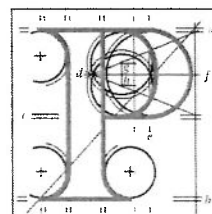


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

GADRA
108 Homefarm Road
Drumcondra
Dublin 9

Date: 18 October 2024

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission regarding the above-mentioned case. We have noted the contents of your letter.

I refer also to your emailed submission on 26th September 2024, and the statement at the end of your email that your address is not for publication.

I wish to make you aware that An Bord Pleanála is obliged to publish documentation on its website when a decision of the Board is made and in this regard your submission will be available on the website and on the hard copy case file for public inspection.

The publishing to the website of all documentation relating to a decision of the Board is set out in the provisions of Section 146 of the Planning and Development Act 2000 as amended as follows: -

146 (5) *Within 3 days following the making of a decision on any matter falling to be decided by it in performance of a function under or transferred by this Act or under any other enactment, the documents relating to the matter—*

(a) shall be made available by the Board for inspection at the offices of the Board by members of the public, and

(b) may be made available by the Board for such inspection—

(i) at any other place, or

(ii) by electronic means,

Teil	Tel	(01) 858 8100
Glaio Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

as the Board considers appropriate.

146 (6) *Copies of the documents referred to in subsection (5) and of extracts from such documents shall be made available for purchase at the offices of the Board, or such other places as the Board may determine, for a fee not exceeding the reasonable cost of making the copy.*

146 (7) *The documents referred to in subsection (5) shall—*

a) where an environmental impact assessment was carried out, be made available for inspection on the Board's website in perpetuity beginning on the third day following the making by the Board of the decision on the matter concerned.

An environmental impact assessment was carried out An ABP-314724-22 so 146(7)(a) above applies in this case. These provisions cover all the documents that make up a case file relating to any matter which falls to be decided by the An Bord Pleanála under its statutory function under the planning legislation.

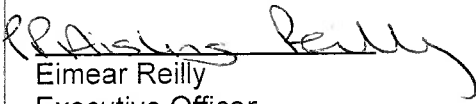
An Bord Pleanála uses your personal data only for the purpose of providing its service and fulfilling its legal duties as set out under relevant planning legislation.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Eimear Reilly
Executive Officer
Direct Line: 01-8737184

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**GADRA Submission to Second Statutory Public Consultation on Metrolink
NA29N.314724**

September 2024

GADRA welcome the opportunity to respond to the document drop that occurred on day one of the oral hearings and to subsequent documents that were released during the Hearings. We feel the application, as applied for on 30/09/2022, was incomplete and much of the information dropped on the first day of hearings had been requested repeatedly by both residents and the Independent Experts in advance of these hearings.

We object strongly to number of NDAs that TII, a publicly funded state body, has entered into with other publicly funded entities. The environment aspects of these agreements have been disclosed so what remains are NDAs relating to financial agreements- which is essentially TII spending taxpayer money without transparency. Furthermore, as financial NDAs impact the “cost-benefit and other economic analyses....of the measures and activities” (as per Article 3(1) of EU Directive 2003/4/EC), they are subject to AIE. We note that GADRA intends to seek access to this information but note that if the TII were meeting their obligations under the Aarhus Convention, we should not need to do so. Such a right of access to public information and freedom of information are recognised as one of the three main tenets of human rights in Europe.

Witness Statement Aiden Foley Day 1

12.20.7 states *that the first point of contact for the IE will be the LLO.*

GADRA strongly objects to this. LLO will be effectively PR workers - we are looking for an engineering point of contact for the IE. We are requesting that this be a condition of RO.

Furthermore, we are asking that the contract of the IE is not under the brief of the TII but is independent and under the brief of the Dept of Transport. Not alone should TII not be involved in the appointment of the IE, but they should also not have a role in determining the Terms of Reference of the IE, as GADRA argued at the time of the initial appointment - and which clearly had had an impact on the support provided. Resident Associations are responding to this consultation process without the benefit of a report from the IE, this was because the TII had not included that activity in the ToR despite the IE contract running throughout the hearings.

TII should not control the independent advice.

Witness Statement Ronan Hallissey

We have already submitted our concerns in relation to the ‘spider algorithm’ as used to dictate the position of the Collins Ave Station. All groups from Ballymun to Griffith Park station dispute the fact that the bus stop at the Ballymun Church is (or ever was) a busier bus stop than the Bus stop at the entrance to DCU - The paragraph below seems to us to confirm that the data used was collected during the lockdown period.

