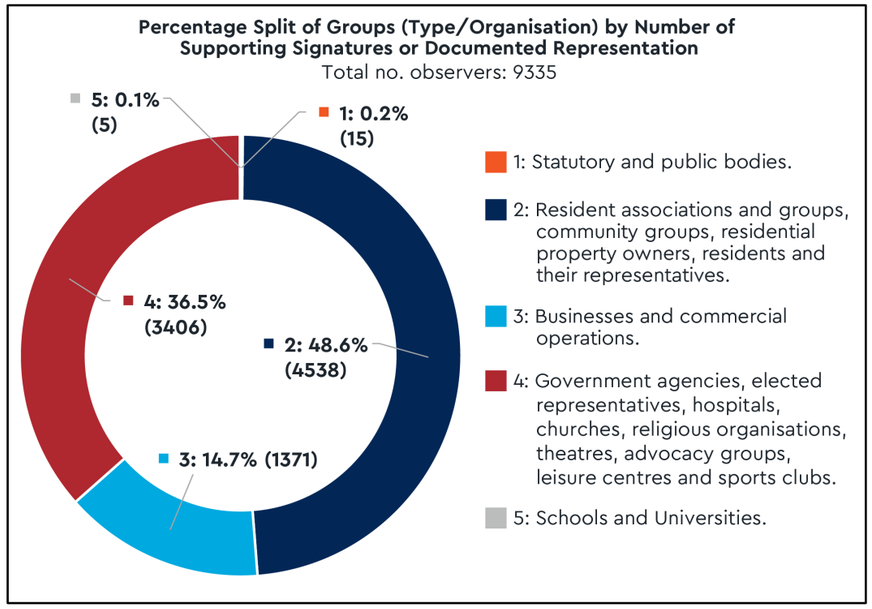

Figure 5 – Division of Submission Groups by Representation of Individuals

Group	No. individuals, households, organisations, or businesses represented
Group 2 (resident and community groups, property owners or their representatives)	
District 7 Community Alliance	1,700
Griffith Avenue and Districts Residents Association (GADRA)	1,000
Terenure West Residents Association	600
Group 3 (businesses and commercial operations)	
Dublin Chamber	1,300
Group 4 (Government agencies, elected representatives, hospitals, churches, religious organisations, theatres, advocacy groups, leisure centres and sports clubs)	
Fingallians GAA Club	2,100
Irish Airline Pilots Association	1,200
Total	**7,900**

Table 2 – Submissions Representing Large Numbers of Individuals

3.3.3 Submissions Categorised by Construction and Operational Phase

Figure 6 shows the split of submissions received in terms of project phase covered by a submission. 57% of submissions received cover both the construction and operational phases of the proposed Project, with the remaining, bar 3, split across construction or operational phase only.

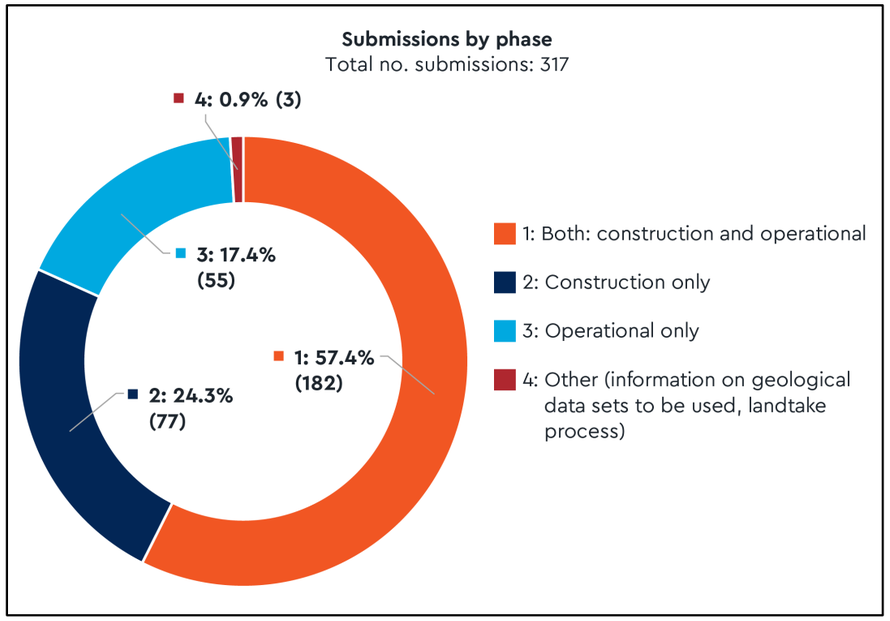

Figure 6 – Split of Submissions by Construction or Operational Phase

3.3.4 Support for MetroLink

The submissions received have been analysed in terms of support for the proposed Project (Figure 7). 58% or 179 of submissions expressed their support for the overall scheme but objected to specific elements of the proposed Project, most often in the immediate locality of the observer. Only 25% or 64 submissions objected to the proposed Project in its entirety.

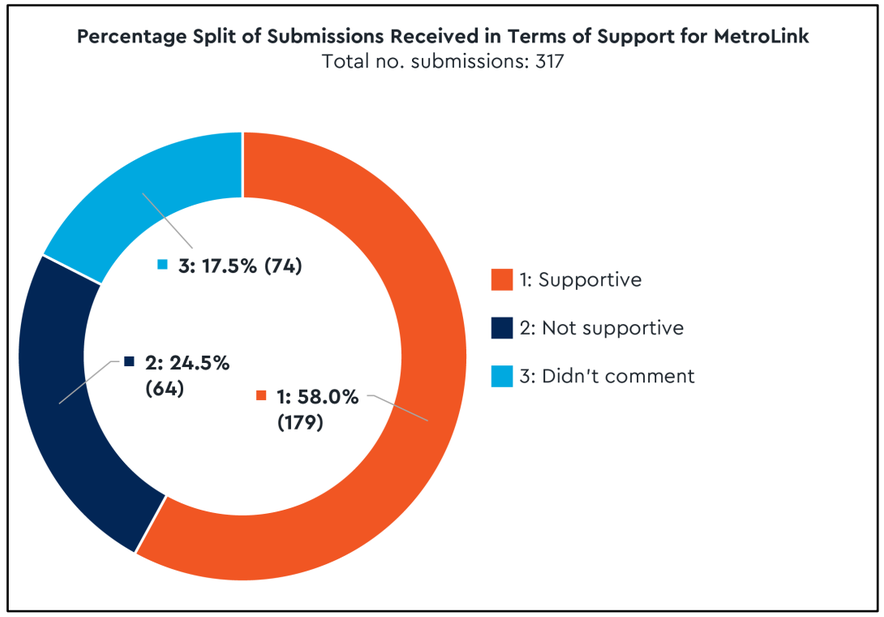

Figure 7 – Percentage Split of Submissions in Terms of Support for the Proposed Project

3.3.5 Submission Themes

The submissions received covered a wide range of themes which corresponded to the chapters of the Environmental Impact Assessment Report (EIAR) and other Railway Order documentation.

A number of submissions and observations raised more strategic transport planning type subjects such as route selection, station location justification and consideration of proposed alternatives, whilst others were very specific to the impact on a specific location or local community, such as the location of individual station placements, the demolition of particular buildings and the loss of local green spaces.

The most common themes covered by submissions were focused on the consideration of options and alternatives and decisions made, and the predicted environmental impacts during the construction phase. A number of other themes, for example traffic and transport, land take, noise and vibration had a significant overlap with the construction phase theme.

Many of the submissions that covered the construction phase were understandably focused on issues which concerned local residents. These included noise and air quality, the perceived impact on quality of life and human health, and the duration of the construction phase. Disturbance to normal daily life was also raised, including the impact of construction traffic on local access and existing parking provision, alongside the impact on businesses and their operations during the construction phase. Similar observations in terms of environmental impact, albeit to a lesser degree, were also raised for the operational phase.

Figure 8 provides a summary of our analysis of the themes covered by the submissions received, showing the number of submissions received and observations made in relation to a particular theme.

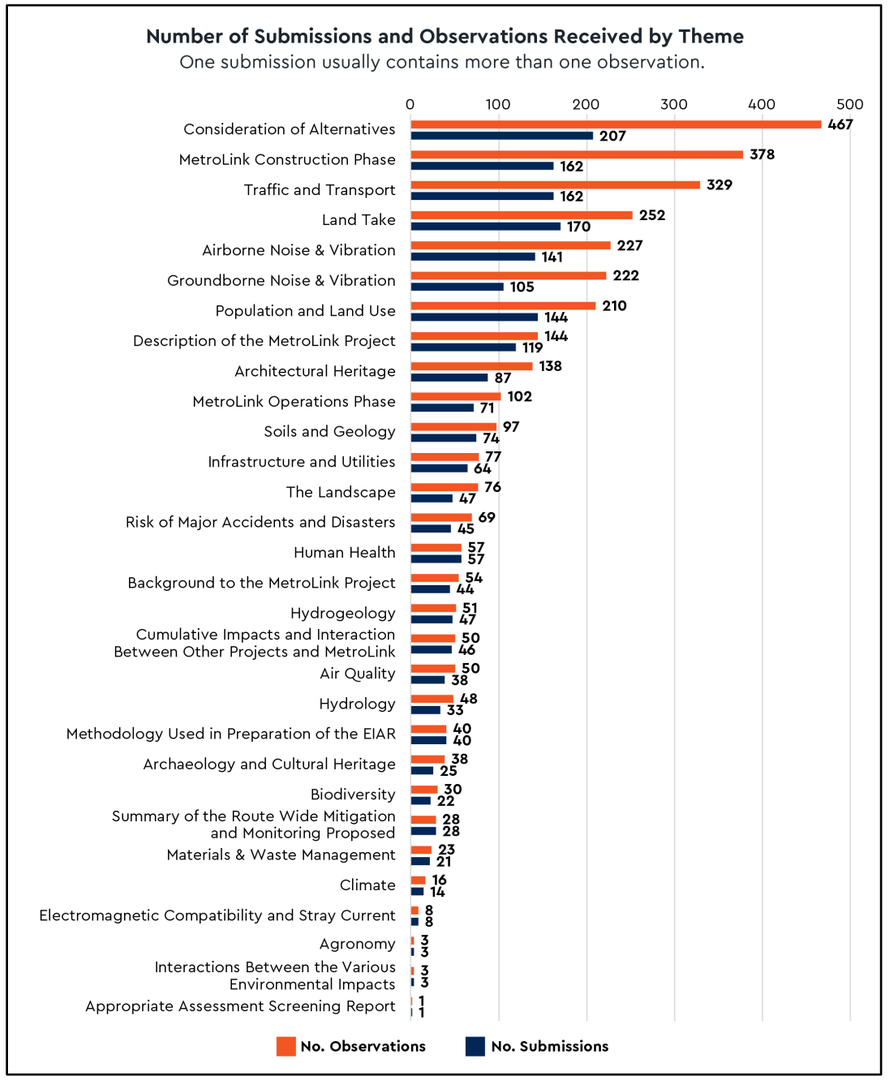

Figure 8 – Number of Submission and Observations Received by Theme

Based on the information presented by Figure 8 and the detailed review and response to individual submissions (section 5), the findings of the thematic analysis have been summarised below under five main subject headings:

1. Strategy and Decisions
2. Construction Phase
3. Operational Phase
4. Strategic Planning
5. Railway Order (RO) Process and RO Documentation

3.3.5.1 Strategy and Decisions

The predominant sub-theme of observations made centred around the subject of alternatives and options considered, and their evaluation leading to decisions taken and the applied for Railway Order.

a) **Support for MetroLink (also see section 3.3.4)** – Nearly 60% of submissions support the need for the proposed Project as a whole and the benefits it will deliver, although many submissions qualify their support by referencing matters which they consider require further consideration.

b) **Preferred Route and Consideration of Alternatives** – Observations that relate to the analysis of alternatives, options and conclusions drawn, the assessed benefits that the proposed Project will deliver, the selection of the preferred route and station locations.

   Decisions made around the construction phase, in particular the location of stations and construction compounds, and the area of land take required that is perceived to be unnecessary is also commented upon. The planned working hours for construction sites have also been mentioned in various submissions, with requests made to reduce working hours, or for works to be limited to weekdays only, to reduce effects.

   A small number of observations suggest that MetroLink is the wrong public transport option as, relative to the cost of the proposed Project, the catchment area served is perceived to be limited. Other observations identify that the alignment chosen for MetroLink is incorrect as it requires the demolition of buildings and passes beneath residential and commercial buildings and should instead be confined to transport corridors.

   Observations have been raised regarding the decision to terminate the alignment at Charlemont, with some observations suggesting that the alignment should terminate further north within the city centre at Tara Street or St Stephen's Green. Other observations consider it more appropriate to terminate the proposed Project further south in areas such as Rathmines or Sandyford. There is also a concern that a station located at Charlemont will constrain or prevent future extension of the metro to the south.

   Residents along the R132 Swords Bypass also suggest that the alignment chosen is not suitable due to removal of existing amenity space and its associated construction impact.

c) **Running Tunnel Configuration** – Observations noted that the selected single bore running tunnel configuration results in an intervention shaft being required in Albert College Park. It is suggested that the EIAR does not explain the rationale for why a single bore arrangement is preferred to a twin bore configuration which would not require intermediate intervention shafts between stations where the distance between stations is greater than 1000m.

d) **Depot Location** – An observation stated that the Dardistown Station and depot should be relocated due to their impact on existing and planned land use, potential environmental impact (dust, light, noise, odour, vibration) and the lack of public access road or car park for passengers using the Station. Observations further suggest that the acquisition of prime economic development land could reduce future potential development opportunities.

e) **Project Delivery** - Observations have been raised in relation to the total project cost, noting that a significant sum of money has been spent to date, prior to the proposed Project's construction or operation. Some observers also perceive the proposed Project to be a costly solution in the current economic climate.

   Other observers urge for the proposed Project to be delivered as soon as possible, with comments indicating that the uncertainty of its delivery has led to distress for those impacted.

3.3.5.2 Construction Phase

Construction phase environmental impacts are amongst the greatest concerns expressed in the submissions, particularly at underground stations from Collins Avenue to Charlemont, and the retained cut alignment along the R132. While some submissions distinguished between advanced enabling and main works, most submissions understandably grouped these collectively under construction.

a) **Construction Programme** - Uncertainty of when the proposed Project and associated impacts will commence was expressed since this is predicated on the granting of an enforceable Railway Order and Government approval. Observations have also been made concerning the duration of the construction programme, with reference to the longevity of environmental impacts.

b) **Noise and Vibration** - The potential for disturbance from construction generated noise and vibration is a common concern raised, particularly by those in close proximity to the station compounds, shafts and cut sections of the alignment, or as a result of the tunnel boring machine (TBM) passing beneath or adjacent to properties. Additionally, observers have commented on the proposed working hours, including 24 hour working which may impact on sleep or working from home. There were also submissions which identified some individuals as being more vulnerable to environmental impacts, such as those working night-shifts, working from home, and individuals with sensory processing challenges.

   There were also concerns raised that construction generated vibration could damage property.

c) **Dust and Air Quality** – Concerns for construction activities generating dust and the impact on public health, amenity and property have been raised. The potential increase in emissions generated by construction vehicles, and the risk of fumes emanating from the construction compounds has also been commented upon.

d) **Hydrology and Hydrogeology** - The impact of construction on groundwater (including flow/barrier effect and quality), and the potential for local flooding has been raised. Observations were also made in relation to the potential contamination of water courses as a result of the construction works and associated run-off, and discharge of construction water, particularly quality, predicted volumes and proposed method of discharge.

e) **Traffic and Transport** - Residential, commercial, and public bodies (including hospitals) have concerns with regards the impact of the construction works on all modes of transport. These include the impact of additional construction vehicles and construction worker travel on the road network (e.g., increased congestion, delay to journeys and increased parking demand thereby reducing parking availability for others), and the impact of traffic management proposals on general traffic, public transport services, pedestrian and cyclist safety, and parking and access (particularly where road closures or removal of on-street parking is proposed).

f) **Landscaping and Visual Impact** – The loss of trees and landscaping, and the resulting impact on the visual amenity of areas surrounding construction sites is a concern.

g) **Biodiversity** – Ecological impacts are a concern, with requests made for the implementation of an ecological management plan. Requests have also been made for further survey work to be undertaken to fully assess the potential impacts on birds, badgers, foxes, habitat loss and ecosystems, among others. The need to avoid tree felling during the bird nesting season was also noted.

h) **Land & Property (including temporary acquisition)** - Land use observations are generally location and owner specific and relate to the duration and physical extent of the land to be acquired on a temporary basis to deliver the works, noting in some cases observers feel the extent of land take is excessive. Associated with this are the potential impacts on green spaces, trees and vegetation, access, public realm, business continuity, the inability to develop temporary land until final hand-back, details of how relocation will work, and compensation (including the process) provided for the temporary acquisition of, or damage to property, including loss of business. Concerns are also raised regarding the temporary devaluation of property that is in the proximity of MetroLink construction.

i) **Settlement and Ground Movements** – Concerns regarding the impact of construction generated ground movements and settlement on property and infrastructure close to deep excavations for stations, shafts and cut sections of the alignment, as well as concerns around the impact of tunnelling generated ground movements and dewatering have been raised. Particular concern was expressed regarding designated Protected Structures or where the alignment is perceived to be close to foundations and/or basements. The observations relate to the geology; potential for damage; residual impacts; lack of surveys or assessment; monitoring; repair; and compensation.

j) **Demolition** - The permanent loss of buildings adversely impacting on the character of areas, particularly if the building(s) to be demolished are residential and/or are culturally or architecturally significant. Observations have also been made regarding the environmental impacts associated with demolition, such as noise and dust impacts.

k) **Cumulative Impacts of Construction of Infrastructure Projects** - Concerns have been expressed relating to the potential for cumulative impacts arising from works associated with MetroLink, BusConnects, DART+, the Greater Dublin Drainage (GDD) project, and other major infrastructure projects, as well as local developments. The potential cumulative impact on traffic disruption, noise, dust and other aspects has also been highlighted by observers.

l) **Site Management and Security** - Residents in the vicinity of the proposed construction sites and compounds have raised observations on the potential for increased risks to the security of their property. With the anticipated volumes of construction personnel, there are concerns around the potential for anti-social behaviour around construction sites, and the impact from workers and contractors in the area. There were also observations raised around the use of parking by construction workers resulting in reduced parking for residents, and the potential for lighting overspill from construction sites to cause disturbance.

   Requests for clarification of the roles and responsibilities of both TII and their contractors has also been made, including who will have responsibility for site management.

m) **Utility Diversions and Effects on Services** - The diversion of utilities and the potential for disruption of services is raised, with some privately owned building owners questioning the need for a particular utility diversion(s). Utility agencies such as Uisce Éireann, ESB Telecom, and Eir Grid, as well as Dublin Airport, An Post and the Rotunda Hospital have also raised concerns regarding potential disruption to the services they provide. One utility owner has requested that additional utility infrastructure at MetroLink crossing points is provided i.e., redundancy, in case it should be needed in the future.

n) **Monitoring of Construction** – The need for monitoring of the works to ensure environmental impacts do not exceed permissible limits, the sharing of this information and access to help when needed was raised and requested by a number of observations.

3.3.5.3 Operational Phase

For the operational phase, observations were mainly concerned with the following:

a) **Anti-social Behaviour** - A perceived potential for anti-social behaviour around the stations, and in the surrounding public realm, particularly late at night.

b) **Traffic and Transport** – The need for localised traffic modelling to ensure traffic volumes to and from the stations do not increase as a result of the provision of drop-off facilities or car parking at stations. It is also noted that a request for car parking to be provided at the city centre stations was made. With the anticipated volumes of passengers using the stations, observations have also been made regarding the adequacy of pedestrian infrastructure around the stations, and the provision of sufficient cycle parking. There is also a concern where loss of on-street parking is permanent.

c) **Amenity** - The possible change of amenity (loss and/or quality) in the area as a result of the perceived impact of a new station or infrastructure has been commented on.

d) **Landscape and Visual Impact** - Some observations commented on the perceived visual impact of stations on the surrounding public realm. Many of these observations overlapped with concerns about architectural design.

e) **Architectural Design** – In particular, the exterior architectural design of the stations. Observations considered that the stations do not adequately compliment their surroundings, and as a result generate a negative visual impact on the area. There are also concerns that the positioning of ventilation structures will result in hot air emissions impacting surrounding properties and individuals.

f) **Accessibility** - The importance of ensuring a high level of accessibility to the MetroLink system for all, including consideration of people with restricted mobility, passenger wayfinding, and safety for vulnerable users. This included reference to the need to ensure the provision of sufficient and reliable passenger lifts at stations, provision of cycle parking that is accessible to all, infrastructure and systems that are designed taking account of voice, hearing and vision impairment, and the safe operation of train doors.

g) **Noise and Vibration** - For those with properties directly above or in close proximity to the stations, tunnels, ventilation shafts, open cut or surface track sections, observations raised concerns regarding noise and vibration impacts from train movements on property, and or operations undertaken at those properties. Properties include residential properties, business operations, hospitals, public buildings, educational facilities and entertainment venues.

   Concerns were also raised around noise generated by passengers entering and leaving stations, and the operation of station equipment such as escalators, lift and public address (PA) systems.

h) **Neighbouring and Overhead Development** – A number of submissions questioned how development of Metrolink could affect the ability to develop their sites under either existing planning permissions or future proposals, and how the development potential of land over or adjacent to MetroLink infrastructure would be managed.

   The observations relate to the perceived lost potential to develop such land, and the impact on developments for which planning permission has either been granted or applied for, or in relation to an intention to seek planning permission. This covers new developments and existing property that is intended to be extended and/or refurbished.

i) **Land & Property (including permanent acquisition)** - Predominately related to the physical extent of the permanent land acquisition proposed, including sub-stratum land beneath property, noting in some cases observers consider the extent of land take to be excessive. Other concerns expressed included the selection of property proposed for demolition; loss of land and green space such as playing fields, trees and vegetation; loss of access or access constraints, timescale and duration of impacts; the compensation process and arrangements (including legal); constraints on future development; the permanent devaluation of land and property located close to MetroLink infrastructure; and the planned reinstatement on completion of the works.

j) **Electromagnetic Compatibility and Stray Current** - Potential for electromagnetic interference at specific stations during the operational phase, and the potential effect on research and specialised equipment.

3.3.5.4 Strategic Planning

Observations asserted that MetroLink was in contravention of planning policy, contrary to what the Planning Report says. The Planning Report, submitted as part of the Railway Order documentation provides an overview of planning policy context as a whole, as well as detailing the local planning context within which MetroLink fits, as of the date of lodgement of the Railway Order application.

a) **Planning Policy Context** - The compatibility of the MetroLink proposals with national and regional policies was questioned, including compatibility with the Dublin City Development Plan 2022-2028, the Fingal Development Plan 2023-2029, National Planning Framework, and Sustainable Swords Strategy 2022, among others. In particular, observations have been made regarding the proposed demolition of residential buildings, and the consistency of such demolition with national housing and economic objectives. Similarly, there are concerns that the provision of MetroLink will restrict high density overhead development, or conflict with zoning objectives.

b) **Climate** – Concerns were expressed that the proposed Project does not address climate change issues effectively and that alternative solutions or routes could be more effective in reducing the number of car journeys.

3.3.5.5 Railway Order (RO) Process and RO Documentation

Observations have been raised in relation to the Railway Order application and process, including comments on consultation and engagement undertaken throughout the development of the proposed Project, the documentation provided to support the application, and the Oral Hearing process.

a) **Consultation and Engagement** - Perceived lack of communication with, and information provided to property owners affected by the proposed Project. There is perceived to be a lack of feedback from TII consultation events, with observations suggesting that previous submissions and comments were not considered in the development of the proposed Project.

   Requests have also been made for a commitment from TII to further consult with affected residents and business owners along the alignment, with some specific requests for liaison committees and involvement of residents' associations, as well as the continued involvement and provision of access to the Independent Engineering Expert.

b) **Adequacy of the Environmental Impact Assessment Report (EIAR)** – Observations are made in relation to the details that have been included in the EIAR, with some requests for more detail or more localised assessments such as local traffic modelling, or local assessments of specific properties affected. Some observations centre on the accuracy and clarity of the assessments, with requests for the Railway Order to be amended to include full and clear information, and requests for better mitigation measures.

c) **Adequacy of Drawings** - The adequacy of the drawings and plans provided as part of the Railway Order is commented on, with observations questioning the suitability of the scale selected and level of detail provided, with some suggesting that the drawings are misleading, and difficult to interpret for those with a non-technical background. One submission raised concerns about the accessibility of the Railway Order application documents, seeking a Braille copy of the NTS and a tactile version of relevant drawings.

3.3.6 Submissions in Relation to Geographic Location

This section considers observations made in relation to a particular geographic area to ensure any observations that are local to a particular area are not overlooked.

3.3.6.1 Number of Submissions by Assessment Zone (AZ)

Most of the submissions refer to a particular geographic area along the MetroLink route, and in some cases to multiple geographic areas. All the submissions have been geographically categorised in accordance with the EIAR Assessment Zones (see section 3.2.1), with account taken of submissions referencing more than one of the Assessment Zones.

Of the 317 submissions received, 274 made observations on a single Assessment Zone (AZ), 15 submissions referred to multiple Assessment Zones, and 28 submissions covered more general subject matter that was not geographic specific to the proposed Project.

The majority of submissions refer to a single assessment zone. This is to be expected as individuals are naturally most of all concerned with the impact of the proposed Project on the locality in which they reside, whether it be positive or negative in their view. This also correlates with section 3.3.1 which shows the largest number of submissions received is from Group 2 (resident and community groups, property owners or their representatives).

Figure 9 shows the split of submissions by Assessment Zone. 239/75% of all submissions geographically fall within AZ4 (Northwood portal to Charlemont) and is reflective of this section of the alignment having the greatest number of stations (all underground), and concern around their associated scale, construction duration and their impact on the surrounding environment.

The second highest number of submissions, 28, relate to AZ1 (Estuary to Dublin Airport North Portal. Particular concerns are raised around construction phase environmental impacts on the suburban sections of the alignment, including impacts on green spaces and residential areas, as well as commercial premises and operations.

AZ2 relates to the Dublin Airport area and has 2 submissions that were directly linked to the Airport itself, with AZ3 (Dardistown to Northwood, including the proposed depot) having 5 submissions.

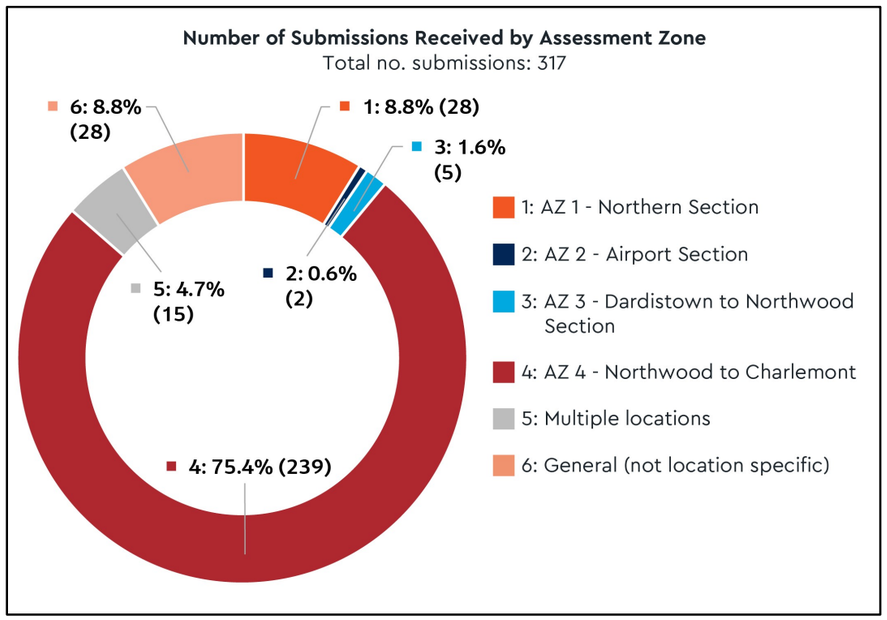

Figure 9 – Number of Submissions Received by Assessment Zone

3.3.6.2 Map Showing the Geographical Areas Covered by Submissions

To help further illustrate the spread and concentration of submissions geographically, Figure 10 provides an overview of the geographic areas referred to by submissions. The map displays the relative number of "location mentions" using a colour scheme to indicate "location mention values" ranging from green with the lowest location mention of 1 to red with the highest location mentions of 29. The map only indicates the relative geographic concentration of submission "location mentions" from the statutory consultation submissions. It does not indicate or allude to the assessed importance of submissions.

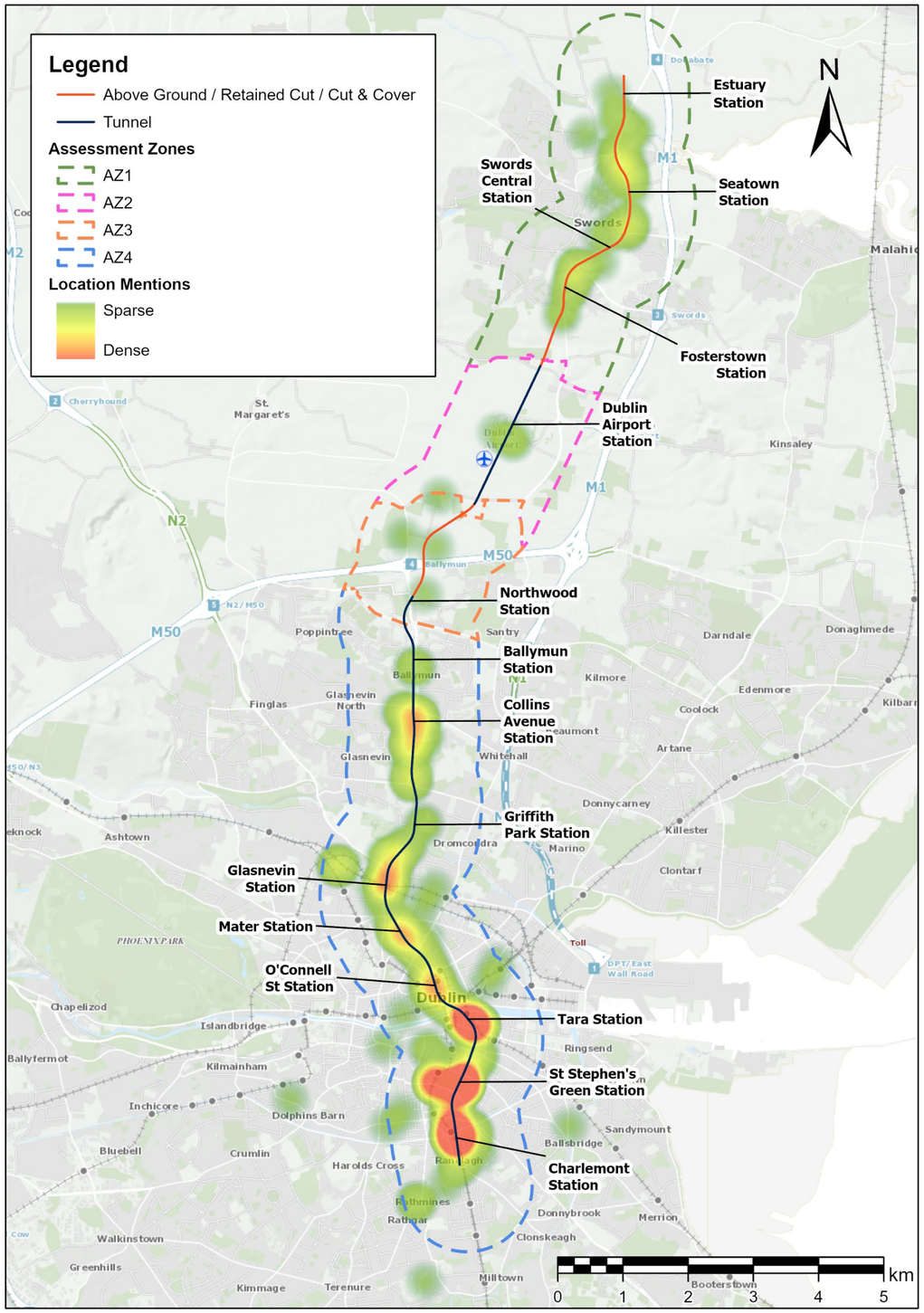

Figure 10 – Map Showing Concentration of Submissions by Location

3.3.6.3 Observations Particular to an Assessment Zone

The following provides a summary of observation topics particular to an Assessment Zone, noting that AZ1 and AZ4 have been further geographically divided in accordance with section 3.2.1. The intention of this section is to supplement and not to repeat section 3.3.5 which has provided an overview of observation themes that are applicable across the proposed Project.

