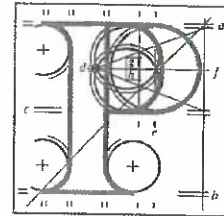


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

Jonathan Griffin and others
10 Hampstead Avenue
Glasnevin
Dublin 9

Date: 05 December 2022

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 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.

Yours faithfully,

PP EM

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Hampstead Residents CLG
10 Hampstead Ave
Dublin 9

AN BORD PLEANÁLA	
LDG- <u>059461-22</u>	
ABP- _____	
24 NOV 2022	
Fee: € <u>50</u>	Type: <u>cheque</u>
Time: _____	By: <u>reg post</u>

Hampstead Residents CLG

Metrolink Submission 22/11/2022. (Case number 314724)

Introduction:

Hampstead Avenue, Glasnevin, Dublin 9, is a narrow crescent shaped cul-de-sac just 6 meters wide and 200 meters in length. The Avenue comprises of 18 Semi Detached and Terrace homes, all of which are 'Art Deco 1930's to 1940's style. Additionally, at the entrance to Hampstead Avenue is 114 Ballymun road. This unique Art Deco detached house is a protected structure. ALL these homes are situated on one side of the avenue (the southern side). The opposite side (northern) adjoins directly onto the parkland, named Albert College Park. The Avenue has a rural atmosphere and is extremely quiet at night (Baseline sound taken during MetroNorth pre-planning , -reading of 35dB's (taken 10+ years ago), at Elmhurst Hospital entrance at 35dB's. This is very quiet, especially in an urban environment! Please refer to map/picture below:-



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 LDG-
 Hampstead Residents CLG
 10 Hampstead Ave
 Dublin 9
 Type:
 Fee: €

Hampstead Avenue provides the main access to Elmhurst and Hampstead Nursing home/hospital, in which grounds include a vibrant tillage farm and various other private residences (all part of the Eustace's Estate). Residents of the above mentioned nursing homes and nearby 'St Michaels House' for special needs, and local residents, GAA, Soccer, such as:- Ballymun Kickhams GFC, Na Fianna GFC, Glasnevin FC, Glasnevin Diggers Juvenile AC, Drumcondra AC, Bohemians FC, Bohemians foundation, Bohemians Junior FC, Home Farm FC, St Kevins Boys FC, Glasnaion FC, St Vincents GFC, ABS ladies Bootcamp, Scoil Aine FC ,Cricket club, Tennis clubs, dog walkers, Joggers, DCU athletics club, the weekly Junior Park run, several local Primary and Secondary schools students and teachers, DCU staff and students, and the 'Tram cafe' patrons, Children playground, open air Gym ..etc All of these people and more, regularly access the amenities of Albert College Park, via Hampstead Avenue.





The entire residential area of Hampstead Avenue, lies within a land-use zoning objective of Z2 . (Z2:- To protect and/or improve the amenities of residential conservation areas. Residential conservation areas that have extensive groupings of buildings and associated open spaces with an attractive quality of architectural design and scale.)

Metro Link is the largest ever single public investment project in the history of the Irish State and we acknowledge that it embraces sustainable transport which ultimately benefits the social, economic, environmental, and cultural assets of Dublin city. As advertised, the underpinning concept is of 'the 15-minute city', which encourages people to use more sustainable transport. Metrolink properly designed, managed and with proper public buy-in (true and fair consultation) will go a long way in delivering all this and is a concept that we believe ALL our residents support fully!

Independent Engineering Expert Service.

In the past (MetroNorth ~2008) Independent Engineering Expert Advice was provided, for all residents along the then planned Route, at the project early design stages.

However in relation to the current Metrolink project, Local Residents Associations (eg:-GADRA) requested Independent Engineering Expert Advice at the initiation of the Metrolink Project, however TII/NTA (Transport Infrastructure Ireland and National Transport Authority) did not act! Eventually TII/NTA provided Independent Expert service (RINA). However this expert

advice was provided late in the project cycle! This delayed decision by TII/NTA, fundamentally limited the service's usefulness to residents.

Additionally, it appears that the 'terms of reference' was provided to RINA exclusively by TII/NTA. Shockingly the public/residents/stakeholders (for whom the service is for) had absolutely no part in developing the terms of reference. This 'anti-inclusive' approach by TII/NTA resulted in the 'Independent expert', advice (when it was eventually provided) -being restricted and limited. Frustratingly, this experience of 'anti-inclusiveness' by our residents persisted throughout the process, and seems to be a mainstay approach by TII/NTA.

Many of the issues now facing residents could have been resolved much earlier, had 'inclusively scoped' Independent Engineering Expert Advice been provided at the Metrolink project start.

R.O. Condition - Request 1: Notwithstanding the damage that has already has been done in relation to our residents confidence and trust in TII/NTA and its agents, we ask that Independent expert advice must be made available to residents and stakeholders, during ALL the upcoming phases of the Metrolink project. (enabling works, construction and commissioning). An appropriate government dept should be the sponsor, and definitely NOT the TII/NTA.

'Consultation' process:-

As per TII/NTA recently published 'Introduction letter', and EIAR from the Railway Order application. TII/NTA states "Public participation has been an integral part of Metro Link from the outset" "The consultation of the public and stakeholders ensured the views of various groups, individuals and stakeholders were taken into consideration throughout the development of Metro Link"... "To ensure that the design of Metro Link has been undertaken having regard to the consultation responses received." etc..

Sadly despite this 'theatrical' public rhetoric, the residents of Hampstead Avenue, and many nearby Residents Associations have NOT had such an 'open and inclusive Consultation' experience with TII/NTA and were in general NOT made feel integral to the above mentioned process.

The EPR (Emerging Preferred route) was announced on the March 22nd 2018. Over an eight-week consultation period (March 22nd 2018 to May 11th 2018) the public and stakeholders were invited to submit their observations on the proposed Project.

The Preferred Route (PR) consultation took place over an eight-week period from March 26th 2019 to May 21st 2019. Some key changes that were implemented following the consideration of feedback received during the consultation for the EPR, were presented and further feedback was provided on the design development.

The issues raised during this public consultation having been considered as part of the final PR (Preferred Route) and formed the basis of the design. In this process, and as a consequence of lobbying on the part of the wider GAA community and others, the Metrolink station location originally proposed in Na Fianna GAA grounds (on St Mobhi Road) was moved south to Griffith Park. Note:-many of these respondents were living and based in different counties across the country! As a direct consequence of this station being moved (and only 2 days before closure of consultation) there emerged from TII/NTA 'a hand drawn sketch' of a proposed intervention shaft for Albert College Park. This was the first time our residents heard of a planned intervention shaft in the Park, and absolutely NO consultation took place on this decision! An extension was formally requested by our Residents Associations, in order that basic and reasonable consultation on this proposed new structure could happen. Astonishingly, this very reasonable request by our residents, was refused by TII/NTA.

