

Griffith Avenue and Districts Residents Association

MetroLink Oral Hearing Submission

22/02/2024

Thank you for the opportunity of speaking here today on behalf of the 1000 homes we represent in our residents' association, which has been in existence since 1974. We welcome the MetroLink project and have tried to engage with TII since the start of the project so as to optimise the project, minimise the negative impacts on our community and also to protect the park land and mature trees within our area.

Before we start with our oral submission, we would like it noted that we are aware that there has been substantial new information submitted by TII on Day 1 of the hearing, much of which represents information that was either 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 information 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 information to be heard.

GADRA supports MetroLink and are seeking the best metro design possible for our residents. We acknowledge that there will be disruption associated with a project of this nature and will be working strenuously to mitigate and minimise this as much as possible.

Our residents were actively involved in the Hearing on the Metro North project and would like it noted for the record that it was openly acknowledged by the Project Manager on the MetroNorth application that listening to and adoption of resident input on that project resulted in a significantly improved alignment progressing to the RO application phase. Unfortunately, we cannot say this of the current application – the engagement and consultation processes have not been used to improve the overall application. Our personal experience was that TII did not appropriately engage with or respond to us.

From our side we have attempted to proactively engage with TII since the very start of this project, sending our first set of questions to the TII in 2018 once we noticed the drones above our homes. We requested and were granted a meeting with the TII in the NTA's offices in March 2019. We attended in good faith expecting to meet the MetroLink project manager only to be informed at the start of the meeting by Mr Hugh Creegan that TII MetroLink staff would not be attending and only BusConnects issues in our area could be discussed. GADRA was never granted a further meeting to discuss MetroLink. We believe that many of the issues that we have today could have been addressed prior to application for Railway Order had there been proper engagement and consultation.

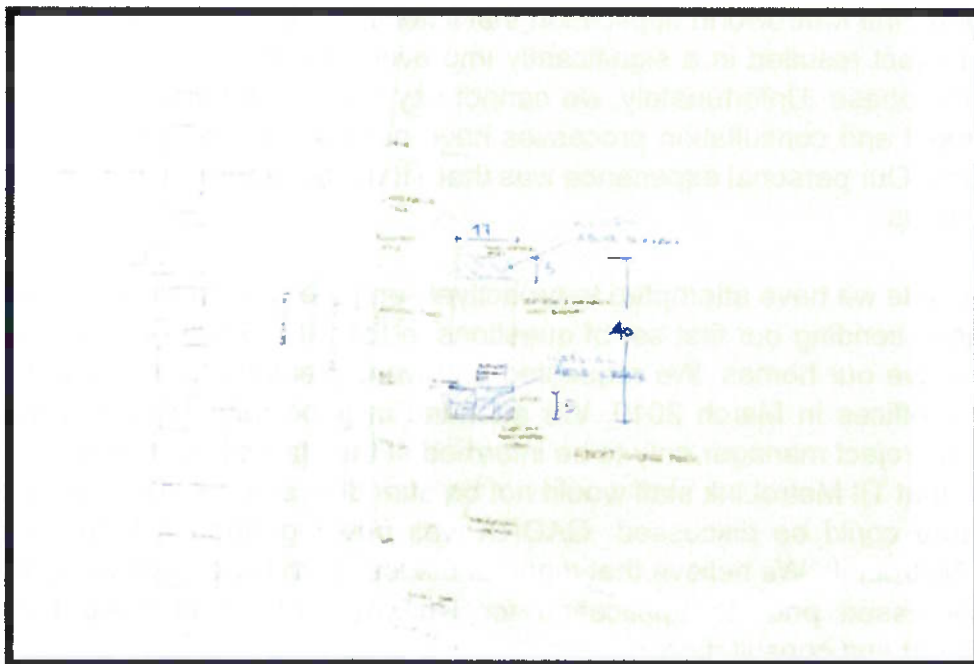
We think it noteworthy and difficult to understand that despite the hundreds of submissions that the NTA responded to, they did not deem even one worthy of

adoption. It appears the NTA are 100% correct on everything with no role whatsoever for mitigation or further consideration.