AZ1 – Estuary Station to Dublin Airport North Portal (28 Submissions)

AZ1(a) Estuary Station (incl. Park & Ride) to Seatown Station to North End of Swords Central Station

(15 Submissions)

Along this section of the route, the proposed MetroLink alignment passes through mainly amenity and residential areas and as such, submissions in this area were largely received from, or on behalf of, residential dwellings, with a few submissions received from businesses and developers. Observations received relate to: the location of the alignment through existing residential areas and its impact on green space and amenity; the demolition of pedestrian footbridges that span the R132 being replaced, in the opinion of observers, by less safe at-grade crossings; the removal of existing residential boundary walls at Seatown Villas, Estuary Court, and Ashley Avenue that in the opinion of residents will make the area less safe as well as increasing the risk of anti-social behaviour as people travel through the area; disruption to businesses; constraints on future development; and impact on a GAA Club's facilities.

Whilst residents in this section are not opposed to MetroLink, they are of the view that the decisions regarding alignment of the route have been made on engineering and cost considerations. They consider the impact and long-term disruption of the proposed route on their community have not been adequately considered and detailed in the Environmental Impact Assessment Report (EIAR).

AZ1(b) Swords Central Station to Fosterstown Station to Dublin Airport North Portal (DANP)

(13 Submissions)

In this section, the proposed MetroLink alignment passes through mainly commercial areas and as such many submissions in this area were received from, or on behalf of, businesses, including regarding the proposed demolition of Smyth's toy store.

Observations were predominantly focused on the construction phase and were generally supportive of the MetroLink Project overall. Observations relate to both temporary and permanent land take, access to and from business premises and the associated impacts on business continuity, customer experience and potential loss of income. Some observers also highlight the scale and length of time their referenced land is required for, and the impact of this on commercial development.

AZ2 – Airport Section (2 Submissions)

Observations have been raised by Dublin Airport Authority (DAA) in connection to requests for airport specific security measures and compliance with the Irish Aviation Authority (IAA) guidelines to ensure the construction and operation of MetroLink does not impact the safety or operations of the airport. DAA have also highlighted their concern that MetroLink will impact their intention to undertake future realignment of sections of the Old Airport Road and the southern airfield perimeter fencing to better meet airport safety requirements.

DAA have made a request for an elevated internal walkway from the Airport Station to the terminals to reduce potential conflicts between airport passengers and the internal road network.

The landscaping and design is requested to be in line with the Dublin Airport Architectural Design Framework. In addition, it is requested by both DAA and the Irish Airline Pilots Association that the station structure be designed in a way that does not compromise future development above the station, in line with the Dublin Airport Masterplan.

The Irish Airline Pilots Association raised observations in relation to the future development of the Western Airfield Campus and the impact this development may have on the design and capacity of the platforms and station.

There were also several submissions that considered wider transport planning / strategic development issues that questioned either the need to link to Dublin Airport, or the cost of providing a metro connection to the Airport, in place of an extension of the DART or Luas network.

AZ3 – Dardistown to Northwood (5 Submissions)

Observations raised in relation to this geographical area include the location of the MetroLink depot and the considered associated limitations on the future development potential of the residual lands. A number of commercial and residential properties are proposed to be demolished in this area, including Whitehall Rangers Club house, a warehouse on Sillogue Green Road, Santry Lodge Gatehouse, and residential properties on Old Ballymun Road opposite Gulliver's Retail Park.

The Sainfoin Property Company Limited landholdings extend across a large proportion of the Dardistown Local Area Plan (LAP) lands, with the company saying they intend extensive future residential and commercial development across the site. Their principal observations relate to the impact of MetroLink land requirements on the development potential of this land, in particular along the western boundary where they consider that the proposed layout of the MetroLink depot and access to it may constrain development opportunities.

Mouna Unlimited Company, which manages the ABP Food Group factory in this area, has raised observations regarding retention of access and operation of their facility during construction and operation. The proposed depot location also impacts on existing sports playing fields with observations raised regarding their continued availability.

An observation also noted that Santry Lodge is now listed on the Record of Protected Structures (RPS) in the new Fingal Development Plan 2023 – 2029 (since the lodgement of the RO application) and that MetroLink proposals do not appear to have regard for the architectural heritage of the building, entrance and boundary.

AZ4 – Northwood to Charlemont (239 Submissions)

(Note: As shown by Figure 9, in addition to submissions that are specific to one of the AZ4 sub-areas below, there are a further 35 submissions that refer to multiple AZ4 sub-areas.)

AZ4(a) - Northwood Portal to Ballymun Station, Ballymun Station and Running Tunnel to Collins Avenue Station

(3 Submissions)

The loss of parking to accommodate Ballymun Station is highlighted by observations. ESB Networks Ltd have made observations in relation to the potential disruption of services and associated land take at Ballymun substation (located at Collins Avenue/R103 Junction), raising reservations regarding any use of the wider substation lands on the grounds of safety, security and access.

AZ4(b) - Collins Avenue Station and Running Tunnel to Griffith Park Station, including Albert College Park Intervention Shaft

(14 Submissions)

Submissions and observations highlighted concerns around how the proposed location of Collins Avenue Station had been determined. This was further linked to concerns around the proximity of the Station to Our Lady of Victories Church, the Our Lady of Victories Schools, Dublin City Council Assisted Living and residential properties, and how these and the area surrounding the Station would be impacted negatively during both the construction phase and when the Station is operational. Particular concerns raised included risks from dust generation during construction, noise and vibration during both construction and operation, exposure to anti-social behaviour as children pass the station entrance, and the potential impacts on children with particular sensory sensitivity who attend the adjacent schools.

Observations have been raised in relation to the location and sizing (construction site and permanent footprint) of the proposed intervention shaft site at Albert College Park, and the potential environmental impacts it will have on the park (including existing playing pitches) and surrounding communities during the construction phase. Concerns have also been raised by residents of Albert College Court regarding the permanent loss of parking; the perceived single entrance and exit into the site once operational from Hampstead Avenue, and a suggestion that on-site parking provision for emergency vehicles should be relocated to the highway (R108) to reduce the footprint of the site.

As well as the selected location of the shaft being challenged, this is also linked to observations questioning the proposed location of Collins Avenue Station. It is suggested that the station would be better placed in Albert College Park as this would be preferable from a transport planning perspective and would also generate less environmental impact than the intervention shaft once operational, since a large proportion of the station would be covered over allowing the park area to be reinstated. By moving the proposed Collins Avenue Station to Albert College Park, it is suggested it would be feasible to relocate the intervention shaft to the front of Ballymun Library and that Griffith Park Station could be moved northwards towards Collins Avenue Station to negate the need for an intervention point between the two stations.

AZ4(c) - Griffith Park Station and Running Tunnel to Glasnevin Station

(9 Submissions)

Submissions in this area have been received from local resident associations and from residents in relation to Griffith Park Station and the proposed tunnel alignment. Many of those received were from within the Prospect Square/De Courcy Square and Environs Architectural Conservation Area (ACA), seeking assurance that these properties will be protected both during the construction and operational phases of the proposed Project.

Other specific observations covered the relocation of Home Farm football pitch and facilities during the construction of the Station; impact on schools, the River Tolka and perceived flood risk; and the overall duration of the construction and use of the station construction compound to strip out the tunnel and clean it after it has been constructed, particularly with regard to proposed nighttime working. It was also requested that An Bord Pleanála make it a condition that nighttime working is prohibited for above ground works and tunnel strip out and cleaning.

One local resident's group requested the rationale be provided for justifying the selection of the proposed station location compared to an alternative location further north.

AZ4(d) - Glasnevin Station and Running Tunnel to Mater Station

(30 Submissions)

Residents of Dalcassian Downs who are located close to the proposed Glasnevin Station have made observations about the environmental impact of construction and the temporary loss of parking. The residents of Coke Oven Cottages have raised concerns about loss of access to their properties, and 24 hour track realignment works leading to significant noise impacts if unmitigated.

Other observations, including those received from Waterways Ireland noted that MetroLink resulted in a significant intervention to the Royal Canal that has a proposed designation as a Natural Heritage Area from the Wildlife Act, and is also considered to be an important heritage asset. Concerns were expressed regards the potential ecological impact on the Royal Canal, and the protection of the Royal Canal itself noting that it will be closed and drained for a period of time to facilitate MetroLink construction. Regarding the temporary closure of the canal, observations were made regarding the impact on boat users, pedestrians and cyclists. A concern was also raised regarding the presence of soil on the south side of the canal contaminated with creosote (from old railway sleepers) and its potential impact on the sensitive environment of the canal if disturbed.

Several observations also outlined objections to the demolition of the Brian Boru public house and car park and the temporary removal of Dalcassian Downs historic railings, as well as the demolition of Prospect House and Des Kelly Interiors.

There were also comments made relative to the complexity of constructing Glasnevin Station which will be a joint MetroLink and Iarnród Éireann station, recognising its interface with the works to the existing Iarnród Éireann tracks will add to this complexity.

AZ4(e) - Mater Station and Running Tunnel to O'Connell Street Station

(17 Submissions)

Submissions received reflected the environmental sensitivities of the proximity of the proposed Mater Station to Four Masters Park, Mater Hospital, St Joseph's Church, and commercial and residential properties, and concerns around nuisance and disruption that may arise during the construction phase.

While submissions were primarily concerned with the impacts during the construction phase, concerns were also raised with regards to the permanent loss of on-street car parking (34 spaces) on Eccles Street and Berkeley Road, and the permanent changes to Four Masters Park as well as the impact of this on amenity and the local area.

AZ4(f) - O'Connell Street Station and Running Tunnel to Tara Station

(6 Submissions)

The development of the site and the importance of integration with Dublin Central GP Ltd's development in terms of schedule and design has been commented upon, as well as the percieved dependency of the MetroLink Project on the development of the site. Observations also covered the impacts of MetroLink construction on access to and from shops on Moore Street, the environmental impacts of increased traffic on the ambience of the shopping environment, and ensuring the General Post Office structure and its operation is protected during MetroLink construction.

AZ4(g) - Tara Station and Running Tunnel to St. Stephen's Green Station

(34 Submissions)

Observations raised at Tara Station primarily centre on the proposed demolition of the College Gate apartment complex and Markievicz Leisure Centre, and the associated impacts on the community. It is also noted that demolition is proposed on Tara Street, Poolbeg Street, Luke Street and Townsend Street. Observations assert that there is no satisfactory evidence that the demolition proposed is unavoidable, with submissions requesting further consideration of alternative options. Residents also consider there has been a lack of engagement on the proposals, compensation or relocation arrangements for those affected.

Observations from commercial users focus on the possibility of over site development being compromised by the station structure, permanent ground fixtures and surface penetrations such as ventilation shafts. Observers suggest the proposals are not in keeping with national, regional or local planning policy for housing or the economy.

Trinity College Dublin (TCD) have raised particular concerns regarding the impact the running tunnel construction and the railway once operational will have on their facilities, particularly in terms of groundborne noise and vibration, and electromagnetic interference. It is suggested there has been inadequate assessment of the impacts, and that the mitigation measures proposed are ineffective. They assert that the alignment should be moved further west away from TCD.

AZ4(h) - St. Stephen's Green Station and Running Tunnel to Charlemont Station

(32 Submissions)

The submission from the OPW raised particular concerns with regard to the proposed location of St Stephen's Green Station within the Park, and the impact that construction and operation of the Station will have on the Park, noting the Park is a National Monument and provides an important green space in the centre of the city that has significant architectural, heritage and amenity value. Concerns were also raised regarding the removal of; trees, monuments and park furniture such as railings to enable construction, as well as the impact on the amenity and use of the Park while construction is underway. It was also commented upon that in the view of the observer, the perceived demolition and destruction of a National Monument may require Ministerial consent under the National Monuments legislation.

The impact on local businesses, including a hotel, at St Stephen's Green was also raised in connection with the proposed temporary road layout, business continuity and the area becoming a less attractive destination for potential customers during construction.

AZ4(i) - Charlemont Station and Turnback South of Station

(59 Submissions)

As noted previously there were a significant number of submissions received that related to the Charlemont area. While most submissions were in favour of the proposed Project overall, this was often qualified by requesting that Metrolink terminate at either Tara or St. Stephen's Green stations. Many asserted that a station at Charlemont was not supported due to both the construction and operational impacts it was perceived would impact a quiet residential area.

Numerous submissions questioned why Charlemont had been selected as the southern MetroLink terminus and the location of the proposed station for interchange with the Luas Green Line; the perceived duplication of infrastructure given the Luas Green line already runs between St Stephen's Green and Charlemont; why St. Stephen's Green or an alternative location to the west of Charlemont had not been selected; requests that the section of the proposed Project between Tara and Charlemont is omitted as it cannot be justified in planning terms as well as undermining the business case for the entire Project; and the perceived conflict with the 'Dublin City Development Plan' zoning objectives and negative impact on amenity (both construction and operational phase).

It was felt particular studies had not been undertaken to determine the location of the southern termination point of MetroLink, and therefore at this time Metrolink should terminate at Tara or St Stephen's Green with a separate study undertaken and Railway Order application made to determine any future extension. There was also a concern that locating the terminus at Charlemont would constrain the future extension of the metro, and that a future extension would result in the demolition of property south of the Station.
In contrast it is noted that some submissions requested MetroLink be extended beyond Charlemont as part of the current proposed Project.

Observations raised concerns regarding impacts due to the proximity of the construction site, the excavation, and the station itself (once operational) to properties located on Dartmouth Square West and Dartmouth Road. Dartmouth Square West properties objected to land being acquired that would prevent access to the laneway to the rear of their properties as well as the temporary removal of the northern section of the lane wall. There were also concerns regards the potential impact on the Dartmouth Square Architectural Conservation Area (ACA).

Dartmouth Road residents located opposite the southern end of the Station site raised particular concerns regarding the 4m high hoarding that will be positioned 1.8m from the boundary of their properties along with the associated temporary closure of Dartmouth Road, loss of on-street car parking, and access provision for emergency services.
The properties on Dartmouth Road and to the south also highlighted concerns regarding the construction impacts of the turnback tunnel infrastructure close to or beneath them.

Traffic congestion and pedestrian movement were both commented upon for both the construction and operational phase, with particular concerns raised regarding a terminus station that will attract more traffic and airport users; the new link between Grand Parade and Dartmouth Road being used as a 'rat run'; lack of provision of drop-off/pick-up facilities for a terminus station leading to congestion; disturbance and loss of access to existing parking by the local population; and the quality of the MetroLink / Luas Green Line interchange and its proximity to the 2 Grand Parade building.

A frequent view shared was that the Station enabling works undertaken as part of the adjacent office development at Charlemont do not have planning permission, have not been assessed by the EIAR, and have predetermined the current proposed route of both MetroLink, and the route of possible future metro extensions.

4. Summary of TII Responses to Submissions

4.1 Approach

This section summarises TII's responses to the submissions and observations received, noting that every submission received, and the observations made within each submission, approximately 4,800 in total, have had individual responses prepared and documented (see section 5). The summary is to assist the reader to understand at a high level, TII's response to the main issues raised as summarised in section 3. Cross reference is made to the EIAR, NIS or Planning Report where relevant to the response provided to assist the reader.

The summary of TII responses to the submissions and observations received comprise the following:

1. Summary response to observation themes (see section 4.2);
2. Summary responses to observations specific to a geographic area (see section 4.3); and
3. Summary of some specific individual responses not fully covered elsewhere (see section 4.4).

The reason for splitting responses by theme and geographic area is to explain TII's general approach, whilst also acknowledging there are responses that are particular to a geographic area.

Attention is also drawn to the fact that in all cases, if an enforceable Railway Order is granted, the contractors that will be employed by TII to deliver the proposed Project will be legally obliged by contract to adhere to all mitigation measures committed to in the EIAR and the NIS, all conditions set by An Bord Pleanála in that enforceable Railway Order, and all applicable health and safety legislation.

4.2 Summary of Responses to Observation Themes

The summary of responses mirrors the same order and structure of section 3.3.5:

1. Strategy and Decisions
2. Construction Phase
3. Operational Phase
4. Strategic Planning
5. Railway Order (RO) Process and RO Documentation

To provide context to the response, the observation subjects are restated at the top of each response.

4.2.1 Strategy and Decisions

a) **Support for MetroLink** - more than half of submissions support the need for the proposed Project but are often qualified by referencing matters that are considered to require further consideration.

TII welcome and are appreciative of the support for the proposed Project. TII are also grateful for the acknowledgment of the importance of the proposed Project in providing a reliable and sustainable public transport system for the Dublin area. TII appreciate there is potential for impacts, particularly during the construction phase, and that this is of concern to many along the alignment. Construction impacts will be temporary or relatively short-term and mitigated to reduce their effects as far as practicable, while operational impacts will be mitigated to eliminate any long-term significant residual impacts[4.5].

Once construction is complete, the benefits delivered by MetroLink will be felt by all and will make a significant contribution to the Greater Dublin Transport Strategy 2022-2042.

b) **Preferred Route and Consideration of Alternatives** –Submissions querying whether the alternatives assessment concluded with the right public transport option, alignment, station locations, southern termination point, construction compound locations, required land take, and working hours.

The Assessment of Alternatives EIAR chapter and associated appendices provide details of the alternatives considered, the decision making that has led to the selection of an option, and follow-on design development [4.1]. This includes the more strategic consideration of options in terms of type of public transport system, and route and station locations, right down to individual location specific options along the alignment.

MetroLink provides the best medium and long-term transport project connecting Dublin Airport and Swords for a number of reasons, including its ability to deliver the highest level of transport benefits when compared to other options, while offering critical interchange with other modes of transport that will discourage the use of private vehicles. MetroLink will divert 6.8 million car trips per annum in the early years, growing to 12 million per annum by 2045[4.2]. Subsequently, there will be a strong modal shift along all sections of the alignment, with a 45-58% increase in public transport usage in trips to/from the northern AZ1 (R132 area) section of the proposed Project[4.3].

A robust decision-making process has led to the selection of the preferred alignment designed in accordance with the National Fire Protection Association (NFPA) standard 130 that permits intervention points at not greater than 1000m apart. The key non-statutory consultation milestones in determining the alignment proposed by the Railway Order application, that is now endorsed by the Greater Dublin Transport Strategy 2022-2042, are:

- **Emerging Preferred Route (EPR)** – first non-statutory consultation on the development of the EPR over a period of seven weeks from 22 March 2018 to 11 May 2018.
- **Preferred Route** – this non-statutory consultation took place over an eight-week period from 26 March 2019 to 21 May 2019.
- **Albert College Park Local Area Consultation** - launched 12 February 2020 and ran for four weeks until 11 March 2020.
- In addition to the above, circa 1,450 meetings were undertaken between January 2018 and July 2022[4.4] which were taken account of in informing the design of MetroLink.

It is also of note that the draft Greater Dublin Transport Strategy consultation ran from 23 November 2020 to 22 January 2021 during which time the public were asked to assist in the development of the strategy goals and objectives, and to help identify transport requirements and opportunities. Parallel to this a list of key stakeholders were contacted and asked for their views.

The alternatives assessment process included a comprehensive assessment of alternative alignments and station locations. The identification of a preferred alignment and station locations took account of the interchange capability of a location with other modes of transport, including buses; the existing rail commuter services; and the future proposed DART+ network. Other criteria were also utilised, such as potential trip demand, key trip attractors in the area, directness of route, impact on the environment, and cost. In terms of the impacts of the proposed Project on overlying and adjacent property, this is covered further under the 'Construction Phase' and 'Operational Phase' sections below.

The proposed working hours have been carefully defined in order to allow the proposed Project to be delivered in line with the proposed construction programme and to minimise the duration of environmental impacts which have been assessed in the EIAR.

[4.1] *EIAR Chapter 7, Alternatives*

[4.2] *EIAR Chapter 3, Section 3.4.2*

[4.3] *EIAR Chapter 3, Section 3.4.2*

[4.4] *EIAR Chapter 8 & Appendix 8.19*

Standard working hours will generally be adopted for all above ground works i.e., Monday to Friday 07:00 to 19:00, and Saturday 07:00 to 13:00[4.5]. Only tunnelling and other works underground will be undertaken 24 hours a day. The only exception to this would be exceptional events, such as concrete pours and abnormal deliveries. Should this be necessary, the contractor will engage with the local community and local authority before such works are undertaken.

The rationale for 24/7 working on underground activities[4.6] is:

- Tunnel Boring Machine (TBM) tunnel construction. It is preferable not to stop and start a TBM as this will have a significant consequence of extending the construction programme and overall duration of construction environmental effects (more than doubling the programme to construct the running tunnels as well as associated knock-on programme impacts for the stations if only day-shift working was permitted) and will also increase the cost of the proposed Project such as to make it unaffordable;
- Sprayed concrete tunnelling, such as for intervention tunnels, needs to be undertaken 24 hours per day, seven days per week to ensure a safe and stable method of excavation;
- The groundborne noise and vibration arising from mechanical excavation of tunnels will not exceed threshold limits[4.7]. During nighttime, support works at the surface will be enclosed within acoustically clad steel framed buildings to control airborne noise breakout to surrounding sensitive properties. All concrete to support the sprayed concrete tunnel lining operation will be batched on site within the acoustic enclosure and will not require nighttime delivery; and
- Mechanical Electrical Plumbing (MEP) and power installation, TBM strip out, and tunnel clean and track laying, can be managed underground without causing disturbance at night.

Construction compounds and land take are covered below by sections 4.2.2 'Construction Phase – Land & Property' and 4.2.3 'Operational Phase – Land & Property', the selected alignment along the R132 is addressed by section 4.3.1 and the proposed southern termination point by section 4.3.4, 'AZ4 (i) - Charlemont Station and Turnback South of Station'.

c) Running Tunnel Configuration – Rationale for single bore compared to a twin bore arrangement and the requirement for an Intervention Shaft at Albert College Park.

A detailed comparative analysis of twin versus single bore tunnel has been undertaken, including consultation with Barcelona Metro[4.8] that currently successfully operates a single bore configuration. The results of this analysis showed a single bore configuration offers significant benefits, including:

Passenger Evacuation and Incident Management:

- Enables faster passenger evacuation from the ends of the train compared to lateral evacuation on to an elevated walkway for a twin bore arrangement.
- Provides increased working space for emergency services adjacent to a train in the tunnel.
- Conditions can be created within a larger single bore that facilitates smoke stratification at a high level, thereby improving evacuation and intervention conditions.

Programme and Cost - A single bore tunnel can be constructed at lower cost due to:

- The overall reduced volume of structure to be constructed.
- Faster construction due to less overall volume of material to be excavated and no requirement for tunnel cross-passages which are slow to construct and add to programme complexity.
- No requirement to construct extra mined/cut and cover sections to accommodate track crossovers.
- Only one TBM to drive/pull through stations thereby reducing the overall station schedule and interface risks with critical construction activities.
- Provides a more flexible system throughout the life cycle of the infrastructure. Allows operational adjustments such as additional track crossovers without the need to build new infrastructure.

Environment:

- The reduction in excavation means spoil quantities, handling and disposal is reduced by 9%/52,750m^3 and hence traffic on the roads and the follow-on volume of land fill disposal are reduced.
- The volumes of concrete and steel used to manufacture the tunnel lining precast segments will be reduced for a single bore tunnel which will therefore reduce the traffic on the roads.
- There is an overall reduced environmental impact since the construction programme is quicker, fewer materials are needed for running tunnel construction (reduced use of natural resources and less traffic to transport materials to site), and less excavation is required (spoil disposal volumes are reduced resulting in less traffic on the roads and reduced landfill), with an overall reduction in embodied carbon as a result of the reduced volume of material required (steel and concrete).

To comply with tunnel fire and life and safety requirements in accordance with NFPA 130, a single bore configuration means there is a need for intervention shafts where the distance between stations (or intervention points) is greater than 1000m. This occurs at the Airport south portal and between Griffith Park and Collins Avenue stations. While these give rise to property, population and land use, landscape and visual, and biodiversity impacts over a limited area, they are offset by the benefits listed above.

d) Depot Location - Dardistown Station and depot should be relocated due environmental impacts, lack of provision for a public access road or car park for passengers using the Station, and the impact on existing planned land use and prime development land.

Options for the location of the depot and the associated rail access routes into the depot have been extensively assessed as part of the development of the proposed Project [4.9]. When compared to the alternative location at Lissenhall, the proposal at Dardistown is considered to provide a better balance between operational requirements, is more in keeping with existing land use and with planning policy for future proposed development (as per the then applicable Fingal Development Plan 2017 – 2023 (FCC 2017) and is also consistent with the current Fingal Development Plan 2023-2029), and results in less environmental impact. Within the Dardistown area itself, the selection of the depot location provides the necessary operational requirements, is compatible with zoning objectives with the majority of the proposed site within 'General Employment' rather than 'High Technology' zoned land and is consistent with the then applicable Dardistown Local Area Plan. It also retains the ability for future adjacent land to be developed for uses consistent with those zoning objectives.

Public access for passengers at Dardistown station is not currently provided. This Station will only become operational in the future once development at this location merits the opening of the Station.

[4.5] *EIAR Chapter 5, Section 5.2.4.1*

[4.6] *EIAR Chapter 5, Section 5.2.4.2*

[4.7] *EIAR Chapter 14, Section 14.4.1 & Chapter 14, Section 14.6.2.1*

[4.8] *EIAR Chapter 7, Section 7.7.2.1*

[4.9] *EIAR Chapter 7, Section 7.7.4 & Appendix A7.6*

An alternative depot location has also been proposed by Sainfoin Property Company Limited and this is discussed further at section 4.3.3.

e) Project Delivery - Project cost (including cost to date and the background of the current economic climate), proposed Project to be delivered as soon as possible, and delivery uncertainty causing distress to those impacted.

While the financial decision making in relation to the proposed Project is a matter for the Oireachtas, Government, National Transport Authority and TII rather than being a matter for consideration by An Bord Pleanála, TII nevertheless take this opportunity to address the concerns raised by the public in this regard.

To ensure that public investment delivers value for money, the Public Spending Code sets out requirements for the evaluation, planning and management of public investment. The preparation of a Business Case, which takes account of the total cost of the proposed Project including cost to date and the benefits the proposed Project is predicted to deliver, is a key element of meeting these requirements. In July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a railway order application by TII to An Bord Pleanála for the MetroLink Project (Decision Gate 1). This approval was granted after the Preliminary Business Case (PBC) had undergone significant scrutiny and challenge by bodies that are independent of TII.

As the Government Agency responsible for delivering MetroLink, TII are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order. TII do however recognise that a degree of uncertainty exists around the proposed Project until it is given the final go ahead by Government to commence construction. With regard to the current economic climate, this is something for Government when considering the value and the benefits the proposed Project will deliver, but TII notes that being granted Government approval to submit a railway order application is a very strong indication of intent.

4.2.2 Construction Phase

a) Construction Programme - uncertainty of when works and associated impacts will commence, and concerns regards the longevity of environmental impacts.

Certainty concerning when the works will commence are dependent on the scheme progressing successfully through the Statutory Approval Process.

The programme for the construction of the proposed Project has been optimised so that it provides an appropriate envelope to enable construction whilst being cognisant of the duration of potential environment impact. The proposed working hours, including 24/7 working (see section 4.2.1 'Strategy and Decisions – Preferred Route and Consideration of Alternatives'), combined with undertaking work concurrently at all MetroLink site locations will ensure the proposed Project is delivered in an effective and timely manner.

In some cases, there is a perception that the environmental impacts of construction will be the same for the entire 9.25 year duration of the construction programme, when in fact the reality is that heavy civil engineering work i.e., excavation and construction of primary supporting structures will be 4 to 5 years[4.14]. After that much lighter and quieter works will be undertaken for fit out i.e., architectural, mechanical, electrical and plumbing followed by the installation of the railway systems, power and trial running.

On appointment of the Contractor(s) to deliver the detailed design and construction of MetroLink, there may be opportunities to further optimise the schedule as a result of design and construction methodology details being finalised.

b) Noise and Vibration – property damage and disturbance, particularly in close proximity to work sites, properties above or adjacent to tunnelling, and 24 hour working which may impact on sleep or working from home.

The EIAR presents a comprehensive and detailed assessment of both groundborne and airborne noise and vibration in the EIAR[4.10]. Where required to mitigate effects, mitigation measures focus on a reduction at source through the selection of appropriate plant, methods of construction, a reduction in blasting charges, and the limiting of working hours (exceptions to this are only out of engineering necessity or where disturbance is not predicted to occur as explained by section 4.2.1 'Strategy and Decisions – Preferred Route and Consideration of Alternatives'). The EIAR assessment has concluded that no vibrations will exceed a limit that will cause structural damage to property[4.11]. The risk of damage caused by construction generated ground movements is covered by (i) below.

In addition, by providing suitable noise attenuation (increased height hoardings, noise screens, dampers where necessary), TII are confident noise and vibration can be maintained within the assessment criteria utilised in the EIAR at the majority of locations, with the exception of TBM generated groundborne noise for the reasons explained below. Comprehensive environmental monitoring will also be undertaken throughout the works that will demonstrate and ensure the works are being undertaken within environmental limits. These measures are set out in the EIAR chapters and appendices.

With regards TBM generated groundborne noise, it is not possible to mitigate noise generated through the ground by the passage of the TBM at source. This noise will only occur for a very limited duration at any location, circa 2 weeks, and TII will communicate well in advance the forecasted time the TBM will pass to assist people affected in managing the temporary impact of this disturbance.

As outlined in the Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy[4.12] there is also a process in place whereby further mitigation measures can be implemented at individual properties should this be merited, including for organisations or individuals that are particularly sensitive to noise.

c) Dust and Air Quality - construction generated dust, emissions generated by construction vehicles, toxic fumes emanating from compounds, and impact on health, amenity and property.

TII will utilise best practice techniques to curtail dust generation including hoarded compounds; wheel wash facilities; and dust suppression for all areas prone to dust (damping down, water misters / sprays, local extraction and filtering)[4.13].

Public health impacts are not anticipated as the dust levels on site will be controlled to strict levels for protection of the workforce in accordance with statutory health and safety legislation. Similarly, vehicle and plant emissions will be controlled by strict health and safety legislation and appropriate construction risk assessment. TII will also ensure that the surrounds to construction compounds are maintained to appropriate standards.

d) Hydrology and Hydrogeology - impact on groundwater (including flow/barrier effect and quality), contamination of water courses and the potential for local flooding.

TII have undertaken localised groundwater modelling and can confirm the works and underground structures are not predicted to lead to increased flood risk at any locations including Collins Avenue. Any local underground streams and/or culverts will be diverted prior to the construction of the proposed station. However, it is important to note that while MetroLink will not exacerbate any local issues, it is not possible for the proposed Project to solve existing network capacity issues. A Flood Protection Plan[4.15] will be developed to manage any local issues, employing onsite mitigation such as upstand walls and bunding, barriers, and the diversion of local drains as required.

