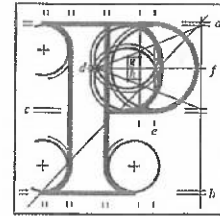


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

Dublin Airport
Cloghran House
Corballis Way
Dublin Airport
Swords
Co. Dublin

Date: 26 January 2023

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 (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised, there is no fee for a prescribed body, to make an observation on this case, therefore, a refund of €50 will be made to the credit/debit card used to make the online observation.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

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

Tel	Tel	(01) 858 8100
Glaao 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

Yours faithfully,

EM

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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MetroLink Railway Order Submission

January 2023

INSIDE COVER PURPOSELY LEFT BLANK

16 January 2023

Re: NA29N.314724 Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin

Dear all,

daa welcomes the proposed MetroLink. MetroLink will provide an efficient transport link between Swords, Dublin Airport and the City Centre for staff and passengers. While it will not be the only public transport solution required, it is welcomed as a key enhancement. The positive benefits of the MetroLink scheme for the airport are highlighted by the journey time comparisons outlined in Table 9.101 in Chapter 9 of the EIAR¹.

The introduction of MetroLink will also have a positive impact on public transport mode shares, with increased proportions of travel to/from the airport being undertaken by public transport. This is seen as a positive impact for access to Dublin Airport, and the climate action plan.

Given the nature, scale and extent of operations at Dublin Airport, planning for future needs must look at long term horizons in addition to its short to medium term requirements. Infrastructural projects have long lead-in timelines for both planning and construction, which means it is essential that due consideration is given to Airport specific requirements; flexibility and continued engagement between the MetroLink project team and daa will be key to planning for these future needs.

The submission below outlines key areas that require further consideration, engagement and agreement. daa aims to represent the needs of users and operators of Dublin Airport. daa's submission relates only to the proposed MetroLink from Dublin Airport North Portal through to Dublin Airport Station and Dublin Airport South Portal.

¹ Source: EIAR Chapter 9 Traffic and Transport, Section 9.6.2.1.3.1.2 Journey Times

Airport Specific Security

daa requests that should a grant of permission be issued, a condition is included requiring MetroLink to adhere to all relevant security measures during construction and operation as detailed by daa as the responsible organisation for Aerodrome Security provisions

The National Civil Aviation Security Programmes (NCASP) and National Facilitation Committee in accordance with the International Civil Aviation organisation (ICAO) makes daa responsible for airport security provisions. The purpose of the committee is 'to maintain a safe, secure civil aviation environment in which services are delivered in a reliable and efficient manner'. The proposed MetroLink must comply with the relevant security requirements adopted by daa, including but not limited to Aviation Security in Airport Developments (ASIAD), Security in Design of Stations (SIDOS) and should take account of other relevant UK codes such as G085 Code of Practice (2018). All above and below ground, subsurface design should be in accordance with the relevant standards.

daa requests that MetroLink prepare the following Security Plans for design, construction, and operation:

- Concept Security Plan (CSP): Sets out the concept for developing the mitigation strategies for the design and operation of the final station that evolve from the Threat Vulnerability and Risk Assessment (TVRA) into a set of design intent details. The CSP shall be submitted to the Dublin Airport Security Committee (DASC) at the commencement of detail design stage.
- Construction Stage Security Plan (CSSP): Sets out the plan for mitigating construction stage security risks. These differ from the permanent case design and operations mitigation set out in the CSP. A CSSP is to be submitted to the DASC a minimum of 1 year prior to planned construction commencement.

MetroLink is requested to nominate representatives to sit within the Dublin Airport Security Committee as headed by An Garda Síochána and the CSP and CSSP shall be agreed within this forum.

It is important that the final design and the phased construction stage implementation allows flexibility to accommodate the required security measures. daa requests that should a grant of permission be issued, a condition is included requiring MetroLink to adhere to all relevant security measures as detailed by as responsible organisation for Aerodrome Security provisions.

