Shaun McGee

From: Declan Campbell <declan.p.campbell@gmail.com>
Sent: Wednesday 21 February 2024 15:46
To: Eimear Reilly
Attachments: Hampstead Residents CLG, ABP oral hearing comments V5 (1).docx

Follow Up Flag: Follow up
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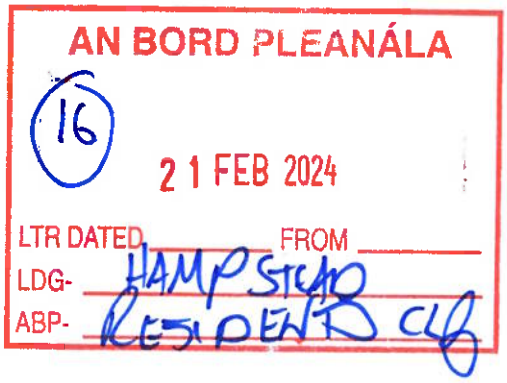


Hampstead Residents CLG, 10 Hampstead Ave Dublin 9

Hampstead Residents CLG. (Ref:- Submission No 111/Case 314724)

Our submissions at An Bord Pleanala (ABP) Metrolink Oral hearing 21/2/24.

Good evening .

Prior to making our oral submissions we would like it noted that we are aware that there has been significant new data submitted by the applicant on Day 1 of this hearing. Much of this new data represents information that was missing or inadequately referenced in the EIAR and/or represented the subject of specific requests for information from the applicant that went unanswered. We will not be responding to this new data today as we have not yet had reasonable time to consider it in detail before making our oral submission. We would expect sufficient time to be allocated by the inspector at the end of the hearing for 'observers' responses, to this new data to be heard.

We, have struggled with the ABP imposed structure of splitting our oral hearing presentation, into two separate sections Module 1 and Module 2, which are to be presented on separate days. We are residents and not tunnel experts, and to us, most items in our submission are related to the Metrolink tunnelling, excavation, soil, noise, property and vibration. We ask for your understanding in relation to this, as we speak today.

We, 'Hampstead Residents CLG', acknowledge the importance of having the opportunity today, to speak at the ABP oral hearing for the Metrolink project. Our residents support the concept of the Metrolink project and have actively sought honest and frank dialogue with TII/NTA.
In the past we have had positive engagement and consultation with the predecessor of the Metrolink project, -MetroNorth, many years ago. This concluded with a Railway Order (RO) being granted.

Hampstead Residents CLG consist of a group of 19 homes, consisting of 18 dwellings on Hampstead Avenue, and one at 114 Ballymun road. Our Avenue in its entirety, borders Albert College Park.
Within 20 meters of Hampstead Avenue, and in the south west corner of Albert College Park, a proposal by TII/NTA, is to position a large Metrolink **excavation and construction** site. This, at completion, will be the only combined 'Vent Shaft', Maintenance facility, Evacuation and Emergency access

and parking space, -which will support the entire Metrolink line. -which is located yards from a central Dublin residential area, and within a public park!

After the associated very significant construction time, **the tunnelling, the excavation**, and disruption - it will bring, absolutely no tangible benefit to our residents and the wider community, and Dublin. All that will remain after its construction, are the negative aspects of a 'useless structure'. It will then remain in Albert College Park as the same useless, negative and expensive Metrolink structure for many generations to come.
We were very disappointed with Dublin City Council abandoning Albert College Park, especially when we observe the Office of Public Works are seen to be protecting Stephens Green.

At the outset we wish to make a general observation in relation to TII/NTA's formal response to our Metrolink Submission:-

Our residents, in good faith submitted what we considered a fair and critically constructive Submission in November 22. We believe that TII/NTA's formal response to our submission was rejectionist, and negative. It appears to us that no items from our submission were acknowledged by TII/NTA as a valuable or a worthwhile contribution. In fact many of our contributions and questions were not even addressed and many answered incorrectly.

We conducted a review of other 'observers' submissions and the associated TII/NTA response. It appears to us, that this 'TII/NTA negative attitude', is a theme throughout.
We make a basic but important point :- TII/NTA cannot be ~100% correct and our Residents cannot be ~100% incorrect. We ask the Inspector to adjudicate impartially and rectify this imbalance.
We will now address each and every one of TII/NTA's responses to all of the items in our submission. We expect that by doing this we will highlight this imbalance, and erase any potential 'plausible deniability' that TII/NTA may subsequently try to retort with.

Item No1 (&2).

We disagree with TII's assessment that the appointment of RINA (independent expert) occurred at the correct time in the project cycle. We believe there were technical changes dynamically occurring during 'earlier

phases' of the Metrolink project. These 'dynamics' had subsequent profound impacts to **tunnel design/alignments and other infrastructure**. An early involvement by RINA would have helped residents understand better what to expect and the consequential impacts. This would have assisted with our understanding of the **complex tunnelling designs, excavation locations and scale, noise and vibration related issues**. This would also have helped with our understanding of design changes as they manifested. Early assistance by an Independent Expert, would have allowed our residents to engage with meaningful communication and ideas, prior to design aspects being 'locked down', by TII/NTA.
This basic commonsense, early engagement with our residents, was rejected by TII/NTA, at the outset.

TII/NTA have also not addressed the item (in our submission) in relation to ignoring our residents request to be involved and contributing to the actual definition of the independent expert 'scope of work'.

Item No3.