Additional to the above, the original twin tunnel alignments suddenly changed to a single bore tunnel. This change in itself, had huge ramifications for the entire Metrolink line and especially in our area. We see no clear information in the Metrolink published documentation outlining exactly why this decision was made. This is unbelievable stuff!

The decision by TII/NTA of including the Albert College Intervention shaft emerged as a 'final decision'. Absolutely No consultation, discussion, investigations of other potential options were advanced by TII/NTA to our local residents, or representatives.

Some time afterwards we believe a 'box ticking' exercise ensued by TII/NTA. The 'Albert College Park Intervention Shaft Local Area Consultation' was launched by TII on February 12th 2020 and ran for four weeks until March 11th 2020. An Info-leaflet/feedback form including colourful drawings/'artistic impressions' of the proposed intervention shaft plus a freepost envelope, were delivered to approximately 4,250 local residents' homes (4250 homes - as per the TII/NTA). We were also told that these leaflets were delivered in the area surrounding Albert College Park. We, (or our residents association) were not informed of the actual leaflet distribution spread -on a map.

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Dublin 9

In these delivered 'leaflets'...residents were asked questions ONLY about the aesthetics/appearance, park amenity (construction phase) etc of the proposed Intervention shaft and NOT about any other potential options or ideas.

See Fig 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

Rialtas na hÉireann
Government of Ireland
2040

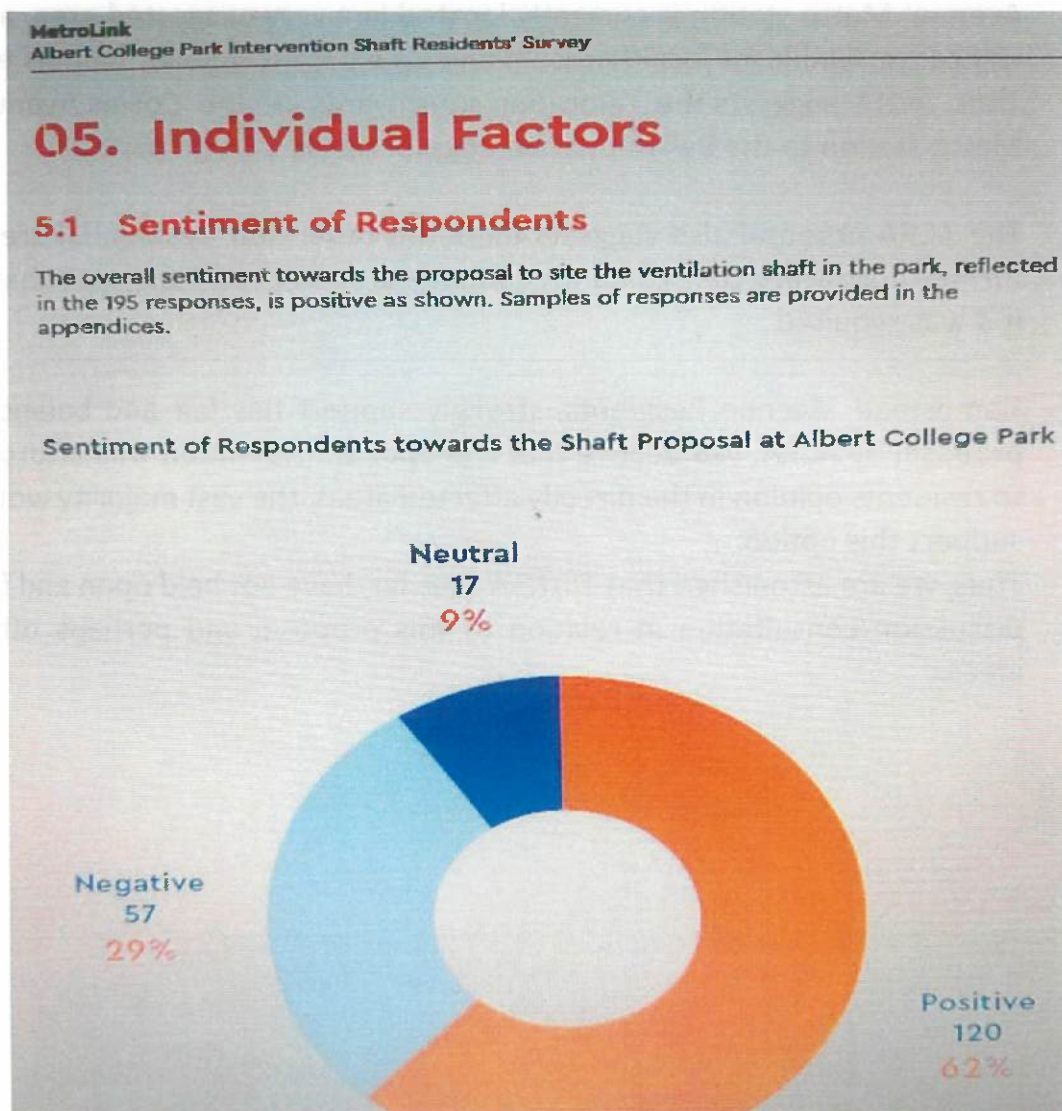
NTA
National Transport Authority

TII
Transport Infrastructure Ireland

TII/NTA then proceeded to present 'the results' at an online meeting to residents and several elected representatives. During the presentation several

'pie graphs', were displayed. From some of the graphs presented publically at the above mentioned meeting, it suggested that only a minority of the respondents were actually 'positive towards' a Metro station in Albert College Park! However we believe this is obviously because the only topic directly asked and requiring feedback in the TII/NTA's posted 'Consultation' leaflets were ONLY relating to an Intervention shaft!...and nothing else!!

In the 'pie graph' below '5.1 Sentiments of Response', it states 'overall sentiment towards the proposal to site the ventilation in the park'. The TII/NTA seems to have taken the direct answers to their direct and leading questions (that were ONLY relating to an intervention shaft) as a 'positive response' to the intervention shaft itself. We strongly believe that this process was a total 'paper exercise', misleading, a sham, a waste of tax payers money, an insult to residents intellect, and certainly does not even get close to the meaning of the word Consultation!



Additionally the survey questionnaire did not have any unique identifier, so it would be impossible to ascertain from what road or even area the responses came from, or indeed if some individuals also used their neighbours leaflet, or photocopied them or passed them on...etc.