[4.10] *EIAR Chapter 13, Chapter 14, Appendix A14.6 & Appendix A15.1*

[4.11] *EIAR Chapter 14, Section 14.4.1.4*

[4.12] *EIAR Appendix A14.6*

[4.13] *EIAR Chapter 16, Section 16.6.1.1& Appendix A16.4*

[4.14] *EIAR Appendix A5.2 & Appendix A5.3*

[4.15] *EIAR Appendix A18.5*

Groundwater to be removed during the construction works has been quantified and will be either discharged into existing foul or combined sewers, or tankered offsite[4.16]. MetroLink has been designed so that there will be no material groundwater drawdown during construction. Water on site will be attenuated so that it does not contaminate water courses or groundwater. During the operational phase the small quantities of water generated by the infrastructure will be discharged directly to sewer.

e) **Traffic and Transport** - construction vehicles and construction worker travel impacting the road network (general traffic, public transport, pedestrian and cyclist safety, and parking and access.)

A hierarchical approach to traffic management has been adopted with provision for the needs of pedestrians, cyclists, public transport and commercial vehicles taking preference over private car usage, with the key objective of maintaining continual access to all adjacent properties during the works [4.18]. Prior to implementation, all traffic management measures will be agreed with the relevant local authority, and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken.

Traffic modelling and environmental assessment have been undertaken to ensure construction traffic does not have an unacceptable impact on the existing road network in terms of congestion and delay, air quality and noise. Construction traffic entering and leaving construction sites will also be marshalled to maintain a safe environment.

Pedestrian modelling, where appropriate, has also been undertaken to ensure acceptable levels of service are maintained throughout the construction phase. Where the existing level of pedestrian or cycle service cannot be maintained in the vicinity of construction sites, alternative routes will be designated to minimise the risk to vulnerable users. All access provided will be safe and segregated from MetroLink works, and access to properties and businesses maintained.

The lessons learned from construction of the UK Elizabeth Line will also be taken account of when considering measures that can be implemented to provide additional protection to cyclists during the construction phase, including the compulsory implementation of 'blind spot' detection for MetroLink HGV's to further protect vulnerable road users.

The construction workforce will be encouraged to make their way to and from site by public transport, by project specific transport (e.g., minibuses from public transport hubs), by bicycle or on foot[4.19]. Limited parking spaces will be provided on site for vehicles required for construction activity and employees, and parking in local areas will be prohibited.

Where it is necessary to implement road closures, or reduce on-street parking, this will be for the minimum amount of time required and will be reinstated as soon as practicable. TII and their contractors will also ensure road surfaces are maintained clean of dust and or dirt deposits arising from MetroLink construction.

f) **Landscaping and Visual Impact** – loss of trees and landscaping, and impact on the visual amenity of areas surrounding construction sites.

Site specific proposals for hard and soft landscape works have been developed, including plans for the retention of mature trees where possible[4.20]. Details of planting proposals will be provided in advance of the construction phase and agreed with the relevant authority. Plans will include: details of the tree species mix, numbers, density and sizes proposed; the tree preparation, presentation, transportation, lifting and placement techniques proposed; the proposed ground preparation, rootball securing technique, backfill materials and methods; and the establishment of specific maintenance proposals for each. (Also see section 4.2.3 'Operational Phase – Landscaping and Visual Impact').

g) **Biodiversity** - impact on ecology, nesting birds, and requests for the implementation of an ecological management plan and further survey work to fully assess the impacts on birds, badgers, foxes, habitat loss and ecosystems, among others.

The analysis presented in the EIAR follows advice set out in the Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA, 2022) and takes account of the necessary information compiled through desk-based assessment, field surveys and consultation with the public, relevant stakeholders and organisations.

The contractor(s) will develop a site-specific Ecology and Landscape Management Plan, and a Non-Native Invasive Species Management Plan[4.17]. They will ensure procedures are implemented to limit disturbance and damage to areas of conservation interest, and legally protected and notable species, in accordance with the control measures described by the EIAR and specified by relevant legislation. Care will be taken to ensure trees containing nesting birds are not felled.

h) **Land & Property (including temporary acquisition)** - duration and extent of land required; impacts on green spaces, trees and vegetation, and the public realm; business continuity; property value; opportunity to develop the land; and compensation for the acquisition of, or damage to property.

It is important to provide adequate space so that construction can be delivered safely, efficiently and effectively, so that the duration of environmental impacts is not unnecessarily extended and or methods of construction become constrained to the extent they extend the programme; such as not to introduce unnecessary cost, or possibly result in an element of the proposed Project being unbuildable.

The land to be acquired, including satellite compounds; the duration for which it is required; and the physical extent of land has been carefully assessed as part of the design so that it provides both appropriate time (also see 'Construction Programme' above), and space to deliver the proposed Project, while being cognisant that the proposed Project does not want to retain land any longer than is necessary to minimise the impact on landowners. This has involved the careful consideration of how the design and construction methodology influence one another, how duration and extent can be reduced, and an iterative process between the two to determine the optimum extent and duration for which land is required to enable construction of the proposed Project.

The majority of temporary land take, noting that permanent land take is utilised for construction as well, is for the purpose of creating access to compounds and undertaking the works, as well as to ensure continual access to properties (including business continuity) along the alignment as the works progress. In some instances, land is taken on a temporary basis for the purpose of mitigating local amenity impacted by the proposed Project and is returned for use prior to commencing the main construction phase. It is the intention of TII to return all land that it does not need permanently, as soon as practicable.

The impact on property value and the process for relocation, compensation, acquisition and return of land and property; compensation for loss of business; as well as how damage to land and property caused by MetroLink is dealt with, are all covered under section 4.2.3 'Operational Phase – Land & Property (including permanent acquisition)'.

The impacts on green spaces, trees, vegetation and public realm is addressed by 'Landscaping and Visual Impact' both under sections 4.2.2 'Construction Phase' and 4.2.3 'Operational Phase' [4.21].

[4.16] *EIAR Chapter 19, Section 19.5.3.3*

[4.17] *EIAR Appendix A15.8*

[4.18] *EIAR, Chapter 9, Section 9.8.1.3*

[4.19] *EIAR Chapter 9, Section 9.6.1.1.3*

[4.20] *Draft Railway Order, Plans of Proposed Railway Works – Landscape Details.*

[4.21] *EIAR Chapter 27, Section 27.5*

i) Settlement and Ground Movements – assessed impact of excavations and tunnelling on property and infrastructure, monitoring, repair and compensation.

TII have undertaken a comprehensive phased settlement assessment[4.22] that has taken account of the construction methodology, geology, and building and infrastructure characteristics. The approach used follows industry standard practice that has been undertaken on tunnelling and underground projects around the world, including on the Channel Tunnel Rail Link, the Dublin Port Tunnel and High Speed 2. The level of assessment, Stage 2, neglects any interaction between the stiffness of the buildings and the ground and is therefore conservative and thus appropriate for this stage of the proposed Project to inform the Railway Order application. The predicted settlements on which this assessment is based are shown in the EIAR.

The assessment work will be handed over to the contractor(s), and further refined Stage 3 assessments will be undertaken for designated Protected Structures and any other structures and property that may be considered particularly sensitive to ground movements to provide a further level of assurance before construction that could impact said property occurs.

Properties currently identified for Stage 3 assessment (Stage 3 assessments make use of refined modelling techniques, detailed construction planning and particular property details that usually results in a further reduction in the assessed impact) are identified in EIAR Appendix A.5.17 Tables 5-2 and 5-4[4.24].

All properties have been assessed as falling within the Category 2 'Slight' damage category or less [4.25], with the exception of two residential terraced buildings on St. Ita's Road and Botanic Avenue, close to the proposed Griffith Park Station, that have been assessed as Category 3 'Moderate' (Cracks may require cutting out and patching. Doors and windows sticking.) for which a Stage 3 assessment will be undertaken at the next stage of design and is expected to reduce the damage category to 2 or less.

The Property Owner Protection Scheme (POPs) scheme can be availed of by private residential owners where properties lie within 30m of the tunnel or 50m of a cut and cover excavation (these distances are based on the ground movement zone of influence) and will provide for pre and post construction surveys and repair of damage attributable to MetroLink.

To protect commercial properties, instead of a Property Owners Protection Scheme, TII contractors appointed to carry out the works will, with the agreement of the owners, commission chartered building surveyors to carry out a precondition survey of their commercial properties. In the event that it is determined that damage has occurred, TII's contractor will be required to commission a follow up survey to confirm the extent of the damage and whether the damage has been caused by MetroLink works. Metrolink project insurances will be put in place in a manner similar to other large rail projects including Luas. Where property damage is confirmed to have been caused by MetroLink works, the property concerned will have access to those insurances.

Movement monitoring (including groundwater monitoring) will be undertaken prior to, during and after completion of the construction works and will be linked to pre-determined movement trigger levels to ensure movements do not breach acceptable levels. Should ground movements attributable to MetroLink cause damage to property, the cost of repair will be borne by TII. The process for repair and compensation is covered under section 4.2.3 'Operational Phase'.

j) Demolition – loss of buildings adversely impacting on the cultural or architectural merit of areas, and environmental impacts associated with demolition, such as noise and dust impacts.

A schedule of proposed demolitions is provided in the EIAR[4.29]. Where proposed demolitions require particular provision to be made such as conservation, or have been included in submissions made, these are referenced under section 4.3 and by the responses to submissions in section 5, while the process for acquiring land and property and compensation is covered under section 4.2.3 'Operational Phase – Land & Property (including permanent acquisition)'.

Noise, vibration and dust impacts resulting from demolition will be managed as set out above.

k) Cumulative Impacts of Construction of Infrastructure Projects – environmental impact of concurrent works, projects, and local developments.

The EIAR has considered and assessed the potential for cumulative impacts arising from the proposed Project in association with other developments during the construction phase [4.23]. The developments that have been considered are either registered in the planning system, are future major projects that TII are aware of, or form part of land allocations within Development Plans.

Projects with concurrent construction phases with MetroLink were screened for potential cumulative impacts, with mitigation measures identified to reduce the severity of impacts. In the case of BusConnects, it is anticipated that its construction and network redesign will be complete prior to the construction works associated with MetroLink.

l) Site Management and Security – security risks to property, volumes of construction personnel, anti-social behaviour around sites, and legitimacy of workers in the area. Light overspill from sites, and TII and contractor roles and responsibilities, including site management.

TII will ensure competent and responsible contractors are appointed to undertake construction, who will be contractually responsible for site management and to ensure their workforce behave appropriately and are respectful at all times of the surrounding environment and the public, and that construction sites are well maintained[4.26]. This will include any necessary vermin control if required, and monitoring of lighting levels and mitigation where necessary to ensure adjacent properties are not disturbed.

The risk of unauthorised access and vandalism will be restricted through fencing and hoarding to secure sites, by all operatives possessing an ID card (that will only be issued to operatives after having attended the site induction), site security staff, and CCTV and alarm systems. When site activity is not being undertaken, site gates will be closed and locked with appropriate site security provisions in place [4.27].

Access to restricted areas and neighbouring properties will be prevented by securing equipment on site, such as scaffolding and ladders, and CCTV will be used to monitor the security of sites, including in relation to the immediately adjacent environment. In the event of the temporary re-location of third parties, the security of vacated property will be maintained by TII or their Contractor.

m) Utility Diversions and Effects on Services – potential for disruption of services and a request to provide additional utility infrastructure at MetroLink crossing points to provide redundancy.

The impact of the proposed Project on services and utilities has been assessed [4.28]. Where there is interaction between MetroLink and existing infrastructure, the locations of the interactions have been identified and planned for, and therefore the potential for any service disruption is limited. In some cases, planned service disruptions are unavoidable to facilitate the connection of existing services to the newly diverted services. In these cases cognisance of the requirements of those premises served by the utility provider will be taken account of in determining the type, duration and phasing of the planned disruption. All of which will be agreed with the property owner and provided in accordance with the utility owner's requirements. It is expected that in most cases the duration of disruption will

[4.22] *EIAR Appendix A5.17*

[4.23] *EIAR Chapter 30, Section 30.4*

[4.24] *EIAR Appendix A5.17. Table 5-2 & 5-4.*

[4.25] *EIAR Appendix A5.17. Table 4-4*

[4.26] *EIAR Appendix A5.1, Section 5.4*

[4.27] *EIAR, Appendix A5.1, Section 5.9*

[4.28] *EIAR Chapter 22*

[4.29] *EIAR Chapter 5, Section 5.4.9 & Appendix A5.8, Section 2.1, Table 2.1*

be no more than a few hours. All impacted utilities will be reinstated in accordance with the current standards and specifications of the utility provider.

n) Monitoring of Construction – monitoring, sharing of information and access to assistance.

Pre-construction surveys of property and monitoring of potential environmental impacts E.g., noise, vibration, air quality, ground movements etc. will be undertaken, with trigger limits set to minimise the risk of acceptable limits being breached [4.31].

Monitoring and auditing will be transparent. It is envisaged that monitoring data and audit results will be presented and shared in community forums. TII will consider options for sharing that data and results with the public and stakeholders in a timely and transparent way which may include the use of online portals and tools. TII proposes that this is not fixed by way of condition so that the content and manner of it can be adapted to the changing circumstances of the proposed Project over time.

A 24-hour helpline will be in place and MetroLink liaison representatives and local community forums will provide updates on construction activities in their areas.
The services of the Independent Engineering Expert (RINA) are due to be concluded on completion of the Railway Order process (expected in 2024). The continuation of provision of independent engineering advice for residential stakeholder groups throughout the enabling works and main construction stages of the MetroLink project is currently being considered as part of an overall comprehensive community engagement plan.
Also see 4.2.5, 'Consultation and Engagement'.

4.2.3 Operational Phase

a) Anti-social Behaviour – perceived potential for anti-social behaviour around the stations, and in the surrounding public realm, particularly late at night.

While the stations will increase the number of people passing through an area, it is important to note that individuals using MetroLink will be moving quickly in and out of the area. The stations themselves have been carefully designed to discourage anti-social behaviour, for example through attractive setting, use of public lighting, open sight-lines, and avoidance of areas where individuals and groups of people can hide. CCTV will also be installed (and monitored by the Operational Control Centre) throughout the MetroLink system, including at station entrances and the public realm, to provide general security and surveillance. In the event that the Operational Control Centre observes or is notified of antisocial behaviour, they will despatch MetroLink security staff immediately to manage the situation, and notify An Garda Siochana if deemed appropriate [4.34].

b) Traffic and Transport – increase in traffic volumes around stations, adequacy of pedestrian infrastructure around stations, cycle parking provision, and permanent loss of on-street parking.

MetroLink will provide significant benefits not only to those who choose to use it, but also to other transport system users, by reducing the demand for scarce road space, and so creating the opportunity for the road transport system to achieve optimum levels of efficiency and effectiveness [4.36].

Traffic modelling and analysis has been undertaken, including taking account of localised traffic movements around stations, that shows the public transport network will experience increases in public mode share along the alignment, see an increase in interchange opportunities along the route, and will present improvements to public transport journey times as a result of MetroLink [4.38]. Alongside this, reductions in traffic flow will be seen along key routes such as the M1 and R132 Swords Bypass, and along most radial routes in Dublin City Centre. Microsimulation pedestrian modelling has also been undertaken to ensure acceptable levels of service are maintained throughout the operational phase around stations [4.30].

Stations have been deliberately designed with minimal private car drop-off and pick-up areas other than what is provided for persons with reduced mobility. No car parking is provided with the exception of the Estuary Park & Ride facility, to support the modal shift from private car use.

Due to space constraints in the vicinity of stations it is not possible for the MetroLink Project alone to provide all the bicycle parking required to meet demand at every station [4.32]. In recognition of this, TII are coordinating the strategy and approach across multiple agencies e.g., Dublin City Council, Fingal County Council, and NTA to identify how future demand can be accommodated sustainably.

There are some isolated areas where there is a permanent loss of non-private on-street parking due to MetroLink [4.33], including Albert College Court, Eccles Street and Berkeley Road, Townsend Street and St. Stephen's Green East. This should be considered in the context that the MetroLink Project will reduce private car usage.

c) Amenity – change of amenity (loss and or quality) because of the perceived impact of a new station or infrastructure.

The proposed Project will enhance amenity overall noting that the proposed route is entirely below ground through the historic city and its suburbs, except for necessary above-ground elements at stations such as accesses, ventilation shafts and skylights, which have a very localised presence.

Reinstatement and landscaping will integrate the MetroLink above ground elements sympathetically with the existing environment. Appropriate public open space will be provided to incorporate green spaces, meeting places and or other amenity areas to meet the modern needs of the adjacent local communities, whilst being respectful of any historic significance of the relevant areas. It is noted that there are a number of stations that will be located within residential areas, but TII consider that the sympathetic urban design, in addition to consideration of safety and security, will ensure that these areas will continue to function as residential areas with the added benefit of having a high quality sustainable transport node in close proximity.

There are some localised exceptions e.g., where green spaces are impacted by the proposed Project. These include the impacts on green spaces along the R132, Home Farm FC, Albert College Park, Four Masters Park, and St Stephen's Green. These are all addressed individually within their respective geographic areas under section 4.3.

d) Landscape and Visual Impact – visual impact of the stations on the surrounding public realm. (Overlaps with Architectural Design below).

Landscape proposals have been developed to create a unified and harmonious whole for each Local Landscape Character Area to assist in the visual assimilation of the proposed Project with the existing environment [4.35]. The Railway Order drawings, supported by the Materials Palette, provide comprehensive proposals for the hard and soft landscape works, including tree and hedgerow planting, that will also offset the effects of net loss. To further reduce the initial visual impact of reinstatement, relatively mature specimen trees will be used where appropriate.

The design of lighting at MetroLink Stations and facilities has taken account of the potential impacts it can have on the quality of life. This includes provision of local ambient lighting and environmental zones, the use of LED lights instead of traditional lights to control light spill, and the use of luminaires to ensure that zero upward light is emitted [4.37].

[4.30] *EIAR Chapter 9, Section 9.6.2.1.3.1.3*

[4.31] *EIAR Chapter 5 Sections 5.4.2, 5.4.11.4 & 5.12.5*

[4.32] *EIAR Chapter 4 Section 4*

[4.33] *EIAR Chapter 9*

[4.34] *EIAR Chapter 6, Section 6.6.5.8*

[4.35] *EIAR Chapter 27, Section 27.6.1*

[4.36] *EIAR Chapter3, Section 3.4*

[4.37] *EIAR Chapter 4, Section 4.12.8.3*

[4.38] *EIAR Chapter 9, Section 9.6.2.1.3.1.1*

e) Architectural Design – design and treatment of the stations to complement their surroundings.

TII consider the station and surface level designs greatly enhance the public realm at all locations along the MetroLink route. There is a unifying commonality in the design of all stations, providing a consistent and coherent architectural language, which assists with orientation and wayfinding, and contributes a new architectural lexicon to the cultural iconography of the city [4.39].

TII have commissioned internationally renowned architect Nicholas Grimshaw and Partners who have delivered a contemporary station design which is appropriate for a state-of-the-art metro system. Appropriately, significant emphasis is placed on the public spaces. Dublin's rich architectural heritage has been respected, but not copied in a pastiche imitation. In accordance with best conservation principles, as set out in the ICOMOS Venice Charter of 1964, the stations are architecturally distinguishable so as not to falsify the existing historic context. Reference and due respect to that context is made through the choice of high quality and appropriate materials and the scale of the interventions.

In terms of ventilation structures, the MetroLink fire strategy, the ventilation system and positioning of these structures has been developed and designed so there is no risk to individuals. During normal use of the system, the inlets and outlets have low flow rates which have no impact on the public and do not emit toxic air. Only in the exceptional event of a fire will the ventilation grilles release smoke. In these cases they are always placed at a sufficient distance so that they do not impact on the passenger emergency exits and the affected area would be cordoned off and evacuated in a similar way to that which occurs for a building fire.

f) Accessibility – ensuring a high level of accessibility to the MetroLink system for all.

The proposed Project has been designed on the principle of 'Access for All'. The design has been developed to meet all legislative requirements relevant to accessibility including the Disability Act 2005 and in turn the Sectoral Plan for Accessible Transport under the Disability Act 2005 (DTTAS 2021) for same [4.40]. The design will also comply with Part M of the Second Schedule of the Building Regulations. For example, wheelchair users and the sight, voice or hearing impaired will be able to access ticket machines, wayfinding will be designed for visually and hearing-impaired persons, help buttons will be provided, platform and the train floor level will be the same with only a very narrow gap between, train door closing mechanisms are designed so it is not possible for a person to become trapped by the door or for the train to move, and all platforms will incorporate ramps or lifts for access purposes.

Passenger lifts to platform level are provided, and in the event of a passenger lift being unavailable, where there is a firefighting lift, this will be made available.

The detailed design of cycle parking provision will also take account of access for all.

TII are committed to working with recognised organisations to ensure that MetroLink infrastructure adequately provides for persons with reduced mobility.

g) Noise and Vibration – noise and vibration impacts; train movements, passengers entering and leaving stations, and the operation of station equipment such as escalators, lift and PA systems.

All sources of potential operational noise and vibration have been considered, and the design incorporates measures to ensure no unacceptable residual impacts [4.41], including:

- Rail noise and vibration levels will not be significant when added to the prevailing noise environment. Where there are particular third-party equipment sensitivities to groundborne vibration, floating track slab is proposed to isolate these vibrations at source.
- For the ventilation systems, to mitigate noise, measures such as in-duct attenuators, acoustic louvres, anti-vibration mountings and couplings and the orientation of grilles and louvres away from sensitive receptors are incorporated into the design.
- Public address systems will employ best practice design principles to minimise noise breakout at the surface via escalators, lift shafts and stairwells.
- Mechanical elements associated with escalators are fully enclosed and housed below ground and therefore will not generate any notable noise.
- Noise associated with passengers entering and leaving a station will form part of the existing soundscape of the prevailing environment and will therefore not be significant.

h) Neighbouring and Overhead Development – post MetroLink development potential of land over or adjacent to MetroLink infrastructure.

MetroLink will be a catalyst for as well as providing the opportunity for future development and regeneration. While the MetroLink Railway Order does not specifically include for future neighbouring or overhead development, the tunnels and stations are designed to support appropriate future imposed loads.

TII will be required to make submissions in relation to future planning applications for proposed future developments on or adjacent to MetroLink. TII will require, in the usual way, that the design of such proposed development is consistent with essential engineering constraints. MetroLink is committed to engaging with development proposals as they emerge with the intent of facilitating such developments to the maximum extent consistent with the safe operation of the proposed Project.

In common with other existing rail and tunnel projects, following granting of an enforceable Railway Order and development of the detailed design, TII will be in a position to produce a "Guidance Note for Developers", that will be the subject of bye-laws. Those bye-laws will be designed to both inform and facilitate future adjacent or over-site development while protecting the integrity and safety of the MetroLink works and operations.

In the meantime, TII is dealing with known development proposals on a case-by-case basis. TII will work with parties in the future to assist with the wider development of sites over and above stations and tunnels. In this context TII has successfully engaged with a number of developers over the last two years to accommodate development over and in proximity to the alignment and there have been no material restrictions on developments subject to the implementation of agreed design and mitigation measures. It is therefore not anticipated that MetroLink will have a material impact on the future development potential of sites above and or in proximity to the alignment.

i) Land & Property (including permanent acquisition) – extent of land acquisition and impacts (demolition, permanent loss, loss of green space and trees/vegetation, land and access constraints, and reinstatement); property devaluation, and CPO (process, compensation and timescales).

The Metrolink project requires the permanent acquisition of certain lands within which Metrolink infrastructure (stations, tunnels, the depot, intervention shafts and other element) will be permanently located. This proposed permanent land take has been carefully assessed and only seeks to acquire the land and easements that are necessary to build, access and operate the MetroLink Project.

[4.39] *EIAR Chapter 4, Section 4.7*

[4.40] *EIAR Chapter 4, Section 4.7.7*

[4.41] *EIAR Chapter 13, Section 13.6.2 and Chapter 14, Section 14.5.2*

Following the completion of MetroLink works it may be possible to return part or a portion of the acquired land to the original landowner. Such arrangements will be made through entering into appropriate legal agreements with the parties concerned.

The design includes for a limit of deviation which is required to allow for unforeseen obstructions and construction tolerances which may necessitate a change to the alignment. In the highly unlikely event that this were to occur, any resulting environmental impacts will comply with the limits set by the enforceable Railway Order.

TII has carried out a comprehensive set of ground investigations in accordance with relevant guidelines and best practice. It has a high confidence that MetroLink can be constructed along the proposed alignment without requiring vertical or horizontal adjustment. However, in order to guard against rare and undetectable subterranean conditions that might interfere with construction, the Railway Order provides for limits of deviation (as have other railway authorisations since at least the 1840s). The impacts of potential changes within the Limits of Deviation are considered in the Wider Effects Report [4.43].

With regards to sub-stratum land, once the proposed Project is complete and operational, the future development of land over and adjacent to MetroLink infrastructure will be dealt with in accordance with section 4.2.3 'Operational Phase –Neighbouring and Overhead Development'.

Regarding property value, once MetroLink is operational, evidence from similar projects shows that introduction of a world class metro system greatly benefits established residential areas and will thus see property value increase.

Upon commencement of the Railway Order the MetroLink Project will be authorised to acquire compulsorily, any land or rights in, under or over land or any substratum of land specified in the Railway Order as this will have effect as if it were a Compulsory Purchase Order. The MetroLink Project will be authorised to serve a notice to treat pursuant to the provisions of the Housing Act 1966 together with a right to enter onto other land for the purpose of carrying out the works permitted under the Railway Order. The acquisition of the specified rights and interests in land and property is necessary in order to deliver the MetroLink Project in its entirety.

Compensation will be paid, in accordance with the statutory compensation code, to parties from whom land, property and interests are acquired. The assessment will depend upon specific circumstances and heads of claim will include, market value of property, disturbance costs and professional fees. Claimants will be encouraged to appoint professional services to assist them with their claim with those reasonable fees and costs being recoverable from the MetroLink Project. Where land or property interests are required temporarily, the affected party will be permitted to claim compensation for any loss or damage caused as a direct consequence of the MetroLink Project's occupation.

Where compulsory purchase powers are used to acquire land and property permanently, it may be necessary for owners, lessees, tenants and occupiers to relocate to another property. In such cases, the MetroLink Project will notify parties at the earliest opportunity and will endeavour to provide assistance to affected parties where practicable.

The approach to managing potential impacts on green spaces, trees, vegetation and public realm is addressed by 'Landscaping and Visual Impact' above.

j) Electromagnetic Compatibility and Stray Current – potential for electromagnetic interference to equipment and or effect on research and specialist equipment.

The potential for impacts due to electromagnetic interference and stray current arising from the operation of MetroLink is very localised and confined to research, medical and entertainment/theatre type establishments where sensitive equipment is located. Such locations include Trinity College, The Gate Theatre and the Mater and Rotunda Hospitals by way of example. Effects at all locations will be mitigated through a combination of measures local to MetroLink, and in the case of highly sensitive equipment, local to the sensitive equipment [4.42].

[4.42] *EIAR Chapter 12, Section 12.11*

4.2.4 Strategic Planning

a) Planning Policy Context – MetroLink compatibility with national and regional policies, demolition of residential buildings and consistency with national housing and economic objectives, and restriction of high-density overhead development conflicting with zoning objectives.

The Planning Report that accompanied the Railway Order application considered how the proposed Project complies with the planning policy in force at that date. The proposed Project is fully in accordance with the statutory planning policy for the area in which it is situated, at national, regional and at local level. It is also noted that the need for the proposed Project has been established in every relevant transport study and policy document going as far back as A Platform for Change – An Integrated Transportation Strategy for the Greater Dublin Area (GDA) 2000 to 2016 (Dublin Transportation Office 2001) [4.44].

[4.43] *EIAR Appendix A5.19*
[4.44] *Planning Report, Section 3.4*

Current policy from national to local level is supportive of the proposed Project and it is included in the National Planning Framework (Government of Ireland 2018), Greater Dublin Area Transport Strategy 2022-2042 (NTA, 2021), and the National Development Plan 2021-2030 (Government of Ireland, 2020). MetroLink will contribute to the response to the challenges of compact growth, sustainable mobility, enhanced regional connectivity, quality international connectivity and transition to a low carbon and climate-resilient society. It will enhance amenity and heritage, maximise sustainability gains, promote a strong economy supported by enterprise innovation and skills, and enhance access to quality childcare, education and health services.

At a local level, it has been demonstrated that the proposed Project is compliant with the principles of the statutory development plans in Fingal and Dublin City. While those Plans have since been replaced, the relevant zoning objectives for the lands through which it passes remain consistent with the proposed Project. The proposed Project facilitates further development in line with those zoning objectives [4.47].

[4.47] *Planning Report, Section 7*

Should An Bord Pleanála consider that the proposed Project does not fully comply with the statutory development plans, it is considered that there is ample justification to permit a Material Contravention, given its strategic importance to the long-term development of the Dublin region for land-use and transport, and its specific inclusion as being of national importance in the National Planning Framework, National Development Plan and other key statutory documents.

As noted above (see 4.2.3 'Neighbouring and Overhead Development'), over site development will not be unnecessarily constrained by MetroLink infrastructure.

There is a regrettable loss of housing resulting from the construction of Metrolink. It is important this is considered in the context of the benefits that the proposed Project will deliver, which includes encouraging compact growth that will in turn help address housing market challenges. The impact on existing residential property is also relatively limited (13 properties, although noting that some of these are multiple residences, including College Gate which comprises 70 apartments) when considering the scale and overall length of the proposed Project.

TII are engaging with owners and tenants affected by the proposed demolition of properties to provide support for rehousing and compensation for the loss of the residential units. Details include initiating early negotiations regarding the acquisition of their properties with a view to achieving early agreement with the Owner. For tenants, TII will engage the services of a Residential Lettings and Management Agency which can be made available to undertake a property search with the intention of identifying suitable alternative

accommodation for tenants impacted by the proposed Project. Further details are provided in the TII Land Acquisition Strategy which is available to view at www.metrolink.ie.

b) Climate – support for the proposed Project in recognition of its contribution to the 2023 Climate Action Plan but also a view the proposed Project does not address climate change issues effectively and that alternative solutions could be more effective in decreasing car journeys.

MetroLink has a significant role to play in achieving the objectives of the Climate Action Plan 2023. That plan may be amended prior to the Oral Hearing, and submissions will be made to An Bord Pleanála relative to consistency with the 2023 Plan and any replacement plan (see 2.3 above). In particular MetroLink will generate a modal shift from private car usage to public transport. As previously noted (see 4.2.1 'Strategy and Decisions - Preferred Route and Consideration of Alternatives.') MetroLink provides the best medium and long-term transport project for the Greater Dublin Area that includes its ability to deliver the highest level of transport benefits when compared to other options.

The proposed Project is a sustainable mobility solution which supports the National Planning Framework's vision of achieving 'transition to a low carbon, climate-resilient and environmentally sustainable economy by 2050' [4.48]. The proposed Project is fully electrified and capable of meeting passenger demands in the initial years of 53 million and scaling to serve over 100 million passengers over time, all within the same project footprint. As such, the proposed Project will divert 6.8 million car trips per annum in the early years, growing to 12 million per annum by 2045 [4.49].

4.2.5 Railway Order (RO) Process and RO Documentation

a) Consultation and Engagement – lack of communication, information or feedback provided. Submissions not considered in the development of the proposed Project, requests for further consultation with affected parties, liaison committees and involvement of residents' associations, and the continued involvement and access to the Independent Engineering Expert.