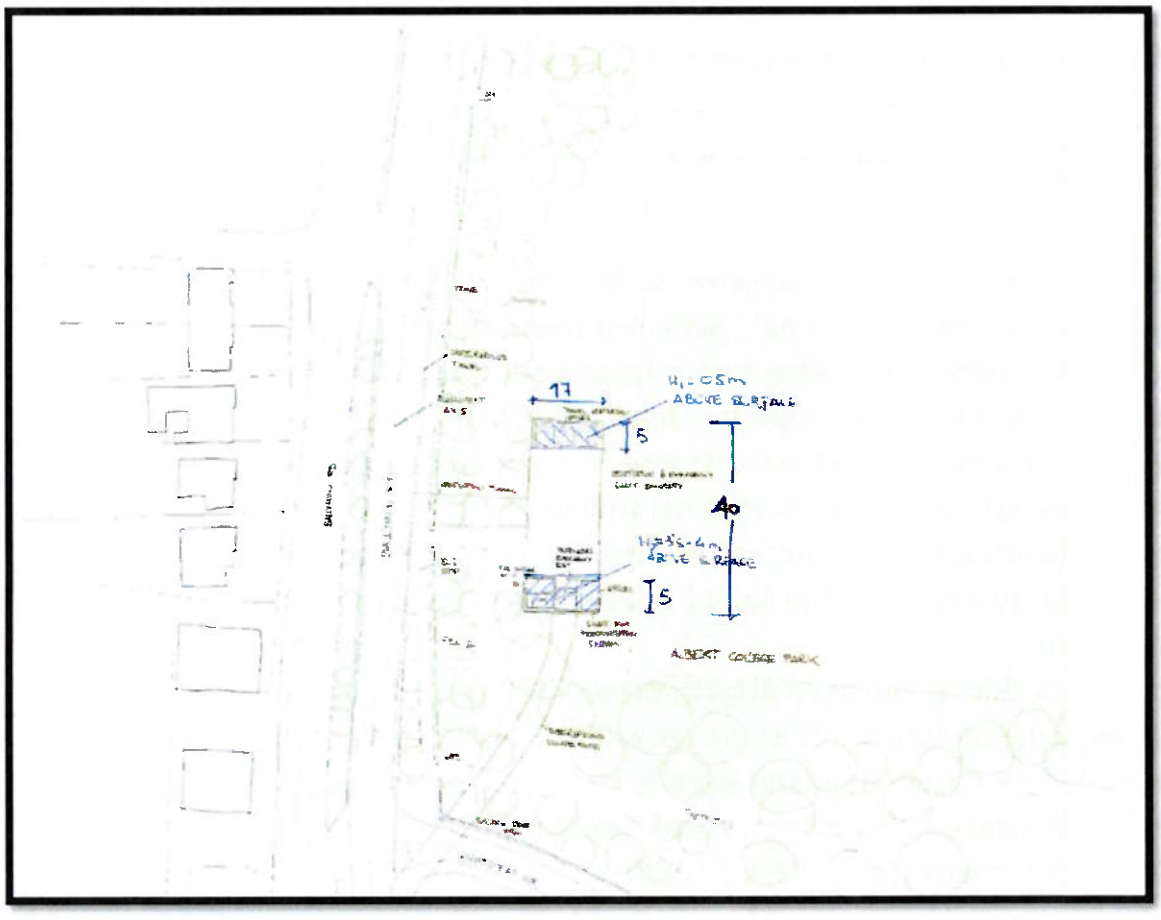
We note, from TII/NTA's response to Item No3 in our submission, which states " TII/NTA held 'two meetings' " with our residents representatives. This was to discuss **Metrolink Tunnelling and related construction aspects, including vibration and noise, and a data presentation, etc..** We must point out that these 'two meetings' that are referred to, were in fact simple 'on-line conference call' meetings. Notwithstanding the fact that Covid19 necessitated social distancing during some of this time period, we must point out that there were years before and after Covid where there were no 'face to face' restrictions.
In contrast, during the MetroNorth project (15 years ago), the Project Director (& other engineering staff) made several in person visits to our area such as Corpus Christi Parish Hall, and even homes, on Hampstead Avenue. They presented, consulted, and communicated face to face. They listen to us! A Railway Order was granted in 2010/11.

Sadly, during the current Metrolink project, absolutely no face to face interaction has occurred, at our local residents level.
In respect to the two 'on-line meetings' a large portion of the time provided by TII/NTA, were in fact taken up by themselves making presentations. Additionally, elected representatives, invited by TII/NTA made speeches. The

outcome was:- residents had little 'air time'. We believe these 'on-line meetings' were simply a TII/NTA 'box ticking exercise'.
Therefore we are adamant, that our Residents have NOT had such an 'open and inclusive Consultation' experience as is publically communicated by TII/NTA. <u>We were NOT, made feel integral to the 'consultation' process.</u>

Item No4.

TII/NTA have failed to address our Item No4 . This is related to the plan for **a large excavation site in Albert College Park.**
Our important point here is that 2 days before closure of the consultation phase (Emerging Preferred Route 'consultation' March-May 2019), there emerged from TII, new but critical **tunnelling/excavation** information. This was a 'hand drawn sketch' of a proposed intervention shaft, located in the South West corner of Albert College Park ,meters away from our residential area. :-



The importance of the 'sketch' of the proposed **excavation** in the Park was huge for our residents. It outlined, a large construction site on our doorstep, with NO associated local benefits for our residents or the wider community.
<u>We ask the inspector to investigate this, and the associated NO consultation.</u>

We believe that TII/NTA definition of the word "consultation" is mistaken. Oxford Dictionary:- "The act of discussing something with somebody or with a group of people before making a decision about it"