Pedestrian and Traffic Impact

daa request the Metrolink station is designed to accommodate an elevated pedestrian walkway. This will ensure there is no impact on the safe and efficient operation of our internal roads which may be impeded by the number and frequency of the crossings.

Pedestrian movement and traffic flows are key to Dublin Airport efficient operation and security. In particular to Airport Security is the movement of pedestrians and pedestrian approach/dispersion routes. The MetroLink design must not allow pedestrians to be corralled and become a potential target. On behalf of daa, Aecom undertook an assessment of the EIAR, Chapter 9 Traffic and Transport and all relevant associated appendices.

Pedestrian Movement:

The proposed station is forecast to generate significant volumes of pedestrian movements in the Airport campus. The location of the proposed station means that, to access the airport, staff and passengers will need to cross internal airport roads. This will significantly increase the numbers of pedestrians crossing and therefore increase the level of conflict between pedestrian movements and internal airport vehicular traffic movements. The figures outlined in Table 1 indicate close to 6,000 pedestrian movements during the AM peak hour in the Opening Year 2035, these movements will conflict with vehicle movements² on the T2 Departures Road (approx. 670) and in the GTC (approx. 450) in the vicinity of the station.

MetroLink proposes five new signalised at grade pedestrian crossings. These are upgrades to existing zebra crossings. An assessment including VISWALK modelling³ was undertaken for these five crossings. Signalised junctions at these locations are deemed to be the minimum appropriate intervention to accommodate the forecast pedestrian volumes. Two crossing points, between Terminal 1 and the Terminal 1 Multi Storey Car Park have not been assessed by MetroLink within the Traffic & Transportation Assessment (TTA). Static analysis tools of the Transport for London (TfL) Pedestrian Comfort Analysis were also used in the TTA to assess pedestrian movement. Table 6.2 of the TTA⁴ shows that in the opening year pedestrians will experience a comfortable to acceptable level.

Impact on Internal Roads:

The Dublin Airport Station TTA asserts that the nature of MetroLink, as a new public transport corridor, means there is unlikely to be any vehicular traffic impacts during the Operational Phase and that the development of a significant public transport intervention will instead reduce traffic impacts through facilitating a modal shift from private car onto public transport. Across the wider route corridor, this is not an unreasonable assumption.

The TTA also states that, with MetroLink providing an attractive alternative for journeys that are currently made by bus, it is likely that there will be a shift from existing bus services onto MetroLink, resulting in a reduction in bus, as well as taxi and private car, trips on the road network at Dublin Airport. This assessment is purely qualitative, however, and the TTA does not provide any details of the modelled flows on the internal Airport road network to illustrate this.

daa identifies that consideration is not given to:

- The potential impact of additional pedestrian crossing movements on general traffic on the internal Airport road network, or
- The potential impact of additional traffic (buses and cars) dropping off/picking up at the Metro Station.

² Source: 7-day average flows recorded in May 2019 (Dublin Airport operated at the permitted 32 million passengers per annum cap in that year)

³ Source: EIAR Volume 5 Appendix A9.2 Overall Project Traffic & Transportation Assessment – Dublin Airport Station

⁴ Source EIAR Volume 5 Appendix A9.2 Overall Project Traffic & Transportation Assessment – Dublin Airport Station

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Óifig Chláraithe: Tírl, An Fhaiche, Lárcheantar Aerfort Bhaile Átha Cliath, Aerfort Bhaile Átha Cliath, Sord, Contae Bhaile Átha Cliath, K67 X4X5, Uimhir Chláraithe: 9401 Éire

Registered Office: THREE The Green, Dublin Airport Central, Dublin Airport, Swords, Co Dublin, K67 X4X5, Registered Number: 9401 Ireland

The following additional comments are also made:

- The Terminal 1 and Terminal 2 kerbside set down areas are a key airport surface access 'processor function' at Dublin Airport. At-grade pedestrian crossings are present in both Kerbside areas. Although assessment of the pedestrian crossings has been undertaken from a pedestrian comfort / level of service perspective, the impact of the additional pedestrian movements caused by MetroLink on Kerbside operations and requires additional consideration in the TTA. It is also possible that the MetroLink operations will result in pedestrian surges from the station as services arrive in either direction.
- The proposed station layout will introduce an additional uncontrolled junction in close proximity to the signal-controlled junction between Corballis Road North and the T2 departures road. Corballis Road North is the main exit route from both terminal areas and associated car parks and its efficient operation is crucial to the wider operation of the internal Airport road network. Consideration should be given to how the proposed exit junction impacts on the operation of Corballis Road North and the adjacent T2 departures road junction.

Bus Circulation and Junctions Improvements on Campus:

The GTC is a key element of public transport operations at Dublin Airport. The development of the Dublin Airport MetroLink station will effectively see an expansion of the functional area of the GTC for passengers. It will also, however, result in a significant increase in the number of pedestrians using the at-grade crossings at the existing bus bays within the GTC.

daa identifies that:

- the impact of the additional pedestrian movements caused by MetroLink on bus circulation and other traffic movements within the GTC requires additional consideration in the Dublin Airport Station TTA.

Alternatives Considered:

Alternatives were considered to facilitate safe and efficient pedestrian movement. daa considered Elevated Pedestrian Connections to be a safer and preferable solution. When assessed all elevated alternatives offered a quality user experience that provides a safe, efficient, enjoyable and stress-free journey that encourages repeated use of MetroLink to access the airport. It is noted that a similar pedestrian walkway is provided at the proposed Estuary Station, connecting the MetroLink Station to the proposed car park. daa requests that the MetroLink station is designed to accommodate an elevated walkway.

Future Airport Development

daa request the station structure be designed, in agreement with the airport, such that it does not compromise future development above the station. is adapted to support a multistorey development.

The MetroLink site is situated at the heart of the airport campus, within an area of high commercial value due to its proximity to both airport Terminals. The Dublin Airport Central (DAC) masterplan indicates that the MetroLink site along with other sites within the GTC will be developed into multistorey commercial developments in the future. This is in line with the concept of Transit-Oriented Development supported in the

National Transport Authority Greater Dublin Area Transport Strategy 2022-2042. The Fingal Development Plan 2017 – 2023 also sets the following objectives that support further development at Dublin Airport:

Objective ED30 Engage and collaborate with key stakeholders, relevant agencies and sectoral representatives to ensure that Dublin Airport is developed and promoted as a secondary hub to capitalise on the associated wider economic benefits for Fingal and the wider region,

Objective ED34 Engage with and support the DAA and other employment providers in aviation uses associated with Dublin Airport to create quality and easily accessible employment opportunities for Fingal residents.

Objective DA01 Facilitate the operation and future development of Dublin Airport, in line with Government policy, recognising its role in the provision of air transport, both passenger and freight.

daa requests that the station structure and retaining walls are designed and constructed to support future loads imposed by Dublin Airport development foundations that may be positioned near the MetroLink stations construction. It should be assumed the pavilion will rise to three levels and may incorporate a possible elevated Automated People Mover platform. It should also be assumed that the multi-storey car park will rise to a height of 110m AOD with the street level being a double height space designed to accommodate the bus/coach park, and thus will likely require increased open plan column spaces with increased foundation loading. daa request that the applicant indicates how the MetroLink station building structure can be adapted to support a multistorey development in line with the above objectives.