The NTA and TII consider non-statutory public consultation to be an essential part of the development of public infrastructure schemes. Consultation has been undertaken throughout the development of the proposed Project, including but not limited to the Emerging Preferred Route (EPR) Consultation, Environmental Impact Assessment (EIA) Scoping Consultation, Preferred Route Public Consultation, and the Albert College Park Local Area Consultation [4.50]. Ongoing consultation and stakeholder engagement has taken place since 2018 with schools, landowners, businesses, and residents associations, among many others. This has allowed the design to evolve and improve to the point it is at now, as submitted in the Railway Order application. The EIAR [4.51], lists circa 1,450 consultation meetings that have taken place over the period January 2018 to July 2022, an average of circa 315 meetings per year. EIAR Chapter [4.52] and the MetroLink website [4.53, 4.54, 4.55] links below provides further detail with regards these consultations.

Throughout the above consultations TII has adopted recognised best practice, as summarised below, and have remained committed throughout to meaningful, transparent and accessible public consultation in compliance with the Aarhus Convention regarding public participation in decision making. Engagement with stakeholders is continuing in response to the issues raised in the submissions received.

Keys aspects of how the non-statutory public consultations were managed include:

- To generate awareness of the proposed Project and to facilitate public participation, a wide range of communications tools were used to publicise the non-statutory public consultation, including advertisements in national and local press and radio, engagement through media and social media; updates to the project website; distribution of flyers; a dedicated information service; targeted consultation events for elected members, the media and members of the public and other interested stakeholders; and a dedicated phone line, email and postal address.
- Publishing and making information available via a variety of channels to ensure it was accessible to as many individuals as possible, including:
  - The MetroLink website, www.metrolink.ie.
  - Meetings. The project team was available to meet with all interested stakeholders.
  - Phoneline. A dedicated MetroLink phone line was manned from Monday to Friday for the duration of the public consultation to assist stakeholders.
  - Social media. The NTA and TII social media channels were used to promote the consultation period and to inform people about the information events. They also provided links to documents and served to remind users of the closing date of the consultation.
  - MetroLink email was used to receive submissions and to answer questions.
- Accessibility:
  - Information events, accessible venues, braille maps, interactive maps and a manned phone line were methods used to facilitate accessibility to the consultation.
  - All venue locations were chosen with a view to their accessibility for members of the public attending. Where possible ground level function rooms were chosen and if not possible, a lift was available to comfortably access the room. Quiet areas were available at each venue should a stakeholder require their concern to be heard in private.
  - Information event venues were selected at key points along the route to ensure communities impacted by the proposed Project had at least one accessible venue.
- Publishing a Consultation Document at the commencement of the consultation on the MetroLink website that detailed the information that was being consulted upon. Hard copies of the document were also printed and distributed.
- Contacting all individuals by email who had made a submission to a previous consultation and or had registered their interest in MetroLink advising them of the launch of the public consultation period and how they could make a submission.
- Briefing of the media at the launch of the consultation.
- Briefing of Elected Representatives and issuing a subsequent email to Oireachtas members advising them of the public consultation open days.
- Holding information events that included:
  - MetroLink branded signage to direct stakeholders to the venue.
  - MetroLink Project Team on hand to answer questions and provide more detail on the proposed Project.
  - Submission forms and submissions box. Hard copy submission forms were available in Irish and English at information events if stakeholders wished to make a submission on the day, and a submission box was located with the project team at the sign-in desk.
  - Displays and pull-up banners were used as visual aids, with additional large print maps of the proposed alignment available.
  - Interactive screens to allow members of the public to view in-depth station mapping and other areas of interest.

[4.48] *Planning Report, Section 3.4*

[4.49] *EIAR Chapter 3, Section 3.4.2*

[4.50] *EIAR Chapter 8, Section 8.1*

[4.51] *EIAR Appendix A8.19*

[4.52] *EIAR Chapter 8, Sections 8.4, 8.6 & 8.7*

[4.53] *MetroLink Emerging Preferred Route Consultation*

[4.54] *MetroLink Preferred Route Consultation*

[4.55] *Albert College Park Consultation*

- Artistic impressions of the design to view.

- The public were encouraged to make submissions in the most convenient way possible by providing options for the public to make submissions, including a dedicated page on www.metrolink.ie or by post, email or at the public consultation events.
- All feedback received was acknowledged and recorded by the MetroLink Project team, and a Public Consultation Feedback Report was published that collated the feedback received from the various public consultation open days, stakeholder meetings and through project information channels.

All submissions received in response to the non-statutory consultation were analysed and the feedback received has influenced the design and development of the proposed Project. The Project team has responded to the previous submissions and feedback received during the non-statutory consultation periods, and, when the Railway Order application process is complete, the consultation undertaken will have fully met the requirements of the Aarhus Convention, Codified EIA Directive and Irish national legislation as well as adhering to best practise principles.

The TII team will present the proposed Project at the Oral Hearing, provide expert evidence, respond to all observations that have been received and answer questions put to them. Should an Enforceable Railway Order be granted, TII will ensure individuals and organisations remain informed and have an opportunity to raise questions or areas of concern. To assist with this, TII will appoint dedicated MetroLink liaison representatives and set up local community forums to provide updates on construction activities in their areas.

TII will also work with all established Community Groups through the local community liaison 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 might include by way of example:

- A local school learning programme.
- Enhancement of community amenity within agreed funding limits.
- Engagement with final landscape and finishing options.

b) Adequacy of the Environmental Impact Assessment – requests for more localised assessments such as local traffic modelling, or properties affected. Accuracy and clarity of assessments, with requests for the Railway Order to be amended to include full and clear information.

As previously noted, TII can also confirm a 24-hour helpline will be in place and MetroLink liaison representatives and local community forums will provide updates on construction activities in their areas. Regards the services of the Independent Engineering Expert (RINA), access will continue to be available to residential stakeholder groups up to completion of the Railway Order process (expected in 2024). The continuation of provision of independent engineering advice for residential stakeholder groups beyond this point is currently being considered as part of an overall comprehensive community engagement plan.

The EIAR follows advice set out in the Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA, 2022) by presenting information in a rational and systemic manner, such that it is clear how the EIAR meets the mandatory requirements and enables An Bord Pleanála to undertake the EIA for the proposed Project.

The EIAR takes into account information compiled through desk-based assessment, field surveys and consultation with the public, relevant stakeholders and organisations. It comprises a very detailed environmental impact assessment, carried out for the full length of the alignment, that has identified and assessed the potential environmental impacts of MetroLink and proposed mitigations for these impacts where necessary.

As such, the EIAR comprehensively details the assessment, and is appropriate for the Railway Order application made for this proposed Project.

Assessments have been undertaken in accordance with industry recognised practice and at a level of detail appropriate to inform the Railway Order application. It is also noted that the assessments undertaken have been drawn upon to assess the impact on human health and to ensure human health is not impacted during the construction or operation of the proposed Project [4.56].

Where a submission has raised a particular observation(s) in this regard, TII have responded to it directly (see section 5 - Responses to Individual Submissions).

c) Adequacy of Drawings – adequacy of Railway Order drawings (scale, detail, misleading, difficult to interpret for those with a non-technical background.)

The drawings provided illustrate in detail the relationship between the proposed works and the surrounding communities, outline the scale and extent of the infrastructure, including its footprint in relation to the surrounding environment and property, and the alignment and location of surrounding utilities. The drawings are clear and at an appropriate scale for this type of linear project and are consistent with other Railway Order applications previously made.

To further assist with aiding understanding of the proposed Project, a Non-Technical Summary (NTS) has also been provided as well as individual property packs to potentially impacted owners/occupiers that include property drawings showing how their particular property relates to the proposed Project. The Independent Engineering Expert also remains available to residents to provide advice.

A Braille version of the EIAR Non Technical Summary (NTS) and relevant Railway Order application drawings were provided to one individual following this individual raising concerns in late October 2022 about the accessibility of the Railway Order application documents, seeking a Braille copy of the NTS and a tactile version of relevant drawings. TII commissioned a Braille version of the NTS early November 2022 and provided it to the individual in advance of the end of the statutory consultation period but had difficulty in getting the tactile drawings produced and printed. A supplier was found and the tactile drawings were ordered in December 2022, proofs were received and reviewed mid-January 2023 and the final drawings were received and sent to the individual in February 2023.

TII regrets that it could not supply the tactile drawings during the statutory consultation period despite its best efforts. This individual can raise any issues arising out of their review of the tactile drawings at the oral hearing and TII will offer all reasonable assistance to enable this individual's participation in the statutory process.

4.3 Summary of Responses to Observations Particular to a Geographic Area

Sections 4.3.1, 4.3.2, 4.3.3 and 4.3.4 provide summary responses that mirror the order and structure of section 3.3.6, noting the summary responses are unique to observations raised for a specific geographic area. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project. The proposed demolition of property has been highlighted in some cases by the aforementioned sections, but the reader is also referred to section 4.2.2 and 'Demolition'. To avoid unnecessary repetition but to provide context to the response, the observation subjects are restated at the top of each geographic response.

[4.56] *EIAR Chapter 10, Sections 10.3 & 10.5*

4.3.1 AZ1 – Estuary Station to Dublin Airport North Portal

AZ1(a) Estuary Station (incl. Park & Ride) to Seatown Station to North End of Swords Central Station

Table 4 provides a list of the 15 submissions specific to AZ1(a) from residents, resident groups, businesses, developers and a GAA club. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ1(a). These matters include:

> Location of the alignment through residential areas and impact on green space and amenity; removal of residential boundary walls; impact on business operations; demolition of footbridges; and impact on GAA Club facilities.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ1(a).)

The MetroLink alignment at the Emerging Preferred Route (EPR) stage proposed an elevated alignment along the R132 median [4.57]. However, significant concerns were raised by the community regarding visual intrusion, noise impact during operation and station accessibility. To address these concerns an alternative retained cut alignment, located along the eastern verge of the R132 and including some limited lengths of cut and cover, was presented at the subsequent Preferred Route consultation. This alignment has been further refined taking account of pre-application consultation with residents' groups, businesses, and Fingal County Council (FCC). The proposed alignment now incorporates additional sections of cut and cover to mitigate local environmental concerns and to accommodate future crossings to development land, whilst complimenting and supporting the adjacent consented FCC Connectivity Project. This is an example of how pre-application consultation has led to a revised design.

An alternative cut and cover option following the R132 median was also assessed. During construction this option causes much greater traffic disruption due to the need for traffic management measures along the whole of the R132 to accommodate a wide working area in the median, with associated temporary widening of the existing road corridor required to maintain the FCC Connectivity Project corridor requirements. Also, due to additional permanent works associated with longer lengths of cut and cover tunnel, the construction duration and construction costs would increase. During operation, passenger access to the stations would be via at-grade crossings over the R132 with limited space provision at the station entrance compared to the landscaped plaza entrances of the proposed option. Additional operating costs would also be incurred due to extra ventilation requirements for the longer cut and cover sections and emergency service access to the stations would be constrained between live traffic lanes.

An alternative bored tunnel option beneath the centre median of the R132 alignment as suggested by some residents was assessed and could not be justified at this location. Bored tunnels are more typically appropriate in built up city areas where there is a need to avoid excessive demolition of buildings. Along the R132 a bored tunnel would require the rail alignment to be deepened, with large underground stations incorporated along with the associated enhanced ventilation and safety requirements. Both construction and operating costs would be higher than other options.

Residents of Ashley Avenue, Estuary Court, and Seatown Villas, (see submissions Ashley Estate Residents (No.14), Estuary Court Residents Association (No.'s 89 and 90), and Seatown Villas Residents (No. 277)) have expressed concern at the loss of existing boundary walls that in their view will have a negative impact, including relative to privacy, security, visual amenity, and safety. MetroLink has been carefully landscaped taking account of local authority objectives which will complement the R132 connectivity scheme that aims to improve the connectivity and safety of pedestrians and cyclists moving along, and across the R132, and enhance facilities for all road users with particular benefits for those choosing sustainable modes of transportation such as bus users, cyclists and pedestrians. Throughout the Swords area the landscaping proposals outlined by the Railway Order application have been developed in consultation with FCC. The proposal aims to improve community connectivity through the development of a park linking all of the stations with the community in an open setting. The planned outcome of the MetroLink architectural and urban realm design for this park is to discourage anti-social behaviour through the use of attractive settings, public lighting, and open sightlines. TII is committed to working with local resident's groups to address concerns that have been expressed in relation to the loss of green space and the impact on the current boundary wall and will continue engagement with these groups in advance of oral hearing.

It is further noted that the R132 Connectivity Project incorporates the signalisation of the roundabouts along the R132 and introduction of at-grade crossings. MetroLink includes for the subsequent removal of the existing footbridges along the R132 Swords Bypass which will only be removed once a suitable and safe pedestrian crossing point has been established.

Businesses impacted include Woodies DIY store who lose land to accommodate the proposed Project and will thus be compensated, and Hertz, where a proposed lorry holding area temporarily impacts part of their site, and construction noise presents challenges to operating their call centre. TII are working with Hertz to make arrangements for providing noise insulation to mitigate noise impacts on the call centre. With regards the lorry holding area, TII would note this is a temporary acquisition and only takes part of a very large site.

Fingallians GAA Club have expressed concern that their playing facilities (pitches #1 and #2) will be negatively impacted. TII have, through consultation with Fingallians and Fingal County Council, established that pitch #1 is the only full sized pitch at this location and is vital for the club's operation. As a result, the phasing of the MetroLink works will be adjusted to suit pitch #1, shifting slightly its position whilst providing at all times a pitch compliant with GAA dimensions with no impact on pitch availability during MetroLink works. Pitch #2 which is currently below full size will be converted to an all-weather pitch with flood lighting, anticipated to take no more than one year. TII will work with Fingallians and FCC to identify suitable alternate facilities while pitch #2 works take place. As a result of the MetroLink works, the condition and appearance of pitch #1 will be improved and the provision of an artificial all-weather pitch (#2) represents a significant upgrade to the existing training pitch.

AZ1(b) Swords Central Station to Fosterstown Station to Dublin Airport North Portal (DANP)

Table 4 provides a list of the 13 submissions specific to AZ1(b) that are predominately business and commercially orientated. Matters covered by these submissions include land and property acquisition, access, and development of land. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes such as these that are applicable across the proposed Project, but rather to address matters that are particular to AZ1(b). These matters include:

> Impacts on businesses – land and property acquisition, commercial development, access, business continuity, customer experience, and loss of income.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submission related to AZ1(b).)

[4.57] *EIAR Chapter 7, Section 7.3.2*

How land required for the proposed Project has been determined is explained by the 'Land & Property' sections in 4.2.2 and 4.2.3 noting that access will be provided to properties at all times. The administration of land and property acquisition and the impact on business and how this will be managed by the proposed Project is covered by section 4.2.3, 'Land & Property (Permanent Acquisition)'. TII's approach to the development of land is covered by section 4.2.3 'Neighbouring and Overhead Development'.

The proposed demolition of Smyths toy store is a significant and regrettable impact and was only proposed after careful consideration and evaluation of alignment options [4.58]. The assessment indicated that Option 2A which avoided the Smyths Airside building, although considered cost neutral compared to the station location proposed by the Railway Order application, had significant disadvantages that included additional utility diversion requirements; significant impact on R132 traffic and other road users over an extended length of the R132 for approximately 5 years; a poor urban integration of the station adjacent to the R132; and the introduction of a poor horizontal track alignment which would constrain the operational speed of trains in this area. Due to the identification of these negative impacts, this option was not preferred.

4.3.2 AZ2 – Airport Section

Table 4 provides a list of the submissions specific to AZ2, comprising 2 submissions, DAA and the Irish Airline Pilots Association. Both raise matters connected with the construction and operation of the proposed Airport Station. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ2. These matters include:

> Airport security measures and compliance with Irish Aviation Authority (IAA) guidelines; request for an elevated walkway connecting the Station to the terminals; and future Airport development.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by the two individual submissions provided in section 5 (Table 4 list TII's response to individual submission related to AZ2.)

TII will work with DAA to ensure all necessary security measures and IAA guidelines are complied with during both construction and operation, including aeronautical safeguarding, safety for critical airport systems, light sources, runway safety area, electromagnetic fields, and the public safety zone. TII can also confirm DAA's proposals to realign sections of the Old Airport Road and the southern airfield perimeter fencing are accommodated by the proposed Project.

The proposed Airport Station location has been designed to be consistent with the current design of the DAA master Plan. The pedestrian modelling undertaken by TII demonstrates that the current proposed at-grade connection between the Station and terminals 1 and 2 provides adequate capacity for vehicles [4.60] and does not cause unacceptable delays or excessive vehicle queuing for traffic using the Airport, and that such connection provides an acceptable, functioning, efficient and safe level of service and route for pedestrians with no excessive queuing or pedestrian crowding or corralling evident for pedestrians travelling to and from the Station.

Similarly, and in line with the relevant planning and policy context, the provision of MetroLink at this location does not compromise the potential for future development of the Airport, such as the Western Airfield Campus or future terminal expansion and Ground Transportation Hub. The Airport Station is designed for future passenger numbers in line with the planned development of the Airport [4.62].

4.3.3 AZ3 – Dardistown to Northwood

Table 4 provides a list of the 5 submissions specific to AZ3 that cover matters including overhead development, land and property acquisition and access to property. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ3. These matters include:

> Depot location, planning context, and impact on future development of land; M50 viaduct land take; access / operation of the ABP Food Group factory; and impact on Santry Lodge and playing pitches.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ3.)

The Dardistown lands between the southern extent of the airport and the M50 are zoned for future development including 'General Employment' to the north of the site, and 'High Technology' to the west and southwest in the Fingal County Development Plan 2017-2023 and the current adopted plan, the Fingal County Development Plan 2023-2029. The LAP includes for indicative lands to accommodate Dardistown Station and the depot.

The proposed positioning and layout of the depot has been the subject of extensive optioneering to determine its optimum position and arrangement, taking account of economic, environmental and planning considerations [4.59]. Sainfoin Property Company Limited proposed an alternative depot location within the Dardistown lands prior to the submission of the Railway Order application. This option has been subject to the same rigorous assessment and does not outperform the proposed location on any of the environmental, planning, operational or economic criteria examined by TII.

In particular, the Sainfoin proposal compromises TII's aim of facilitating the best possible passenger experience at a future passenger station integrated into the surrounding area. A depot in the Sainfoin proposed location would be so far from the MetroLink main line that it would require the large looping structures shown by the Sainfoin proposal which would restrict the efficient operation of the depot. Those structures would separate passengers from the future urban realm and passengers would have to traverse them by way of a long bridge or underpass structures. In contrast, the location proposed by the Railway Order application has the potential for passengers to exit the station directly into future urban realm.

It is also noted that this Sainfoin proposal encroached into the Inner Public Safety Zone of Dublin Airport, meaning that a depot cannot be built there without materially contravening the Fingal County Development Plan and Government guidance in relation to safety in proximity to the Airport. The proposed depot location included in the Railway Order application avoids the Inner Public Safety Zone entirely. The Sainfoin proposal is also on the route of the proposed orbital sewer forming part of the Greater Dublin Drainage (GDD) project, while the Railway Order proposal avoids the sewer route entirely.

TII are committed to returning land needed to construct the M50 viaduct to Sainfoin Property Company Limited as soon as practicable. The return of this land will not be constrained by waiting for depot construction and rail fit-out to be completed.

With regard to the ABP Food Group factory, construction proposals allow for continued access and retention of services to the facility, and the EIAR assessment has concluded there will be no significant impacts from the operation of MetroLink [4.61]. TII have also included for modifications and improvements to the sports facilities located in the area to ensure their continued use can be enjoyed.

[4.58] *EIAR Chapter 7, Section 7.7.9.1.2*

[4.59] *EIAR Chapter 7, Section 7.7.4 and Appendix A7.6*

[4.60] *EIAR Appendix A9.2*

[4.61] *EIAR Chapter 9, Section 9.6.1.2.3 & Appendix A9.5, Section 6.5.6.3.2*

[4.62] *EIAR Chapter 9 Section 9.4.3.3*

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 National inventory of Architectural heritage (NIAH). Nor were the grounds of Santry Lodge included in the NIAH garden survey. Notwithstanding the lack of statutory protection at the time of the Railway Order application, the EIAR has treated Santry Lodge as a significant structure, equivalent to being included in the NIAH. All potential significant impacts on Santry Lodge have been identified, described and assessed in Chapter 26 of the EIAR [4.63] with proposed mitigation measures described. 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.

4.3.4 AZ4 – Northwood Portal to Charlemont

AZ4(a) - Northwood Portal to Ballymun Station, Ballymun Station and Running Tunnel to Collins Avenue Station

Table 4 lists the 3 submissions specific to AZ4(a) that request adjustments to improve service provision, community and environmental impact, as well as requests that Ballymun Station takes account of Dublin City Council proposals. It is also of note that one of the submissions expresses concerns in relation to the location of the proposed Collins Avenue Station and Albert College Park Intervention shaft which is addressed by AZ4(b) below. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(a). These matters include:

> Ballymun substation land take, disruption to ESBT services, and loss of car parking.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(a).)

The proposed temporary land take at the ESB Ballymun substation is only required to make a grid connection at this location for MetroLink. This connection and work will only be undertaken by a contractor approved by and in accordance with ESB/EirGrid standards and approvals. This means that access to this site, security for the site and site safety will remain fully within the control of ESB, with no direct MetroLink involvement during the construction phase.

Whilst there will be a loss of commercial parking to accommodate the proposed Ballymun Station that has been coordinated with Dublin City Council requirements, 24 new car parking spaces will be provided as part of the urban realm and reconfiguration of the R108 Ballymun Road.

AZ4(b) - Collins Avenue Station and Running Tunnel to Griffith Park Station, including Albert College Park Intervention Shaft

Table 4 provides a list of the 14 submissions specific to AZ4(b) from residents, resident associations, and Our Lady of Victories Church and schools that are predominantly concerned with the impacts resulting from the proposed location of Collins Avenue Station and Albert College Park Intervention Shaft. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(b). These matters include:

> Location of Collins Avenue Station and proximity to; Our Lady of Victories Church, Our Lady of Victories School, Dublin City Council Assisted Living and residential properties. Location and size of Albert College Park Intervention Shaft, impact on the park, and loss of parking at Albert College Court.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(b).)

The proposed location of Collins Avenue Station allows the proposed Project to achieve a core project objective of providing public transport that is integrated with the public transport network, allowing for interchange between bus routes both on Collins Avenue and on Glasnevin Road. A station location further south at the northern section of Albert College Park would not allow for this interchange potential as there would be over 300m separating some connecting bus stop locations and the MetroLink station [4.64].

The proposed Collins Avenue Station also has a significant catchment area. The station location was identified as having the highest potential passenger numbers when compared with other possible station locations. The proposed location of the Station also enables access to be maintained along the R108 and traffic disruption to be reduced.

Some residents expressed concerns regarding the construction and operation of Collins Avenue Station which is close to sensitive receptors such as the church, schools and residential properties, noting submissions were received from Our Ladies of Victories Church (No. 243), Our Lady of Victories Boys' School (No. 244), Our Lady of Victories Girls National School (No.245), and Our Lady of Victories infant School (No. 246). A submission was also received from Hampstead Residents CLG (No. 111) that expressed concerns similar to the GADRA (No. 99) submission (see 4.4.1 Submissions Extending Over More Than One AZ4 Sub-Area, GADRA) with regards to the proposed Collins Avenue Station and Albert College Park intervention Shaft. Albert College Residents Association (ACRA) and Ballymun North Residents (No.1) presented a strong preference for a station in Albert College Park and for the proposed Albert College Park Intervention shaft to be relocated north of Collins Avenue.

The Residents of Albert College Lawn (No. 295) noted that while they did not object in principle to the proposed location of Collins Avenue Station, they wanted to see green space protected including the station not moved to within Albert College Park, and access maintained during construction for Albert College residents.

During the construction and operation of MetroLink, all residual environmental impacts will be effectively mitigated to acceptable levels in accordance with 4.2.2 and 4.2.3 and as detailed in the Scheme Traffic Management Plan (STMP) and the Construction Environmental Management Plan (CEMP). Measures will be implemented to maintain access to the church and schools during the construction phase with no footway, footpath or cycle lane closures that would require users to significantly divert from the existing routing [4.65]. A toucan crossing will also be maintained at its location in front of the schools for the full duration of the works to allow for safe access across the road. There will also be a temporary footpath constructed to the rear of the Church in order to maintain access from Albert College Court. Vehicles accessing the Church car park will be required to use a diversion via Albert College Court, maintaining access throughout the construction phase. TII and their contractor will also work with the Church to limit noise impacts on services wherever practicable.

Once Collins Avenue Station is operational, the area will benefit significantly from the provision of a high quality sustainable public transport link which will reduce long term traffic congestion and associated effects such as noise and air pollution [4.66]. The Station design will also ensure that the Church will remain visible and identifiable from the road so that it can retain its local landmark status, with clear views to the Church from the road and

[4.63] *EIAR Chapter 26, Section 26.7.1*

[4.64] *EIAR Chapter 7, Section 7.7.10.7*

[4.65] *EIAR Chapter 9, Section 9.6.1.2.4.3*

[4.66] *EIAR Chapter 13 & Chapter 16*

the residential properties beyond maintained but softened by the proposed intervening planting. There will be a permanent loss of Pay & Display car parking spaces at Albert College Court to accommodate the construction site, and cycle parking and station ground elements in the operational phase, but no impact on residential permit parking.

The requirement for an intervention shaft between Collins Avenue and Griffith Park stations is a function of the proposed single bore running tunnel configuration and NFPA 130 which requires intervention points not to be more than 1000m apart.

The position of the intervention shaft has been determined taking account of the following considerations: being no more than 1000m from either Collins Avenue or Griffith Park Stations; positioned adjacent to the running tunnel on the west side of the park in order to reduce the length of connecting tunnel; the park area is the only "open space" on the MetroLink route between the two stations and as a result the location of the intervention shaft here avoids the need for any demolition; the intervention shaft can be accessed easily by emergency vehicles; and there is sufficient space available for the emergency services and evacuees to congregate in an emergency.

The size and layout of the site has been developed having regard to construction, operation and maintenance requirements, consultation feedback, and detailed discussions with Dublin Fire Brigade to ensure the necessary provision is made for the emergency services (including layout and emergency vehicles space adjacent to the building entry point). The above ground structure will be 3m high at the top of the access shaft, with the remainder of the structure placed below ground to mitigate the visual impact. The entrance to the construction site, and the site once MetroLink is operational will be from the R108. During the construction and operation phases, all residual environmental impacts will be mitigated to acceptable levels in accordance with sections 4.2.2 and 4.2.3.

While temporary and permanent land take at the intervention shaft site will result in the loss of two 5 a-side soccer pitches and a small portion of one full sized pitch situated in Albert College Park, this will be mitigated by rotating the existing full-sized pitches 90 degrees and locating them side-by-side to the east of the park, resulting in slightly reduced dimensions [4.68]. Sufficient area will be available to increase the dimensions of both 5 a-side pitches as well as providing sufficient circulation around the pitches while they are occupied. Loss of habitat and wildlife will also be reinstated after initial construction.

It has been suggested by some resident's groups that a more appropriate location for the intervention shaft is in front of Ballymun Library. The proposed location of Collins Avenue Station for the reasons explained above, and Griffith Park Station (explained below) means this is not required.

AZ4(c) - Griffith Park Station and Running Tunnel to Glasnevin Station

Table 4 provides a list of the 9 submissions specific to AZ4(c) that predominantly cover concerns in relation to the impact of tunnel construction on property. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(c). These matters include:

- Proposed station location, relocation of football pitch at Mobhi Road (occupied by Home Farm FC) during construction; impacts on the Prospect Architectural Conservation Area and local primary schools; River Tolka flood risk; and duration of construction and prohibition of nighttime working.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(c).)

The rationale for a station at Griffith Park is explained by EIAR [4.67]. If a station was not provided at Griffith Park, there would be a distance of 2,600m between the proposed stations at Collins Avenue and Glasnevin which would be too far without an intermediate station. It would also result in the need for an additional intervention point between these two stations to comply with NFPA 130 that permits intervention points at not greater than 1000m apart.

At the Emerging Preferred Route (EPR) stage it was proposed that the TBMs would be launched and serviced from a site at Griffith Park. Feedback from the EPR non-statutory consultation identified that there were significant concerns regards the scale and proximity of the Griffith Park construction site, noting it would be a tunnelling site used to launch and service four TBMs (two north and two south) as well as a station construction site. In response to EPR feedback, an alternative tunnelling strategy using a single bore tunnel configuration was proposed at the Preferred Route stage that enabled only one TBM to tunnel southwards from Northwood rather than four TBMs from a single site at Griffith Park. This relocation of the TBM tunnelling site to Northwood had the positive impact of significantly reducing the footprint and impact of the construction site at Griffith Park and is now proposed by the Railway Order application.

Having reduced the construction footprint of the Griffith Park site, a multi-disciplinary analysis was undertaken to identify the preferred location of the Station under the Home Farm pitch or the CLG Na Fianna club pitches. The principal considerations were: Population – the construction of a station beneath GLG Na Fianna or Home Farm FC playing pitches; Noise and vibration – impact on sensitive receptors; Hydrology/Biodiversity – risk of uncontrolled discharges to the Tolka River and impact on biodiversity due to vegetation clearance and tree felling; and Architectural heritage – impact on Whitehall College. Both locations have sensitive receptors nearby, meaning that mitigation measures as described by 4.2.2 will be necessary during construction. The key difference between the options is the potential impacts on sports facilities and as a result it was determined that the Station should be located beneath the Home Farm site, as the Home Farm Club has its main playing and training facilities at Drumcondra Road Upper, whereas the Na Fianna pitches form the club's principal playing pitches and training ground, and thus the construction impacts would be more significant. On completion of construction, the existing grass pitch will be reinstated above the Station and returned to Home Farm Club.

The design for the station location has also considered the proximity of the Tolka River, with full details of the assessments carried out provided in the relevant EIAR Chapters. The Flood Risk Assessment [4.69] confirms, based on information provided from the Office of Public Works and their National Flood Hazard Mapping indicates there is no risk of flooding at this location.

The impact of settlement on the Prospect ACA has been assessed in accordance with 4.2.2 'Settlement and Ground Movements', with "Negligible" impacted predicted [4.70]. Surveys and monitoring of these historical houses will be overseen by the Project Conservation Architect (PCA), and while requests have been made for floating track slab to mitigate train vibration, the analysis undertaken by TII shows this is not necessary.

The objection to nighttime working for above ground works and tunnel strip out and cleaning is noted. TII and their contractors will manage this in accordance with 4.2.1 to avoid causing nuisance and disturbance, noting that prohibition of such working patterns would significantly increase the overall duration of the proposed Project.

The MetroLink works at Griffith Park are not anticipated to have any direct impact on any school entrances. If works are required past school entrances (for example, utility diversion works) these will be scheduled in discussion with the schools to provide alternative means of safe segregated pedestrian and vehicle access as necessary during school opening times.

[4.67] *EIAR Chapter 7, section 7.7.10.8*

[4.68] *EIAR Chapter 11, Table 11.64*

[4.69] *EIAR Appendix A18.5*

[4.70] *EIAR Appendix A5.17*

AZ4(d) - Glasnevin Station and Running Tunnel to Mater Station

Table 4 provides a list of the 30 submissions specific to AZ4(d) that include concerns around: proposed land acquisition; potential construction environmental impacts on residents including Dalcassian Downs, Shandon Mills and Coke Oven Cottages; traffic management impacts during construction; impact on future development; risk of damage to property from construction generated settlement; demolition of the Brian Boru public house and protection of the Royal Canal. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(d). These matters include:

> Construction impacts on residents of Coke Oven Cottages, Dalcassian Downs and Shandon Mills; demolition of the Brian Boru public house and temporary removal of historic railings; potential impact on the Royal Canal including ecology; and complexity of Glasnevin Station construction.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(d).)

Submissions received included Glasnevin Village Residents Association (No.104) who emphasised their expectation that contractors adhere to normal guidelines to minimise the effects on the village. As noted previously by 4.1 above, contractors will be legally obliged by contract to adhere to all mitigation measures committed to in the EIAR and the NIS, all conditions set by An Bord Pleanála in that enforceable Railway Order, and all applicable health and safety legislation.