Section 4A / within AZ4: • Percentage Change (2016-2022): -5% • Total Population Change: -1,037 individuals This section comprises the Ballymun Station. The decline

here is likely attributable to the temporary vacancy of on campus student accommodation during Covid in DCU specifically.

Section 4B/ within AZ4 experienced a 0% change with an increase of 99 individuals. The nominal increase here is likely attributable to a temporary vacancy of on-campus student accommodation during Covid-19. This section includes Collins Avenue, Griffith and Glasnevin. Section 4C/within AZ4 had an 18% percentage change with a total population change of positive 17,733 individuals. This section includes the Mater, O'Connell Street, Tara, St Stephen's Green and Charlemont Stations. Growth in this section is 8% above the national average despite likely lower on-campus occupancy during the pandemic, indicating significant change.

The algorithm which TII have relied on to decide the position of the Collins Ave station is only reliable if the data inputted is accurate. As this information is the basis on the decision to position the Collins Ave station so far North and not in the NW corner of ACP at the entrance to DCU we are very concerned as to its accuracy. We believe the data was recorded during the period of Covid when all lectures were online and not in person and student accommodation and campus was closed to students and staff. **It makes no sense the church bus stop (more distant from the university) is busier than the stop at the entrance to DCU which has 17000 students and 1600 staff.**

Please see response below from Anne Graham (CEO, NTA) obtained via a PQ by Gary Gannon TD which supports our position:

I refer to the matter you raised in Parliamentary Question No. 168 of 23 July last, which has been referred to the National Transport Authority (NTA) for reply. I apologise for the delay in responding.

The number of passengers boarding Dublin Bus at stop 115 Ballymun Church and stop 37 Ballymun DCU for the past two years are contained in the following table;

<u>Year</u>	<u>Stop Number</u>	<u>Count</u>
<u>2022-07-23 to 2023-07-22</u>	<u>115 Ballymun Church</u>	<u>140,696</u>
<u>2022-07-23 to 2023-07-22</u>	<u>37 Ballymun DCU</u>	<u>435,185</u>
<u>2023-07-23 to 2024-07-23</u>	<u>115 Ballymun Church</u>	<u>102,822</u>
<u>2023-07-23 to 2024-07-23</u>	<u>37 Ballymun DCU</u>	<u>347,866</u>

I trust that the above is of assistance.

Anne Graham

Chief Executive

We are asking the Inspector to:

- ensure correct data is being used and submitted to ABP.
- review the position of the Collins Ave station and consequently the need for the ACP shaft based on the above information and to consider the potential development of lands between Hampstead and Griffith Avenue and the impact of access to these on the analysis of the location of the station.

Paul Brown Risk Management- Day 1

2.1.9 The emphasis is on limited but key safety critical information. The information collected needs to be reliable and provided regularly on time. TII will therefore use a separate organisation, The Independent Monitoring Engineer (IME), employed by the Contractor, for installing, reading the instruments and processing the data collected during construction that is required to give TII the assurance that the works are progressing within the specified tolerance or give sufficient warning that movements are identified progressing towards the specified limits to enable corrective action to be taken.

This is of concern to residents as it appears the TII is taking a 'hands-off' approach to issues. This separate IME needs to feed into the IE and vice versa. This needs to be set up as one of the formal points of contact for the IE.

2.1.10 The data collected by the IME will be made publicly available to provide the assurance that the works are progressing safely and correctly.

If TII are requesting an emphasis on limited information from the IME with no specified time frame, no resident will be assured of safety. We are requesting real time information with trigger monitoring plans with associated Monitoring Action Plans MAPS for residential areas not just schools and universities. The monitoring of this information needs to be part of the ToR of the IE contract.

2.2.2 The stakeholder engagement plan is designed to achieve three key objectives: • Ensure all communications with the community and stakeholders are timely, consistent and coherent; • To build and maintain relationships with the community and stakeholders; and • To ensure that the Project team is a trusted source of information.