Safeguarding Dublin Airport

daa request consultation with and approval by daa and IAA regarding Cranes and Construction Plant, Hazardous, Confusing or Misleading Lights, Runway End Safety Area (RESA) and Electromagnetic Field Safety prior to commencement of development

Aeronautical Safeguarding:

daa is responsible for upholding the EASA Implementing Rules (Regulation (EU) No 139/2014); ADR.OPS.B.075 – Safeguarding of aerodromes. The IAA, as the provider of terminal air traffic services, is responsible for the safeguarding of their Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) surfaces and Radio / Navigation equipment. Both daa and IAA request engagement in respect to demonstrating that MetroLink operation or construction will not impact airport or aeronautical operations. daa and IAA expect all required measures will be taken to ensure there will be no impact to safety critical systems or infrastructure from construction methodology or operation e.g., vibration or settlement.

Cranes and Construction Plant:

In accordance with Statutory Instrument SI 215 of 2005, Obstacles, all cranes in the vicinity of the Dublin Airport must be referred to IAA-ANSP, who will advise whether further assessment is required in relation to Instrument Flight Procedures (IFP) or Communications Navigation and Surveillance (CNS).

In accordance with the specifications of ICAO Annex 14, EASA Certification Specifications, and IAA ALM 002 (the Aerodrome Licensing Manual) all obstacles on and adjacent the aerodrome shall be illuminated with approved lighting sources. It is the responsibility of the owners/operators of obstacles to ensure that such sources and systems are maintained.

Hazardous, Confusing or Misleading Lights:

The development (both in construction and operation) will be required to assess the proposed lighting to ensure that the development will not entail the introduction of hazardous, confusing, or misleading lights, unless suitable mitigations such as shielding can be incorporated in the design. An assessment will be required and assessed, in conjunction with the IAA-SRD and IAA-ANSP, with a view to removing the lights or adapting or shielding them to reduce the hazard.

Runway End Safety Area (RESA):

The MetroLink South Portal lies adjacent the Departure area of Runway 16 and the Approach Area to Runway 34. The current RESA at the end of Runway 34 does not meet current European Union Aviation Safety Agency (EASA) Requirements. The location of the south portal should allow the relocating of all roads (current and planned), navigational aids and perimeter fencing to establish a compliant RESA. daa also requests that consideration is given to the ability to accommodate future dual road bridges to carry the realigned Old Airport Road (Collinstown Lane).

Electromagnetic Fields:

As noted in the application the proposal is not considered to impact safety or operations of Aircraft at Dublin Airport with regard to electromagnetic fields. Any impact can be overcome by appropriate procedures in the flight crew operations manual. daa requests that the final as constructed alignment is provided to daa and all airlines to ensure appropriate safety procedures are applied to aircraft. daa requests continued consultation to ensure sensitive equipment, such as hold baggage screening (HBS) systems at Dublin Airport is not impacted.

Public Safety Zone:

The ERM – Public Safety Zones Report provides guidance on what developments are appropriate within the Inner and Outer Public Safety Zones (PSZ). ‘The purpose of PSZs is to protect the public on the ground from the small, but real possibility that an aircraft might crash in a populated area. Essentially, a PSZ is used to prevent inappropriate use of land where the risk to the public is greatest’.

The Inner Public Safety Zone guidance aims to prevent further development within the Inner PSZ. The Outer Public Safety Zone guidance aims to prevent high density development and sets a limit on person densities per half hectare.

The north portal construction compound is located partially within the Inner PSZ and Outer PSZ. The central and southern portal compounds are located partially within the Outer PSZ. daa refers the Board to the limitations of the Inner Public Safety Zone, and the appropriate person densities for the Outer Public Safety Zone contained within the ERM Report, Public Safety Zones (2005).