If 'Consultation'/openness/fairness was a key aspect of this project then TII/NTA should surely recognise that there were other potential options that should have been investigated, properly evaluated and then presented openly and fairly -for public discussion. Some examples:-

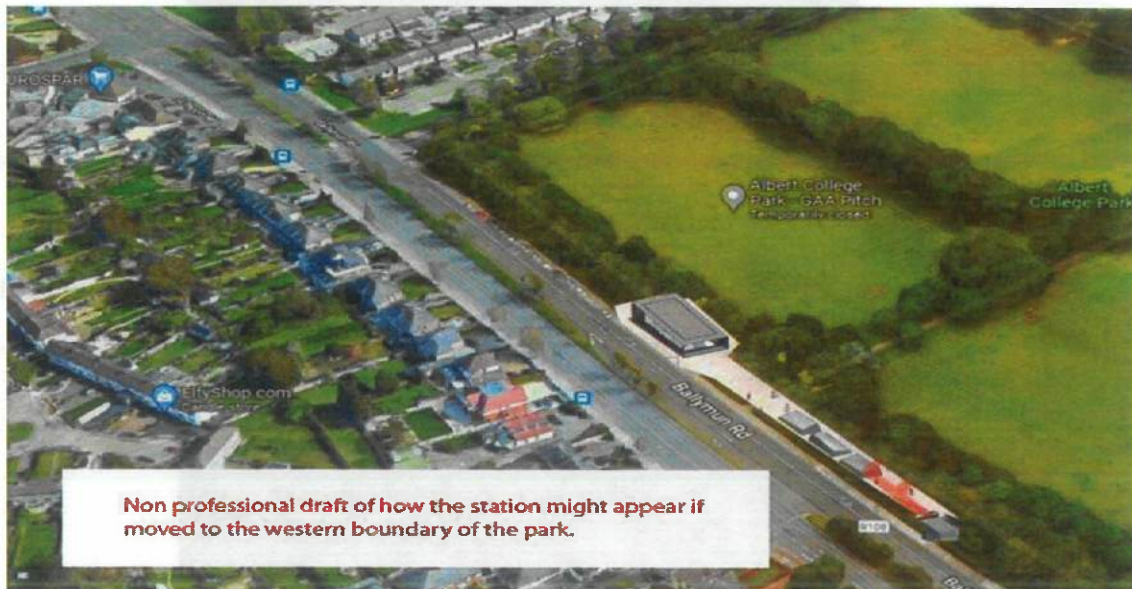
- a. Investigation, of the Albert College Park Residents Association (ACRA) proposal. This proposal is also strongly supported by one of the largest residents groups in the entire City :- Griffith Avenue and District Residents Association. (GADRA). The ACRA proposal points out that the 'Collins Avenue' Metro station is currently located in a very congested area, and will cause significant local hardship and issues for residents, schools etc. Thus, ACRA suggests the relocation southwards of the 'Collins Avenue' Metro station to the Ballymun road edge of Albert College park .

The ACRA proposal also suggests there are other non residential areas, further northward that could accommodate an intervention/vent shaft , if it was required.

Hampstead Avenue Residents, strongly support this fair and balanced proposal by ACRA. We believe that if proper consideration was afforded to residents opinion in the directly affected areas, the vast majority would support this option.

Thus, we are astonished that TII/NTA thus far, have not held open and fair discussion/consultation in relation to this proposal and perhaps other ideas.

See Fig below:-



- b. Investigate the possibility to change the proposed Intervention shaft in Albert College Park for a Metro station. A Metro station will have the same function as an intervention shaft, but importantly it will be a high value 'transport amenity' for our community and surrounds. The presence of a local Metro station will future proof the area in anticipation of imminent development (example:- a nearby 10 acre development site at DCU lands in Eustace's Estate off Griffith Avenue.)

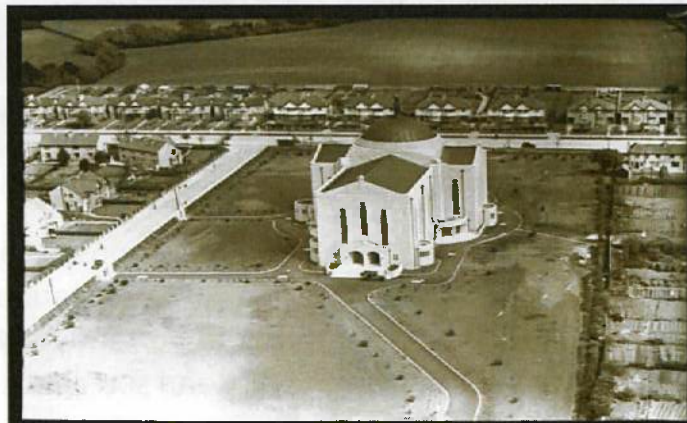
In Summary: A station would fulfil all of the safety criteria of the shaft, and would meet the zoning requirements, and would benefit the local area. Additionally we believe there is a clear and distinct lack of future planning here . eg:- If this 'proposed shaft' was made a station for future use. There is a precedent! – it could act in the manner of Dardistown to remain inactive until these sites are developed.

Refer to the picture below. The 'red' outlined area, indicates the pending 10Acre development site in the vicinity of Albert College Park. Also, as you can see from this picture below (and also from the introduction picture at the start of this submission) there are additional huge areas of undeveloped privately owned land (green/brown areas) that may be developed in future years.

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Dublin 9



Below 1930's picture, – it's of the same area as in the picture above (but its taken north facing). Note the large residential development in the area, since then!



The Key point to the Inspector is:- We strongly believe that there were other real alternatives to an 'intervention/vent shaft, and its associated car park', being located in Albert College Park. Consultations should have taken place in relation to all possible options. These should have been presented and evaluated accurately fairly and openly by TII/NTA. However, it seems to us that TII/NTA have exempted everything other than an intervention shaft. This, in our opinion has seriously degraded the much publicised and so called "consultation process. It is also a flawed approach on their behalf.

A ventilation and emergency shaft (with adjoining 'car park') is a totally useless structure for our residents. However, these same residents are expected to endure a severe disruption day and night continuously for possibly up to 10 years. In respect to a very major excavation site and associated heavy machinery works, located on their doorstep. Then after all this severe disruption -there will be NO local public amenity at the end to be enjoyed by residents and the many clubs and sporting groups

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Dublin 9

The current TII/NTA proposed ventilation/emergency shaft site is located just 15 to 20m from Hampstead Avenue. We strongly believe that if an intervention shaft is placed in the Park it will attract anti social elements (especially at night), as it will not have the constant policing, monitoring, maintenance and security and public attention afforded to a MetroStation.. Refer to the attached pictures of current buildings in Albert College Park, the nearby Fairview Park, and Griffith Park, covered in graffiti and looking unkempt. These buildings have been in this state for decades and there are numerous more examples. This has always be a flawed approach by developments. Let's not add one more! Albert College Park is one of the city's last remaining gold gems on the northside of Dublin.