We would say that the stakeholder engagement plan has failed on all three key objectives- the fact that we had to resort to FOI and Information Commissioner for information that the public had right to proves this – evidence previously submitted to ABP in module 2

We also note that in Stakeholder document *Item8 Tone of Voice* was apparently implemented in 2018 running right through the consultation periods. We are saying that this has also failed as it includes the periods when we had to obtain information from the Information Commissioner and the time when GADRA attended a pre-arranged meeting in NTA offices to meet with TII Director Aidan Foley who never showed up nor any of the TII team attended. ABP must make it a condition of RO that real stakeholder engagement plan is put in place as TII appear unable to do so.

2.2.3 TII's approach to communication will be open and transparent and will be designed to ensure regular liaison with the community. This will include the sharing of monitoring data at regular community forums as well as online, including how this monitoring data relates to the predefined trigger levels to demonstrate compliance.

The RO would need to set the above ToR to ensure community involvement as our experience of the Fora set up under Bus Connects was not inclusive with numbers restricted and indeed the forum in our area was cancelled by Hugh Creegan as he felt "afraid" to come to Ballymun. Again, residents will be doing this in their spare time, so IE needs to attend these fora and to produce reports for residents.

2.2.4 Procedures will enable the timely dissemination of information to inform decision making and communications to stakeholders through relevant channels. • To inform

stakeholders of all relevant project development and works, local offices will be open along the route staffed by Local Liaison Officers. • Local Forums for community groups and public representatives will be established.

Here again, no definition of timely dissemination nor informed decision making – we are requesting real time information and no PR offices/officials – we are looking for TII technical staff IME, IE, DCC and residents' representatives along with Councillors, TDs, EPA and DFB etc – residents are not interested in a talking shop.

Recently we have discovered that in relation to routine ground investigation, TII appear to think that they have the right under section 36 of the Railway Order ACT 2001 to work out of hours 7 days a week. When we questioned the reason for these hours of work the TII said they would revert the following week i.e. after the weekend works were completed. See below:

From: "Suzanne Angley" <Suzanne.Angley@tii.ie>
Sent: Friday, August 9, 2024 1:05 PM
To: "info@gadra.ie" <info@gadra.ie>
Cc: "Metrolink Information" <info@metrolink.ie>
Subject: RE: FW: Metrolink Ground Investigation Works - Home Farm Playing Pitch, Mobhi Road

Hi Ruth,

I am chasing this for you and had hoped to respond today but I'm sorry it will be early next week. The works will be finished before next weekend the 16th.

I hope you have a lovely weekend, forecast is glorious for a change!

Kind regards

Suzanne

From: Suzanne Angley
Sent: Thursday, August 8, 2024 4:33 PM
To: info@gadra.ie
Cc: Metrolink Information <info@metrolink.ie>
Subject: RE: FW: Metrolink Ground Investigation Works - Home Farm Playing Pitch, Mobhi Road

Hi Ruth

I hope you are well,

I will check with the team for you, and just to advise we notified you on 30 July of these works.

I'll come back to you tomorrow.

Kind regards

Suzanne

From: Griffith Avenue & District Residents Association <info@gadra.ie>
Sent: Thursday, August 8, 2024 4:05 PM
To: Suzanne Angley <Suzanne.Angley@tii.ie>
Subject: re: FW: Metrolink Ground Investigation Works - Home Farm Playing Pitch, Mobhi Road

Dear Suzanne

Could you clarify why TII requested out of hours works on the Homefarm site

And could you forward the reason given to DCC planning for these out of hours works

Working Hours: Working Hours: 08:00-18:00 Monday to Friday,

09:30 – 17:30 Saturday and Sunday

Kind regards

Ruth

GADRA

When we pursued this issue, we were quoted Section 36 as their authority and the reason being the Stakeholder's wishes. We had confirmed with the contractor that there was no construction or technical reason to work 7/7 days on this site- the reason given to the contractor was stakeholder request. See below:

From: "Suzanne Angley" <Suzanne.Angley@tii.ie>

Sent: Friday, August 9, 2024 4:10 PM

To: "info@gadra.ie" <info@gadra.ie>, "Metrolink Information" <info@metrolink.ie>, "Aidan Foley" <Aidan.Foley@tii.ie>

Cc: "paschal.donohoe@oireachtas.ie" <paschal.donohoe@oireachtas.ie>, "GaryGannon" <gary.gannon@oireachtas.ie>, "marylou.mcdonald@oireachtas.ie" <marylou.mcdonald@oireachtas.ie>, "Neasa Hourigan" <neasa.hourigan@oireachtas.ie>, "marie.sherlock@oireachtas.ie" <marie.sherlock@oireachtas.ie>, "Mary Fitzpatrick" <Mary.Fitzpatrick@oireachtas.ie>

Subject: RE: FW: Metrolink Ground Investigation Works - Home Farm Playing Pitch, Mobhi Road

Dear Ruth

Thank you for your email.