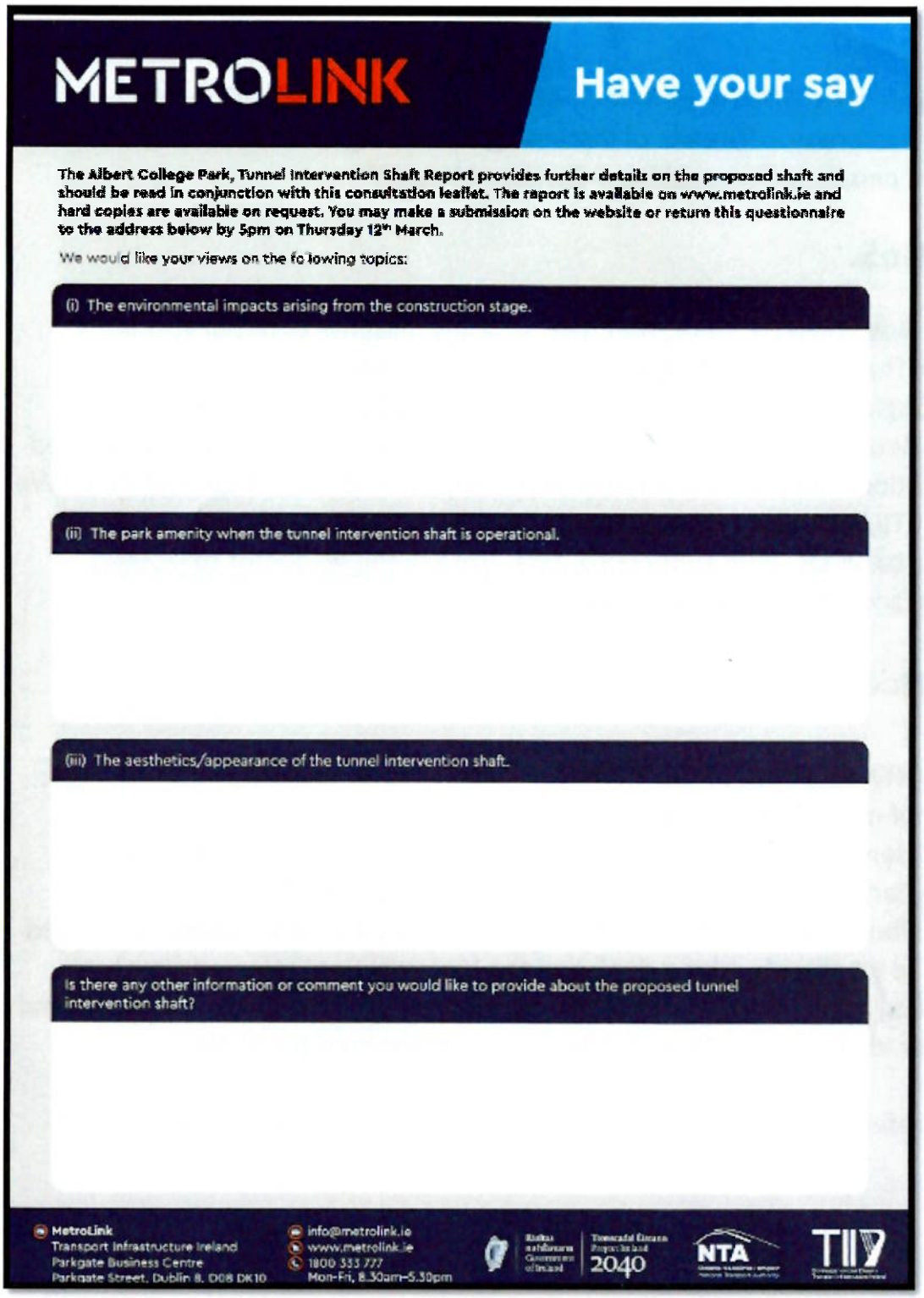
Item No5.

In Item No5, TII/NTA state, that they strongly disagree with our residents position that "matters of concern have not been addressed".
We strongly challenge this statement, and formally request TII (again) to furnish detailed and genuine consultation material, pertaining to the 'alleged consultations' on the Intervention Shaft proposed for Albert College Park. We ask that TII/NTA also submit any technical investigations of other potential options, or ideas, with supporting data. We ask the inspector to instruct TII/NTA provide a detailed answer on this.

Item No6.

The TII/NTA response to our Item No6, has failed to understand or address several of our substantial issues.
Our residents have clearly stated that they believe the proposed 'Albert College Park Intervention Shaft Public Consultation Feb/March 2020' was again a 'box ticking exercise' and in essence 'pseudo consultation'. It related merely to an already 'done deal' and the 'consultation' referred simply to aesthetics, appearance, park amenities, environmental aspects -of a vent shaft. No other ideas/options/investigations were presented by TII/NTA.

Please refer to the actual 'consultation' questions issued by TII/NTA below:-



METROLINK

Have your say

The Albert College Park, Tunnel Intervention Shaft Report provides further details on the proposed shaft and should be read in conjunction with this consultation leaflet. The report is available on www.metrolink.ie and hard copies are available on request. You may make a submission on the website or return this questionnaire to the address below by 5pm on Thursday 12th March.

We would like your views on the following topics:

(i) The environmental impacts arising from the construction stage.

(ii) The park amenity when the tunnel intervention shaft is operational.

(iii) The aesthetics/appearance of the tunnel intervention shaft.

Is there any other information or comment you would like to provide about the proposed tunnel intervention shaft?

MetroLink
Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street, Dublin 8, D08 DK10

info@metrolink.ie
www.metrolink.ie
1800 333 777
Mon-Fri, 8.30am-5.30pm

2040

NTA

TII

TII/NTA have not directly addressed the fundamental issue that we have outlined several times in our submission :-No consultation occurred in relation to the actual existence of the proposed shaft. This shaft will bring with it huge **excavations, noise, vibration etc**. TII/NTA have presented no other ideas or alternative, for consultation.