Shandon Residents Association (No.279) raised concerns regards 24 hour working, ecological impacts including those on the Royal Canal, traffic management including the installation and use of a temporary bridge to facilitate access, and the landscape and visual aspects of the proposed Glasnevin station. These matters are elaborated on further below, with the exception of landscape and visual which is covered by section 4.2.3 Operational Phase '(d) Landscape and Visual impact' and '(e) Architectural Design', and are responded to in detail in section 5 of this document.

The location of Glasnevin Station is determined by its connectivity to the two existing Iarnród Éireann heavy railway lines (Western Commuter Line and the South-Western Commuter Line) [4.67], as well as connectivity to BusConnects, and cycle and pedestrian routes. To achieve this connectivity with Iarnród Éireann it will be necessary to temporarily close the 'Western Commuter Line Maynooth to Docklands' for up to 21 months, and the 'South Western Commuter Line Maynooth and Phoenix Park to Connolly' for up to 5 months during construction [4.75]. There is also an interface with the DART+ project at Glasnevin. In all cases, TII and Iarnród Éireann are engaging and will continue to work closely together to ensure all works are delivered within acceptable environmental limits whilst minimising disruption to passengers.

It is recognised that the residents of Dalcassian Downs will be particularly impacted due to their proximity to the Glasnevin Station compound and therefore relocation will be available, subject to certain conditions, during peak construction should residents decide to temporarily relocate during these works. It is anticipated that mitigation measures will be required in line the TII Airborne Noise & Groundborne Noise Mitigation Policy [4.76] at 1-18 and 19-36 The Court Apartments, Dalcassian Downs. TII are also working with residents to allocate suitable alternate parking where private car parking is impacted during the construction phase.

It is further noted that there is the potential for significant effects on Shandon Mills in terms of airborne noise and vibration during the construction phase during certain work phases. The track possession works require 24 hour working which has the potential to significantly impact the residents of Coke Oven Cottages due to nighttime noise if unmitigated, albeit for a limited duration. The measures set out in the TII Airborne and Groundborne Noise Mitigation Policy will be deployed as necessary to ensure any residual noise impacts are not significant.

TII acknowledge that the demolition of the Brian Boru public house is a significant impact, noting that it is referenced in James Joyce's Ulysses. Prior to demolition, the Brian Boru pub will be recorded by means of photography and written description to English Heritage Level 3 [4.71]. The Dalcassian Downs historic railings and plinth walls will also be similarly recorded prior to their temporary removal, transportation, storage and eventual reinstatement by a specialist heritage contractor in accordance with a specification prepared by the Project Conservation Architect (PCA).

To enable construction of Glasnevin Station it will be necessary to close and drain the Royal Canal for a period of time. These works will be agreed with Waterways Ireland, overseen by the Project Conservation Architect, undertaken by skilled specialists, and undertaken in accordance with any separate licence, secured in advance, that is required to access the Canal. The duration of the canal closure is envisaged to comprise of two closures, each of three months duration. Proposed canal closures will take place in the off-boating season which runs from October to March with the timing to be agreed with Waterways Ireland.

During the works, the northern towpath will be closed to public access and an alternative access will be provided on the southern side of the canal which will ensure there is no impact on the proposed Royal Canal Way. This will be facilitated by a temporary cantilevered pedestrian/cycle path along the southern tow path, and a temporary bridge over the canal providing access for pedestrians, cyclists, emergency vehicles and residents to Coke Oven Cottages and Shandon Mills. The EIAR [4.72] describes and shows this proposed diversion route. The anticipated vehicle numbers using this route are low and therefore environmental and traffic impacts are not assessed to be significant.

For the construction phase the contractor will also be required to develop a site-specific Ecology and Landscape Management Plan, and a Non-Native Invasive Species Management Plan [4.73]. The contractor will be obligated to ensure that procedures are implemented to control and minimise disturbance and damage to areas of conservation interest and legally protected and notable species.

A concern was also raised regards the presence of soil on the south side of the canal contaminated with creosote (old railway sleepers). It is not anticipated this contamination will be disturbed by MetroLink, however it will be taken account of to ensure contaminated material is not spread wider [4.74].

[4.71] *Chapter 26 Table 26.66*

[4.72] *EIAR Appendix A9.5*

[4.73] *EIAR, Appendix A15.8*

[4.74] *EIAR Chapter 20, Section 20.3.5.10*

[4.75] *EIAR Appendix 5.5*

[4.76] *EIAR Appendix A14.6*

AZ4(e) - Mater Station and Running Tunnel to O'Connell Street Station

Table 4 provides a list of the 17 submissions specific to AZ4(e) that include submissions from Mater Hospital, Rotunda Hospital, Berkeley Road Services and Traders Association, St Joseph's Church, the Ambassador Theatre, and local residents including District 7 Community Alliance (No.66). Concerns expressed include; the Mater Station design and position, environmental impacts during the construction and operational phases, including impacts on built heritage and Four Masters Park, impact on businesses during construction, disturbance to the operation of and access to the Church, settlement impact on property, and access and parking generally.

It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(e). These matters include:

> Proximity of construction works to Mater Hospital, Four Masters Park, and St Joseph's Church. Station location, loss of parking on Eccles Street and Berkely Road, and impact (loss of amenity) on Four Masters Park and surrounding area.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(e).)

The Mater Station entrance has been positioned so that it is conveniently located to enable individuals to walk to Mater Hospital, St Joseph's Church and Berkeley Road. The Station location will also connect with bus services to and from Dublin City Centre via bus stops on Berkeley Road.

To mitigate any significant impact on the amenity of Four Masters Park, the Mater Station architecture has been designed to integrate with the park in a sympathetic fashion. Station skylights are framed by planting (including mature specimens), circulation routes are provided through the park, and existing monuments and protected railings will be reinstated at the park following the construction phase [4.81] However as noted in the EIAR [4.82], there will be permanent changes to the character of the park resulting in a moderate impact.

The construction of Mater Station will take place largely within Four Masters Park. The railings, gates and plinth walls enclosing the park at the corner of Eccles Street and Berkeley Road comprise part of a protected structure, along with the cross commemorating the Four Masters. All features associated with the park will be removed to a place of secure storage in accordance with a conservation method statement prepared by the Project Conservation Architect (PCA), that will also include any necessary repair and conservation of the Cross. On completion of station construction, these features will be returned to the park and re-erected in a place to be agreed as part of the landscaping design of the park in accordance with a conservation method statement prepared by the PCA. The Four Master Park will be fully reinstated to provide for a new walkway, planting and access locations, with the park operated and maintained by TII and secured at nighttime to prevent anti-social behaviour.

While construction noise will be mitigated as noted by 4.2.2, 'Noise and Vibration', it is recognised that Mater Hospital and St. Joseph's Church are sensitive receptors. Mitigation measures include construction plant selection, noise reduction at source, and the provision of 4m high acoustic hoarding [4.84]. TII will also work with St. Joseph's Church to agree work patterns where practicable to reduce the impact on church services.

Specific building measures may also need to be implemented at the Mater Hospital to maintain noise limits within acceptable levels, and to manage the risk of dust and Aspergillus [4.85]. In the case of noise, this will involve the sealing of windows to the upper floors or for people to be relocated.

With regards to dust and Aspergillus, when dust mitigation measures in accordance with EIAR Chapter 16, section 16.7.1 are implemented, fugitive dust emissions from the site are not predicted to be significant and pose no nuisance, human health or ecological risk to nearby receptors. The potential risk from Aspergillus is considered in the EIAR [4.77]. A risk assessment will be undertaken in accordance with the National Guidelines for the Prevention of Nosocomial Aspergillus taking account of the assessed sensitivity of patients. It is noted that most of the rooms at the facade of Mater Hospital comprise administrative or meeting rooms, however where there are vulnerable patients who are at a high risk of being impacted by Aspergillus, the sealing of windows will be required prior to the commencement of construction.

No significant impacts during construction or operation are predicted for the Rotunda Hospital with the exception of airborne noise as a result of short-term demolition works where noise mitigation will be implemented, including a specific measure in the case of O'Connell Street compound to use 4m high construction site hoarding instead of standard 2.4 m high to reduce residual impacts to not significant [4.78]. There will also be a short term temporary disturbance of approximately two weeks from groundborne noise as the TBM passes by for which advance notice will be provided to help manage the impact.

The Ambassador Theatre has been categorised and assessed as being particularly sensitive to groundborne noise and vibration impacts along with buildings like libraries, lecture theatres, auditoria, hospitals, churches, and schools. During construction the impact of groundborne noise and vibration has been assessed as having no significant impact on the Theatre's operation with the exception of a short term temporary disturbance of approximately two weeks from groundborne noise as the TBM passes by, for which advance notice will be provided to help manage the impact [4.79]. For the operational phase, floating track slab will be used so there is no significant impact on the building's operations.

There will be slight impacts on loading and parking during the construction phase associated with the construction of Mater Station [4.80], as well as the necessary closure of access to Eccles Street from Berkeley Road to all traffic except for emergency vehicles. In its place, an alternative route will be provided via the N1 onto Eccles Street. Access will be maintained to all businesses and premises throughout the construction phase, including St Joseph's Church, ensuring no disruption to funeral or wedding cars.

To accommodate the station entrance when operational, the footways and traffic lanes on Eccles Street will be realigned, with a signalised crossing provided in proximity to the Station entrance [4.83]. As a result, there will be a permanent loss of residential on-street parking (34 spaces) and loading bays on Eccles Street and Berkeley Road. The modal shift from road to public transport when the proposed Project is operational will reduce the overall demand on parking and loading facilities, thus reducing the severity of this impact.

[4.77] *EIAR Chapter 16, Section 16.6.1.3*

[4.78] *EIAR Chapter 13 Table 13.85*

[4.79] *EIAR Chapter 14, Section 14.4*

[4.80] *EIAR Appendix A9.2, Section 2.9.5*

[4.81] *EIAR Chapter 26, Sections 26.5 and 26.7*

[4.82] *EIAR, Appendix A15.8*

[4.83] *EIAR Appendix A9.2*

[4.84] *EIAR Chapter 13, Section 13.6*

[4.85] *EIAR Chapter 10 & Chapter 16*

AZ4(f) - O'Connell Street Station and Running Tunnel to Tara Station

Table 4 provides a list of the 6 submissions specific to AZ4(f) that expressed concerns with regards to the proposed demolition of property on O'Connell Street, impact of settlement and vibration on a bank, disturbance to the operation of Abbey Theatre, impacts of traffic on a business, and the impact on a hotel from settlement and train operations, as well as the hotel's future development being constrained. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(f). These matters include:

> Development of the site and integration with Dublin Central GP Ltd's development, and impacts on a bank, theatre and hotel. Access to and from shops and impact: of increased traffic on the shopping environment; on the General Post Office structure and its operations; and on protected structures and building facades.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submission related to AZ4(f).)

The O'Connell Street Station design, while fully integrated with Dublin Central GP Ltd.'s development, will remain structurally independent from the over-site development. This allows for the possibility that should Dublin Central GP Ltd.'s development be delayed or not progress, the MetroLink Project will still be able to progress. Both scenarios (with and without the over-site development) have been assessed by the relevant EIAR chapters, noting that in most cases it is the phasing of the works that changes between scenarios rather than the assessed magnitude of the environmental impact.

The exception to this is treatment of the landscape, where, as documented in the EIAR [4.87], this will differ between both scenarios. The 'preferred option' is that planning for the over site development is approved in the future. The impact of the overhead development has been assessed as part of that planning application which has been submitted separately to An Bord Pleanála. The proposed Project has in the absence of the Dublin Central GP Ltd.'s planning application being approved, assessed the option of no over-site development in place.

The proposed demolition of existing buildings on the site and their facades fronting on to O'Connell Street, together with the retention of the protected facades, with their associated shoring-up structures and associated works, that will include the insertion of false facades to help retain a sense of continuous façade bounding, will result in significant impacts and a changed landscape for the O'Connell Street area both during the construction and operational phases of the proposed Project. It is important to note that this is not the 'preferred option' and that this assessed impact will only occur should an over-site development not go ahead quickly relative to the proposed Project.

Construction of the station will require the demolition of several commercial properties from 46-49 and 55-56 O'Connell Street Upper [4.88]. The entrances/exits to the Station will be integrated into the existing façades, and buildings at 43-45, 52-54 and 57-58 O'Connell Street Upper will have their facades retained to maintain the streetscape and minimise impacts on O'Connell Street North. TII are also cognisant of the cultural and historical importance of buildings located at 8-9 and 14-17 Moore Lane and would note that the proposed Project will not impact these buildings.

No significant construction impacts are predicted for the General Post Office structure or its operations, or on An Post's wider operations due to increased road traffic during the construction phase [4.89], with the exception of temporary groundborne noise generated by the passing of the TBM which will last for approximately two weeks for which advance notice will be provided to help manage the impact. Post construction, the operation of MetroLink will reduce private car usage and benefit An Post's operations.

Regarding possible disturbance to the Abbey Theatre during the construction and operational phases, there will be temporary significant impacts from groundborne noise for approximately 2 weeks as the TBM passes for which advance notice will be provided to help manage the impact. Floating track slab will be provided to mitigate the impact of noise and vibration on the Theatre from operation of the railway [4.86].

Regards redevelopment of the Abbey Theatre, TII reviewed the draft DCC CDP 2022-2028 which supported the redevelopment of the Abbey Theatre, as does the final adopted DCCDP 2022-2028. However, at the time of the Railway Order application no planning application had been lodged for the Abbey site and therefore it could not be assessed. TII will work with Abbey Theatre to seek to ensure that any large scale development at this important cultural site is not unduly constrained by MetroLink.

With regards the bank, Institutional Investment Partners GmbH, located at 2-4 O'Connell Street Lower, the property does not fall within the construction ground movement zone of influence. However, while the predicted temporary vibration from passage of the TBM is lower than the level to cause significant effect, it may be sufficient to trigger bank vault monitors and therefore arrangements with the Bank will be made to manage the passing of the TBM. Groundborne vibration from operation of the railway is not predicted to impact the vaults, whilst also noting that the Bank will also benefit from the floating track slab that will be installed to mitigate operational impacts on the Abbey Theatre.

The proposed development of Wynns Hotel for additional floors (DCC. Reg Ref. 3131/28; ABP-303179-18) will not be prejudiced by the Railway Order. No significant effects, including settlement and noise and vibration are predicted for the Hotel with the exception of temporary groundborne noise generated by the passing of the TBM for approximately two weeks for which advance notice will be provided to help manage the impact.

During the construction, while slight increases in traffic flow are anticipated in the area, this is predicted to have a negligible impact and will not lead to congestion. Vehicle and pedestrian access to all businesses and shops will be maintained, with clear signage provided where necessary to direct individuals to shops and businesses.

AZ4(g) - Tara Station and Running Tunnel to St. Stephen's Green Station

Table 4 provides a list of the 34 submissions specific to AZ4(g), the majority of which are concerned with the demolition of; the College Gate apartment complex, Markievicz Leisure Centre, and buildings on Tara Street, Poolbeg Street, Luke Street and Townsend Street. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(g). These matters include:

> Perceived lack of evidence to support demolition of property and buildings noted above and a lack of engagement regards proposals, compensation or relocation; missed opportunity for over site development; and the impact of running tunnel construction and railway operation on Trinity College Dublin (TCD).

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(g).)

Submissions were received that expressed concerns at the loss of community infrastructure and city centre residential accommodation from residents and An Taisce - The National Trust for Ireland (No. 8).

Tara Station will be one of the busiest and most used MetroLink stations as a result of its interchange with Irish Rail [4.90]. Within the area of Tara, eleven alternative options for Tara Station, including mined options, were considered [4.91] and evaluated before determining the Station location and form of construction proposed by the Railway Order application provides the optimal solution.

[4.86] *EIAR Chapter 14, Section 14.5*

[4.87] *EIAR Chapter 27, Section 27.5.4.2.1*

[4.88] *EIAR Chapter 26, Section 26.5.4.10.2*

[4.89] *EIAR Appendix A9.5, Section 7.8*

[4.90] *EIAR Appendix A9.4, Section 6.3*

[4.91] *EIAR Chapter 7, Section 7.7.10.9*

The reasons why the cut and cover station option proposed by the Railway Order application is preferred are because it provides good interchange with Irish Rail, is less disruptive to traffic and existing utilities, aligns with the MetroLink architectural vision by providing a high-quality operational station and passengers with a feeling of space and light, whilst providing a station that can be economically delivered in terms of cost, time and risk.

Regrettably the selection of the proposed option results in the necessary demolition of the College Gate Apartment complex and the Markievicz Leisure Centre, Dublin City Council housing on Luke Street, two properties on the corner of Luke Street and Townsend Street, and an office block on Tara Street. Before taking this decision, a mined station option at Tara was considered as a solution to avoid the demolition of the College Gate building but was not progressed for the following reasons:

- There will be significant disturbance to College Gate residents for an estimated 2 years because of mining of the cavern beneath the College Gate building and shaft construction directly adjacent to the building that will generate a level of groundborne vibration and noise that would make the College Gate apartments uninhabitable during that period.
- Mining of the cavern, using drill and blast, will also need to be undertaken 24 hours a day, 7 days a week to ensure the safety and security of the works and to avoid a sequence of working that would import significant and unacceptable cost escalation and programme extension.
- A mined tunnel option will still require two large cut and cover boxes to be constructed at either end of the platform cavern to facilitate vertical access. The cost and programme duration will be greater than the proposed cut and cover station, noting that also increased time and cost risk allowances will need to be made. Other points of note regarding cost and programme are:
  - The platform cavern will need to be mined prior to TBM arrival due to programme constraints. Mining a cavern is more costly, time consuming and requires more complex management of risk when compared to cut and cover construction.
  - The construction working space available for a mined option with two separate shafts required either side of the College Gate apartment complex would be very limited. The phasing of construction activities would therefore be constrained leading to a longer construction period.
- A mined station configuration does not align with the MetroLink architectural vision and will provide a sub-optimal passenger experience. Passengers would be required to access platform level by escalators that reverse back on themselves within the space constraints of the shafts, as opposed to the preferred arrangement of passengers always travelling in the same direction to/from platform level. This unique arrangement compared to the other MetroLink stations would also result in inefficient passenger end loading of platforms as well as trains, as a result of passengers managing their exit from the Station.

  In contrast, the cut and cover station will provide a high-quality operational station, providing passengers with a feeling of space and light as passengers quickly and easily navigate the station.

Section 4.2.4 Strategic Planning '(a) Planning Policy Context' explains TII's approach to engaging with owners and tenants affected by the proposed demolition of properties. TII have also informed DCC of the requirement to demolish properties on Townsend Street as part of the work. TII will work with DCC to provide any assistance necessary in relation to the relocation of affected DCC tenants.

TII will also continue to work with DCC in relation to the development of an alternative sports and recreational facility to replace the Markiewicz leisure centre and intends to fund the alternative. However, TII does not have control over that development, which is part of DCC's function to provide public sport and recreational facilities in its function area. DCC may or may not be in a position to deliver it in parallel with the proposed Project. Accordingly, the Board should assess the proposed Project on the basis that the alternative may not be available. The impact would then be significant, but nonetheless one that would not outweigh the strategic scale long term benefits that MetroLink will deliver.

In terms of future over-site development, the station will act as a catalyst for redevelopment of the area and TII will work with stakeholders, including to assist and promote the wider development and regeneration of the area around Tara Station. It is however important to state that oversite development at Tara Street does not form part of this Railway Order Application.

Trinity College Dublin (TCD) have raised concerns that the impact of groundborne noise and vibration, and electromagnetic interference (EMI) from operation of the railway will interfere with some of their equipment. TII's analysis and assessment shows that vibration effects can be mitigated at the vast majority of locations with floating track slab in the tunnel and at all other locations using base-isolated foundation slabs within the equipment rooms (for highly sensitive equipment). While EMI can be mitigated by the installation of Active Cancellation within equipment rooms [4.92].

[4.92] *EIAR Chapter 12, Section 12.10.2.1.3 & Chapter 14, Section 14.4.1.7*

TCD's proposal to move the alignment further west from its current proposed position is not appropriate. The proposed alignment past the TCD campus has previously been moved west from its original Preferred Route alignment to reduce the impact on TCD facilities, whilst still meeting the proposed Project's operational requirements and providing appropriate space proofing within the tunnel as required at this stage of design. EIAR assessments indicate that appropriate mitigation for EMI and vibration effects can be provided to all potentially impacted equipment.

Moving the alignment further west as proposed by TCD would require a tighter (reduced) radius tunnel alignment, and in order to maintain the necessary space proofing for the safe running of trains, that would result in a local speed reduction from 80kmph to 55kmph being required. TII note that TCD's alignment proposal also entails a small rotation of Tara Station which would also impose a speed restriction on the line north of the proposed Tara Station. These speed restrictions, though limited, would reduce the Project economic benefits and result in a compromised system from opening which is not acceptable. It is further noted that whilst the alternate TCD alignment proposed would provide some additional mitigation at source, as assessed by TCD it would not fully mitigate all impacts, so still requiring additional mitigation for EMI effects in a similar way to the alignment proposed by the Railway Order application.

Furthermore, it is generally accepted in the railway industry that lower radius curves can introduce greater rail/wheel interface issues, with increased noise, vibration and wear impacting passenger comfort and maintenance requirements. A reduction in radius would thus increase the risk of creating a poorer operational environment at this location.

During construction, as a result of the TBM passing, there will be a short period of circa 2 weeks when TCD equipment will not be able to operate due to groundborne vibration. TII will provide TCD with advance notice of when this is likely to be so TCD can make the necessary arrangements to manage this temporary impact.

Other submissions received concerned:

- A building at 10/11 Leinster Street founded on piles and a concern excessive vibration would be experienced during construction. TII have confirmed that the assessment shows the impact will not be significant, and that the assessed impact of settlement is 'Negligible'.

- The HSE National Drug Treatment Centre (NDTC), 30/31 Pearse Street, has raised a concern that construction and operation of MetroLink will impact the service they provide. While buildings included in the noise and vibration assessment near 30/31 Pearse Street have been assessed as they are residential buildings and are therefore sensitive to noise and vibration, 30/31 Pearse Street is not referenced as it is an outpatient / non-residential service and therefore less sensitive to noise and vibration. At this time, based on the assessment undertaken, no significant impacts are predicted on the NDTC, with the exception of groundborne noise for approximately two weeks as the TBM passes for which advance notice will be provided to help manage the impact.
- Espirit Investments Limited expressed a concern regards noise and vibration and potential settlement impacts on their properties, 155 Townsend Street, 15 Shaw Street, 33 Pearse Street, and 36/37 Pearse Street. No impact from construction groundborne noise and vibration is predicted with the exception of 33 and 36/37 Pearse Street where for approximately two weeks groundborne noise will be significant as the TBM passes, for which advance notice will be provided to help manage the impact. The predicted operational noise and vibration levels for these buildings will not exceed the groundborne noise and vibration thresholds, and therefore no adverse impacts during the railway operation are predicted within the area of Espirit Investments Limited properties. No significant settlement impacts are predicted, with buildings falling within the "Very Slight" or "Negligible" damage category, noting 15 Shaw Street is outside of the settlement zone of influence.
- The Grace Bible Fellowship, 28a and 29 Pearse Street raised concerns regarding these properties being damaged by settlement and or construction generated vibration. Settlement impact is not predicted to exceed the 'Slight' category [4.94], and no damage is predicted from construction generated vibration.

AZ4(h) - St. Stephen's Green Station and Running Tunnel to Charlemont Station

Table 4 provides a list of the 32 submissions specific to AZ4(h) that includes submissions expressing concerns with regards to the location and position of the proposed St Stephen's Green Station; and submissions from individual property owners or their representative's concerning settlement and noise and vibration impacts, vertical clearance to the proposed alignment, and permitted Limits of Deviation (LOD).

A key submission associated with this area is submission No. 239 OPW (St Stephens Green Park)) that has expressed concern that the Park, a National Monument, will be negatively impacted by both station construction and operation, including archaeology, cultural heritage, landscaping and reinstatement, loss of trees and amenity. OPW consider TII have prioritised uniformity of design, construction methodology, programme and cost, and therefore the right balance has not been struck between transport needs and national heritage.

It is also of note that there is a degree of overlap with submissions received in regard to Charlemont and area AZ4(i), where suggestions for an alternative terminus at St Stephen's Green and deletion of the section of the alignment between St Stephen's Green and Charlemont from the Railway Order application overlap with submissions objecting to the proposed Charlemont Station. Examples of such submissions include the College and Wainsfort Resident's Association (No. 48), Recorders Residents Association (No. 263), St Annes Residents Association (No. 284), and WORK Residents Association (No. 316).

It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(h). These matters include:

Location of the Station partially in St. Stephen's Green Park: impact of construction and operation of MetroLink on the Park; removal of trees, monuments and park furniture; and a perceived requirement for Ministerial consent. Impact on local businesses.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(h).)

Sixteen station options [4.93] have been considered and evaluated to inform the proposed location of St Stephen's Green Station. This has included the consideration of environmental effects (recognising that St Stephen's Green is a designated National monument); effects on buildings on the east and north sides of St. Stephens Green; effects on traffic and transport along St. Stephens Green East; and effects on critical utilities serving large areas of the city located under the road in St. Stephen's Green East.

Options assessed included alternative MetroLink alignment options through this area with alternative station locations, alternative station locations on St. Stephen's Green East, and alternative construction methodologies such as mining (ruled out due to a prolonged construction programme and not being possible to provide a high-quality operational station).

The proposed location of St. Stephen's Green East was chosen as it minimises the potential impacts on the Park when compared to other options with a larger Park footprint. The proposed station occupies circa 5% of the Park area during the construction phase, reducing to just 0.2% of the Park during the operational phase, meaning there will be no significant impact on the amenity of the Park during either phase. In addition, all heritage features such as monuments, railings, bollards, and paving stones will be reinstated following completion of construction.

The Station has also been carefully designed to ensure that St Stephen's Green East continues to function as a transport route and as an important corridor for critical utilities, whilst negating the need for direct impact on properties along St Stephen's Green East. Ensuring this critical functionality on this side of St. Stephen's Green would have been prolonged and very difficult to achieve with a station located fully outside of the Park.

To facilitate construction a number of heritage items that are architecturally significant such as railings, bollards, lamp standards, paving, the Wolfe Tone monument, and the Famine sculpture will be temporarily removed, stored and reinstated following the completion of the main works The removal, transportation, storage and reinstatement will be undertaken by a specialist heritage contractor in accordance with a method statement prepared by the Project Conservation Architect (PCA) and agreed with the Office of Public Works (OPW).

The felling of 64 trees of class A, B, C is considered significant, however we have identified just 5 of these trees are "A class". These trees are listed with full details in the Appendix to the Arboricultural Impact Assessment (AIA). Their removal is confined to a localised area on the east side of the Park adjacent to the Park's fence line. On completion of construction these trees will be replaced with mature specimens to reduce the time it takes for the contrast between existing and newly planted trees to become imperceptible.

OPW submit that the removal of trees, railings and the Wolfe Tone monument constitute demolition of part of a National Monument and as such may require the submission of a separate EIAR and Ministerial consent. TII do not consider the proposals for St Stephen's Green in anyway constitute demolition or destruction. However, TII confirms that all consents and approvals required in relation to St Stephens Green will be obtained by TII prior to works being undertaken that will impact St Stephen's Green Park.

[4.93] *EIAR Appendix A7.8*

[4.94] *EIAR Appendix A5.17, Table 4-4*

As noted above, access via St Stephen's Green East is maintained throughout the construction phase to all properties and businesses in the vicinity of St Stephen's Green, with construction impacts mitigated to acceptable residual levels.

The responses to submissions contained in section 5 provide specific responses to individual property concerns raised in relation to settlement, noise and vibration impacts (construction and operation), and vertical clearance of properties to the proposed alignment and associated permitted Limits of Deviation (LOD). Section 4.2.2 '(b) Noise and Vibration', and '(i) Settlement and Ground Movements' provides further background to how these construction phase impacts have been dealt with by TII, and similarly section 4.2.3 '(g) Noise and Vibration' explains how this is dealt with for the operational phase of the proposed Project. Section 4.2.3 Operational Phase (i) Land & Property explains the approach to how LOD will be manged by the proposed Project.

AZ4(i) - Charlemont Station and Turnback South of Station

Table 4 provides a list of the 59 submissions specific to AZ4(i) from individuals, resident associations and consultants on behalf of residents, that almost all present an objection to the proposed Charlemont Station. In broad terms the submissions cover construction and environmental impacts, or more strategic transport planning type observations that challenge the proposed Station location and propose consideration of alternate southern termini locations, as well as the extension of the metro south beyond Charlemont.

Three submissions, No.'s '40 Dartmouth Road', '41 Dartmouth Square West' and '42 General Area Submission' made by MacCabe Durney Barnes on behalf of the Charlemont and Dartmouth community collate most of the concerns presented by other submissions with regards the proposed Charlemont Station. The Butterfield District Residents Association (No. 31) requested the terminus be located at St Stephen's Green with consideration being given to a terminus located at Rathmines in the future, while the Upper Leeson Street Area Residents Association (No. 307) noted the convenience of the proposed station for residents throughout the area, but was concerned that traffic congestion and illegal parking will result when the Station is operational and thus negatively impact the quality of life for those in the immediate neighbourhood.

It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Project, but rather to address matters that are particular to AZ4(i). These matters include:

Station location (including, development and consultation, rationale, alternatives, Luas Green Line interchange, future extension, the need for the section of MetroLink between Tara and Charlemont, and lack of drop-off/pick-up); impacts on traffic and pedestrians, the residential area, the architectural conservation area (ACA), and Dartmouth Square West and Dartmouth Road; turnback tunnel construction impact; the new road linking Grand Parade and Dartmouth Road; conflict with the 'Dublin Development Plan'; and planning permission for Station enabling works.

The below provides a summary of TII's response to these matters raised with detailed responses covering all matters raised by individual submissions provided in section 5 (Table 4 lists TII's response to individual submissions related to AZ4(i).)

The NTA Transport Strategy builds on a significant body of analysis carried out by TII in the consideration of designs, alignments and locations.

The location of Charlemont station location was determined following a review of options to determine the Emerging Preferred Route (EPR). In the Emerging Preferred Route Report [4.101],

www.metrolink.ie/en/consultations/emerging-preferred-route-2018/

Charlemont was identified as the last station prior to the tie-in to the Luas Green Line which was intended to be upgraded to Metro standard. As outlined in EIAR Chapter 7, the decision to terminate at Charlemont was driven by three factors:

i. the additional impacts that would be involved in upgrading the Luas Green Line south of Charlemont as a result of the proposed adoption of a high degree of automated operations (GoA4);

ii. the development of alternatives to accommodate increased capacity on the Luas line south of Charlemont without that upgrade; and

iii. feedback received during the EPR non-statutory consultation.

The proposed Charlemont Station design is therefore a modification (in response to the postponement of the upgrade of the Luas Green Line to metro standard) to the preferred Luas Green Line Tie-in Option 4B as set out by the March 2017 Green Line Tie-In study [4.95]

http://www.metrolink.ie/en/news/published-reports/green-line-tie-in

The Preferred Route for MetroLink, which was subject to public consultation, was published in March 2019 and was based on the Emerging Preferred Route for the proposed Project, and a comprehensive route options study which included a station at Charlemont. (Appendix O of the Preferred Route Design Development Report provides the rationale for and details of the design refinements proposed) [4.96]

Further analysis was also undertaken to analyse the decision for an interchange with Luas at Charlemont when compared to an interchange location at St. Stephen's Green. The EIAR [4.97] identified Charlemont as the preferred location for an interchange.