The National Roads Authority operating as Transport Infrastructure Ireland(TII) are carrying out these site investigation works under Section 36 Part 3 of the Transport (Railway Infrastructure) Act, 2001. TII has authorised Causeway Geotech(Contractor) to carry out these investigation works on Home Farm football field, Mobhi Road. Any representatives from Causeway working on-site have been provided with authorisation letters and these letters are available upon request by any person affected by the said works. No permission for these works is required from DCC planning authority as the site investigations are not taking place on DCC property.

With regards to weekend working, it was originally proposed to carry out these investigation works Monday to Friday 8am to 6pm on Home Farm football club, however, during consultation and agreement with the football club to avoid disruption to the scheduling of their training and ensure the pitch was back available to the local children and youths for upcoming matches.

A leaflet drop to residents in the immediate area took place 30 July 2024 notifying them of the works in advance.

Kind regards

Suzanne Angley

Metrolink Communications Coordinator

Transport Infrastructure Ireland

Parkgate Business Centre

GADRA reverted that section 36 does not confer the right on the applicant to do out of hours works for routine ground investigations to facilitate a stakeholder wishes. Indeed, all discussions with said stakeholder have been private and we the public have no idea what TII

have agreed with this or any of the stakeholders that have an NDA in place. We have asked from the start that residents who live 24/7 beside these constructions' sites are treated with the same level of courtesy as other stakeholders. TII may have agreed with this stakeholder that all works will occur at night without residents being aware of this.

We then found ourselves included in an email from TII communications to TII legal looking for an opinion on legality of the weekend works AFTER the weekend works have been carried out. See below:

From: "Metrolink Information" <info@metrolink.ie>
Sent: Monday, August 12, 2024 10:13 AM
To: "Claire Cunneen" <Claire.Cunneen@tii.ie>, "John O'Connor" <John.O'Connor@tii.ie>
Cc: "info@gadra.ie" <info@gadra.ie>
Subject: FW: FW: Metrolink Ground Investigation Works - HomeFarmPlayingPitch,Mobhi Road

Hi Claire

Just to keep you in the loop, please see below from GADRA.

When you have time would you please just let me know if we are correct.

Many thanks

Suzanne

From: Griffith Avenue & District Residents Association <info@gadra.ie>
Sent: Friday, August 9, 2024 4:56 PM
To: Metrolink Information <info@metrolink.ie>; Aidan Foley <Aidan.Foley@tii.ie>; Suzanne Angley <Suzanne.Angley@tii.ie>
Cc: paschal.donohoe@oireachtas.ie; GaryGannon <gary.gannon@oireachtas.ie>; marylou.mcdonald@oireachtas.ie; Neasa Hourigan <neasa.hourigan@oireachtas.ie>; marie.sherlock@oireachtas.ie; Mary Fitzpatrick <Mary.Fitzpatrick@oireachtas.ie>
Subject: RE: FW: Metrolink Ground Investigation Works - Home FarmPlayingPitch,Mobhi Road

Dear Suzanne

Thank you for following up on this.

It is our understanding that Section 36 of the Transport infrastructure Act 2001 does give you the right to carry out these ground investigation works but it does not give you the right to carry out these works outside of normal working hours which is what you plan to do this weekend. To infer from section 36 that these routine ground investigations can be carried out outside of normal working hours is, in our opinion, mistaken.

Kind regards

Ruth

GADRA

None of the above gives any residents along the Metrolink route any faith in TII or their communications – so we are requesting that any application for out of hours works is made to the planning authority individually with a reference number for each with clear reasons for the derogation and the name and contact details for the person granting the derogation within DCC

WE want communications to be at a much higher level than PR – we need residents to have clear channels of contact to actual decision makers.

2.4.1 As I have shown there are close links between monitoring, communications and risk management and the allocated roles and responsibilities between TII and its contractors. This organisational diagram illustrates the construct of the MetroLink delivery model, with particular attention drawn to the relationship between TII's roles and responsibilities (the MetroLink Directorate and Project Delivery Partner), and the contracts that will be procured and let to deliver the MetroLink project. The MetroLink Directorate and the Project Delivery Partner i.e. TII, will provide independent construction supervision and oversight to assure the safe and correct delivery of the Project and be the point of contact for the public, and the channel through which communications will be provided.