Noise and Vibration

the TII/NTA proposed ventilation/emergency shaft site is located just 15 to 20m from Hampstead Avenue. We strongly believe that if an intervention shaft is placed in the Park it will attract anti social elements (especially at night), as it will not have the constant policing, monitoring, maintenance and security and public attention afforded to a MetroStation.. Refer to the attached pictures of current buildings in Albert College Park, the nearby Fairview Park, and Griffith Park, covered in graffiti and looking unkempt. These buildings have been in this state for decades and there are numerous more examples. This has always be a flawed approach by developments. Let's not add one more! Albert College Park is one of the city's last remaining gold gems on the northside of Dublin.



R.O. Condition REQUEST 2:- We call on the Inspector to instruct TII/NTA to adhere to the meaning of Consultation. Instruct TII/NTA to formally and openly investigate other potential options other than an Intervention /ventilation shaft for Albert College Park. All respective residents and stakeholders opinions should be part of this process equally and fairly. This should happen using up to date data such as current foot-fall statistics, journey modelling and future proof -projections. We strongly believe this should promptly happen and obviously prior to the Railway Order process advancing any further.

Additionally we ask the Inspector to request detailed information relating to the decision by TII/NTA of changing the proposed Metrolink tunnels from twin bore to single bore. This information should be made public. It has been requested by our residents association some time ago....Sadly, so far we have not attained an answer.

In respect to the EIAR.

The below text and points should not in any way be seen as an endorsement by Hampstead Residents for a vent/intervention shaft, in Albert College Park. We are totally against a needless vent/intervention shaft. The points we make, are relevant to any Metro structure located in the Park.

Noise and Vibration:-

The 'AZ4' (ie:- a Noise and vibration assessment zone) extends from a location south of the Northwood Portal to the tunnel termination located south of Charlemont Station, nine underground stations, and the Albert College Park Intervention shaft. Hampstead Avenue as previously stated lies within 15 to 20m of the proposed Metro link construction site in Albert College Park. There are

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NO intervening buildings or other structures that lie between Hampstead Avenue and the proposed Albert College Park site.

According to TII/NTA "The extent of the Noise and Vibration study area is typically up to 300m from each construction areas with a focus on sensitive receptors within 100m of construction areas which are those most impacted by the works based on modelling results. The closest NSLs to the compound in Albert College Park, are the residential dwellings along Hampstead Avenue (including 114 Ballymun road) to the south and residential properties across the R108 Ballymun Road to the west. (Ref EIAR AZ4 13.5.2.6.3)

In respect to the TII/NTA published EIAR Vol3 ENV Baseline noise and vibration, and with particular reference to geographical sections in 'Albert College Park' (Section AZ4 assessment zones) Unattended Location Daytime locations UT31 and UT32 (Table 13.30). These assessment zone locations are not in or next to Albert College Park. Thus there are NO baseline monitoring points which cover adequately the Hampstead Avenue receptors.


NOTE:- UT31 is a Paved area to the front of residential building off R108 in Whitehall! UT32 is a Green area within grounds of Special Education building off Ballymun Road in Ballygall! So UT31 and UT32 are on the other side of Ballymun road and very close to traffic noise. AT64 is not adequate either as its also located near to Ballymun road which is a large and busy road with four traffic lanes and two bus lanes!


So in summary:- there appears to be NO baseline noise data in the EIAR, for the entire length of Hampstead Avenue...even though the TII/NTA propose that Hampstead Avenue will be within meters of one of the biggest excavations and construction sites on the entire Metrolink line. Please refer to the below TII/NTA, - EIAR excerpts:-

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Unattended Location	Daytime dB L _{Aeq,15hr}	Daytime dB L _{A90,15hr}	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 _{den}
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
UT30	55	47	48	41	57	AT24	69	59	72
						AT25	65	56	68
						AT63	68	58	70
Albert College Park									
UT31	68	56	64	44	72	AT26	60	50	63
UT32	60	53	55	44	63	AT27	48	46	52
						AT28	69	62	71
						AT64	66	56	69
Griffith Park									

JH/16/9975NR02

Location	Equipment Set up
UT32 Green area within grounds of Special Education building off Ballymun Road in Ballygall	

Location	Equipment Set up
UT31 Paved area to front of residential building off R108 in Whitehall	

We find this absence of baseline noise locations, near sensitive receptors, absolutely unbelievable! It is our opinion any serious Noise and Vibration study

must have continuous sampling taken over a prolonged time period (eg 7 days) and on a 24x7 basis. There should be several sampling sites and they must be positioned close to local noise sensitive receptors ...ie:- residents houses located on Hampstead Avenue!

R.O. condition REQUEST 3: It is our opinion the baseline noise environment monitoring readings for Albert College park/Hampstead Avenue are incomplete/missing/fundamentally flawed. Based on this we have NO confidence in the EIAR presented noise and vibration study.

We request that the Inspector instructs that this study must be seriously reviewed/examined and performed again to provide valid and accurate empirical data. We strongly believe this condition s/b imposed as a condition of the Railway Order.

We 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.

In respect to the proposed Shaft/ Intervention Tunnel in AZ4 (Albert College Park) the EIAR outlines the following activities:- Advanced enabling & utility work/diversions, site preparation works , Piling works (D-wall/secant piles) , Excavation works & roof slab construction , Excavation (including blasting), Drilling, Breaking rock into smaller grades on-site prior to removal. There is potential for significant ground-borne and air borne noise, vibration and dust from all this activity.

In addition to the above we understand that TII/NTA proposes that there will be site lighting, water pumps, ventilation fans etc which are intended to operate on a 24/7 basis and may require generators. TII/NTA proposal, points out that night-time operation will be fully attenuated and/or enclosed to control noise emissions beyond the site boundaries to below the significance thresholds.

However, as per the EIAR, (Ref 13.6.1.2.6) "Monitoring During the Construction Phase" the contractor will be required to carry out noise and vibration monitoring at representative NSLs to evaluate and inform the requirement and/or implementation of noise and or vibration management measures. A full monitoring and auditing programme will form part of the CNVMP which will be agreed with the Local Authorities prior to the commencement of the Construction Phase. As a minimum the monitoring programme will include an alert system for exceeding thresholds, remote access and a platform for sharing monitoring results between the contractor, TII/NTA, DCC and FCC.

R.O. condition REQUEST 4: We request the Inspector ensures ALL respective residents must also be included in the above described 'report sharing system'. We strongly believe that in respect to mitigation for noise/dust/vibration etc...the paramount mitigation MUST be operational control (hours and periods). Attenuation targets, should aim to go far below 'significant thresholds', and in sympathy with proper baseline noise measurements. Deliveries, traffic movement, etc should be contained to working hours. It's critical that proper baseline measurements for All times of the day/week should be established. Calibrated and maintained Sensors s/b put in place (permanently -during construction phase) close to sensitive residential zones on Hampstead Avenue, to monitor noise, vibration, light, dust (air) etc. The above mentioned 'alert system' and live data from these sensors should also be made public ...or be freely available to selected residents representatives or independent experts (that the public can access). An appropriate penalty scheme should be in place in order to ensure contractors proper adherence. An appropriate fund should be 'ring fenced'... To finance (for example) cleaning of affected residents properties/windows from dust contamination, insulation from noise, cleaning roads, etc. These actions should be included in the Construction Environmental Management Plan (CEMP). We ask the Inspector that all these conditions s/b imposed as part of the Railway Order.