The Green Line Option 4B Charlemont Station alignment runs in a northwest / southeast alignment i.e., the station is perpendicular to Grand Parade and Dartmouth Road, compared to the Preferred Route Charlemont Station alignment that runs north - south. This slight angled reorientation of Charlemont Station does not create an alignment that makes significant changes to the proposed Project, or constrains the alignment approaches north and south of the proposed Station, noting:

- The station box at Charlemont allows for a future tie into the Luas Green Line should it be determined in the future that through running metro services to Sandyford is the required solution to address the public transport needs to the south of the city. Regards a possible future connection to the Luas Green Line at Ranelagh, The EIAR [4.98] shows how MetroLink would connect to the Luas Green Line. The connection will comprise a mined tunnel extension from the MetroLink overrun tunnel to the Luas Green Line tie-in location. Cut and cover construction will only be undertaken in the confines of the Luas Green Line and no property will be demolished as a result.
- The proposed Charlemont Station location has not influenced the decision not to consider station options on St Stephen's Green West, noting the Preferred Route was based on the Emerging Preferred Route for the proposed Project which included a station at Charlemont and considered station locations at St Stephen's Green West. The reasons for why a station is not preferred on St Stephen's Green West is explained further below.

It is very important to note that the alignment consulted on at the Preferred Route stage [4.99] compared to that presented by and applied for by the Railway Order [4.100] is almost identical, and that part of the design refinement was to reduce the extent of the Station box at the north east corner so that it no longer intruded in to the rear gardens of the Dartmouth Square West properties.

[4.95] *Green-line-tie-in Study*

[4.96] *Preferred Route Consultation*

[4.97] *EIAR Appendix A7.9*

[4.98] EIAR Appendix A7.4 (Figure 3-1)

[4.99] *EIAR Appendix A7.9, Appendix O*

[4.100] *Railway Order Drawing ML1-JAI-ARD-ROUT_XX-DR-Y-03096*

[4.101] *Emerging Preferred Route Consultation*

Charlemont Station is proposed for the reasons noted above and because it:

- is supported by Government policy that includes consideration of the possible future upgrade of the Luas Green Line to metro, or extension of metro.
- provides a short interchange distance to the Luas Green Line, as well as being within a 5-minute walk of BusConnects proposed A Spine and E Spine routes. An alternative terminus located to the west in the area of Rathmines would not comply with policy or provide an interchange with the Luas Green Line.
- future proofs the Luas Green Line (noting it is therefore not a duplication of existing infrastructure), bypassing the capacity constrained on-street non-segregated section of the Luas Green Line from Charlemont northwards through the city centre. The nature of this route and the fact that it currently crosses several road junctions (Adelaide Road, Harcourt Street / Hatch Street upper and Harcourt Street / St Stephens Green south) limit the service to a maximum of 24 trams per hour per direction. The projected demand for this section would require a higher frequency of up to 30 trams per hour and this demand cannot be met with on-street systems (Luas / bus).
- makes provision for an option to extend the line south noting that in the event of this, tunnel launch sites would be prioritised at the southern end of any future extension to minimise impacts on overlying property at Charlemont.
- contributes significantly to the overall benefits of the scheme, reflected by an improved Project Benefit Cost Ration (BCR) compared to adopting St Stephen's Green as the terminus.

Since the date of the submission of the Railway Order application, the NTA's GDA Transport Strategy 2022-2042 has been adopted and confirms Charlemont as a station location. Omitting Charlemont station or providing an alternative location would contravene the Transport Strategy. TII is legally obliged to secure the provision of the light rail and metro infrastructure as determined from time to time by the NTA. An Bord Pleanála is also required to give significant weight to the Transport Strategy. It is among the most important policies in the national planning hierarchy.

The section of MetroLink route between St Stephens Green and Charlemont Stations serves a significant area of the south city of Dublin and offers enhanced access from the local area to the city centre and a direct connection to Dublin Airport. It serves key trip attractors including residential areas and offices / workplace locations, with high passenger boarding and alighting figures in the peak hours. During the morning peak, at Charlemont Station the flows include 1,800 passengers alighting, 2,300 boarding and 1,229 passengers alighting, and 2,276 boarding during the evening peak. The passenger numbers contribute significantly to the overall benefits of the scheme and the effect of these benefits outweigh the additional costs that are associated with the delivery and operation of the section from St Stephens Green to Charlemont station.

A number of submissions in relation to Charlemont have requested that the section of MetroLink between Tara Street and Charlemont be omitted on the basis that it cannot be justified in planning terms as well as undermining the business case for the entire project. Other submissions have requested that MetroLink terminates at St. Stephen's Green, including an alternative termination location on St Stephen's Green West, noting its proximity to the Luas Green Line. One submission proposed Iveagh Gardens as an alternative terminus site but this would not be feasible from a construction logistics aspect. Some submissions in contrast have requested that MetroLink is extended south of Charlemont now even though this is out of scope of the proposed Project but noting that the GDA Transport Strategy 2022-2042[4.102] includes consideration of the need for the upgrade of the Luas Green Line to metro, and metro extension to Dublin southwest or southeast.

The business case for the proposed Project is a matter for the Oireachtas, the Government, NTA and TII, to be approved in accordance with the Public Spending Code. An Bord Pleanála's role is by contrast, to determine whether the proposed Project should be approved by reference to the proper planning and sustainable development of the area and the impacts of the proposed Project on the environment, including the carrying out of an Environmental Impact Assessment and Appropriate Assessment.

With regard to locating the terminus at St Stephen's Green West, notwithstanding the fact that a terminus at St Stephen's Green is not proposed for the reasons stated above, if a station was placed on St Stephen's Green West, the alignment between the proposed Tara Station and such a station would result in an undesirable horizontal reverse curve and an alignment greater than 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with NFPA 130 on which the MetroLink Fire Strategy is based. Additional construction would be required to provide such a facility, similar in size to the proposed Albert College Park Intervention shaft. This could feasibly be situated in the Trinity College Dublin sports grounds.

Should a station be placed on St Stephen's Green West, the alignment between a station located here and the proposed Charlemont Station would also result in an undesirable horizontal reverse curve and an alignment that is greater than 1000m long and would thus again require an intervention shaft similar to the proposed Albert College Park Intervention shaft to be provided. This would be expected to result in significant demolition and redevelopment in an existing built-up area.

In both cases, compared to the proposed alignment that runs much more directly between Tara, St Stephen's Green and Charlemont, the additional length of tunnel and the addition of two intervention shafts generated by locating a station on St Stephen's Green West is more impactful in comparison. It is also noted that while the proposed location of a station at Charlemont is objected to by some, it does not change the fact that an alignment between the proposed Tara Station and the critical interchange it provides with Irish Rail, and a station on St Stephen's West is not preferred by TII for the reasons set out above.

As a potential station location, St Stephen's Green West itself is a very constrained location due to the presence of buildings, Luas and St Stephen's Green Park. Maintaining the Luas operational during station construction would be complex and challenging with significant disruption expected, whilst the impacts on St Stephen's Green Park would be greater for a station in this location compared to the proposed location on St Stephen's Green East. This would be the result of; the likely need to place more of the station in the Park compared to the proposed station on St Stephen's Green East; it would impact an area of the Park that has greater amenity value than St Stephen's Green East due to the nearby Park entrance adjacent to the southern end of Grafton Street; and there would be a risk of impacting the existing Park lake.

Submissions by local residents and residents' associations suggest that the location of Charlemont Station was fixed by the inclusion of Metrolink enabling works as part of the No. 2 Grand Parade development. They submit that the preferred location for MetroLink was chosen in advance of planning permission being sought and granted for the Grand Parade development. In fact, the inclusion of those works in that planning application merely ensured that the option of including a station there was preserved. Rather than prohibit the much-needed development of this site, or delay it, TII worked collaboratively with the developer to ensure its development could proceed while safeguarding the Metrolink Preferred Route beneath and through the new development. This included Metrolink enabling works as part of the No. 2 Grand Parade development to ensure both developments could progress in tandem and to avoid the need for demolition if and when an enforceable Railway Order is in place. It also removed the possibility of having to compensate the developer for the postponement of its development plans at the site until such time as MetroLink had been completed. It is important to recognise for the reasons explained above that the alignment approaches north and south of the proposed Charlemont Station is not constrained by the Metrolink enabling works,

4.102 *Greater Dublin Area Transport Strategy 2022-2042*

nor has the proposed Charlemont Station location influenced the decision not to consider station options on St Stephen's Green West, noting the Preferred Route was based on the Emerging Preferred Route for the proposed Project which included a station at Charlemont and considered station locations at St Stephen's Green West.

Submissions have also called into question the planning status of the Metrolink enabling works constructed as part of the No. 2 Grand Parade development. The Metrolink enabling works were included in the planning application for No. 2 Grand Parade and in relation to which planning permission was granted for the development in April 2019. Such that the works were carried out with the benefit of planning permission, are fully compliant with that planning permission and do not constitute unauthorised development of any kind.

It is agreed that the short-term implications for local residents will be significant as the proposed Project progresses through the construction stage, however the EIAR assesses the environmental impacts of the construction phase and commits to the implementation of appropriate mitigation measures that reduce the environmental impacts so they are not significant, with the exception of the short-term passing of the TBM for the reasons explained by section 4.2.2 Construction Phase (b) Noise and Vibration. For the operations phase, all environmental impacts are mitigated so they are not significant. TII will work closely with local residents to ensure the required mitigation measures are put in place. No settlement property impacts above 'Slight' are predicted as a result of station box construction, TBM tunnel construction or mechanical excavation of the turnback tunnels south of Charlemont Station. TII can also confirm that the turnback tunnel infrastructure south of Charlemont Station will only be mechanically excavated to reduce environmental impacts on overlying property. Drill and bast will not be used.

For approximately 18 months, utility diversions works will be undertaken along Dartmouth Road, during which time through traffic and on street parking will be maintained along one side of the street. Dartmouth Road will then be shut for approximately 30 months to enable construction of the southern end of the station box, during which time a 4m high hoarding for noise mitigation will be located approximately 1.8m from the boundary of properties on Dartmouth Road. During this time pedestrian and emergency access will be maintained to property, but vehicle access and approximately 30 on-street car parking spaces will be removed [4.105]. After this period the hoarding line will be moved back to the other side of Dartmouth Road and the road re-opened and parking reinstated. While TII are of the view that the environmental impacts can be mitigated, the impact of the proximity of the hoarding to property is appreciated, and therefore relocation is an available option for Dartmouth Road residents immediately adjacent to the construction site during peak construction.

In terms of the overall potential for noise disturbance during construction, no profound impacts have been identified for residents and mitigation measures proposed will be effective at reducing the impacts. Significant mitigation is proposed to include 4m high noise barriers (7m high along the boundary with Dartmouth Square West properties) and further proposed mitigation in line with TII's Airborne and Groundborne Noise Mitigation Policy (EIAR Appendix A14.6). On the implementation of these measures the residual impacts are predicted to be moderate. However, as outlined in the Airborne and Groundborne Noise Mitigation Policy there is a process in place whereby further mitigation measures can be implemented at individual properties should this be merited.

The Scheme Traffic Management Plan [4.106] presents the analysis undertaken to assess the impact of the traffic management measures on the local road network surrounding the proposed Charlemont Station during the construction phase. The analysis undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The largest increase in driver delay of 12 seconds is registered on the westbound approach on Grand Parade to the Ranelagh Road signalised junction. The proposed lorry holding zone on Grand Parade is an area that will be temporarily closed off with traffic management during mainly off-peak periods as and when required to off load major items of plant and equipment. It is not a permanent holding area and will only be used by exception for the reasons noted.

During the construction phase, pedestrians will experience a reduction in quality of pedestrian infrastructure and space. The construction site boundary will encroach upon footways in the local area, including the northern side of Dartmouth Road, and the southern side of Grand Parade. However, a temporary signalised crossing will be provided west of the Luas to maintain pedestrian access to and from the Stop. Whilst there are partial closures on Dartmouth Road and Grand Parade, pedestrian movements will be maintained on appropriately sized footways through the area.

Regarding Dartmouth Square. The impact on the Architectural Conservation Area (ACA) has been assessed [4.103], with the only potential impact being from utility diversion works on historic granite steps, kerbing and lamp standards. These works will be overseen by the Project Conservation Architect (PCA) to ensure there are no significant impacts. Access to the laneway to the rear of the Dartmouth Square West properties will be maintained with the exception of a 33m long section which will be occupied for a period of up to 6 months to facilitate construction of the station box.

Operationally, the Station will see people moving quickly in and out of the area, noting that it will act as an interchange, and has been deliberately designed with minimum set down space or room for taxis so that it does not encourage the Station to be used as a terminus. All operational environmental impacts are mitigated so they are not significant, while the impact on amenity will be permanent and positive, noting that the internal street between Grand Parade and Dartmouth Road will have barriered and controlled access preventing it from being used as a "rat-run". The Station is also compliant with the zoning set out by the Dublin City Development Plan 2022 – 2027 [4.104].

Concerns have also been expressed that the Station will be used as a terminus station and that this will attract more traffic and airport users. MetroLink forms part of an integrated public transport network. The system is designed in an integrated manner so that people travelling from the area south of Dublin to access locations north of Charlemont, such as Dublin Airport, Mater, Swords etc. will utilise public transport to interchange with the MetroLink or will walk or cycle to access their local station. The system is not designed to encourage people to drive to stations within the City, and TII actively discourage people from doing so other than the Park & Ride station at Estuary. As previously noted, TII have also deliberately designed the Charlemont Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used for a significant volume of car or taxi trips.

A microsimulation VisWalk model has been developed for the immediate area surrounding Charlemont Station during the operational phase. The model covers the full extent of the publicly accessible station area, including the immediate vicinity of the station entrance at street level, the Luas stop and nearby junctions at Charlemont Bridge.

In order to accommodate the forecast demand from the proposed Charlemont Station, a new staircase with a 2.4m stair width is proposed at the southeast corner of the Charlemont Luas stop. An elevator will also be provided at this location for persons of restricted mobility, including those with luggage. Both are sized for MetroLink to Luas, and Luas to MetroLink passenger numbers. It will be also designed so that it does not intrude on the privacy of or compromise the fire and evacuation strategy of No. 2 Grand Parade.

With the proposed pedestrian infrastructure in place, the model indicates that at the Station northern entrance, the footways will operate at an acceptable level of service. A reduced level of service is only observed at the pedestrian crossing whilst pedestrians are waiting for the green phase at signals. The model indicates that the strongest flow of passengers will be going west from the northern entrance, towards the Luas interchange and Charlemont Street, with lower flows of pedestrians utilising the southern entrance on Dartmouth Road to travel east towards Dartmouth Square West.

[4.103] *EIAR Chapter 26*

[4.104] *Dublin City Development Plan 2022-2027*

[4.105] *EIAR Appendix A9.4, Section 6.3*

[4.106] *EIAR Chapter 9 & Appendix A9.5*

Therefore, the level of service of the pedestrian network at the southern entrance will be higher than that of the northern entrance.

In addition, it is proposed that the pedestrian crossing on R111 Grand Parade will be repositioned to the front of the building being developed by Hines. With this infrastructure in place, the model indicates that the R111 Grand Parade will have an acceptable level of service overall, with some reductions in service seen at the pedestrian crossing where pedestrians are required to wait for a green phase at the signals. Overall, it is considered that the model displays an acceptable level of network performance.

The proposed pedestrian crossing on Grand Parade will have minimal impact on the traffic flow along Grand Parade and can be programmed to operate in sync with the existing signalised junction at Grand Parade /Charlemont Street to maintain the flow of traffic movements. When the Project is operational, car mode share will decrease, with a reduction of up to approximately 830 car tips to and from the zones surrounding Charlemont Station over the 12hr period in 2065. In overall terms, the Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.

4.4 Summary of Some Specific Individual Responses Not Fully Covered Elsewhere

This section provides an overview of submissions that are not captured by the general themes covered in section 4.2 or by the local/geographic specific concerns raised and discussed in Section 4.3. The submissions under this categorisation have been divided in to three sub-groups:

i. General overview or non-geographic specific submissions.
ii. Submissions that extend over more than one of the four Assessment Zones (AZ's).
iii. Submissions that span more than one AZ4 sub-area.

This section highlights many of the matters raised by these submissions and how they have been addressed, noting that section 5 provides TII's full response to each submission made.

4.4.1 Submissions that Cover Multiple Areas or are Non-Area Specific

General Overview or Non-geographic Specific Submissions

28 submissions, as listed by Table 4 have been received that are not specific to a geographic area. Subjects covered by observations included:

- Alternate proposals in lieu of the proposed Project, including but not limited to the Newton Transport Plan referred to by submission 'Association of Combined Residence Association' (No.2).

  EIAR Chapter 7[4.106] presents in detail the alternative transport options that were analysed to serve the Fingal/North Dublin Corridor. The options assessed included for heavy rail, light rail and Bus Rapid Transit (BRT) options, as well as potential combinations of options. These options were assessed in a two-stage analysis, based on the feasibility of the option and on the consideration of whether the option meets the fundamental Project objectives by serving Swords, Dublin Airport and the city centre. A Multi-Criteria Analysis (MCA) was undertaken having regard to Environment, Economy, Safety, Accessibility, and Social Inclusion and Integration. This assessment identified an Optimised Old Metro North as the best medium and long-term transport project for the Greater Dublin Area. The reasons for this choice are presented in the EIAR[4.111].

- Submissions that were critical of the proposed Project that observed: the proposed Project does not enhance public transport options within those parts of Dublin where most journeys take place; enhancing public transport options between Dublin City Centre and the Airport can be achieved by other means; connectivity is only improved for a small area; it is not possible to integrate with Luas, DART or long distance rail services; a heavy rail connection for the Airport is preferred; and the proposed Project incurs enormous costs for small improvements.

  EIAR Chapter 3[4.107] explains the need for the proposed Project, and how MetroLink will address challenges within the Greater Dublin Area. The proposed Project will provide significant benefits not only to those who choose to use it, but also to other transport network users, by reducing the demand for road space and creating the opportunity for the road transport system to achieve optimum levels of efficiency and effectiveness. Also as outlined in EIAR Chapter 3, the proposed Project is part of an integrated transport network that also includes for BusConnects and DART+ which are all included under Project Ireland 2040. Together, these projects will result in a reliable, sustainable, affordable, integrated public transport network that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2023 and make Dublin a more liveable and sustainable city. Whilst MetroLink is a standalone project that is not dependent on any other projects for its delivery or effective operation, it is nonetheless a critical part of the proposed integrated transport network for the Greater Dublin Area.

  The proposed Project will improve the performance of the public transport and road networks in North Dublin, including the critical Dublin-Belfast trade corridor, and the supporting infrastructure for Dublin Port and Dublin Airport. By creating a new transport mode choice for passengers, the proposed Project will enhance regional and international connectivity and help optimise the transport network. The EIAR presents an analysis of the capacity of existing public transport corridors, indicating that the Ballymun bus corridor, as well as many of the other bus corridors in North Dublin, is currently operating well over its capacity, and therefore an alternative solution is required to accommodate demand.

- Thomas Herlihy (No. 298) objected to the proposed Project as it encourages air travel, and its construction will increase CO_2 submissions.

  EIAR Chapter 9[4.108] presents the passenger demand modelling at Dublin Airport for which the proposed Project has been designed, noting that this is based on the requirements set by DAA. The proposed Project does not determine the Airport passenger demand or usage, this is a matter for DAA and planning control.

  The EIAR [4.103] details the need for the proposed Project, and how MetroLink will address challenges such as climate change and the production of CO_2 emissions. As noted, private vehicles are a significant contributor to Ireland's Green House Gas (GHG) emissions and providing an alternative to private vehicle-based journeys is a key benefit of the proposed Project. The proposed Project will aim to be a fully sustainable and carbon neutral public transport alternative (by the Design Year of 2050), and therefore the way in which people access Dublin Airport, and other parts of the city, will be in a much more sustainable way than at present. The proposed Project, as a sustainable mobility option, will have a direct and long-lasting impact on Ireland's transition to a low carbon economy. The proposed Project will be fully electrified and will be able to reduce its emissions footprint as Ireland moves increasingly to green energy production [4.109].

  Based on modelling undertaken for the EIAR[4.110] it is estimated that the modal shift resulting from the provision of MetroLink will result in a reduction in GHG emissions of between 12kt and 13kt in the opening year, with the reductions expected for 2050 (Design Year) of between 2kt and 14kt.

[4.107] *EIAR Chapter 3*

[4.108] *EIAR Chapter 9 Section 9.6.2.2.2*

[4.109] *EIAR Chapter 17*

[4.110] *EIAR Chapter 7, Section 7.3*

[4.111] *EIAR Chapter 17, Section 17.5.3*

The EIAR[4.112] presents the proposed Project's carbon emissions during both the construction and operational phase. During the construction phase the embodied carbon assessment includes for construction materials such as concrete or steel, excavations, waste, transportation of materials and waste, power usage and water usage.

As calculated using the TII Carbon Tool (v2.1) the proposed Project will result in total Construction Phase GHG emissions of 1,149KT CO2eq over the 9.25 year period, equivalent to an annualised total of 0.37% of Ireland's non-ETS 2030 target. Over the predicted 60-year lifespan the annualised emissions due to the initial Construction Phase and ongoing maintenance of the Proposed Project will reach at most 0.05% of Ireland's non-ETS 2030 emissions target, or 2% of the 2030 transport sector carbon budget [4.114].

With regard to the emissions linked to the excavation of MetroLink, these emissions are considered within the embodied carbon assessment. In addition to excavation of this material, the disposal and transportation of the material is also considered within the embodied carbon assessment.

With regard to equipment associated with the operation of MetroLink, the EIAR [4.115]discusses the embodied carbon associated with the rolling stock. The rolling stock has not yet been selected, however once the rolling stock is finalised an Environmental Product Declaration (EPD) will be prepared for the exact specification. As this is currently not available for the proposed Project, an EPD published in 2019 for rolling stock that is utilised on a similar Metro project (Sydney Metro Northwest) has been sourced to give a likely estimate of the embodied carbon of the rolling stock. The main components of the rolling stock are metallic materials and electronic equipment which allow a high recyclability (95.2%) potential. The Sydney Metro Northwest EPD for rolling stock had upstream and core emissions of 0.3447gCO2e per passenger km. With future improvements in technology, energy efficiency and sustainable practices, the proposed Project aims to reduce the future rolling stock embodied carbon.

- Several submissions express strong support for the proposed Project and urge that the proposed Project is realised as soon as possible. Failte Ireland also notes the benefits the proposed Project will deliver for tourism and sustainability.

  TII as the Government Agency responsible for delivering MetroLink, are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order. TII are equally committed and supportive of Failte Ireland's commitment to sustainability. In 2021 TII published a Sustainability Implementation Plan – "Our Future" (TII 2021a). Within this plan, six key sustainability principles have been developed to reflect TII's organisational ambition to lead in the delivery and operation of sustainable transport. 'Transition to net zero' principles focus on reduction of the carbon impact of construction, operation, and use of the transport network through responsible use of resources, reuse and repurposing, as well as driving the net-zero transition and enabling customers to make more sustainable choices.

- Dublin Commuter Coalition (No. 72) and other submissions have commented upon the need for sufficient cycle parking at stations, that is accessible, with parking also provided for hire bikes, and that is semi enclosed or in monitored areas. The coalition also requested that pedestrian and cycling be prioritised during construction, and consideration be given to the 24-hour running of trains.

- Accessibility was raised by Dublin Commuter Coalition (No. 72), Voice of Vision Impairment (No.311) and the National Disability Authority (No.198) amongst others who noted some concerns with the proposed station designs and suggested the adoption of best practice and a request to implement the Universal Design approach.

  Traffic Management Plans have prioritised ensuring continued pedestrian and cycling access during the construction phase, please refer to section 4.2.2 Construction Phase '(e) Traffic and Transport'.

  Regards the provision of cycle parking, please refer to section 4.2.3 Operational Phase, '(b) Traffic and Transport', and '(a) Anti-social Behaviour' regards security provision.

  Accessibility, including station design and accessible cycle parking, please refer to section 4.2.3 Operational Phase, '(f) Accessibility'.

  Regarding the hours of operation of MetroLink, as set out by EIAR [4.113], "It is anticipated that services will operate between 05:30 and 00:30, every day". At this time there is no economic justification for a service running 24 hours day, 7 days a week however as with any transport system, the future development and needs for serving the Dublin population may change in time, and this would be considered if such a situation arose requiring extended MetroLink operating hours.

- Dublin Commuter Coalition (No. 72) and another submission raised a concern that public welfare facilities will not be available at every station.

  Public welfare facilities will only be provided at the main interchange stations. The remaining non-interchange stations will not be provided with public welfare facilities for reasons of safety, deterring anti-social behaviour, maintenance and security.

- The Irish Georgian Society (No.128) noted that significant sections of the proposed Project will run beneath some of Dublin's most architecturally important and sensitive areas and requested that accredited professional advisers are employed by the Project, condition surveys are undertaken, and plans for the permanent and temporary removal of parts of structures of architectural interest are in place, and these plans are implemented.

  The MetroLink Project Conservation Architect (PCA) Team was appointed by TII in January 2022 and is engaged for a 12.5 year period to ensure continuity of service. The PCA Team comprises multiple Conservation Architects all of whom are RIAI/RIABA accredited. The PCA team are supported by CARE accredited Chartered Engineers, Chartered Surveyors, Industrial Heritage and Stained Glass specialists.

  An enforceable Railway Order if granted will oblige TII to comply with all EIAR commitments in full, including the reinstatement of heritage items unless conditioned otherwise by An Bord Pleanala. TII have a good record of reinstating items previously removed by light rail projects.

  As set out by EIAR[4.116], the dismantling, transportation, storage, conservation or repair and reinstatement will be carried out in accordance with the specification compiled by the MetroLink PCA and the works, by specialist heritage works contractor(s), supervised appropriately by qualified professionals.

  The MetroLink Cultural Heritage Strategy [4.116] will be updated by the MetroLink Project Archaeologist and PCA, and agreed with the now Minister for Housing, Local Government and Heritage (HLGH). Prior to the commencement of reinstatement works, TII will engage with the relevant divisions of each Local Authority on the management and reinstatement of relevant elements of architectural and heritage interest.

- Requests have been made for a local area liaison committee, clarification regards the acquisition of temporary land, replacement of trees, conditions to reduce parking impacts, and targets set for the use of public transport by contractors.

  Local area liaison committee, please refer to section 4.2.5 Railway Order (RO) Process and RO Documentation, '(a) Consultation and Engagement'.

[4.112] *EIAR Chapter 17*

[4.113] *Emerging Preferred Route Consultation*

[4.114] *EIAR Chapter 17, Section 17.5.2*

[4.115] *EIAR Chapter 17 Section 17.3.4.2*

[4.116] *EIAR Appendix A25.1*

Temporary land take referred to is in relation to the Albert College Park Intervention Shaft. Please refer to section 4.2.2 Construction Phase '(h) Land & Property' and section 4.3.4 AZ4(b).

Replacement of trees, please refer to 4.2.2 Construction Phase '(f) Landscaping and Visual Impact', and 4.2.3 Operational Phase '(d) Landscaping and Visual Impact'.

Parking and use of public transport by contractors during the construction phase, please refer to 4.2.2 Construction Phase '(e) Traffic and Transport'.

- Several submissions requested the proposed Project is extended beyond Charlemont now, including Rathgar Residents Association (No.262). Terenure West Residents Association (No.289) requested that metro is extended to the southwest of the City to Harolds Cross.

  The overall project objective of MetroLink, established by TII and as outlined by the NDP 2021-2030 (Government of Ireland, 2021) is to 'provide a sustainable, safe, efficient, integrated and accessible, public transport service between Swords, Dublin Airport and Dublin City Centre'. The extension of the alignment to Tallaght, via Rathmines, Rathgar, Terenure and Templeogue does not align with this objective and the areas to be served by the proposed Project.

  It is also of note that the proposed MetroLink route alignment from Estuary to Charlemont is consistent and compliant with the GDA Transport Strategy 2022-2042 (published in January 2023). Section 4.3.4 AZ4(i) provides further detail in relation to this matter.

- Requested undercover access to the Airport Station and underground access from other buildings to stations.

  Regards pedestrian access to / from Dublin Airport Station please refer to section 4.3.2.

  Passenger demand forecasts together with Access for All design guidelines have been used to design the size and layout of the public areas used by passengers, including the entrances, as detailed in the EIAR [4.117]. Additional entrances or connections through adjacent buildings are not required at this stage. As outlined in the EIAR, each of the proposed stations has been designed to provide a high-quality environment at the station approach to ensure easy access from the existing pedestrian footpath network surrounding the station. The Transport for London Pedestrian Comfort Guidance for London (Transport for London, 2010) was used as a reference during the design development process to guide the design of access to each station to ensure that pedestrian footpaths and road crossings are appropriate to the volume of type of users accessing the stations.

The complete list of non-geographic submissions received is provided by Table 4, and section 5 provides the full responses to the submissions received.

Submissions Extending Over More Than One Of The Four Assessment Zones (AZ's)

15 submissions, as listed by Table 4 have been received that extend over more than one Assessment Zone, including:

- Development Applications Unit (DAU) (No.63). The submission received made observations expressing concerns regarding the impact of the proposed Project on: St Stephen's Green, Lissenhall Bridge, Moore Street and Moore Lane, Santry Lodge, Glasnevin, Mater, and Charlemont; the historic city (noting the impact on the Georgian city, and the later designed elements and landscape of the C19th suburban expansion); and architectural heritage. Concern regards excavations in the close vicinity of structures and the general construction environmental impact on structures was raised, with a request for a heritage led approach within areas of significant historic character, noting the appointment of the Project Conservation Architect for the proposed Project is welcomed by DAU.

  TII's responses to the observations made by DAU are provided in response No. 63 contained in section 5 of this document.

- Dublin City Council (No. 71). The DCC submission covers matters including: conservation impacts; pedestrian and cycle connectivity; overhead development opportunity; amenity; demolition of property; station architectural treatment, including urban context and impact on the public realm; archeology; architectural and cultural heritage; landscaping and visual impact (including the removal of trees); impact on historical structures; approach to conservation; traffic and transport; and provision of bicycle parking.

  The observations raised by this submission covered all areas along the route of the proposed Project from Charlemont to the boundary with Fingal County Council. All observations made by DCC have been responded to in response No.71 contained in section 5 of this document.

- Final County Council. The FCC submission was made in response to a request made by An Bord Pleanála. Matters covered by the submission include: the change in protected status of Santry Lodge; loss of trees and planting; request for community gain conditions to be imposed in order to support sport, recreation, leisure and community development initiatives; traffic management requirements during construction; and management of construction environmental impacts.

  TII responses to all observations made by FCC, including those noted above are provided in section 5. It was also noted that FCC 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 acknowledged the MetroLink team's meaningful and constructive engagement.

- Irish Water (No. 133). Observations raised by the submission covered; a requirement for existing and future Irish Water infrastructure to be protected and future proofed where there is an interface with the proposed Project; management of the interface with the Greater Dublin Drainage (GDD) project, including protection measures where the GDD crosses the MetroLink alignment close to Dardistown; designs for diversions; the design of the proposed Swords pumping station; easements and land acquisition.

  TII responses to all observations made by Irish Water, including those noted above are provided in response item No. 133 contained in section 5. A key point of note, as set out by EIAR Chapter 19, section 19.5.3.3 is that TII propose where possible to discharge water into existing foul or combined sewers.

- Dublin Cycling Campaign (No. 73) submission raised concerns including cycle access along the Royal Canal during Glasnevin Station construction, levels of cycle parking provided, and HGV's equipped with safety equipment to reduce the risk of cyclists.

  Section 4.2.2 Construction Phase '(e) Traffic and Transport' covers the protection of cyclists from HGV's, and section 4.2.3 Operational Phase, '(b) Traffic and Transport' addresses the cycle parking provision being made by the proposed Project. Section 4.3.4 AZ4(d) explains the re-routing that will be in place during Glasnevin Station construction.