Of great concern to residents is that should/when something goes wrong -knowing who is in charge – at present it appears very unclear where responsibility will lie. We specifically asked that should a disaster, natural, economic, or political, happen and the project stalls that the TII/NTA have risk managed this and are responsible for addressing and restoring all sites along the route.

Legal submission by TII

35. Consistent with the provisions of the 2001 Act, the submissions received from all stakeholders arising from the public consultation in response to this Railway Order application have been carefully considered and responded to. In this regard, TII has sought to engage meaningfully with the submissions of all stakeholders.

Environmental Impact Assessment 36.

In accordance with section 39 of the 2001 Act, the EIAR for this Railway Order Application was prepared by competent experts and contains, inter alia:- a. a description of the proposed railway works comprising information on the site, design, size and other relevant features of the proposed works; ii. a description of the likely significant effects of the proposed railway works on the environment; iii. the data required to identify and assess the main effects which the proposed railway works are likely to have on the environment; iv. a description of any features of the proposed railway works, and of any measures envisaged to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment; v. a description of the reasonable alternatives studied by TII which are relevant to the proposed railway works and their specific characteristics and an indication of the main reasons for the option chosen, taking into account the effects of the railway works on the environment; and vi. a summary in non-technical language of the above information

We do not believe that TII have satisfied this requirement of the Act – By their own admission they have confirmed at the oral hearings in Module 2 that they did not consult the public in relation to the position of the ACP Shaft – the TII reasoning was 'because they needed it'. We cannot see in the Act where you can bypass consultation because you need a structure. Because of the change from twin bore to single bore and the move from Na Fianna grounds a shaft/station was required. However, the siting of that structure required public consultation just as every other structure did. So, without evidence of a consultation on the position and alternatives to this structure (Station) we do not feel the application has met the standard in either of the quoted paragraphs from the Act above.

By not disclosing to the public that the Shaft would be a) an above ground permanent structure b) was and expected size c) had an associated hard car parking surfacing requiring the fencing off of a large section of a public park - means that TII has not met the requirements under to RO Act.

We have provided The Inspector evidence to back up the claim that we and only GADRA were aware of this structure being above ground (because of our previous participation in MetroNorth RO hearings) and TII NTA refused to delay the closing date for the public Consultation so the public could be informed of this. They released the information to GADRA 48 hours before closing date (evidence supplied in submission and oral submission module 2)

83. In recognition of the nature and scale of the works required to construct a rail project, the 2001 Act is less prescriptive than the Planning and Development Regulations 2001 as to the contents of an application for approval. Section 37(3) of the 2001 Act merely requires that the application include "a plan of the proposed railway works". Also relevant is section 39 of the 2001 Act which requires that the EIAR submitted with an application for a railway order contain, inter alia: 20 - a description of the proposed railway works comprising information on the site, design, size and other relevant features of the proposed works; and - a description of any features of the proposed railway works, and of any measures envisaged, to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment.

TII have not satisfied this requirement in relation to Shaft – only 17 words in the PR EIAR with no reference to the above or below ground structures.

Witness statement Sandeep.

2.8 Therefore, to maintain a robust fire safety strategy for the project, the decision was taken through consultation with key stakeholders to adopt NFPA 130 2020 standard "Standard for fixed guideway transit and passenger rail systems" to develop the fire strategy for the Tunnels and Stations. In instances, where NFPA 130 mandates a requirement, but both Irish Building Regulation and European Regulation/Standards also show relevant requirements, a comparative assessment has been made and where possible the most stringent fire safety requirement has been followed.

We note that NFPA 2020 standard has been adopted in relation to Fire safety strategy. We would like clarification as to what standard was in play when in March 2019 TII announced the plan for a shaft in Albert College Park with just 17 words in PR EIAR and in May 2019 sent GADRA and only GADRA the 'back of the beer mat drawing' already submitted as part of our submission and part of our oral submission to module 1 and 2.

The size of the shaft compound was large, and we asked project manager Aiden Foley at open day in Gresham was it was so large – we were told by him that the size was indicative only. We want it noted that this 'indicative size has not changed since 2019 and again we are asking what standard was used for this site.