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

In respect to the proposed 'Intervention/ventilation shaft in Albert College Park', - when the Metro is operational. The ventilation part is to be used for extraction of heat produced by the trains in normal operation and, in case of an emergency, the smoke produced by a fire. Jet fans, located inside the tunnels help ventilation shafts drive the air longitudinally. We understand the key potential noise source relates to breakout noise from ventilation shafts and grilles at surface level. We understand that attenuators will be employed to mitigate negative noise effects. We believe there is a lack of detail provided in the EIAR in this area, relating to the operational monitoring and management.

In relation to dust/air emanating from the grilles, at surface level:-

In case of normal operation:- in our opinion the EIAR does not provide detail on how the hot air/fumes will be managed. eg:- during cold winter months hot air/fumes will meet the cold air outside and may cause plumes of 'smoke'. The

air grilles are proposed to be located close to many residential houses and adjacent to a very busy road (Ballymun road). Any potential 'plumes' could be dangerous to traffic. How will this hot air be managed, and will it be monitored using sensors/and filters for potential pollutants?

RO condition REQUEST 5: Calibrated and maintained Noise/Air/Vibration monitoring sensors should be integrated into the Albert College Park Metro structure at ground level , and constantly operating during the life of Metrolink. Data should be made public. This condition should be included in the Environmental Management Plan (EMP). This condition s/b imposed as part of the Railway Order

Public liaison:-

As stated in the EIAR, it is proposed "The Contractor will provide proactive community relations and will distribute information circulars informing people of the progress of works and any likely periods of significant noise and vibration . A designated noise liaison officer will be appointed to site during construction works. All noise complaints will be logged and followed up in a prompt fashion by the liaison officer."

RO condition Request 6: The above 3rd party only 'community relations' is simply NOT good enough! We formally request the TII/NTA are part of this, and they also provide an escalation point within TII/NTA itself. The TII/NTA contact should also be available on a 24x7 basis, and answerable to senior management level within TII/NTA. They should be permanent TII/NTA staff members. A trouble ticket system should be employed that is fully transparent between contractor/TII/NTA and the residents. The trouble ticket system, should be of 'Customer Service industry ' standard and ISO (International Standards Organisation) accredited. However, the ultimate overall responsibility must remain with our elected representatives and the appropriate Government department.

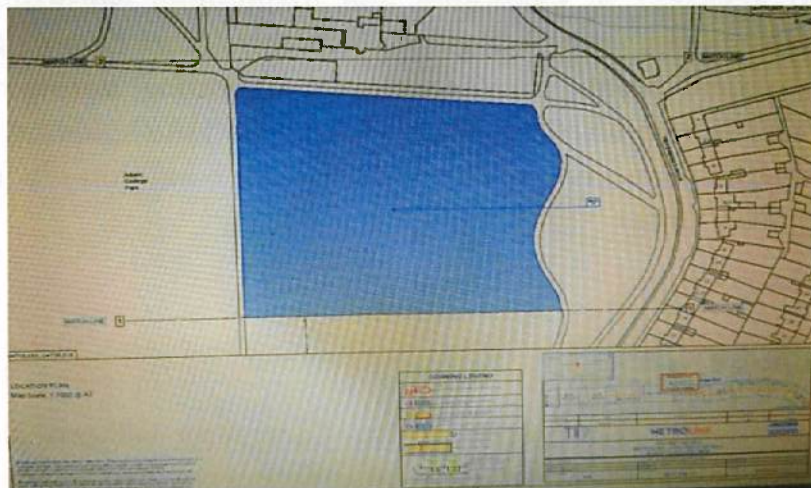
We firmly believe that a Metrolink 'Residential Monitoring Group', should be set up ASAP, which will have influence and be formally supported by government. Additionally a 'Community fund' must be created in order to give something back!

We request strongly that these condition s/b imposed as part of the Railway Order

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10 Hampstead Ave
Dublin 9

'Temporary land take' -proposed for Albert College Park :-

Please refer to the construction compound as defined in detail in the Construction Report (page 94 and 95 of Vol.5, Chapter 5, A5.3). Ref the dark blue areas in the below three figs.



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Dublin 9

According to Linda Carroll (TII staff)“The construction of the proposed ventilation shaft and emergency access at Albert College Park will require a reconfiguration of the existing pitches in proximity to the ventilation shaft site. As such, the sections of parkland are being temporarily acquired under the Railway Order to allow for the relining of the pitches only and not for use during the construction stages. Some fencing may be required during the relining works but otherwise these lands will not be fenced off.”

In respect to these dark blue areas:- they don't just cover 'existing pitches' they also include woodland and hedging (approximately 35 meters deep), which grows north of and adjoins the 'winding footpath' that runs in parallel to Hampstead Avenue. This significant amount of mature trees and hedgerows are clearly NOT part of the current football pitch set-up in Albert College Park, but are obviously included by the TII/NTA in the 'Proposed Temporary site'.

We totally reject any aspiration of TII/NTA to incorporate this band of trees and hedging into a proposed new football pitch alignment/reconfiguration.

Ref:- the below four pictures of this strip of Trees and Hedgerow:-





RO condition Request 7:- We believe the Inspector should include an exact condition on this (or any) 'extra land use' in the Railway Order. In this particular instance... this land in the 'shaded dark blue area' in referenced appendix maps above, is specifically allocated for football pitch re-instatement and should not at any stage during the build process be used for temporary construction, storage or support uses for any Metrolink facility in Albert College Park.

NOTE:- In the above R.O. condition it must also include:- that any trees and hedging that are within the dark blue areas above (ie:- areas not currently in football pitch use) should remain untouched, and fully protected.