TII/NTA have also refused to address the very clear issue in our submission relating to how they presented to the public 'the data' they gathered from the vent shaft 'consultation' in Feb/Mar 2020:-
TII/NTA organized an online meeting with the Hampstead Residents representatives (and they invited elected representatives). TII/NTA at the meeting characterised the 'consultation' feedback data they attained as positive and that it actually supported an intervention shaft. However the topic/questions in the TII/NTA 'consultation' leaflet was only related to an intervention shaft, and nothing else! Answers to these focused questions, were then presented by TII/NTA as 'positive' to a shaft. They said "out of 195 responses 120 were positive to the shaft!..and 57 of the respondents were negative".

Our residents venomously contest the way this 'survey' was conducted and we believe the resulting data, is not reflecting the opinion of our residents or indeed the wider community. TII have failed to understand or chosen to simply ignore this important item in our submission. We ask the Inspector to investigate the lack of consultation on this **major tunnelling and excavation project** with urgency in our area.

TII/NTA also state in their response to Item No6, "many of the observations (objections) that Hampstead Residents raised to the vent shaft in Albert College Park would apply to a station if constructed at this location".

Hampstead Residents at the outset have clearly stated we support Metrolink and we acknowledge that **excavation/construction/tunnelling**, close to our residential area will be disruptive. But we also expect that TII/NTA put in place world class mitigation measures in order to minimise any such disruption.

Once work starts on any proposed site in Albert College Park, it must continue to completion, and does not adapt a 'start stop' approach over numerous years. Additionally any work on the site proposed in Albert College Park must be only related to this site. This site must NOT be used as a staging ground/storage facility/access route for other parts of the Metrolink project. These are a very important conditions that we ask the inspector to apply to the RO.

We acknowledge that there will be significant disruption from **excavation/tunnelling/construction** and other associated works. However, if

our community has to endure many years of disruption, excavation and construction, we believe we deserve a useful structure such as a Metrolink station that will be beneficial for our residents, and our wider community, our university, our schools, hospitals, businesses etc.

Item No7.

We have already responded to many TII/NTA comments in Item No7 relating to the Albert College Park Intervention shaft 'consultation' in Item No6.

In relation to TII/NTA lengthy list of benefits of Single v Twin bore **tunnelling.**

We believe that TII/NTA initially started out the design of this Metrolink Project incorporating a 'twin bore' tunnel design.
Now the list of benefits of ' Single over Twin bore' provided by TII/NTA, basically illustrates the 'single bore' design is totally superior in almost all aspects. In our submission we questioned this fundamental u-turn. Unfortunately, TII/NTA have failed to answer exactly why!

TII/NTA have listed numerous advantages of the single bore **tunnelling** system, and basically 'none' for the twin bore. Based on this logic, then surely the 'selection' of a twin bore system at the outset of this project looks like an incredibly bad design choice, by TII/NTA.
We now formally ask the inspector to get to the bottom of this and attain the requested detailed information that our Residents Association (GADRA) requested some years ago and that we requested in our submission relating to the 'Twin bore to Single bore' **tunnelling** selection. This **tunnelling** design change had huge ramifications on the Metrolink Project, and consequently impacted many communities along the route, there was no consultation!

TII/NTA have not addressed our concern relating to how anti social activities will be prevented, in or around a Metrolink structure that may be placed in Albert College Park.

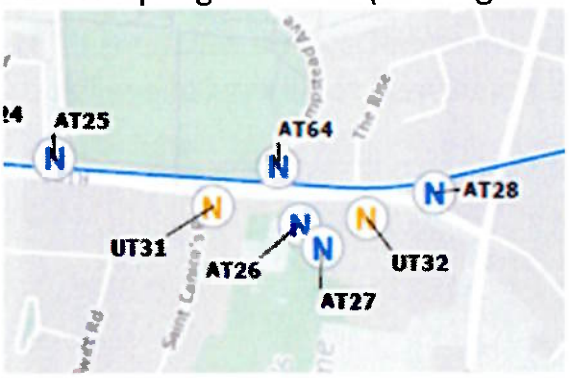
TII/NTA have not addressed our concern in relation to how graffiti will be prevented and/or addressed if it happens on or around a Metrolink structure that may be placed in Albert College Park.

The below Items should not in any way be seen as an endorsement by Hampstead Residents for a Vent shaft. These points apply to any Metrolink structure, like a Metro Station, that may be located in the Park.

Item No8.

EIAR Noise and Vibration:-

TII/NTA states the baseline noise readings are suitable and sufficient, and noise sensitive locations were modelled along Hampstead Avenue.
Based on the TII/NTA data we cannot agree! We have worked hard to retrieve the noise data from TII/NTA multi layered and cross referenced documents.
We have eventually identified and consulted the relevant documents.
REF:-sampling locations (in our general area) as per TII/NTA documentation.