2.27 Where reasonably practicable, an assembly area shall be identified at the surface for escaping passengers and for attendance by emergency services. However, in central Dublin due to space constraints it is likely that pavements and roads will be used for assembly or alternative solutions will be considered in consultation with Dublin Fire Brigade and other

emergency responders. Considerations shall be given to the likelihood that evacuating passengers will immediately carry on their journeys using alternative routes.

As previously stated in our submission and verified by the independent expert the hard standing layby in the Ballymun road satisfies the need for a hard standing area for emergency vehicles. The above paragraph states that the pavement and road can be used for assembly. The current plan by TII is to fence off a large corner of the park. The public will be permanently excluded from this area of their park. We object totally to this and are appealing to the inspector to deny this request from TII **as there is an alternative** which will reduce the shaft footprint in the park by two thirds. We are requesting that the Inspectors make this a condition of the RO. We further note that 2.27 states that *that evacuating passengers will immediately carry on their journeys using alternative routes*. If a station were in place instead of a shaft at this location this might be possible.

3.10 ix. Surface Roads shall be closed upon arrival of GARDA and Emergency Services.

The above supports the use of the road for emergency vehicle and assembly. The Ballymun road is a 6-lane highway so there is absolutely no requirement for TII to permanently remove and fence off a large area of the park. The IE agree that there is a more logical solution that complies with safety standards however the TII refuse to consider and engage on this matter.

5.2 Basis for and location of the ACP Shaft is as follows. • The Albert College Park Intervention Shaft is required to comply with the tunnel fire strategy for the MetroLink project. It is determined by the need to reduce the travel distance and thus time needed for occupants to escape from an incident in the tunnels and emergency services to reach an incident on foot carrying breathing apparatus and other equipment. The ACP shaft also assists in providing pressure relief during the normal operation of the line, and for ventilation for passenger comfort in normal day-to-day operations. • The Fire Safety strategy for the single bore tunnels limits the length of the incident (train on fire) tunnel sections to a maximum distance of 1km. • Most underground stations with the AZ4 section are within 1km of each other. As the distance from Collins Avenue Station to Griffith Park Station is approximately 1500m, this requires an Intervention Shaft to be inserted in between such that the intervention distance is less than 1000m from each of these adjoining stations. ACP Intervention shaft is within 500m from Collins Avenue and 100m from Griffith Park Station. • The rationale and optioneering for the choice of this specific location from a constructability and Environmental perspective is provided in the EIAR and a chapter on ACP is provided in Appendix A8.16 of the EIAR submission. The current location of the shaft is compliant with the tunnel fire strategy developed for this project. • The ACP shaft comprises of Tunnel Ventilation equipment like that provided in the stations, a firefighting and emergency staircase within a secure building and a fire brigade storage room. This dictates the footprint of the shaft and the associated ventilation buildings. • The footprint of the shaft is comparable to other Metros in Europe and worldwide (Madrid Metro, Dubai Metro, Elizabeth line London). The compound for the shaft has been appropriately sized to accommodate vehicular access to maintain, service and if required replace tunnel ventilation and emergency access equipment.

We note above that a station at this location also satisfies all the above requirements and TII have not shown that this option of a station was seriously considered nor was the moving of the Position of the Collins Ave station to the NW corner of Albert College Park where it had previous approval under the MetroNorth RO. We note that the *footprint of the shaft is comparable to other Metros in Europe and worldwide (Madrid Metro, Dubai Metro, Elizabeth*

line London). What Sandeep fails to mention is that none of the above-mentioned Metros have located a shaft in a Public Park – they have all located their shafts within the built-up areas. We asked the IE to show us any Shaft placed in a public park, and they were unable to do so. We feel this shows an unwillingness within the TII to engage proactively – they simply saw a green space and placed the shaft there without consultation or communicating rationales. Sandeep states that the compound is sized to facilitate car parking emergency vehicles service vehicles – all of which can use the hard area on the Ballymun Road so again we say that TII saw the green space and used it all – we feel the compound is not appropriately sized at all given the value of the parkland. The compound needs to be reduced in size dramatically with no fenced off areas and no parking – we are requesting that Inspector makes TII reduce this site to the Shaft footprint and removes the compound completely.

We would like to draw the attention of the Inspectors to *DAY4 ACP Comparison of Shaft V Station* which fails to include the planned fenced compound in size, nor does it indicate that the shaft is above ground and station below ground.