Hydrogeology and the management of flood risk:-

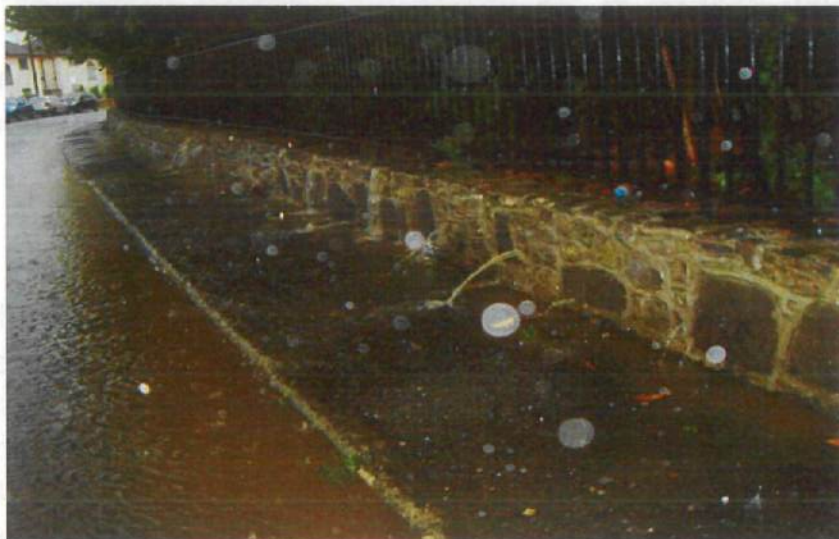
The water table is very close to the surface at Hampstead Avenue. Properties on Hampstead Avenue have been threatened in the past by flood water flowing from the higher gradient of Albert College Park. Dublin City Council (DCC) have installed special large flood gullies/drains in the Park. Despite these drains flood water continues to gather on the Avenue. Substantial soil and clay will be disturbed and moved during excavations and during the proposed football pitch re-location, etc. All this will simply compound the local flooding risk . The EIAR mentions water gathering/holding etc, but lacks detail in exactly how flood

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water will be managed in the specific area of the currently installed DCC flood drains in Albert College Park and directly adjacent to Hampstead Avenue.



The picture below shows flood water from Albert College Park, pouring through the stone wall, flooding onto Hampstead Avenue.



The picture below shows 'extra large storm drains' installed by DCC in Albert College Park.



R.O. condition Request 8: We believe the Inspector should request TII to include a condition in the R.O. detailed plans on how run-off water, or disturbed underground water (pools/streams/rivers), will be managed in the area as specified above, and in consideration of the serious flood risk to residential properties.

Management of potential Rodent infestation:-

Over the last numerous years, DCC have requested the HSE (Health Service Executive) pest control team to install and manage numerous pest (rodent) 'baiting points' in Albert College Park. Due to planned Metro link activity in the park (including potential football pitch 're alignments'), substantial soil and clay and hedgerow will be disturbed and moved during excavations. All this will likely disturb the local rodent population. The EIAR lacks detail in exactly how TII/NTA proposes to monitor and manage potential rodent 'migration' due to the major earth works proposed for Albert College Park.

R.O. condition Request 9: We believe the Inspector should request TII/NTA to include a condition in the R.O. requiring TII/NTA to detail plans on rodent management.

Fire , emergencies and drills:-

In case of a fire:- there is huge potential for massive amounts of dangerous and toxic smoke and associated noise emanating from grilles in the proposed (or any) Albert College Park Metrolink structure , -when emergency fans are activated. The Inspector must consider the fact that the proposed compound is currently planned to be extremely close :- 15 to 20 meters from residential

houses on Hampstead Avenue! In our opinion:- the EIAR does not provide details on what mitigation measures will be taken in respect to toxic smoke/fumes. eg:- How will such toxic fumes be managed/filtered? The EIAR does not provide details on how a fire situation or emergency would (or may be) managed. eg:- could local residents be evacuated from their homes, or what is the procedure for fire drills etc?

R.O. condition Request 10:- We believe the Inspector should request TII to include a condition in the R.O. requiring TII/NTA to detail plans on toxic fumes management, and fire/emergency/evacuation procedures and plans.

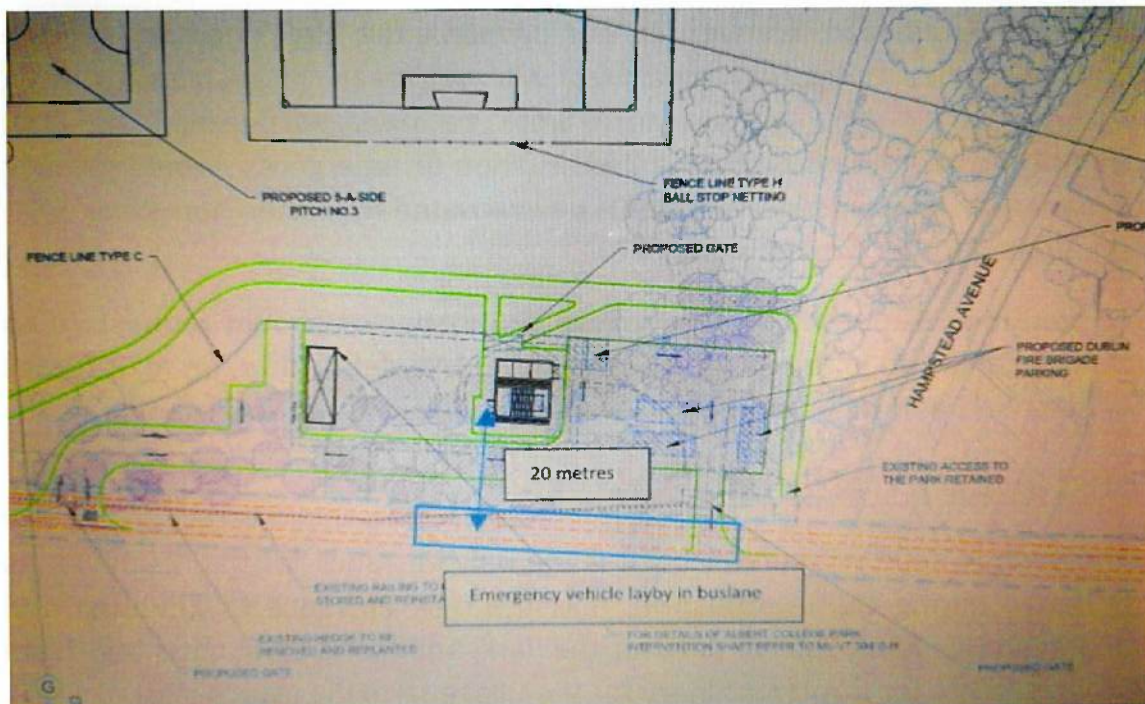
Construction Traffic and Parking:-

Hampstead Avenue is a cul-de-sac. It is the only entrance for the residents. As mentioned during the Introduction, it is the only entrance to Elmhurst and Hampstead Hospitals, the car park for the Park, and facilities, such as the 'Tram cafe' and access for farm machinery for the tillage farm in Eustace's estate, park users (via car), etc. Unhindered access to the avenue is essential at all time.

Parking is a contentious issue in the general area. In the case of Hampstead Avenue..it is only 6m wide and has double yellow lines along the entirety of one side. Residents are concerned that any Metrolink construction site will compound the parking problem, as workers/agents/visitors etc, who do not or cannot use public transport, will look locally to park. The EIAR is very weak on how these situations will be managed, and to be honest very gullible in proposing that all folks that work or want access to an Albert College Park Metrolink site, will use public transport.