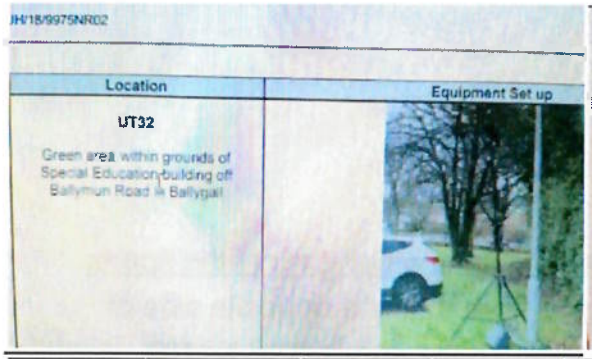
We note from the above that AT27 is the location of a Car park of the sports facility adjacent to a housing estate in Ballygall. This is on the opposite side of Ballymun road and not near Hampstead Avenue. There appears to be NO baseline monitoring points covering Hampstead Avenue (bar AT64 at the corner of R108). The AT27 location is listed 'as applicable' to Hampstead Avenue in the table below:-

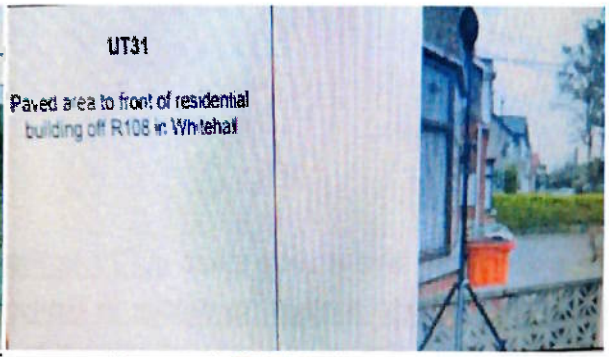
Activity	Receptor		Predicted $L_{Aeq,T}$ dB	Baseline Ref	Construction Noise Threshold		Predicted Magnitude of Impact	
	Ref	Description	Day		Weekday Day (07:00 - 19:00)	Saturday Morning (07:00 - 13:00)	Weekday Day (07:00 - 19:00)	Saturday Morning (07:00 - 13:00)
Shaft Excavation Above ground	1	1 - 6 Albert College Lawn	58	AT25	75	75	Not Significant	Not Significant
	2	7 - 12 Albert College Lawn	58	AT25	75	75	Not Significant	Not Significant
	3	13 - 16 Albert College Lawn	57	AT25	75	75	Not Significant	Not Significant
	4	2 Albert College Avenue	57	AT25	75	75	Not Significant	Not Significant
	5	Hampstead Avenue	60	AT27	65	65	Slight to Moderate	Slight to Moderate
	6	4/5 Albert Cottages	54	AT27	65	65	Slight to Moderate	Slight to Moderate
	7	6/7 Albert Cottages	54	AT27	65	65	Slight to Moderate	Slight to Moderate
	8	1-4 Hampstead Avenue	60	AT27	65	65	Slight to Moderate	Slight to Moderate
	9	5-8 Hampstead Avenue	62	AT27	65	65	Slight to Moderate	Slight to Moderate
	10	9-10 Hampstead Avenue	63	AT27	65	65	Slight to Moderate	Slight to Moderate
	11	11-14 Hampstead Avenue	64	AT27	65	65	Slight to Moderate	Slight to Moderate
	12	15-18 Hampstead Avenue	67	AT27	65	65	Moderate to Significant	Moderate to Significant
	13	114 Ballymun Road	71	UT32	70	70	Moderate to Significant	Moderate to Significant
	14	112 Ballymun Road	66	UT32	70	70	Slight to Moderate	Slight to Moderate
	15	Cilnde K	68	UT31	75	75	Not Significant	Not Significant
	16	67 Ballymun Road	70	UT31	75	75	Not Significant	Not Significant
	17	69 Ballymun Road	70	UT31	75	75	Not Significant	Not Significant
	18	71 Ballymun Road	70	UT31	75	75	Not Significant	Not Significant
	19	73-75 Ballymun Road	70	UT31	75	75	Not Significant	Not Significant

From the above table, the noise 'Predicted magnitude of Impact' to the Circle K service station located on Ballymun road is "Not Significant". Circle K is approximately located only 50 meters from the proposed Metrolink construction site in Albert College Park! However houses at 1 to 4 Hampstead Avenue, which are over 100 meters away from the proposed Metrolink site have a worse 'Predicted Magnitude of Impact' of "Slight to Moderate". TII/NTA have provided a very casual response to this Item in our submission.

Hampstead Avenue is located within 20 meters of one of the largest proposed construction and **excavation** sites on the entire Metrolink route. TII appear to have chosen to apply a distant sampling location as "applicable" to Hampstead Avenue.

In respect to the EIAR Vol3 ENV Baseline noise. With reference to geographical sections in 'Albert College Park'. Unattended Location Daytime locations UT31, UT32. These assessment zone locations are not in/next to Albert College Park.





nattended ocation	Daytime dB $L_{Aeq,16hr}$	Daytime dB $L_{A90,16hr}$	Night-time, dB $L_{Aeq,8hr}$	Night-time, dB $L_{A90,8hr}$	dB L_{den}	Attended Location	dB $L_{Aeq,15min}$	dB $L_{A90,15min}$	dB $L_{...}$
Ballymun									
UT25	57	47	50	40	59	AT18	56	53	59
UT26	68	62	63	50	71	AT19	52	43	55
UT27	60	53	55	44	63	AT20	67	55	68
UT28	62	54	56	44	65	AT21	69	60	72
						AT22	68	60	70
Collins Avenue									
UT29	51	46	43	39	53	AT23	66	54	69
						AT24	69	59	72
UT30	55	47	48	41	57	AT25	65	56	68
						AT63	68	58	70
Albert College Park									
UT31	68	56	64	44	72	AT26	60	50	63
						AT27	58	46	59
UT32	60	55	55	44	63	AT28	69	62	71
						AT64	66	56	69
Collins Park									

UT32 and UT31 are on the opposite side of R108,from the Albert College proposed excavation site. <u>We ask the inspector to instruct TII/NTA to review and respond in detail. As they failed to do so in our submission.</u>

Item No9.
EIAR Noise and Vibration:-

TII states that:- "with regard to night time working, Metrolink have already considered the receiving environment and will implement measures to mitigate night time noise" ...using acoustically clad 'physical' structures.