The safeguarding of Dublin Airport is supported in the Fingal Development Plan 2017 – 2023 which includes the following objectives:

Objective DA13 Promote appropriate land use patterns in the vicinity of the flight paths serving the Airport, having regard to the precautionary principle, based on existing and anticipated environmental and safety impacts of aircraft movements

Objective DA14 Review Public Safety Zones associated with Dublin Airport and implement the policies to be determined by the Government in relation to these Public Safety Zones

Construction phases

Dublin Airport is a live campus with ongoing development. Continued co-operation between MetroLink and daa will be required to undertake the construction and operation of MetroLink with particular reference to construction traffic, vibration utilities, tunnel depth, dewatering and airport security.

daa request that all construction plans are developed in consultation with and approved by daa as the landowner prior to commencement of development.

daa notes that Dublin Airport is a live campus with ongoing development. Diagram 5.3 Summary Construction Programme⁵ details a construction programme of over eight years. Continued co-operation between MetroLink and daa will be required to undertake the construction and operation of the MetroLink. The following areas are of key importance:

Construction Methods:

all construction methods and final design must take account of existing development including aprons, piers and terminals above the tunnel and adjacent to above ground structures.

Construction Traffic:

During the life of the project traffic flows within and surrounding the airport campus will change. The Fingal Development Plan 2017-2022 includes the following objective:

Objective DA25 Maintain and protect accessibility to the Airport as a priority.

To protect accessibility all construction traffic will be required to work within the limitations of an operating airport. daa will provide a comprehensive set of requirements for contractors to work within.

Utilities:

The application does not illustrate details of Dublin Airport Services such as 10kV Network, Aviation Fuel Network, IAA Utilities, etc. The location and impact on these services must be considered during the consultation phase of MetroLink.

Tunnel Depth:

daa note the proposed depth of approximately 10-15 meters below ground level through the tunnel on airport lands. The interaction with current and future projects must be co-ordinated at the time of construction.

⁵ Source: EIAR Chapter 5 MetroLink Construction Phase, Diagram 5.3 Summary Construction Programme

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Dewatering:

Consideration should be given to any dewatering of construction areas, particularly in the area of the proposed station. daa are aware of possible soil and groundwater contamination to the north of this area, which is currently under investigation. Any pumping of groundwater from the station area may have the potential to pull a plume of contaminated groundwater towards the works.

Design

daa requests the Board has regard to the Dublin Airport Architectural Design framework and all relevant design elements are agreed with daa prior to the commencement of development and operation as appropriate.

The proposed MetroLink at Dublin Airport should adhere to the objectives of the Dublin Airport Architectural Design framework. The framework aims to assist in delivering daa's own Vision of Dublin Airport as an industry leader and aims to further its purpose in delivering an outstanding experience for both airlines and passengers. The framework assists in delivering consistency in Architectural design approach and acts as a tool to safeguard and manage design quality throughout the project.

The Fingal Development Plan 2017-2022 also sets the following objectives:

Objective DA21 Ensure that all development within the Dublin Airport Local Area Plan lands will be of a high standard of design, to reflect the prestigious nature of an international gateway airport, and its location adjacent to Dublin City.

daa requests the Board has regard to the design elements detailed below that require further engagement:

Landscaping:

Enhanced landscaping is required to soften the current highly utilitarian environment of the Ground Transportation Centre (GTC) and to help improve the passenger experience within this area. The Dublin Airport Central Masterplan refers to the "green lung" which extends into the GTC. Green roof, plant and tree specifications and species need to be agreed upon in consultation with Dublin Airport's Asset Management team and Airport Ornithologist to minimise bird or wildlife hazards with the potential to impact safe aircraft operations. **daa requests further consultation and agreement on final landscaping plans at the proposed Dublin Airport Station.**

Wayfinding:

It is unclear what wayfinding signage strategy is proposed for the MetroLink. Wayfinding is critical within an airport environment and the airport needs to understand how the addition of the MetroLink will affect existing wayfinding within the airport campus and at the entrance and exit from the campus. **daa request that all new and alterations to existing wayfinding signage are to be agreed with daa prior to operation.**

MetroLink Tickets

It is unclear from the plans shown how tickets are purchased for the MetroLink. Is it proposed that ticket kiosks machines will be provided within the station footprint? Is there any infrastructure required within the

Airport Terminals or carparks buildings to facilitate booking or purchasing tickets? Passenger circulation and flow is a key function within an airport and transport environment and the congregation of people along key circulation routes should be avoided for security reasons. **daa request further consultation and agreement on the location of ticket machines prior to operation.**