We have worked closely with Ballymun Residents Association, Albert College Park Residents Association and Hampstead Residents CLG in relation to construction issues, and particularly the location of the Collins Ave station. We fully support their request that the Inspector in accordance with section 42 Section 2 (e) fully consider the alternative position of this station as articulated by the Albert College Residents association, Ballymun Residents Association and Hampstead Residents CLG.

We have a number of specific observations.

1. **GADRA take issue with item 8 in NTA response to GADRA.** The NTA state that, where appropriate, they have incorporated feedback into the consultation process. We fundamentally disagree with this. The general public and in particular our residents were not informed about the plan to put an above ground shaft into Albert College Park. This is a major construction site and will have all the issues associated with same. In fact, when the Preferred Route (PR) was announced in March 2019, there were only 17 words in the entire documentation which referred to the Intervention Shaft. There was no detail as to whether the shaft was to be above or below ground. GADRA asked for this information on the day of the announcement. GADRA did obtain what we refer to as a back of a beer mat drawing (see below) approximately 48 hours before the close of consultation on the PR. The NTA confirmed we were the only ones that were sent this map. It is simply a matter of fact that no other members of the public were even aware of this above ground structure during that consultation.



Drawing provided to GADRA only in relation to the Intervention Shaft

As no further information or effort was made by TII to inform the public in relation to the shaft GADRA sought to disseminate this information to interested and affected parties, but the remaining time available was too short.

GADRA attended the open day in the Gresham Hotel on April 10th, 2019, and asked again if the shaft was to be an above ground structure and for information in relation to the shaft. At that time, we also suggested it would be much more beneficial to the community if this shaft could become a station.

At the same time GADRA also queried the reasons/rationale as to why the footprint around the shaft was larger than the footprint of any of the other station boxes. We were informed by the Project Director MetroLink that the sizes were indicative only, but that there would need to be sufficient room around the shaft to allow fire engines to turn. There is no need for Fire Engines to turn on this footprint as indicated in the EIAR Section 4.17.5, and as confirmed to GADRA by Dublin Fire Brigade (DFB). DFB have requested a one-way system with two exits – thus negating the need to turn vehicles. Despite this confirmation, highlighted by GADRA, the 'hand drawn map' and footprint of the shaft has not changed since the drawing originally produced in May 202~~0~~¹⁹.

The public cannot appropriately feed into a process and hope to have that feedback incorporated where if they are not properly informed of the nature, scale and purpose of proposed significant structures. It is clear that the public were not in a position to engage in a meaningful way with what was a flawed consultation process.

2. As the NTA's consultation on the Albert College Shaft was inadequate, they then carried out a "local area consultation" on the Shaft in January 2020. In relation to this, **GADRA fundamentally disagree with the NTA's response in item 11 indicating that the issues of concern raised in the consultation were only aesthetics, environment, amenities and parking.** We feel that this is disingenuous as in the consultation, the public were asked to respond only on very specific questions relating to design and amenity aspects of the shaft.

Below: Form used in the Local Area consultation undertaken on the Intervention Shaft:

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 335 777
 Mon-Fri, 8.30am-5.30pm

Rialtas
 na hÉireann
 Government
 of Ireland

Transport Infrastructure
 Ireland
 2040

NTA
 National Transport
 Authority

TIIV
 Tunnel Intervention
 Intervention Shaft

The public were never provided with any alternatives to the shaft, either in the Preferred Route consultation or the local area consultation. Options such as a station, or realistic alternatives to the shaft location were not provided. This is despite the fact that RINA, the appointed Independent Experts, made GADRA aware of many other possible locations for this shaft and indeed, communicated these on behalf of GADRA and other Residence Associations to the NTA.