We disagree that no **night time noise (or vibration)** data is required. Hampstead Avenue is extremely quiet at night. No system, structure, material on Earth is infallible or unbreakable! A structure or material can degrade, get damaged or malfunction. A breach of process, by operators can occur. Sensors can fail, etc. All these could lead to slow or sudden noise breakout at night time. How will it be determined if 'noise breakout' is starting to occur at night if there is no baseline night time reference data. TII must perform night time noise (and vibration) baseline readings. All data must be publically accessible. We ask the inspector as part of the RO, to instruct TII/NTA to attain related nigh time noise data recordings, in our area - 24x7 weekdays and weekends.

TII/NTA have also not responded to our reasonable request that the inspector places a condition in the R.O., that proposed excavation/construction in Albert College Park is a **'dark & quiet'** site at night. We now formally ask the inspector to make this a condition of the RO.

Item No10.
EIAR Noise and Vibration:-

We welcome the statement from TII/NTA that the results of the proposed Noise and Vibration monitoring programme (during construction) will be available to the Independent Engineering resource and Hampstead Avenue residents.
We welcome the fact that the contract documents will include penalties and incentives to contractors (during construction) to ensure adherence.

However, we would argue that in order to limit **'noise and vibration'** ...that deliveries to and from the proposed **excavation** site should be strictly limited to standard working hours. (not 'generally'...as stated by TII/NTA) We ask the inspector to make this a condition of the RO, :- deliveries to/from site, are performed only during standard working hours.

We welcome the statement that TII/NTA will work with established community groups (eg GADRA, ACRA etc) to identify projects at community level, exploring mechanisms to support affected communities etc.
However this potentially could come to nothing, if funding is not 'ring fenced' to support such initiatives.
We believe that the item above, must be included in the Construction Environmental Management Plan (CEMP). We ask the inspector to include affected community 'ring fenced' funding as a condition of the RO, and that a relocation scheme is available to affected residents if required.

Item No11.
Operational Noise/Vibration and Dust (Air quality):-

We welcome the additional detail TII/NTA have provided in respect to the potential negative **noise vibration** and air quality-ingress and egress at ventilation fan locations.
However the issue of management of this system appears vague and remains unanswered. As per TII documentation, there is a potential of **noise Breakout** from ventilation shaft/grilles at surface level. Attenuators, anti vibration mountings/couplings etc, are included, by design engineers to try and address this.

The question, (as we stated in our submission) is that we are concerned with the lack of detail we have found in the definition of the actual monitoring and management of these systems themselves. We would expect that these systems when new, will be efficient and work as intended, but mechanical systems degrade over time, electronic components can drift out of tolerance, cause poor performance and ultimately fail, etc. What residents are concerned about is not just at commissioning stage, and early operation phase but also the subsequent years after. A plan is required for the monitoring and maintenance (plus preventative maintenance), of the systems that control and prevent the potential of noise breakout, from ventilation grilles (at surface level), due to failing attenuators, aging anti vibration mountings/couplings, open doors, etc. We ask the Inspector to include this as a condition of RO.

Item No12 and 13.
Operational Noise/Vibration and Dust (Air quality):-
In relation to dust/air emanating from the grilles at surface level.

We acknowledge TII have provided detail on the ventilation systems, but we believe the concern in our submission may have been misunderstood.

We re-state our observation again:- Consider large volumes of warm air from the Metrolink tunnel forced out of the vent grilles in cold weather. There is a potential when the warm air meets the cold outside, that 'clouding' or 'fog' plumes could occur. If this happens near or adjacent to traffic or a pedestrian footpath or cycleway, it could lead to a potential safety risk.
We believe the EIAR in this situation does not provide detail on how the hot air and fumes, will be managed.

Mechanical and electrical systems wear out and can slowly become less efficient and obviously often fail. In our opinion we believe TII/NTA is naive to state that "operational noise levels will be calculated and specific attenuation designed for each system"...and imply monitoring sensors are not required. We argue that, a simple modern car has numerous sensors embedded in it and when they trigger an alarm, they are a source of NCT failures. We thus argue that high quality calibrated, managed and monitored noise, air and vibration monitoring sensors should be integrated into any of the proposed Metrolink structures, at ground level ventilation points, or areas of potential breakout. Especially when these are located close to residential areas. We ask the inspector to include this as a condition of RO.

Item No14.
Tunnelling and excavation, public liaison:-

We welcome TII/NTA statement that their staff will remain responsible and accessible. However TII/NTA have not clarified or elaborated that a transparent 'trouble ticket system', based on ISO, will be put in place. Some aspects we suggest:- Each case (issue reported) must have a unique identifier, an owner (TII/NTA or agent), a severity level and with an associated 'time to closure'. Such a system must monitor for repeat of similar cases, manage and escalate accordingly. The individual that raised the case must have access to the case progress, and have input into the ultimate closure of the case. Overall transparent reporting must be provided regularly to all stakeholders, and reviewed/sanctioned by senior TII/NTA management. An appropriate government department must retain overall stewardship and responsibility. We ask the inspector to ensure a world class trouble ticket system is in place,

suitable for such a Metrolink **tunnelling and excavation** project and this is placed as a condition of RO.