The design of the Dublin Airport Station

The materials pallet booklet provided as part of the Railway Order provides some clarification on the types of materials that will be used across a variety of the MetroLink Station Designs. The Dublin Airport MetroLink station is located in the heart of the airport campus and will be a highly visible public structure. **daa request more detailed information in relation to the life expectancy of the façade and roof, and external landscaping**

Luggage and Trolleys

The station design needs to ensure there is adequate provision for passengers arriving and exiting the Airport terminals and carparks with large volumes of luggage including Out of Gauge (OOG) Luggage up to the maximum allowable size including golf clubs and bike boxes. Circulation routes, escalators, lifts, train cars and corridors need to be designed to allow sufficient space for people with luggage. It is unclear if trolleys are provided or if there is a trolley collection point for people bringing trolleys from other facilities. **daa request further consultation and agreement on the management of trolleys prior to operation.**

Washroom Facilities:

The Dublin Airport Station plans do not indicate washroom facilities for passenger use. daa requests that MetroLink clarify that the station design meets building regulations, codes, and standards in relation to washroom facilities considering the distance to existing washroom facilities within the Airport Terminals.

Sculpture:

There is an ideal opportunity to provide a piece of sculpture/art within the proposed MetroLink landscaped space to announce a user's arrival at Dublin Airport in line with Dublin Airports Design Framework proposals.

Areas constructed by MetroLink that will be operated and maintained by Dublin Airport:

These areas need to be designed and constructed in accordance with Dublin Airport specifications and design standards in addition to the latest national and international building regulations, codes and standards. **The extent of these areas needs to be agreed upon between all parties and Dublin Airport requires input into the specification of materials and construction methods within these areas.**

If there are any questions on any of the points contained in this submission daa would welcome the opportunity to discuss in more detail.

Sincerely,

Jennifer Boyle
Senior Planner
INFRASTRUCTURE

Key Issues

Further to the above detailed review daa identifies the following key issues and brings the Board's attention to important considerations, where appropriate daa requests specific conditions should a grant of permission be issued.

Aviation Security	daa requests that should a grant of permission be issued, a condition is included requiring MetroLink to adhere to all relevant security measures during construction and operation as detailed by daa as responsible organisation for Aerodrome Security provisions.
Pedestrian and Traffic Impact:	daa request the Metrolink station is designed to accommodate an elevated pedestrian walkway. This will ensure there is no impact on the safe and efficient operation of our internal roads which may be impeded by the number and frequency of the crossings.
Future Airport Development:	daa request the station structure be designed, in agreement with the airport, such that it does not compromise future development above the station. is adapted to support a multistorey development.
Aeronautical Safeguarding:	daa request consultation with and approval by daa and IAA regarding Cranes and Construction Plant, Hazardous, Confusing or Misleading Lights, Runway End Safety Area (RESA) and Electromagnetic Field Safety prior to commencement of development. .
Public Safety Zone	daa refers the Board to the limitations of the Inner Public Safety Zone and the appropriate person densities for the Outer Public Safety Zone contained within the ERM Report, Public Safety Zones (2005).
Construction Phase	Dublin Airport is a live campus with ongoing development. Continued co-operation between MetroLink and daa will be required to undertake the construction and operation of MetroLink with particular reference to construction traffic, vibration utilities, tunnel depth, dewatering and airport security. daa request that all construction plans are developed in consultation with and approved by daa as the landowner prior to commencement.
Design	daa requests the Board has regard to the Dublin Airport Architectural Design framework and that all relevant design elements are agreed with daa prior to commencement of development and operation, as appropriate, of the Metrolink. In particular details on the following should be agreed, landscaping, wayfinding, ticket machines, design of the Airport Station and materials proposed, luggage and trolleys, washrooms, the inclusion of a sculpture and design standards.