The NTA attempted and have to date succeeded in limiting this to a meaningless, box ticking consultation. As was the experience in Metro North, the shaft then as now was kept under wraps for as long as possible, as it is generally perceived as a completely negative structure with no benefit to the area in which it is located.

In a strikingly similar set of circumstances during the MetroNorth process, residents also had to argue for shaft details to be disclosed in the consultation phase. At that time, we were fortunate to be assisted by the now late Tim Brick DCC City Engineer, who would not accept that the RPA were marking a structure of this size by a simple dot on the maps and therefore insisted on full disclosure. Unfortunately, current DCC officials do not seem to see themselves in the same way as the late Tim Brick did, as 'defenders of the city' and are happy to give away a large section of Albert College Park which will be permanently sterilised for an above ground structure, which the public can never access, in addition to a large car park which appears to be for maintenance vehicles. This large area is being taken from a valuable, busy, and much-loved city park when it can be avoided.

It is our belief that realistic options need to be considered in determining an optimal solution and that the public needed to be informed of these options for this to have been considered an open and fair consultation. In a case where a consultation only proposes questions on a narrow range of items, none of which include meaningful alternatives to the installation of a shaft or the location of said shaft, it is hardly a surprise that the responses made only refer to the small number of areas in which questions were raised.

3. In item 11, the NTA state that the large construction compound around the Intervention Shaft is required for emergency vehicles and congregating passengers.

The Independent Experts have informed us that custom and practice in Metro's worldwide prove that this is not the case. This shaft will be in a park – the evacuating passengers will be able to congregate safely within the park without there being any need for an extended car park. Indeed, we know that many DFB approved fire evacuation plans for large office buildings in Dublin City Centre incorporate local parks for this purpose, so there is absolutely no justification for not doing so in this case – especially as no public roads have to be crossed to access a safe congregation space. This would negate the NTAs assertion that the large area around the intervention shaft is required for congregating passengers.

RINA have informed us of international standards and best practice and, having looked at the alignment drawings, we made a proposal into the RO application that the layby into the side reservation of Ballymun Road is created and marked for fire and emergency vehicles. The layby could fall within 20 metres of the entrance of the shaft and thus would meet DFB's requirements. This would enable all the parking for emergency vehicles to be outside the park boundaries, with a single large double gate facing the layby. This is an option that would negate the NTAs assertion that the large area around the intervention shaft is required for emergency vehicles.

GADRA would like to also note that when a recent fire occurred in Ballymun the full R108 (Ballymun Road) was closed for emergency vehicles. There is no doubt that this would happen again in the event of a metro fire requiring evacuation from the shaft.

As mentioned earlier, GADRA know from the DFB that they were not consulted on their requirements in relation to the size of the area around the shaft at the time these statements were originally made by the NTA. Indeed, the DFB were not consulted on this matter until this time last year - this has been confirmed to GADRA by DCC and DFB. We note that DFB have only recently engaged Atkins to advise them on fire safety matters – with this shaft being one of the matters for consideration.

In the view of RINA, twin bore solutions, which the majority of new Metro schemes have adopted, are inherently easier to manage in terms of fire risk. So when assessing the single-bore vs twin-bore configuration, consideration must be given to the extra costs incurred relating to the design and operational provisions necessary to mitigate the consequent fire and evacuation issues. IDOM's designers did provide an overview, but did not explain in any detail, their main preliminary assumptions to develop the general design of the new Metro in this regard.

NTA state in its response (10) that a single bore allows for faster passenger evacuation from the train onto the tracks, but it is the evacuation of people out of the tunnel and above ground to safety that is most important. RINA have informed us that with a twin bore construction it is much easier to evacuate away from a fire. We have seen no evidence anywhere in the EIAR that backs up TII claims that a single bore is better from a fire safety aspect. We are asking ABP to seriously review this issue.