Day 4 Floating Slab Track updated 20/2/24 does not show ACP shaft at all.

Appendix 10 Mobility Management Plan

Due to the volume of workers expected on various sites across the construction stage (maximum of 1,500 workers on a single site at maximum employment), it is necessary that the transportation of workers to site is undertaken in an efficient and sustainable manner to alleviate pressure on the local network and minimise disruption for local residents

We have read this plan with some disbelief- as it appears to rely on the good will of the workers rather than this being a condition of the RO and associated contract.

5.4.11 planning to hold coffee mornings to encourage carpooling and the distribution of umbrellas appears amateurish as a plan. It seems that Pay and Display parking will be needed throughout the GADRA area with discs issues to residents for the duration of the build.

1.4

One contractor(s) will be nominated as the main contractor(s) in each geographical location in order to ensure a coordinated approach to safety and environmental management, including mobility management. Under this form of contract, the successful contractor(s) will ultimately be responsible for the final detailed design of the proposed Project, within the requirements and conditions as outlined in the EIAR and the Railway Order (RO). The contractor(s) will be required to comply with all of the performance requirements set out in the tender documentation, including the Railway Order Approval and conditions may be granted by An Bord Pleanála.

Again, the IE will need to have contact directly with this contractor in real time to address issues.

APPENDIX 12 STAKEHOLDER COMMUNICATIONS

An undertaking as complex as the construction of MetroLink will pose a huge challenge to all involved in delivery. Transport Infrastructure Ireland (TII) will take responsibility for ensuring that the Contractor puts a Stakeholder Communication Plan in place well in advance of the commencement of any MetroLink construction.

GADRA are requesting that all residents along the route are given advance notice of TBM activity and TII have a plan communicated to the stakeholder for re housing of vulnerable residents should that be required for the period of the TBM movements through an area. GADRA are requesting floating track slab within our residential area, and we are requesting the rationale for TII not putting this in place in all residential areas.

Disruption to Utilities

TII need to ensure that during construction and operation of Metrolink GADRA's residents will not be affected by disruptions to utilities including sewer system. In the event of any unavoidable disruption, TII will engage in advance with the residents and agree the timing and duration of such disruptions. Where there is an interruption to the electricity supply within the GADRA area, TII will supply electricity generators where necessary and as agreed with the residents.

Protection of retained trees.

Prior to commencement of project within the GADRA area including Albert college Park, all trees, groups of trees, hedging and shrubs which are to be retained shall be enclosed within stout fences not less than 1.5 metres in height in accordance with the tree management plan. All tree works to comply with British Standards BS 5837:2012: Trees in relation to Design, Demolition and Construction. No construction equipment, machinery or materials shall be brought into Albert College Park for the purpose of the development until all the trees which are to be retained have been protected by this fencing.

We note Avril Challoner statement below.

8.1. The Dublin City Action Plan is based on four foundations (A Resilient, Resource Full, Creative and Social City) and sets out the 2030 vision that Dublin City Council have for the city. The four foundations can be described as: a Creative City, a Resource-Full City, a Resilient City and a Social City. These foundations aim to deliver the overall target of a 51% reduction in greenhouse gas emissions in line with our National Climate Objective by 2030 (2018 baseline), while striving for neutrality before 2050 as per Dublin City's participation in the EU Mission for 100 Climate Neutral and Smart Cities (Net Zero Cities). While achieving this, DCC want the city to also ensure it remains climate resilient and that the transition to its 2030 is Just. Action OS7 states that Dublin City Council should promote active travel and public Transport. Promotion of public transport projects such as MetroLink fits with this aim. Dublin City Council CAP 2024-2029 identifies Ballymun as a "Decarbonisation Zone" requiring "Use of systems thinking that promotes exploration, co-creativity, innovation and new learnings; be test beds for portfolio of actions, projects, technologies and interventions to achieve our targets and; address energy and non-energy related issues (adaptation, biodiversity and just transition)" The construction and operation of a MetroLink station at Ballymun will be an important element of infrastructure that will assist in the decarbonisation of transport in the area in the long-term. The Ballymun launch construction site will align with the decarbonisation zone as it will be operated on 100% renewable energy and have diesel site requirements replaced with sustainable sourced Hydrotreated Vegetable Oil (HVO).

We request that ACP shaft is included in this decarbonisation zone.

GADRA request the right of reply to any response from NTA to this submission

GADRA 26/09/2024