- CLG Na Fianna CO Cormac O Donnchu (NO. 46) noted that many of the strategic concerns raised have been addressed and requested that operational concerns are now addressed.

  As explained by section 4.3.4 AZ4(b), the pitches at Albert College Park (ACP) have been slightly relocated and realigned within the existing confines of ACP to avoid any loss of amenity.

[4.117] *EIAR Chapter 6, Section 6.8.2*

In relation to the facilities at Collinstown Lane, the pitches currently used by CLG Na Fianna will be modified to accommodate the requirement to divert the existing open drain/river to the south of the grounds, which will result in the loss of land and impact one existing pitch. To mitigate this impact, the pitch will be rotated by 90º and the existing juvenile pitch will be relocated to the southwest of the site and made larger. It should be noted that the playing facilities will be enhanced through the provision of additional pitch drainage and lighting.

TII will continue to engage with CLG Na Fianna throughout the works to ensure disruption to playing and training activities is minimised.

- Rail Users Ireland (No. 261) raised concerns including: the layout of the proposed Glasnevin interchange; the need for the proposed Tara Station; all interchanges except Glasnevin are "out of station" and require passengers to exit, cross public footpaths and in the case of Dublin Airport interact with road traffic; selection of a single bore tunnel configuration; 64m trains are restrictive; the reversing section of tunnel at Charlemont appears to only be able to accommodate a single train while allowing one track for reversing; and performance of the Charlemont MetroLink/Luas Green Line interchange.

  EIAR Chapter 4 (Description of the MetroLink Project) details the urban realm and landscaping design of Glasnevin Station, including its integration with the Iarnród Éireann station. The proposed arrangement provides access from the Cross Guns Bridge on Prospect Road to maximise pedestrian access to the Iarnród Éireann and MetroLink stations. The station will include a pavilion providing a shared entrance to both MetroLink and Iarnród Éireann stations, as well as clear wayfinding to both.

  A station at Tara Street provides good interchange opportunities, serves important key trip attractors in the area with high potential passenger trips. This option also takes a direct and short route through areas of high demand in the centre of the study area.

  Each of the proposed stations has been designed to provide a high-quality environment at the station approach to ensure easy access from the existing pedestrian footpath network surrounding the station. The Transport for London Pedestrian Comfort Guidance for London (Transport for London 2010) was used as a reference during the design development process to guide the design of access to each station to ensure that pedestrian footpaths and road crossings are appropriate to the volume and type of users accessing the stations. The proposed Project has been designed on the principle of Access for All (see section 4.2.3 Operational Phase (f) Accessibility) and section 4.3.2nprovides further information of the connection provided between the Airport Station and airport terminals.

  The rationale for the selection of a single bore running tunnel configuration is explained by section 4.2.1 Strategy and Decisions, (c) Running Tunnel Configuration.

  All station platforms will be 65m in length and at least 3m wide. The design for the width of the platforms is based on the predicted number of passengers, assumptions about the distribution of passengers along the platform, and the position of other features such as the stairs and escalators. This approach follows Station Planning Standards and Guidelines, Transport for London, 2012 and Station Capacity Planning, Transport for London S1371.

  The turn-back section south of Charlemont is approximately 250m long and facilitates 4 train positions to allow the turn-back frequency to be achieved. A detailed analysis of the operations and service pattern is provided in EIAR [4.118] Chapter 6 (MetroLink Operations and Maintenance).

The complete list of submissions extending over more than one AZ area is provided by Table 4, and section 5 provides the full responses to the submissions received.

Submissions Extending Over More Than One AZ4 Sub-Area

35 submissions, as listed by Table 4 have been received that extend over more than one sub-area in area AZ4, including:

- The Office of Public Works (OPW) made 28 separate submissions (No.'s 213 to 240) for individual OPW properties, that included St Stephen's Green Park (No. 239). These submissions covered matters including; access to property (including control of access to property), risk of damage to property, mitigation of noise and vibration, traffic management, monitoring of construction, and future development.

  Matters raised in relation to St Stephen's Green Park are covered by 4.3.4 (h) as well as response No. 239 contained in section 5. An individual TII response is also provided to each of the individual submissions made by OPW in Section 5 (No.'s 213 to 238, and 240).

- Griffith Avenue & District Residents Association (GADRA) (No. 99) expressed concerns, including: access to independent expert advice; historic stakeholder engagement; the rationale for selecting a single bore running tunnel configuration; the proposed location (including construction and environmental impacts) of: Albert College Park (ACP) Intervention Shaft, Collins Avenue Station (including its relationship with ACP Intervention Shaft), and Griffith Park Station (including its proximity to the Tolka River); objection to nighttime working; settlement and noise and vibration impact on properties in the Prospect ACA; request for construction workers to use sustainable transport; concerns with regards how the Limits of Deviation (LOD) will be used; Glasnevin Station architectural treatment; and impact on the Royal Canal.

  A full response to this submission No.99 is provided in section 5, as well as noting the below:

  Access to independent expert advice and historic stakeholder engagement - see section 4.2.5 Railway Order (RO) Process and RO Documentation '(a) Consultation and Engagement', and '(b) Adequacy of the Environmental Impact Assessment'.

  The rationale for selecting a single bore running tunnel configuration – see section 4.2.1 Strategy and Decisions, (c) Running Tunnel Configuration.

  Proposed location of Collins Avenue Station and Albert College Park (ACP) Intervention Shaft – see 4.3.4 AZ4(b).

  Proposed location of Griffith Park Station, and settlement and noise and vibration impact on properties in the Prospect ACA - see 4.3.4 AZ4(c).

  Impact on the Royal Canal - see 4.3.4 AZ4(d).

  Rational for proposed nighttime working – see section 4.2.1 Strategy and Decisions '(b) Preferred Route and Consideration of Alternatives'.

  Request for construction workers to use sustainable transport – see section 4.2.2 Construction Phase '(e)Traffic and Transport'.

  Glasnevin Station architectural treatment – see 4.2.3 Operational Phase '(e) Architectural Design'.

  Use of Limits of Deviation (LOD) – see section 4.2.3 Operational Phase '(i) Land & Property'.

- Iarnród Éireann (No. 121) submission commented upon the Iarnród Éireann /MetroLink interface at Glasnevin and Tara Street.

  Regards Glasnevin, observations include: programme interface between DART and MetroLink projects, the required closure of the MGWR and GSWR lines, and operations and management of interface areas between Iarnród Éireann and MetroLink.

[4.118] *EIAR Chapter 6*

Regards Tara Street, observations include: minimising impacts on Iarnród Éireann's services, construction proposals that address the impacts of construction on the operational viaduct and other railway support structures, and operations and management of interface areas between Iarnród Éireann and MetroLink.

Glasnevin:

There is uncertainty around the timing of the DART + and MetroLink projects, and the duration of the planning process for both schemes will have a significant impact on which project proceeds to construction first. TII recognise that there is a possibility the Dart + West and Dart+ Southwest may commence in advance of MetroLink. TII is working with Iarnród Éireann to seek to present an agreed approach at the oral hearings for each project. Both organisations will continue to work closely together to ensure all works are delivered within acceptable environmental limits whilst minimising disruption to passengers.

TII acknowledges that the interplay between the two projects will lead to disruption of existing services and will impact on customers. However, TII believe that the planned closures described in the EIAR [4.120] - 21 months for the Western Commuter Line (Maynooth to Docklands) Midland Great Western Railway (MGWR), and 5 months for the Southwestern Commuter Line, Great Southern and Western Railway (GSWR), represent a worst case construction and customer service impact. TII continue to work closely with Iarnród Éireann and the National Transport Authority with a view to reducing the overall duration and impact of the required mainline rail closures and confirm that every effort will be made to minimise the impacts on passengers and services, especially connection to Connolly station. During the works taking place on MGWR, all trains can still travel to Connolly Station.

Tara Street

The proposed Tara Station does not directly impact on Iarnród Éireann's existing services and infrastructure. Indirect environmental impacts have been assessed and are reported in the EIAR, including noise, dust, vibration and settlement impacts to ensure impacts are mitigated to acceptable levels. The management and mitigation of construction impacts is set out by the outline Construction Environmental Manager Plan (CEMP)[4.122] included with the EIAR. TII are also developing an Instrumentation and Monitoring Plan (IMP) which will set out the specific monitoring requirements for works adjacent to Iarnród Éireann Infrastructure. The CEMP and IMP will be further developed by the main works Contractor and upon which Iarnród Éireann will be consulted. TII will continue to work collaboratively with Iarnród Éireann to ensure that the design and construction process is coordinated and controlled such that any residual impacts remain acceptable.

Operations and Management of Interface Areas (Glasnevin and Tara Street)

TII and Iarnrod Éireann are in the process of putting in place an agreement which will capture the operational and maintenance responsibilities of the parties at both stations. Both parties have committed to agreeing these interfaces in advance of the commencement of construction.

- Dublin Chamber (No. 70) raised concerns regards the disruption caused by construction to businesses.

  Traffic management plans have been developed to minimise the impact to road users, and to maintain access to businesses and premises (see section 4.2.2 Construction Phase (e)Traffic and Transport.). As identified in the EIAR [4.123], pedestrian routes will be maintained throughout construction, and the environment around sites will be designed to ensure pedestrians feel they are entering a safe and accessible environment. This will ensure that the impact to businesses and shops adjacent to works areas is minimised.

  Noise, dust and vibration levels will be maintained at a level such that they will not present a health and safety risk to pedestrians, and all environmental impacts will be monitored.

- Senator Marie Sherlock (No. 181) raised concerns including: construction traffic in the vicinity of the proposed Griffith Park, Glasnevin and Mater stations, including the impact on parking at Mater; vermin control close to the Royal Canal; noise impacts on the Shandon and Dalcassian areas and Berkeley Road; the Property Owners Protection Scheme (POPS) is limited; impacts on wildlife particularly in the vicinity of the Royal Canal; and the replacement of tress lost due to construction. A request for a 24-hour helpline to be provided was also made.

  Construction traffic and parking will be managed in accordance with the principles set out by 4.2.2 Construction Phase '(e)Traffic and Transport'. The Scheme Traffic Management Plan [4.119] assesses that there will be a moderate impact to designated on-street parking at Mater due to the removal of parking bays on Eccles Street and Berkley Road.

  Vermin control will be implemented as part of standard site housekeeping measures. Construction noise impacts have been assessed and will be managed in accordance with the principles set out by 4.2.2 Construction Phase '(b) Noise and Vibration'.

  TII do not consider that the POPS is overly restrictive. The 30m zone is designed to encompass the zone within which construction generated ground movements might be expected to occur that could have an impact on property. To provide further assurance, TII and their contractors will be undertaking comprehensive ground movement and vibration monitoring that will provide the data, that in the event a property owner considers their property may have been impacted by Metrolink construction, will be available to determine whether that is the case.

  The EIAR [4.121] shows the residual impact significance on habitats and biodiversity for the Royal Canal following mitigation results in no likely significant residual effect. The Contractor will be legally obliged to ensure that procedures are implemented to control and minimise disturbance and damage to areas of conservation interest and legally protected and notable species, in accordance with the mitigation and control measures referred to by this document and as set out by the EIAR.

  TII and the MetroLink project are committed to minimising impacts on wildlife habitats and on biodiversity more generally. Proposals include for example, the provision of tree and woodland planting to replace trees unavoidably lost as a result of the design and construction of the proposed Project. 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 improvements over and above the baseline and would therefore be considered "enhancements".

  As previously noted, TII also confirm a 24-hour helpline will be in place.

- An Post (No.7) in their submission noted the potential for disruption to their operations during construction, and the potential for tunnel construction to impact the GPO.

  Section 4.3.4 AZ4(f) responds to these observations.

The complete list of submissions extending over more than one AZ4 sub-area is provided by Table 4, and section 5 provides the full responses to the submissions received.

[4.119] *EIAR Appendix A9.5, Section 7.7*

[4.120] *EIAR Appendix A5.5, Section 1*

[4.121] *EIAR Chapter 15 Table 15.24*

[4.122] *EIAR Appendix A5.1*

[4.123] *EIAR Chapter 9*

5. Responses to Individual Submissions

The following section details TII's response in alphabetical order to each of the 317 submissions received from the statutory consultation, plus the submission received from Fingal County Council.

Section 5.1 provides the index for TII's response to each individual submission and section 5.2 provides TII's response to each individual submission received.

5.1 Submissions Index

To assist the reader, Table 3 presents an index that reflects the alphabetical order of the submissions and the order in which they are presented in this document with the exception of those submissions noted below. These submissions have been grouped together as they cover the same subject matter and have thus been responded to under a single response to avoid unnecessary duplication:

- Submission No's – 016, 049, 083, 084, 086, 091, 120, 138, 157, 164, 172, 197, 207, and 267.
- Submission No's. – 017, 038, 061,147, 158, 184, 201, 294, and 308.
- Submission No.'s – 77, 177 and 206
- Submission No.'s – 103 and 285.
- Submission No.'s – 123 and 124.
- Submission No.'s – 178, 179, and 195.
- Submission No.'s – 243, 244, 245, and 246.

The response to these grouped submissions has been placed in the order of its lowest number.

OPW submissions cover No.'s 213 to 240 inclusive. The cover letter provided with each submission is the same and therefore again to avoid unnecessary repetition, this has been responded to once and is included in the response to submission No. 213.

A second index, Table 4, is provided that groups the submissions in accordance with the categorisation set out by section 3.2.1, and sections 4.3 and 4.4 of this document.

For information, the following submissions relate to the proposed:

- location of Charlemont Station, including local environmental impacts and wider strategic transport planning concerns – 010, 015, 016, 018, 027, 031, 034 to 037, 040 to 043, 048, 049, 051, 055, 060, 063, 065, 071, 081, 083, 084, 086, 091, 098 to 101, 105, 107, 108, 114, 120, 126, 134, 136 to 138, 142, 144 to 146, 148, 149, 151, 153, 157, 159, 161, 163, 164, 166, 170, 172, 189 to 192, 197, 202 to 204, 207, 208, 241, 257, 259, 261 to 264, 267, 272, 284, 286, 289, 293, 300, 305 to 307, 316, 319, and 320.
- position of the MetroLink alignment along the R132 or its impact on green space – 011, 014, 058, 089, 090, 125, 277, 281, 283, 288, and 315.

To further assist the reader, the index has been colour coded by 'Area / Category':

Area / Category	Description
AZ1(a)	Estuary Station (including Park & Ride facility) to Seatown Station to northern end of Swords Central Station.
AZ1(b)	Swords Central Station to Fosterstown Station to Dublin Airport North Portal (DANP).
AZ2	Section AZ2 includes the ESB Networks connection and new substations, the Dublin Airport North Portal (DANP), the tunnel running beneath Dublin Airport lands, Dublin Airport Station and Dublin Airport South Portal (DASP) and associated intervention and ventilation tunnels.
AZ3	Section includes embankment, elevated, open and retained cut, and cut and cover sections of the alignment. AZ3 extends from south of Dublin Airport South Portal (DASP) to the Northwood Portal, and includes Dardistown Station, the Dardistown Depot, ESB Networks connection and substations, the M50 viaduct crossing, Northwood Station and the TBM launch site at Northwood.
AZ4(a)	Northwood Portal to Ballymun Station, Ballymun Station and running tunnel to Collins Avenue Station.
AZ4(b)	Collins Avenue Station and running tunnel to Griffith Park Station, including Albert College Park Intervention Shaft.
AZ4(c)	Griffith Park Station and running tunnel to Glasnevin Station.
AZ4(d)	Glasnevin Station and running tunnel to Mater Station.
AZ4(e)	Mater Station and running tunnel to O'Connell Street Station.
AZ4(f)	O'Connell Street Station and running tunnel to Tara Station.
AZ4(g)	Tara Station and running tunnel to St. Stephen's Green Station.
AZ4(h)	St. Stephen's Green Station and running tunnel to Charlemont Station.
AZ4(i)	Charlemont Station and tunnel turnback south of the Station.
MULT AZ'S	Submissions that extend over more than one of the four Assessment Zones.
MULT AZ4	Submissions that span more than one AZ4 sub-area.
GEN	General overview or non-geographic specific submissions.

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
1	ACRA and Ballymun Road North Residents	Collins Ave-Griffith Park	AZ4 (b)
2	ACRA Association of Combined Residence Association	General	GEN
3	Aidan Cyril Forde	Tara-SSG	AZ4 (g)
4	Aine Wellard	Tara	AZ4 (g)
5	Alstead Securities Limited	Tara	AZ4 (g)
6	Amanda Hughes	Mater	AZ4 (e)
7	An Post	Multiple	MULT AZ4
8	AnTaisce	Tara	AZ4 (g)
9	Andrew Conlon and Maeve Fitzpatrick	Mater	AZ4 (e)
10	Andrew Whelan	Multiple	MULT AZ's
11	Anne Behan and John Kearns	Seatown-Swords	AZ1(a)
12	Anne Confrey	Griffith Park-Glasnevin	AZ4 (c)
13	Anne G Meehan	Griffith Park-Glasnevin	AZ4 (c)
14	Ashley Estate Residents	Seatown-Swords	AZ1(a)
15	Barry and Aileen Dempsey	Charlemont	AZ4 (i)
16	Barry Murphy	Charlemont	AZ4 (i)
17	Bart and Patricia Broderick	Tara	AZ4 (g)
18	Ben and Tatiana Hurley	Charlemont	AZ4 (i)
19	Berkeley Road Services and Traders Association	Mater	AZ4 (e)
20	Bernard Seymour	SSG	AZ4 (h)
21	Bindford Limited	Glasnevin	AZ4 (d)
22	BORG Developments and JOM Investments	Northwood	AZ3
23	Bovale Developments ULC	Estuary	AZ1(a)
24	Bovale ULC and Balheary Properties ULC	Estuary	AZ1(a)
25	Breda Scully	Mater	AZ4 (e)
26	Brendan Flanagan	Mater	AZ4 (e)
27	Brendan Heneghan	Charlemont	AZ4 (i)
28	Brendan Howley	Collins Ave-Griffith Park	AZ4 (b)
29	Brian McGrath	O'Connell St.	AZ4 (f)
30	Brigid Purcell (People Before Profit representative)	Tara	AZ4 (g)
31	Butterfield District Residents Association	Charlemont	AZ4 (i)
32	Cairn Homes Properties Limited	Estuary-Seatown	AZ1(a)
33	Caitriona and Ciaran Byrne	Seatown	AZ1(a)
34	Caitriona Shaffrey	Charlemont	AZ4 (i)
35	Carmen Neary	Charlemont	AZ4 (i)
36	Caroline Eyre O'Connor	Charlemont	AZ4 (i)
37	Caroline Regan and family	Charlemont	AZ4 (i)
38	Cathal Duffy	Tara	AZ4 (g)
39	Catherine Foley and Keith Madden	Griffith Park-Glasnevin	AZ4 (c)
40	Charlemont and Dartmouth Community (Dartmouth Road)	Charlemont	AZ4 (i)
41	Charlemont and Dartmouth Community (Dartmouth Square West)	Charlemont	AZ4 (i)
42	Charlemont and Dartmouth Community (General Area)	Charlemont	AZ4 (i)
43	Ciaran Black and Leon McCarthy	Charlemont	AZ4 (i)
44	Ciaran Cuffe	Multiple	MULT AZ's
45	Claire Dunne	Glasnevin	AZ4 (d)
46	CLG Na Fianna CO Cormac O Donnchu	Multiple	MULT AZ's
47	Colin Torpay	SSG	AZ4 (h)

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
48	College and Wainsfort Residents Association	SSG-Charlemont	AZ4 (h)
49	Colm and Caitriona Warfield	Charlemont	AZ4 (i)
50	Commission for Railway Regulation	Multiple	MULT AZ's
51	Conor and Lorraine Power	Charlemont	AZ4 (i)
52	Coras Iompair Eireann	Multiple	MULT AZ4
53	Core Capital	SSG-Charlemont	AZ4 (h)
54	Cormac McKay and Aeravai	Multiple	GEN
55	Dan Coulcher and Paula Fyans	General	GEN
56	DECC Geological Survey Ireland	Multiple	GEN
57	Declan Ryan	SSG-Charlemont	AZ4 (h)
58	Deirdre Byrne and Family	Seatown-Swords	AZ1(a)
59	Deirdre Vaughan	Griffith Park-Glasnevin	AZ4 (c)
60	Denis McLoughlin and Teresa Reid	Charlemont	AZ4 (i)
61	Dermot and Doris Healy	Tara	AZ4 (g)
62	Desmond and Kathleen Rice	Griffith Park-Glasnevin	AZ4 (c)
63	Development Applications Unit	Multiple	MULT AZ's
64	Devonmill Limited	Swords-Fosterstown	AZ1(b)
65	Diarmuid Burke	Charlemont	AZ4 (i)
66	District 7 Community Alliance	Mater	AZ4 (e)
67	Donal O'Brolcain	General	GEN
68	Dublin Airport	Dublin Airport	AZ2
69	Dublin Central GP Limited	O'Connell St.	AZ4 (f)
70	Dublin Chamber	Multiple	MULT AZ4
71	Dublin City Council	Multiple	MULT AZ's
72	Dublin Commuter Coalition	General	GEN
73	Dublin Cycling Campaign	Multiple	MULT AZ's
74	Duncan Smith	Multiple	MULT AZ's
75	Dympna Rooney	Griffith Park-Glasnevin	AZ4 (c)
76	Eamonn Smyth	Mater	AZ4 (e)
77	Eanna Coffey	Tara	AZ4 (g)
78	Earl Court Management Company DAC	SSG-Charlemont	AZ4 (h)
79	Earldev Properties Unlimited Company	SSG-Charlemont	AZ4 (h)
80	Earlsfort Basin Limited	SSG-Charlemont	AZ4 (h)
81	Edward Kelly and Joyce MacRedmond	Charlemont	AZ4 (i)
82	Eirgrid	Multiple	MULT AZ's
83	Elisabeth Vandenberghe	Charlemont	AZ4 (i)
84	Emir McDonagh	Charlemont	AZ4 (i)
85	Emma Kelly	SSG-Charlemont	AZ4 (h)
86	Erica and Bryan Dalton	Charlemont	AZ4 (i)
87	ESB Telecoms Limited	Collins Ave	AZ4 (a)
88	Espirit Investments Limited	Tara-SSG	AZ4 (g)
89	Estuary Court Residents Association 2	Seatown-Swords	AZ1(a)
90	Estuary Court Residents Association	Seatown-Swords	AZ1(a)
91	Eveleen Coyle	Charlemont	AZ4 (i)
92	Failte Ireland	General	GEN
93	Farrier Technology Limited	Glasnevin	AZ4 (d)
94	Father Paul Churchill and others (St. Josephs Church)	Mater	AZ4 (e)

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
95	Fingallians GAA Club	Estuary-Seatown	AZ1(a)
96	Fiona O'Kelly	Glasnevin	AZ4 (d)
97	Frances Maguire	Collins Ave	AZ4 (b)
98	Frank McDonald	General	GEN
99	GADRA	Multiple	MULT AZ4
100	Geraldine Ann Cusack and Geraldine O'Connell Cusack	Charlemont	AZ4 (i)
101	Gerard F Brouder	Multiple	GEN
102	Gerard Gannon Properties	Swords	AZ1(b)
103	Gerhard and Rosemary Mayrhuber	Tara	AZ4 (g)
104	Glasnevin Village Residents Association	Glasnevin	AZ4 (d)
105	Godfrey Gillett	Charlemont	AZ4 (i)
106	Grace Bible Fellowship	Tara-SSG	AZ4 (g)
107	Grace Maguire	Charlemont	AZ4 (i)
108	Grand Parade Property Trading Company DAC	Charlemont	AZ4 (i)
109	Greybirch Limited	Tara	AZ4 (g)
110	Hammerson ICAV	Swords	AZ1(b)
111	Hampstead Residents CLG	Collins Ave-Griffith Park	AZ4 (b)
112	Hedigans Limited (Michael and Peter Hedigan)	Glasnevin	AZ4 (d)
113	Helen and Luke Sherlock	Tara	AZ4 (g)
114	Helena Kelly	Charlemont	AZ4 (i)
115	Hertz Europe Service Centre Limited	Seatown-Swords	AZ1(a)
116	Hibernia Real Estate Group Limited	SSG-Charlemont	AZ4 (h)
117	Hines Real Estate Ireland Limited	SSG	AZ4 (h)
118	HSE National Drug Treatment Centre	Tara-SSG	AZ4 (g)
119	Hugo Byrne CO John Byrne	Dardistown-Northwood	AZ3
120	Ian and Eva Sutherland	Charlemont	AZ4 (i)
121	Iarnrod Eireann	Multiple	MULT AZ4
122	Institutional Investment Partners GmbH	O'Connell St.	AZ4 (f)
123	Iona and District Residents Association 2	Glasnevin	AZ4 (d)
124	Iona and District Residents Association	**Repeated submission (superceded by #123)**	
125	IPUT plc and Irish Life Assurance plc	Fosterstown	AZ1(b)
126	Irene Sorohan	Charlemont	AZ4 (i)
127	Irish Airline Pilots Association	Dublin Airport	AZ2
128	Irish Georgian Society	General	GEN
129	Irish Life Assurance plc. (19-20 Earlsfort Terrace and 65A Adelaide Road)	SSG-Charlemont	AZ4 (h)
130	Irish Life Assurance plc. (4 Earlsfort Terrace)	SSG-Charlemont	AZ4 (h)
131	Irish Life Assurance plc. (70 St Stephens Green)	SSG	AZ4 (h)
132	Irish Life Assurance plc. (Earlsfort Terrace Block C)	SSG-Charlemont	AZ4 (h)
133	Irish Water	Multiple	MULT AZ's
134	IvanaBacik	Multiple	GEN
135	J Murphy (Devlopments) Limited	Fosterstown	AZ1(b)
136	James Geoghegan	Charlemont	AZ4 (i)
137	James Wickham	General	MULT AZ4
138	Jamie Maher and Others	Charlemont	AZ4 (i)
139	Jennie McGee and Ian Kelly	Glasnevin	AZ4 (d)
140	Jerdip Properties Unlimited Company	SSG-Charlemont	AZ4 (h)
141	Jian Cheng and Family	Collins Ave-Griffith Park	AZ4 (b)

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
142	Jim O'Callaghan	Charlemont	AZ4 (i)
143	Johann Harty	Glasnevin	AZ4 (d)
144	John A Ryan	Charlemont	AZ4 (i)
145	John and Josianne Bullows 2 (Letter+ land registry records, deeds, vesting certs & photos)	Charlemont	AZ4 (i)
146	John and Josianne Bullows (same letter as above)	Charlemont	AZ4 (i)
147	John and Majella Darcy	Tara	AZ4 (g)
148	John Bernard Reid	Multiple	GEN
149	John Conway and Orlaith McCarthy	Charlemont	AZ4 (i)
150	John Lawlor	General	GEN
151	John Loughrey	Charlemont	AZ4 (i)
152	John McGreevy	Fosterstown	AZ1(b)
153	John Neary and Kathleen White	Charlemont	AZ4 (i)
154	Jonathan Healy	Mater	AZ4 (e)
155	Juliana and Joe Boland and Family	Swords	AZ1(b)
156	Justin Marden	Multiple	MULT AZ's
157	Karen Colgan	Charlemont	AZ4 (i)
158	Karl Egan	Tara	AZ4 (g)
159	Kathleen McDonagh	Charlemont	AZ4 (i)
160	Kathleen Shields	Tara	AZ4 (g)
161	Kevin Muaghan	Charlemont	AZ4 (i)
162	Kieran Smyth and Margaret McDonnell and Others	Collins Ave-Griffith Park	AZ4 (b)
163	Knocklyon Network CLG	SSG-Charlemont	AZ4 (h)
164	Kohlin Lourenco	Charlemont	AZ4 (i)
165	KW Real Estate ICAV	SSG	AZ4 (h)
166	Leo and Anne Crehan	Charlemont	AZ4 (i)
167	Leonard Kinsella	SSG-Charlemont	AZ4 (h)
168	Lesley Hewson	Glasnevin	AZ4 (c)
169	LIDL Ireland GmbH	Northwood	AZ3
170	LOKRA Lower Kimmage Road Residents Association	SSG-Charlemont	AZ4 (h)
171	Lorraine Rooney	Glasnevin	AZ4 (c)
172	Louisa Gannon	Charlemont	AZ4 (i)
173	Louise Boughton and Glenn Sharpe	Collins Ave-Griffith Park	AZ4 (b)
174	M.E. Hanashoe Solicitors	Glasnevin	AZ4 (d)
175	Management Company Board on behalf of The Court	Glasnevin	AZ4 (d)
176	Margaret Morrissey	Glasnevin	AZ4 (d)
177	Maria Elena Garcia Valasco	Tara	AZ4 (g)
178	Maria O'Connor	Tara	AZ4 (g)
179	Marie Balfe	Tara	AZ4 (g)
180	Marie McMahon	Glasnevin	AZ4 (d)
181	Marie Sherlock	Multiple	MULT AZ4
182	Mark Campbell and Aimee O'Farrell	Glasnevin	AZ4 (d)
183	Mark O'Connell	Glasnevin	AZ4 (d)
184	Martin Sheridan	Tara	AZ4 (g)
185	Mary Fitzpatrick	Multiple	MULT AZ's
186	Mater Misericordiae and the Childrens University Hospitals	Mater	AZ4 (e)
187	Mater Misericordiae University Hospital	**Repeated submission**	
188	Maureen O'Scanaill	Swords	AZ1(b)

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
189	Metro South West Group	SSG-Charlemont	AZ4 (h)
190	Michael A Doyle and Carmel Smith Doyle	Charlemont	AZ4 (i)
191	Michael B. Barry	SSG-Charlemont	AZ4 (h)
192	Michael McDowell	Charlemont	AZ4 (i)
193	Michael Quinn	Glasnevin	AZ4 (d)
194	Millenium Theatre Company	Mater-O'Connell St.	AZ4 (e)
195	Monica Deering	Tara	AZ4 (g)
196	Mouna Unlimited Company	Dardistown	AZ3
197	Muiris O'Dwyer	SSG-Charlemont	AZ4 (h)
198	National Disability Authority	General	GEN
199	National Transport Authority	General	GEN
200	Neasa Hourigan	General	GEN
201	Newcourt Retirement Fund Managers Ltd Trustees of Majella Darcy PRSA	Tara	AZ4 (g)
202	Niall Lynch	SSG-Charlemont	AZ4 (h)
203	Niall Parsons 2	Charlemont	AZ4 (i)
204	Niall Parsons	Charlemont	AZ4 (i)
205	Nicholas Mansergh	Multiple	GEN
206	Nicola Brait and Greta Tumiatti	Tara	AZ4 (g)
207	Nicola O'Doherty	Charlemont	AZ4 (i)
208	Nigel Clerkin	General	GEN
209	Nigel Mallen	Glasnevin	AZ4 (d)
210	Nuala Kelly	Tara	AZ4 (g)
211	October Investments Limited	Swords	AZ1(b)
212	Olan O'Brien	Mater	AZ4 (e)
213	OPW (1 Georges Quay and others)	Multiple	MULT AZ4
214	OPW (13-14 Burgh Quay Offices)	Multiple	MULT AZ4
215	OPW (14-17 Moore Street - 8-9 Moore Lane)	Multiple	MULT AZ4
216	OPW (16 Parnell Square)	Multiple	MULT AZ4
217	OPW (22-25 Clare Street)	Multiple	MULT AZ4
218	OPW (44-45 O'Connell Street)	Multiple	MULT AZ4
219	OPW (52 St Stephens Green)	Multiple	MULT AZ4
220	OPW (9-15 O'Connell Street)	Multiple	MULT AZ4
221	OPW (Apartments 1-8 Clare Court)	Multiple	MULT AZ4
222	OPW (Ballymun Garda District Headquarters and INTERO Office)	Multiple	MULT AZ4
223	OPW (Department of Enterprise, Trade and others)	Multiple	MULT AZ4
224	OPW (Department of Finance)	Multiple	MULT AZ4
225	OPW (Department of Justice 50-51 St Stephens Green)	Multiple	MULT AZ4
226	OPW (Garden of Remembrance)	Multiple	MULT AZ4
227	OPW (Government Buildings Block)	Multiple	MULT AZ4
228	OPW (Headquarters of the Department of Agriculture, Food and the Marine)	Multiple	MULT AZ4
229	OPW (Iveagh House - Department of Foreign Affairs)	Multiple	MULT AZ4
230	OPW (Leinster House Complex)	Multiple	MULT AZ4
231	OPW (Mobhi Road Complex)	Multiple	MULT AZ4
232	OPW (National Concert Hall Complex)	Multiple	MULT AZ4
233	OPW (National Gallery of Ireland)	Multiple	MULT AZ4
234	OPW (National History Museum)	Multiple	MULT AZ4
235	OPW (National Library of Ireland)	Multiple	MULT AZ4