Considering all of the above, it seems to us that the purpose of the large footprint allowed for at this site is to facilitate space for maintenance vehicles. In our opinion, this is not an acceptable use of a public park, especially, where there are other options. Opportunities are never going to arise to increase the city parks in our area. We do not see it as appropriate to give precious park land including pitches, away in exchange for a sterile car park for maintenance vehicles. We believe these maintenance vehicles could be housed in a location which is not as widely used and valued as a public amenity.

As part of our ongoing engagements with the Independent Experts, GADRA queried whether they were aware of any Intervention Shaft designs globally that required the scale of footprint that is being considered here. RINA indicated that they had seen intervention shafts of considerable scale but noted that they had not previously come across an Intervention Shaft in a park – shafts tend to be incorporated into buildings or as free-standing structures within the built environment.

All of the above points lead GADRA to question how NTA can stand over their statement that the current large area around the Intervention Shaft is required for emergency vehicles and congregating passengers.

4. GADRA would also like to respond to **item 10 in the NTA response**. The decision to move the TBM launch site and station from Na Fianna coincided with the decision to change from a twin bore to a single bore, yet these two decisions are not connected. The launch site and the movement of a station do not necessitate a change from twin to single bore. GADRA note in NTA response item 10 that cost seems to be the main reason provided for the change in design from a twin to a single bore. GADRA is aware that cost is not an issue that ABP considers in coming to its' decision and cannot see in the documentation that has been provided what other options were considered. We would be grateful for this decision to be reconsidered by the Inspector. Safety for residents and future passengers is our greatest concern.

More recently RINA confirmed that this question of the switch from twin to single bore had been raised at their July 2023 meeting with the TII Design Consultants and that justifications suggested to them included:

- The reduced programme length due to less tunnelling and no cross bores.
- Potential benefits of being able to build the system without dedicated crossover chambers.
- Potential for >10% cost saving.

However, RINA also conceded that they had not seen any ranking of relative importance of the justifications relied on, or any additional documentation on the detailed assessment of each option.

When we queried the reason for the initial decision to go with a twin bore at the very first open day in the Crown Plaza we were told a twin bore metro was deemed to be safer from fire safety and evacuation than a single bore. It is somewhat ironic, that the decision to move to single bore does not seem to have been met with an early engagement with the fire authority to ensure that the question of fire safety is being appropriately addressed.

5. In relation to **item 54 in the NTA responses**, the Independent Expert's opinion is that the issue of settlement is greater when adopting a single bore over the original twin bore proposal. GADRA have learned that there is a mitigating technology available whereby a shield is installed behind the TBM and when the soil compresses, there is a gap behind the shield which can be injected with mortar by the TBM. This leads on to a Grouting Oversight Requirement which we believe needs an independent party to monitor (i.e. monitoring of the mortar in the gap). We are asking that independent expert oversight of this is made a condition of the Railway Order.
6. In relation to **Item 9 of the NTA responses on the Impact of Unexpected Downturn**: GADRA have raised the question of what happens if there is an economic downturn. RINA confirmed that they had raised this question with TII and that TII state in this response that it has been considered. Does this mean that this issue is on the risk register? We are requesting that the inspector makes its addition to the risk register a condition of the Order.

7. We have concerns in relation to the lack of information given in the responses as to the construction management of the Albert College shaft site. As it is not integral to the tunnels and is being built adjacent to the main works we are asking that a specific schedule of works is made a condition of the order. We do not want works starting and stopping on this site should for example construction on other station boxes fall behind and work on the shaft is suspended or elongated to get construction on other sites back on schedule. The construction on the shaft site needs to be completed in a timely fashion and we have fears that there will be a start stop approach unless a condition is attached by ABP to that effect.

In conclusion, GADRA would like to reiterate that our Association are pro metro and are simply seeking to get the best possible design of metro for our residents. While GADRA does understand that there will be disruption associated with a project of this nature, we are working strenuously to mitigate and minimise this as much as possible. GADRA also would like to again state that in our opinion that it would be easier to gain support for the challenges residents would face during construction if there was a consequent gain in terms of a station in the park.