In relation to the indicated 'car park area' for the proposed Albert College park intervention shaft. There is an extensive hard shoulder along Ballymun road. This hard shoulder lies within the '20 meters rule' from the proposed structure's entrance. The use of this strip of ground (blue rectangle in picture below), would satisfy best international standards for emergency parking and thus reduce land take from Albert College Park..ie:- the proposed fire brigade spaces could remain parkland.

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The key advantage of moving emergency vehicle parking onto the hard shoulder is that the area 'freed up' can remain parkland and retain the area for trees and hedgerow. Public Parkland is an incredibly important asset for ALL residents of our City. All efforts should be made to preserve every inch of it, as we will not get any more! Refer to the picture below, of the area that can be 'preserved in Parkland', if the 'emergency vehicles' parking gets moved to the hard-shoulder. Its astonishing that the TII/NTA have not incorporated this from the outset. It again proves the total disconnect that TII/NTA have with our residents!



R.O. condition request 11: We strongly believe the Inspector should include a condition in the R.O. requiring TII/NTA to detail plans of any potential traffic restrictions/management at the Hampstead Ave intersection with Ballymun road, and provide a realistic solution to how parking will be managed for those Metrolink workers (visitors or associates) that do not use public transport.

Additionally we strongly object to any Metrolink emergency exit or any proposed site access onto Hampstead Avenue.

We believe that the inspector must also include the following condition in the R.O. The Ballymun road hard shoulder must be used as an emergency vehicle parking area, for any Metrolink structure placed in Albert College Park, and thus eliminate the need for a 'car park'/emergency vehicle parking -within the park.

Non disclosure of information and enforcement

Throughout the life of Metrolink project thus far, there are many examples where we feel the TII/NTA have behaved poorly, were very slow at providing information (until forcefully requested under FOI), and had in fact shown some indifference for our residents.

Just some examples:-

1. TII/NTA hit our residents with a 'surprise bombshell'- of a 'hand drawn sketch' of a proposed intervention shaft for Albert College Park. This happened just two days before the Preferred Route 'consultation' deadline of 21st May 2019. An extension was formally requested by our Residents Associations, in order that basic and reasonable consultation on this proposed new structure could happen. Astonishingly, this very reasonable request, was refused by TII/NTA.
2. The NTA/TII refused to release the submissions made during the TII/NTA pseudo 'consultation' in Feb 2020. This request - the local residents association (GADRA) made under (FOI) Freedom Of Information. GADRA had to complain to the Information Commissioner who upheld GADRA's complaint requiring that the above mentioned data was to be (finally) released to GADRA.

3. Some weeks ago TII/NTA formally submitted 'All' the Metrolink R.O. application documentation (1000's of technical pages) in order that the public could review and then make submissions by 17.30hrs on 25th November 2022. The local residents association (GADRA) had to lobby to get paper copies of the submission placed in certain public places such as local Libraries, as some residents do not have internet access.
4. The local residents Association (GADRA) requested for an extension to the public submission deadline of 25th November. This was refused by TII/NTA.
5. This week (16th November 2022) local residents on Hampstead Avenue observed Metrolink TII/NTA agents (Apex surveys) gathering more information pertaining to the proposed major Albert College Park, Metrolink site. The residents approached the TII/NTA agents and formally asked to view this information, as they were concerned that this new information was not in the public domain, and this 'new information' could potentially colour the residents submission. They were refused access to this information. Additionally the TII/NTA agents (Apex surveys) while doing this work, illegally parked with two wheels of their vehicle, on the footpath.

See photos below:

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Please see below an exact copy of two emails sent to TII/NTA (Tom Manning) requesting an explanation and extension of 25th November deadline, in order this new information can be reviewed by the public/residents. No reply from TII/NTA received (at time of posting submission).

.....
Metrolink data collection, ongoing.

Declan Campbell <declan.p.campbell@gmail.com>

Wed, Nov 16, 4:22 PM (3 days ago)

Hi Tom,

our residents on Hampstead Avenue, noticed activity at the intersection of Hampstead Avenue and Ballymun road this morning 16th Nov 2022.

The people involved wearing Hi-Vis jackets (Ref Pic1) indicated they were from Apex surveys and they said they were gathering information for the Metrolink project.

After a brief conversation with Ronan Hayes and Sarah Edgely (Apex) they both said that they were photographing the wall which is of 'historical significance'.

We find this hard to understand, as the wall in question at this corner was built approx 25 yrs ago and the lower section of wall plus modern galvanized railings that run along Hampstead Avenue were constructed and installed approx 15 yrs ago. Please note:- they were observed using a device that 'looked like' a camera and were likely photographing/ electronic recording/ or electronic sampling /measuring, and were pointing it directly into the park. (Ref Pic1)

We formally asked Ronan ...could we take a look at the 'pictures' they were taking. - Ronan refused this request!

We pointed out to the Apex personnel that several weeks ago TII/NTA, formally submitted numerous documents containing 1000's of sheets of text and technical drawings etc, as part of the R.O. application with An Bord Pleanala. The residents and stakeholders were currently trying to analyze this information already provided

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in order to make a Submission....and it now appears that new data and information is being gathered that may be relevant in order residents can make an informed and full submission.

Tom, can you please let us know:- a.) why is this new information being withheld from residents? and b.) what exactly is the purpose of this further information gathering, - which is obviously NOT part of the R.O. application -current process?
c.) are drones (by Apex or others under the remit of TII/NTA) being used over residents gardens and the Public Park without permission?

Also please note that TII/NTA's agents (Apex) are parking illegally on Hampstead Avenue. Please see Pic2 attached showing the Apex vehicle with two wheels on the footpath. This compounds to us the importance of enforcement of any conditions, by An Bord Pleanala.

Looking forward to your response.
Regards
Declan Campbell

.....
Declan Campbell <declan.p.campbell@gmail.com>

Fri, Nov 18, 3:37 PM (1
day ago)

Tom, please respond to my previous email from yesterday.

FYI...today the same Apex employees were at the same wall on Hampstead Avenue, this time, taking pictures of every brick in its entirety!

They were accompanied by a Mr Frank Fallon, who I understand is a construction supervisor employed by

TII/NTA. I approached Frank as the Apex team would not converse with me.

I again asked him why a wall that is not of any historical value was getting every brick

pictured and recorded, and requested from Frank to view the information/pictures.

Unfortunately Frank (despite being sent on site by TII/NTA) could not answer the question except say he was carrying out orders

as he understood there was conservation value in it, and say the data was Apex property, and thus, I could not see it.

This all does not bode well for future customer (the public) / supplier (TII/NTA) relationship, going forward on this Metrolink project.