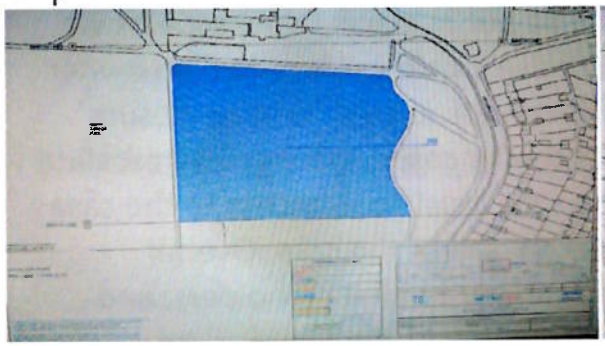
Item No15.
Temporary Land take proposed for Albert College Park:-

We welcome the TII/NTA clarification that the blue areas do not relate to removal of any trees or hedges, in the TII/NTA maps (Ref Map A&B item 16) and that we had attached to our submission. We acknowledge that TII/NTA have stated that no trees along the Hampstead Avenue boundary are planned to be removed (Ref:- Map A and B in item 16 below) .
However we would require that the word 'planned' is removed from the statement...and revised as:- "No trees along the Hampstead Avenue boundary, and the blue area (maps indicated in Item16) will be removed." We ask the Inspector to place this condition in the RO.

Item No16.
Temporary soil impacts proposed for Albert College Park:-

In this section where we referred to the Construction Report (page 94 and 95 of Vol.5, Chapter 5, A5.*3).* TII/NTA have chosen not to respond to our request, that a condition be placed on the use of lands in 'blue shaded areas' (Map A) in the above mentioned report. We requested in our submission that any of the **soil impacts** to park lands that are indicated by TII/NTA in maps and specifically allocated for football field re-alignment (according to TII/NTA) ...is only for football field re-instatement (Map A). This land should not at any stage be used for temporary construction, storage, support uses etc for a Metrolink facility that may occur in Albert College Park.

Map A



MapB

In previous communications, TII/NTA themselves have stated the above indicated Map A, is only for football field re-instatement, however TII/NTA have chosen not to respond to our request for this clarification in our submission. We ask the inspector to include this as a specific RO condition.

Item No17 and 18.
Hydrogeology and the management of flood risk:-

We acknowledge and welcome the response from TII/NTA "that flood risk is minimal".
We acknowledge and welcome the response from TII "that in order to manage/mitigate all environmental risk at Albert College Park, the appointed contractor will be required to set out their proposals in the Construction Environmental Management Plan. (CEMP)"

In the EIAR it specifically mentions water gathering/holding etc, but it lacks detail on exactly how this will be employed to mitigate flooding/water run off. In our submission we pointed out there was little detail in relation to this, eg:- where exactly will this water be "held" and managed etc. This is a concern for our residents as significant water 'run off' occurs year-on-year, from Albert College Park.
Flood risks, may be compounded by **soil excavation works**, concrete structures etc. We ask the inspector to instruct TII/NTA to provide exact and appropriate water management details in order to fully mitigate any risks to properties on Hampstead Avenue.

Item No 19, 20.
Excavation related issues -rodent infestation:-

We acknowledge and welcome that TII/NTA state that vermin control will be implemented at all Metrolink sites.
As per the response :-Chapter 10, Section 10.5.1.10... notes that rodents will be displaced as a result of construction activities.
However in our the submission, we were specifically talking about the Metrolink **excavation activities disturbing and impacting a very significant area of ground and soil** which may cause rodent migration into nearby areas - such as residential properties on Hampstead Avenue.

We accept TII's comments that "there will be a reduction in level of rodents and the subsequent risks" on or near the Metrolink **excavation** site. This could be, because these disturbed rodents have migrated elsewhere, and away from the disturbed **soil/ground** of Albert College Park, and into surrounding gardens and properties on Hampstead Avenue.

We still require a specific answer from TII/NTA on how they will deal with the rodents that have migrated towards our residential properties. We ask the inspector to instruct TII/NTA to outline a realistic rodent plan for the area, and not just the construction site in Albert College Park.

Item No21, 22.

We acknowledge and welcome the comments from TII/NTA, that indicates emergency access and egress to any Metrolink structure, and **excavation site** in Albert College Park will be from the R108 (Ballymun road).

We have found it difficult to find a specific definition and sufficient detail on how fumes/smoke (toxic) and emergencies will be managed in the EIAR. The TII/NTA response to our submission lacks detail.
For example, how can the proposed system filter and clean, the potentially huge amounts of smoke/fumes from a major **tunnel**/station accident.
It seems according to TII, in response to our submission, the management of fumes /smoke, and emergencies is up to the construction contractor and appointed Metrolink operator, to put in place a health and safety plan, -which will be vetted/sponsored by TII/NTA.
We suggest that TII/NTA show confidence in their own systems/processes/contractors tasked with residents safety. We thus require the following TII/NTA statement (in quotes) replaced with the statement underlined below:-

"it is not anticipated Hampstead Avenue would be impacted or closed, nor residents requested to evacuate from their homes".

Hampstead Avenue will not be impacted or closed, nor residents requested to evacuate from their homes.

This revised 'TII/NTA' statement, we believe should be a condition of the RO.

Item No 23.

TII/NTA have outlined that the Scheme Traffic Management Plan (STMP) Appendix A9.5 of EIAR supports and promotes travel for construction staff and constraints the use of private cars to access work compounds, and **excavation** sites. This is welcome!