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
236	OPW (National Museum of Ireland)	Multiple	MULT AZ4
237	OPW (St Stephens Green Buildings)	Multiple	MULT AZ4
238	OPW (St Stephens Green House)	Multiple	MULT AZ4
239	OPW (St Stephens Green Park)	Multiple	MULT AZ4
240	OPW (The General Post Office)	Multiple	MULT AZ4
241	Orwell Park (Templeogue) Residents Association	SSG-Charlemont	AZ4 (h)
242	O'Scanaill Veterinary Hospital	Swords	AZ1(b)
243	Our Ladies of Victories Church	Collins Ave	AZ4 (b)
244	Our Lady of Victories Boys' School (Dermot Murphy)	Collins Ave-Griffith Park	AZ4 (b)
245	Our Lady of Victories Girls National School (Dermot Murphy)	Collins Ave-Griffith Park	AZ4 (b)
246	Our Lady of Victories Infant School (Dermot Murphy)	Collins Ave-Griffith Park	AZ4 (b)
247	Owners of 9, 10 and 11 Nelson Street	Mater	AZ4 (e)
248	Pat and Barbara McCormack	Glasnevin	AZ4 (d)
249	Patricia Roe	Collins Ave-Griffith Park	AZ4 (b)
250	Patricia Whyte	SSG-Charlemont	AZ4 (h)
251	Paul and Brian Connell	Glasnevin	AZ4 (d)
252	Paul Cusack on behalf of residents of 153 Ballymun Road	Ballymun-Collins Ave	AZ4 (a)
253	Paul Hughes	Mater	AZ4 (e)
254	Paul McAuliffe	Ballymun-Collins Ave	AZ4 (a)
255	Peter and Breda Gregory	Glasnevin	AZ4 (d)
256	Peter Schneider Energy Consultants	General	GEN
257	Peter Twamley	Multiple	GEN
258	Phibsboro Village Tidy Towns (PVTT)	Glasnevin	AZ4 (d)
259	Proinsias Mac Fhlannchadha	Charlemont	AZ4 (i)
260	Prospect Architectural Conservation Area	Glasnevin	AZ4 (c)
261	Rail Users Ireland (Thomas J Stamp)	Multiple	MULT AZ's
262	Rathgar Residents Association	General	GEN
263	Recorders Residents Association	SSG-Charlemont	AZ4 (h)
264	Rethink Metrolink	Charlemont	AZ4 (i)
265	RGRE Burlington Limited and RGRE Harcourt Terrace Limited	SSG-Charlemont	AZ4 (h)
266	Richard Guiney	General	GEN
267	Rita Marie Harvey	Charlemont	AZ4 (i)
268	Rohan Holdings Limited (Part I & Part II)	Seatown-Swords	AZ1(a)
269	Roisin Shortall	Collins Ave-Griffith Park	AZ4 (b)
270	Royal Canal Clean-Up Group	Glasnevin	AZ4 (d)
271	Ruadhan MacEoin	Multiple	GEN
272	Sadhbh O Neill	Multiple	GEN
273	Sainfoin Property Company Limited	Dardistown	AZ3
274	Santry Forum	Multiple	MULT AZ's
275	Sarah Meredith	Glasnevin	AZ4 (d)
276	Save Markievicz Pool & Gym Campaign (John Dean)	Tara	AZ4 (g)
277	Seatown Villas Residents	Seatown	AZ1(a)
278	Shandon Mill Owners Management Company CLG	Glasnevin	AZ4 (d)
279	Shandon Residents Association	Glasnevin	AZ4 (d)
280	Shira Mehlman	Glasnevin	AZ4 (d)
281	Sinead Quilty	Swords	AZ1(a)
282	Smokin Bones LTD	Swords	AZ1(b)

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
283	Smyths Toys Superstores	Swords	AZ1(b)
284	St.Annes Resident's Association	SSG	AZ4 (h)
285	Susan Cosgrove	Tara	AZ4 (g)
286	Suzi Taylor and G.I Taylor	Charlemont	AZ4 (i)
287	Tanat Limited	Tara	AZ4 (g)
288	Tanrat Limited TA Starbucks	Swords	AZ1(b)
289	Terenure West Residents Association	General	GEN
290	Tesco Ireland	Multiple	MULT AZ's
291	The Abbey Theatre (Amharclann na Mainistreach)	O'Connell St.-Tara	AZ4 (f)
292	The CMCCG Action Group (Sabine Klinger)	Tara	AZ4 (g)
293	The Foley Family	Charlemont	AZ4 (i)
294	The Owner of Apartment 27 College Gate	Tara	AZ4 (g)
295	The Residents of Albert College Lawn	Collins Ave-Griffith Park	AZ4 (b)
296	The Rotunda Hospital	Mater-O'Connell St.	AZ4 (e)
297	Thomas Harty	Glasnevin	AZ4 (d)
298	Thomas Herlihy	General	GEN
299	TII (Edel McCormack) **NOT A SUBMISSION**	**Proof of postage of notification letters to landowners/occupiers**	
300	Tom Harrington	Charlemont	AZ4 (i)
301	Tony Graham	General	GEN
302	Townsend Apartment Management Company Limited	Tara	AZ4 (g)
303	Trinity College Dublin	Tara-SSG	AZ4 (g)
304	Troys Butchers	O'Connell St.	AZ4 (f)
305	Union Investment Real Estate GmbH	Charlemont	AZ4 (i)
306	University College Dublin (UCD)	Charlemont	AZ4 (i)
307	Upper Leeson Street Area Residents Association	Charlemont	AZ4 (i)
308	Veronica Jane O'Mara	Tara	AZ4 (g)
309	Vincent Harrison and others 2	Glasnevin	AZ4 (d)
310	Vincent Harrison and others	Glasnevin	AZ4 (d)
311	Voice of Vision Impairment	General	GEN
312	Waterways Ireland	Glasnevin	AZ4 (d)
313	Westward Group Ltd	Mater-O'Connell St.	AZ4 (e)
314	Will Phelan	SSG-Charlemont	AZ4 (h)
315	Woodies DIY co Grafton Group PLC	Seatown	AZ1(a)
316	WORK Residents Association (Michael Griffin)	SSG-Charlemont	AZ4 (h)
317	Wynn's Hotel	O'Connell St.-Tara	AZ4 (f)
318	Yu Miao Yang YMY Ltd	Mater	AZ4 (e)
319	Yvonne Allen	Charlemont	AZ4 (i)
320	Yvonne Collins	SSG-Charlemont	AZ4 (h)
N/A	Fingal County Council	Multiple	

Table 4: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Grouped by 'Area/Category')

Submission No.	Submission Entity/ Person	Location	Area/ Category
11	Anne Behan and John Kearns	Seatown-Swords	AZ1(a)
14	Ashley Estate Residents	Seatown-Swords	AZ1(a)
23	Bovale Developments ULC	Estuary	AZ1(a)
24	Bovale ULC and Balheary Properties ULC	Estuary	AZ1(a)
32	Cairn Homes Properties Limited	Estuary-Seatown	AZ1(a)
33	Caitriona and Ciaran Byrne	Seatown	AZ1(a)
58	Deirdre Byrne and Family	Seatown-Swords	AZ1(a)
89	Estuary Court Residents Association 2	Seatown-Swords	AZ1(a)
90	Estuary Court Residents Association	Seatown-Swords	AZ1(a)
95	Fingallians GAA Club	Estuary-Seatown	AZ1(a)
115	Hertz Europe Service Centre Limited	Seatown-Swords	AZ1(a)
268	Rohan Holdings Limited (Part I & Part II)	Seatown-Swords	AZ1(a)
277	Seatown Villas Residents	Seatown	AZ1(a)
281	Sinead Quilty	Swords	AZ1(a)
315	Woodies DIY co Grafton Group PLC	Seatown	AZ1(a)
64	Devonmill Limited	Swords-Fosterstown	AZ1(b)
102	Gerard Gannon Properties	Swords	AZ1(b)
110	Hammerson ICAV	Swords	AZ1(b)
125	IPUT plc and Irish Life Assurance plc	Fosterstown	AZ1(b)
135	J Murphy (Devlopments) Limited	Fosterstown	AZ1(b)
152	John McGreevy	Fosterstown	AZ1(b)
155	Juliana and Joe Boland and Family	Swords	AZ1(b)
188	Maureen O'Scanaill	Swords	AZ1(b)
211	October Investments Limited	Swords	AZ1(b)
242	O'Scanaill Veterinary Hospital	Swords	AZ1(b)
282	Smokin Bones LTD	Swords	AZ1(b)
283	Smyths Toys Superstores	Swords	AZ1(b)
288	Tanrat Limited TA Starbucks	Swords	AZ1(b)
68	Dublin Airport	Dublin Airport	AZ2
127	Irish Airline Pilots Association	Dublin Airport	AZ2
22	BORG Developments and JOM Investments	Northwood	AZ3
119	Hugo Byrne CO John Byrne	Dardistown-Northwood	AZ3
169	LIDL Ireland GmbH	Northwood	AZ3
196	Mouna Unlimited Company	Dardistown	AZ3
273	Sainfoin Property Company Limited	Dardistown	AZ3
87	ESB Telecoms Limited	Collins Ave	AZ4 (a)
252	Paul Cusack on behalf of residents of 153 Ballymun Road	Ballymun-Collins Ave	AZ4 (a)
254	Paul McAuliffe	Ballymun-Collins Ave	AZ4 (a)
1	ACRA and Ballymun Road North Residents	Collins Ave-Griffith Park	AZ4 (b)
28	Brendan Howley	Collins Ave-Griffith Park	AZ4 (b)
97	Frances Maguire	Collins Ave	AZ4 (b)
111	Hampstead Residents CLG	Collins Ave-Griffith Park	AZ4 (b)
141	Jian Cheng and Family	Collins Ave-Griffith Park	AZ4 (b)
162	Kieran Smyth and Margaret McDonnell and Others	Collins Ave-Griffith Park	AZ4 (b)
173	Louise Boughton and Glenn Sharpe	Collins Ave-Griffith Park	AZ4 (b)
243	Our Ladies of Victories Church	Collins Ave	AZ4 (b)
244	Our Lady of Victories Boys' School (Dermot Murphy)	Collins Ave-Griffith Park	AZ4 (b)

Table 4: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Grouped by 'Area/Category')

Submission No.	Submission Entity/ Person	Location	Area/ Category
245	Our Lady of Victories Girls National School (Dermot Murphy)	Collins Ave-Griffith Park	AZ4 (b)
246	Our Lady of Victories Infant School (Dermot Murphy)	Collins Ave-Griffith Park	AZ4 (b)
249	Patricia Roe	Collins Ave-Griffith Park	AZ4 (b)
269	Roisin Shortall	Collins Ave-Griffith Park	AZ4 (b)
295	The Residents of Albert College Lawn	Collins Ave-Griffith Park	AZ4 (b)
12	Anne Confrey	Griffith Park-Glasnevin	AZ4 (c)
13	Anne G Meehan	Griffith Park-Glasnevin	AZ4 (c)
39	Catherine Foley and Keith Madden	Griffith Park-Glasnevin	AZ4 (c)
59	Deirdre Vaughan	Griffith Park-Glasnevin	AZ4 (c)
62	Desmond and Kathleen Rice	Griffith Park-Glasnevin	AZ4 (c)
75	Dympna Rooney	Griffith Park-Glasnevin	AZ4 (c)
168	Lesley Hewson	Glasnevin	AZ4 (c)
171	Lorraine Rooney	Glasnevin	AZ4 (c)
260	Prospect Architectural Conservation Area	Glasnevin	AZ4 (c)
21	Bindford Limited	Glasnevin	AZ4 (d)
45	Claire Dunne	Glasnevin	AZ4 (d)
93	Farrier Technology Limited	Glasnevin	AZ4 (d)
96	Fiona O'Kelly	Glasnevin	AZ4 (d)
104	Glasnevin Village Residents Association	Glasnevin	AZ4 (d)
112	Hedigans Limited (Michael and Peter Hedigan)	Glasnevin	AZ4 (d)
123	Iona and District Residents Association 2	Glasnevin	AZ4 (d)
139	Jennie McGee and Ian Kelly	Glasnevin	AZ4 (d)
143	Johann Harty	Glasnevin	AZ4 (d)
174	M.E. Hanashoe Solicitors	Glasnevin	AZ4 (d)
175	Management Company Board on behalf of The Court	Glasnevin	AZ4 (d)
176	Margaret Morrissey	Glasnevin	AZ4 (d)
180	Marie McMahon	Glasnevin	AZ4 (d)
182	Mark Campbell and Aimee O'Farrell	Glasnevin	AZ4 (d)
183	Mark O'Connell	Glasnevin	AZ4 (d)
193	Michael Quinn	Glasnevin	AZ4 (d)
209	Nigel Mallen	Glasnevin	AZ4 (d)
248	Pat and Barbara McCormack	Glasnevin	AZ4 (d)
251	Paul and Brian Connell	Glasnevin	AZ4 (d)
255	Peter and Breda Gregory	Glasnevin	AZ4 (d)
258	Phibsboro Village Tidy Towns (PVTT)	Glasnevin	AZ4 (d)
270	Royal Canal Clean-Up Group	Glasnevin	AZ4 (d)
275	Sarah Meredith	Glasnevin	AZ4 (d)
278	Shandon Mill Owners Management Company CLG	Glasnevin	AZ4 (d)
279	Shandon Residents Association	Glasnevin	AZ4 (d)
280	Shira Mehlman	Glasnevin	AZ4 (d)
297	Thomas Harty	Glasnevin	AZ4 (d)
309	Vincent Harrison and others 2	Glasnevin	AZ4 (d)
310	Vincent Harrison and others	Glasnevin	AZ4 (d)
312	Waterways Ireland	Glasnevin	AZ4 (d)
6	Amanda Hughes	Mater	AZ4 (e)
9	Andrew Conlon and Maeve Fitzpatrick	Mater	AZ4 (e)
19	Berkeley Road Services and Traders Association	Mater	AZ4 (e)

Table 4: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Grouped by 'Area/Category')

Submission No.	Submission Entity/ Person	Location	Area/ Category
25	Breda Scully	Mater	AZ4 (e)
26	Brendan Flanagan	Mater	AZ4 (e)
66	District 7 Community Alliance	Mater	AZ4 (e)
76	Eamonn Smyth	Mater	AZ4 (e)
94	Father Paul Churchill and others (St. Josephs Church)	Mater	AZ4 (e)
154	Jonathan Healy	Mater	AZ4 (e)
186	Mater Misericordiae and the Childrens University Hospitals	Mater	AZ4 (e)
194	Millenium Theatre Company	Mater-O'Connell St.	AZ4 (e)
212	Olan O'Brien	Mater	AZ4 (e)
247	Owners of 9, 10 and 11 Nelson Street	Mater	AZ4 (e)
253	Paul Hughes	Mater	AZ4 (e)
296	The Rotunda Hospital	Mater-O'Connell St.	AZ4 (e)
313	Westward Group Ltd	Mater-O'Connell St.	AZ4 (e)
318	Yu Miao Yang YMY Ltd	Mater	AZ4 (e)
29	Brian McGrath	O'Connell St.	AZ4 (f)
69	Dublin Central GP Limited	O'Connell St.	AZ4 (f)
122	Institutional Investment Partners GmbH	O'Connell St.	AZ4 (f)
291	The Abbey Theatre (Amharclann na Mainistreach)	O'Connell St.-Tara	AZ4 (f)
304	Troys Butchers	O'Connell St.	AZ4 (f)
317	Wynn's Hotel	O'Connell St.-Tara	AZ4 (f)
3	Aidan Cyril Forde	Tara-SSG	AZ4 (g)
4	Aine Wellard	Tara	AZ4 (g)
5	Alstead Securities Limited	Tara	AZ4 (g)
8	AnTaisce	Tara	AZ4 (g)
17	Bart and Patricia Broderick	Tara	AZ4 (g)
30	Brigid Purcell (People Before Profit representative)	Tara	AZ4 (g)
38	Cathal Duffy	Tara	AZ4 (g)
61	Dermot and Doris Healy	Tara	AZ4 (g)
77	Eanna Coffey	Tara	AZ4 (g)
88	Espirit Investments Limited	Tara-SSG	AZ4 (g)
103	Gerhard and Rosemary Mayrhuber	Tara	AZ4 (g)
106	Grace Bible Fellowship	Tara-SSG	AZ4 (g)
109	Greybirch Limited	Tara	AZ4 (g)
113	Helen and Luke Sherlock	Tara	AZ4 (g)
118	HSE National Drug Treatment Centre	Tara-SSG	AZ4 (g)
147	John and Majella Darcy	Tara	AZ4 (g)
158	Karl Egan	Tara	AZ4 (g)
160	Kathleen Shields	Tara	AZ4 (g)
177	Maria Elena Garcia Valasco	Tara	AZ4 (g)
178	Maria O'Connor	Tara	AZ4 (g)
179	Marie Balfe	Tara	AZ4 (g)
184	Martin Sheridan	Tara	AZ4 (g)
195	Monica Deering	Tara	AZ4 (g)
201	Newcourt Retirement Fund Managers Ltd Trustees of Majella Darcy PRSA	Tara	AZ4 (g)
206	Nicola Brait and Greta Tumiatti	Tara	AZ4 (g)
210	Nuala Kelly	Tara	AZ4 (g)
276	Save Markievicz Pool & Gym Campaign (John Dean)	Tara	AZ4 (g)

Table 4: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Grouped by 'Area/Category')

Submission No.	Submission Entity/ Person	Location	Area/ Category
285	Susan Cosgrove	Tara	AZ4 (g)
287	Tanat Limited	Tara	AZ4 (g)
292	The CMCCG Action Group (Sabine Klinger)	Tara	AZ4 (g)
294	The Owner of Apartment 27 College Gate	Tara	AZ4 (g)
302	Townsend Apartment Management Company Limited	Tara	AZ4 (g)
303	Trinity College Dublin	Tara-SSG	AZ4 (g)
308	Veronica Jane O'Mara	Tara	AZ4 (g)
20	Bernard Seymour	SSG	AZ4 (h)
47	Colin Torpay	SSG	AZ4 (h)
48	College and Wainsfort Residents Association	SSG-Charlemont	AZ4 (h)
53	Core Capital	SSG-Charlemont	AZ4 (h)
57	Declan Ryan	SSG-Charlemont	AZ4 (h)
78	Earl Court Management Company DAC	SSG-Charlemont	AZ4 (h)
79	Earldev Properties Unlimited Company	SSG-Charlemont	AZ4 (h)
80	Earlsfort Basin Limited	SSG-Charlemont	AZ4 (h)
85	Emma Kelly	SSG-Charlemont	AZ4 (h)
116	Hibernia Real Estate Group Limited	SSG-Charlemont	AZ4 (h)
117	Hines Real Estate Ireland Limited	SSG	AZ4 (h)
129	Irish Life Assurance plc. (19-20 Earlsfort Terrace and 65A Adelaide Road)	SSG-Charlemont	AZ4 (h)
130	Irish Life Assurance plc. (4 Earlsfort Terrace)	SSG-Charlemont	AZ4 (h)
131	Irish Life Assurance plc. (70 St Stephens Green)	SSG	AZ4 (h)
132	Irish Life Assurance plc. (Earlsfort Terrace Block C)	SSG-Charlemont	AZ4 (h)
140	Jerdip Properties Unlimited Company	SSG-Charlemont	AZ4 (h)
163	Knocklyon Network CLG	SSG-Charlemont	AZ4 (h)
165	KW Real Estate ICAV	SSG	AZ4 (h)
167	Leonard Kinsella	SSG-Charlemont	AZ4 (h)
170	LOKRA Lower Kimmage Road Residents Association	SSG-Charlemont	AZ4 (h)
189	Metro South West Group	SSG-Charlemont	AZ4 (h)
191	Michael B. Barry	SSG-Charlemont	AZ4 (h)
197	Muiris O'Dwyer	SSG-Charlemont	AZ4 (h)
202	Niall Lynch	SSG-Charlemont	AZ4 (h)
241	Orwell Park (Templeogue) Residents Association	SSG-Charlemont	AZ4 (h)
250	Patricia Whyte	SSG-Charlemont	AZ4 (h)
263	Recorders Residents Association	SSG-Charlemont	AZ4 (h)
265	RGRE Burlington Limited and RGRE Harcourt Terrace Limited	SSG-Charlemont	AZ4 (h)
284	St.Annes Resident's Association	SSG	AZ4 (h)
314	Will Phelan	SSG-Charlemont	AZ4 (h)
316	WORK Residents Association (Michael Griffin)	SSG-Charlemont	AZ4 (h)
320	Yvonne Collins	SSG-Charlemont	AZ4 (h)
15	Barry and Aileen Dempsey	Charlemont	AZ4 (i)
16	Barry Murphy	Charlemont	AZ4 (i)
18	Ben and Tatiana Hurley	Charlemont	AZ4 (i)
27	Brendan Heneghan	Charlemont	AZ4 (i)
31	Butterfield District Residents Association	Charlemont	AZ4 (i)
34	Caitriona Shaffrey	Charlemont	AZ4 (i)
35	Carmen Neary	Charlemont	AZ4 (i)
36	Caroline Eyre O'Connor	Charlemont	AZ4 (i)

Table 4: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Grouped by 'Area/Category')

Submission No.	Submission Entity/ Person	Location	Area/ Category
37	Caroline Regan and family	Charlemont	AZ4 (i)
40	Charlemont and Dartmouth Community (Dartmouth Road)	Charlemont	AZ4 (i)
41	Charlemont and Dartmouth Community (Dartmouth Square West)	Charlemont	AZ4 (i)
42	Charlemont and Dartmouth Community (General Area)	Charlemont	AZ4 (i)
43	Ciaran Black and Leon McCarthy	Charlemont	AZ4 (i)
49	Colm and Caitriona Warfield	Charlemont	AZ4 (i)
51	Conor and Lorraine Power	Charlemont	AZ4 (i)
60	Denis McLoughlin and Teresa Reid	Charlemont	AZ4 (i)
65	Diarmuid Burke	Charlemont	AZ4 (i)
81	Edward Kelly and Joyce MacRedmond	Charlemont	AZ4 (i)
83	Elisabeth Vandenberghe	Charlemont	AZ4 (i)
84	Emir McDonagh	Charlemont	AZ4 (i)
86	Erica and Bryan Dalton	Charlemont	AZ4 (i)
91	Eveleen Coyle	Charlemont	AZ4 (i)
100	Geraldine Ann Cusack and Geraldine O'Connell Cusack	Charlemont	AZ4 (i)
105	Godfrey Gillett	Charlemont	AZ4 (i)
107	Grace Maguire	Charlemont	AZ4 (i)
108	Grand Parade Property Trading Company DAC	Charlemont	AZ4 (i)
114	Helena Kelly	Charlemont	AZ4 (i)
120	Ian and Eva Sutherland	Charlemont	AZ4 (i)
126	Irene Sorohan	Charlemont	AZ4 (i)
136	James Geoghegan	Charlemont	AZ4 (i)
138	Jamie Maher and Others	Charlemont	AZ4 (i)
142	Jim O'Callaghan	Charlemont	AZ4 (i)
144	John A Ryan	Charlemont	AZ4 (i)
145	John and Josianne Bullows 2 (Letter+ land registry records, deeds, vesting certs & photos)	Charlemont	AZ4 (i)
146	John and Josianne Bullows (same letter as above)	Charlemont	AZ4 (i)
149	John Conway and Orlaith McCarthy	Charlemont	AZ4 (i)
151	John Loughrey	Charlemont	AZ4 (i)
153	John Neary and Kathleen White	Charlemont	AZ4 (i)
157	Karen Colgan	Charlemont	AZ4 (i)
159	Kathleen McDonagh	Charlemont	AZ4 (i)
161	Kevin Muaghan	Charlemont	AZ4 (i)
164	Kohlin Lourenco	Charlemont	AZ4 (i)
166	Leo and Anne Crehan	Charlemont	AZ4 (i)
172	Louisa Gannon	Charlemont	AZ4 (i)
190	Michael A Doyle and Carmel Smith Doyle	Charlemont	AZ4 (i)
192	Michael McDowell	Charlemont	AZ4 (i)
203	Niall Parsons 2	Charlemont	AZ4 (i)
204	Niall Parsons	Charlemont	AZ4 (i)
207	Nicola O'Doherty	Charlemont	AZ4 (i)
259	Proinsias Mac Fhlannchadha	Charlemont	AZ4 (i)
264	Rethink Metrolink	Charlemont	AZ4 (i)
267	Rita Marie Harvey	Charlemont	AZ4 (i)
286	Suzi Taylor and G.I Taylor	Charlemont	AZ4 (i)
293	The Foley Family	Charlemont	AZ4 (i)
300	Tom Harrington	Charlemont	AZ4 (i)

Table 4: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Grouped by 'Area/Category')

Submission No.	Submission Entity/ Person	Location	Area/ Category
305	Union Investment Real Estate GmbH	Charlemont	AZ4 (i)
306	University College Dublin (UCD)	Charlemont	AZ4 (i)
307	Upper Leeson Street Area Residents Association	Charlemont	AZ4 (i)
319	Yvonne Allen	Charlemont	AZ4 (i)
2	ACRA Association of Combined Residence Association	General	GEN
54	Cormac McKay and Aeravai	Multiple	GEN
55	Dan Coulcher and Paula Fyans	General	GEN
56	DECC Geological Survey Ireland	Multiple	GEN
67	Donal O'Brolcain	General	GEN
72	Dublin Commuter Coalition	General	GEN
92	Failte Ireland	General	GEN
98	Frank McDonald	General	GEN
101	Gerard F Brouder	Multiple	GEN
128	Irish Georgian Society	General	GEN
134	IvanaBacik	Multiple	GEN
148	John Bernard Reid	Multiple	GEN
150	John Lawlor	General	GEN
198	National Disability Authority	General	GEN
199	National Transport Authority	General	GEN
200	Neasa Hourigan	General	GEN
205	Nicholas Mansergh	Multiple	GEN
208	Nigel Clerkin	General	GEN
256	Peter Schneider Energy Consultants	General	GEN
257	Peter Twamley	Multiple	GEN
262	Rathgar Residents Association	General	GEN
266	Richard Guiney	General	GEN
271	Ruadhan MacEoin	Multiple	GEN
272	Sadhbh O Neill	Multiple	GEN
289	Terenure West Residents Association	General	GEN
298	Thomas Herlihy	General	GEN
301	Tony Graham	General	GEN
311	Voice of Vision Impairment	General	GEN
7	An Post	Multiple	MULT AZ4
52	Coras Iompair Eireann	Multiple	MULT AZ4
70	Dublin Chamber	Multiple	MULT AZ4
99	GADRA	Multiple	MULT AZ4
121	Iarnrod Eireann	Multiple	MULT AZ4
137	James Wickham	General	MULT AZ4
181	Marie Sherlock	Multiple	MULT AZ4
213	OPW (1 Georges Quay and others)	Multiple	MULT AZ4
214	OPW (13-14 Burgh Quay Offices)	Multiple	MULT AZ4
215	OPW (14-17 Moore Street - 8-9 Moore Lane)	Multiple	MULT AZ4
216	OPW (16 Parnell Square)	Multiple	MULT AZ4
217	OPW (22-25 Clare Street)	Multiple	MULT AZ4
218	OPW (44-45 O'Connell Street)	Multiple	MULT AZ4
219	OPW (52 St Stephens Green)	Multiple	MULT AZ4
220	OPW (9-15 O'Connell Street)	Multiple	MULT AZ4

Table 4: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Grouped by 'Area/Category')

Submission No.	Submission Entity/ Person	Location	Area/ Category
221	OPW (Apartments 1-8 Clare Court)	Multiple	MULT AZ4
222	OPW (Ballymun Garda District Headquarters and INTERO Office)	Multiple	MULT AZ4
223	OPW (Department of Enterprise, Trade and others)	Multiple	MULT AZ4
224	OPW (Department of Finance)	Multiple	MULT AZ4
225	OPW (Department of Justice 50-51 St Stephens Green)	Multiple	MULT AZ4
226	OPW (Garden of Remembrance)	Multiple	MULT AZ4
227	OPW (Government Buildings Block)	Multiple	MULT AZ4
228	OPW (Headquarters of the Department of Agriculture, Food and the Marine)	Multiple	MULT AZ4
229	OPW (Iveagh House - Department of Foreign Affairs)	Multiple	MULT AZ4
230	OPW (Leinster House Complex)	Multiple	MULT AZ4
231	OPW (Mobhi Road Complex)	Multiple	MULT AZ4
232	OPW (National Concert Hall Complex)	Multiple	MULT AZ4
233	OPW (National Gallery of Ireland)	Multiple	MULT AZ4
234	OPW (National History Museum)	Multiple	MULT AZ4
235	OPW (National Library of Ireland)	Multiple	MULT AZ4
236	OPW (National Museum of Ireland)	Multiple	MULT AZ4
237	OPW (St Stephens Green Buildings)	Multiple	MULT AZ4
238	OPW (St Stephens Green House)	Multiple	MULT AZ4
239	OPW (St Stephens Green Park)	Multiple	MULT AZ4
240	OPW (The General Post Office)	Multiple	MULT AZ4
10	Andrew Whelan	Multiple	MULT AZ's
44	Ciaran Cuffe	Multiple	MULT AZ's
46	CLG Na Fianna CO Cormac O Donnchu	Multiple	MULT AZ's
50	Commission for Railway Regulation	Multiple	MULT AZ's
63	Development Applications Unit	Multiple	MULT AZ's
71	Dublin City Council	Multiple	MULT AZ's
73	Dublin Cycling Campaign	Multiple	MULT AZ's
74	Duncan Smith	Multiple	MULT AZ's
82	Eirgrid	Multiple	MULT AZ's
133	Irish Water	Multiple	MULT AZ's
156	Justin Marden	Multiple	MULT AZ's
185	Mary Fitzpatrick	Multiple	MULT AZ's
261	Rail Users Ireland (Thomas J Stamp)	Multiple	MULT AZ's
274	Santry Forum	Multiple	MULT AZ's
290	Tesco Ireland	Multiple	MULT AZ's
124	Iona and District Residents Association	**Repeated submission (superceded by #123)**	
187	Mater Misericordiae University Hospital	**Repeated submission**	
299	TII (Edel McCormack) **NOT A SUBMISSION**	**Proof of postage of notification letters to landowners/occupiers**	
N/A	Fingal County Council	Multiple	

5.2 TII Response to Individual Submissions

This section has been divided in to two parts and is appended separately to this document to enable TII's response to individual submissions to be presented in hard copy as well as soft copy.

i. Section 5.2, Part 1 of 2 – TII Response to Submission No's 001 to 140.

ii. Section 5.2, Part 2 of 2 – TII Response to Submission No's 141 to 320, plus Fingal County Council submission.