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Tom, can you please explain (I repeat a and b from yesterdays email) :-

a.) why is this new information being withheld from residents? and b.) what exactly is the purpose of this further information gathering, -which is obviously NOT part of the R.O. application -current process?

c) Since the R.O. has not even started to go through planning stages, don't you think its arrogant on TII/NTA's behalf to continue gathering data

on a Metrolink structure in Albert College Park when the Inspector may deem serious changes are necessary...based on public submissions.. ?

d) I believe all this does not align with the statutory process, so I formally request that TII/NTA provide an extension to the public submission deadline of 25th November 2022, in order the public can review this new information being gathered - please respond?

Please get back to us ASAP. I have also asked Frank to contact you directly.

Regards

Declan Campbell

.....

As from the above email examples we hope the inspector can get a sense of our difficulty attaining, basic and reasonable information, understanding/flexibility, in a timely manner from the TII/NTA (and their agents).

R.O. condition request 12:- We request that the Inspector should include a governing clause in the R.O. on how the conditions themselves will be monitored and enforced.

Submission Closing statement:

Metrolink properly designed, managed and with genuine public buy-in (consultation) will be an enormous benefit for residents of Dublin city and all the visitors to our city for many years to come. This concept and project is one that ALL our residents support fully. The Irish Government (on behalf of the people

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of Ireland) tasked TII/NTA to scope, oversee design, consult and deliver this vision.

Our residents (most with fulltime jobs and other commitments) had an arduous task of trying to read through the Metrolink project 1000's of online pages (many technical). Our residents found it extremely stressful to try and understand exactly the implications of this highly technical and intrusive project, is going to have for their quality of life and that of their children and indeed their property, in the coming approx 10 years.

The independent expert (RINA) , while helpful, was provided far too late in this project phase. Disappointingly, residents involvement was excluded from the 'Scope of work' that the TII/NTA provided to RINA. Thus, the overall benefit of RINA to our residents was much subdued. As clearly outlined in the initial pages of this submission, we strongly believe that TII/NTA have failed in delivering proper 'consultation' in respect to the proposed Metrolink structure planned in our area. In addition we believe that the EIAR is incomplete and lacking in several aspects such as, noise sampling, reasoning for moving to single bore tunnel, reasoning for use of Z9 parkland for an intervention shaft/ car park, lack of proper definition of problem management, flood mitigation, emergency parking located within a public park, ...etc.

Thus, we believe the assigned Inspector will be burdened unduly with the addition of many conditions to the R.O.. and ensuring fairness for all citizens equally, while trying to expedite the planning process at the same time. However, we formally ask the Inspector to include all our conditions into the R.O.

However first of all, address the key issue of -lack of 'consultation' visited on our residents by the TII/NTA and thus ensure our residents are treated as equal, to other groups on the Metrolink route. It is with this objective that the "Hampstead residents CLG" was formed!

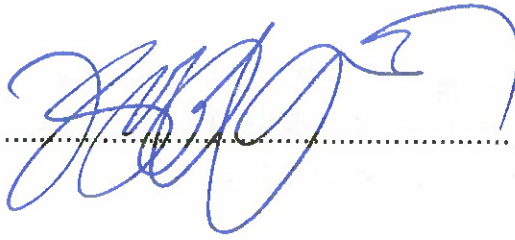
The 'Hampstead residents CLG', Mission statement:- the main formal objective of our Company is to achieve for our residents, the same basic right of consultation, as afforded to many other citizens/groups in the vicinity and along the Metro link line.

Signatures of Directors of Hampstead residents CLG:

Hampstead Residents CLG
10 Hampstead Ave
Dublin 9

Jonathan Griffin

Director



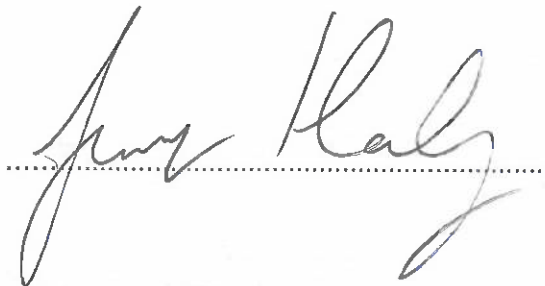
Declan Campbell

Director



Gerry Kealy

Director



The Signatures of the Residents (18+ yrs of age) of Hampstead Avenue that have fully read and support this attached Metrolink 'Hampstead residents CLG' submission.

NAME

ADDRESS

Patricia Walsh

1 Hampstead Avenue, Dublin 9

Deirdre Campbell

1 Hampstead Avenue, Glasnevin D9 DO9P034

Sada Simpson

3 HAMPSTEAD AV. D09 VY60

Thomas Simpson

3 HAMPSTEAD AVE D09 VY60

Brian Ross

5 Hampstead Ave. D09 E8X2

Joseph Gallagher

6 Hampstead Ave D09 DK 40

Luke Gaffney

2 Hampstead Avenue D09 F20

John Gaffney

2 Hampstead Avenue D09 F20S

Aidan Gaffney

2 Hampstead Avenue

Felicity Gaffney

2 Hampstead Av. Glasnevin D9

The Signatures of the Residents (18+ yrs of age) of Hampstead Avenue that have fully read and support this attached Metrolink 'Hampstead residents CLG' submission.

NAME

ADDRESS

<u>Marie Boughen</u>	<u>114 Ballymun Rd, D09C433</u>
<u>Glen Sze</u>	<u>114 Ballymun Rd, D09C433</u>
<u>Filme Lemun</u>	<u>14 Hampstead Ave D09F892</u>
<u>Julian King</u>	<u>14 HAMPSTEAD AVE D09F892</u>
<u>Patrick O'Farrell Donkraig</u>	<u>11 Ascension through BAE. J.</u>
<u>James F. Bergin</u>	<u>15 Hampstead Ave D.9.</u>
<u>Schiriz Bergin</u>	<u>15 Hampstead Ave, D.9.</u>
<u>B. J.</u>	<u>16 Hampstead Ave</u>
<u>Patricia B. B.</u>	<u>18 Hampstead Ave.</u>
<u>Lorraine Hanks</u>	<u>13 Hampstead Ave</u>
<u>Maria van Kampen</u>	<u>13 Hampstead Ave</u>

The Signatures of the Residents (18+ yrs of age) of Hampstead Avenue that have fully read and support this attached Metrolink 'Hampstead residents CLG' submission.

NAME	ADDRESS
Richard Carroll	4 Hampstead Ave.
Dorothy McGoffey	4 Hampstead Ave Dublin 9
Willy Clarke	7 HAM(STEAD AVE D9
Patricia Healy	9 Hampstead Ave D9
Terence Doyle	17 Hampstead Ave, D9
Joanna Gough	10 Hampstead Ave, D9
JOEL MORRIS	8A HAMPSHEAD AVE. D.9
Theresa	8A HAMPSHEAD AVE D.9
Cheryl	10 HAMPSHEAD AVE.
Frank Skay	12 Hampstead Ave Glasnevin D9X072
Clare Kelly	12 Hampstead Ave D9X072