However, the implementation and its policing are indicated by TII/NTA to be the responsibility of the appointed contractor.
It appears to us, the EIAR does not deal with how non private traffic /commercial traffic/ visitors/non compliant construction staff are exactly managed. It does not deal with how the contractor's policing of STMP is monitored, the system improved, and penalties imposed if non compliances are identified. TII/NTA seem to also partly offload the issue to the Gardai.
As we stated in our submission, Hampstead Avenue residents (and other residential communities in the area) are already sensitive to local parking issues and we have difficulty getting the Gardai to address the current issue promptly.
We strongly believe that any Metrolink project in our area has the potential to compound this problem.
Our residents do not have the time and resources to proactively monitor, identify and report parking issues associated with Metrolink to the Gardai.
Therefore we ask that TII/NTA provide a suitable proactive solution and resource it properly. Any issues with Metrolink associated parking, must be addressed spontaneously. This system should be also included in a Metrolink 'trouble ticket' system.

Item No 24.

We welcome the statement from TII/NTA that "no Metrolink associated access traffic is provided off Hampstead Avenue, with both accesses now provided off Ballymun road to the **tunnelling and excavation** site. (RO drawings, structure book 3of 3)"

TII/NTA have not addressed or commented on the necessity of the proposed post construction phase, vehicle parking within Albert College Park, and the sensible suggested alternative of potentially using the hard shoulder on Ballymun road.

Item No 25 ,26.

In consideration of TII/NTA's response to our submission Item25, we believe it fails to address our direct questions and concerns relating to Non disclosure of Information, surprise change of design (vent shaft) and its associated **excavation, tunnelling, noise, and vibration etc**. TII/NTA refused to allow our residents an extension in order to allow affected areas process this new information, at the end of the Preferred route deadline of 21 May 2019.

Despite TII/NTA's statement that they "met with the Hampstead Residents group twice". We repeat again, this is simply untrue. They have not "met" with us! They held <u>two</u> 'video conference calls' over a period of several years! At these two calls many other elected representatives were invited 'to dial in', we were just one of the many invitees. We could state with confidence that we the residents had only had a small minority of the time allotted in which to speak.

TII/NTA did not, in the years before or after the above mentioned two conference calls, request any face to face meeting with Hampstead Avenue residents. This experience, seems similar with other residents associations.

Again we reiterate, that we hope that the inspector can see for himself/herself, from the unanswered items in our submission, the difficulty that we the residents had in attaining information, and being afforded time in which to understand and respond to changes and impacts such the proposed large **excavation and tunnelling** site nearby. We were never made feel a valuable contributor to the process.

Item No 27.

In response to our comments in Item 27 relating to our residents 'arduous task of trying to review Metrolink 1000's of online page and technical drawings'. TII/NTA have responded that a summary exists in EIAR Volume 1 Book 1.

As we hope all present here today can appreciate, we the residents cannot rely on any summary detail, that could through it, seek to potentially minimise apparent impacts of Metrolink to our lives for years to come.
Thus we felt compelled to try and read through the huge amount of on-line detail and in doing so it has helped form our view in Items 25/26 above.

Item No 28.

In respect to TII/NTA's response to Item28 in our submission, "the appointment of the Independent Expert RINA was appointed at the most appropriate time". In this reply ...its evident to us, that TII/NTA fail to understand and have failed to listen to our residents who at the outset clearly asked for an Independent Engineering expert prior to when TII/NTA had the design considerations 'finalized'.

In item 28, TII/NTA have not answered our claim that our residents group and other residents groups were ignored when we requested to be involved in the actual generation of the 'scope of work' that was to define the role of the independent engineering expert, when it was eventually provided.

TII/NTA disagrees with our claim that "no proper consultation" has been delivered and they quotes EIAR chapter 8, in relation to vent shaft consultation. (TII/NTA then referrers to their answers to Item 3,4,5,6,7) .

We fundamentally disagree. The EIAR chapter 8, does NOT outline a stateable or justifiable consultation process!

Item No 29 and 30.

TII/NTA's answer to several items in our submission was a simple referral to comments provided in previous items. However TII/NTA have not addressed these items directly in previous items. We find this response dismissive.

In items 29 and 30 , we summarized some issues that we had in attaining simple answers or information from TII/NTA. Just some examples:-

Our residents association had to forcefully request information we required under freedom of Information. (FOI).

Our residents association had to lobby (elected reps) to get TII/NTA to place RO application docs in local libraries (some residents do not have internet).

Eight days before the submission deadline of 25/11/22 TII/NTA's Agent (Apex) Agent, on Hampstead Ave, refused to allow us access to new info not in the public domain, and this could have coloured our submission. A deadline extension was requested, but was refused by TII/NTA.

The inspector must ensure the RO conditions are monitored for compliance.

Closing Summary:-

Hampstead Residents CLG, would like to now formally close our oral submission to the ABP Metrolink oral hearing. We, expect media personnel in this room, will report fully on what has been said today, and especially that Hampstead Avenue residents have always sought positive, genuine and inclusive engagement and consultation with TII/NTA. Unfortunately, in this regard, we have been very disappointed.

We also expect our elected representatives to understand fully and support the issues we have outlined.

We fully acknowledge that the Metrolink project is necessary for the wider good -for the population of Dublin City and Ireland. We acknowledge there is going to be significant disturbances, but these must be alleviated by proper and sufficient world class and quality mitigation measures.

We strongly believe that many of the issues we have raised in our submission could have been addressed, or mitigated against, early in the project cycle,- had genuine consultation, been provided.

We ask the Inspector, based on the oral statements from our group and many other residential groups in our area that he/she must instruct TII/NTA to fully and openly review the Metrolink route from Griffith Park up to Collins Avenue Metro stations. We simply want our residents and the wider community to be afforded genuine and inclusive consultations. We believe this will help provide the best possible Metrolink design for our all our communities, and attain wider public buy in and support.

Thank you for listening. Hampstead Avenue CLG.