

Submission No.	19
Organisation Name or Name of Submitter	Berkeley Road Services and Traders Association (BSTA)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
-----------------	---------------------	-----------------	------------------------------	---------------------

On behalf of the Berkeley Road Services and Traders Association (BSTA), we would like to make the following submission identifying our concerns regarding the proposed metro link project.

1	BSTA Concerns	3	<p>While we anticipate that the proposed development will be a major benefit to our area we do have concerns as to how this can be achieved in an effective and timely manner with minimal disruptions on our businesses. It is inevitable that there will be major issues re. availability of parking, the disruption with the noise and vibration, access for our clients and customers to our services and businesses, the impact of dust on our premises both internal and external and hence the added expense of dealing with this issue, any potential disruption in the supply of water and electricity will require the operation to close.</p>	<p>Programme</p> <p>As detailed in EIAR Chapter 5, MetroLink Construction Phase, the programme for the construction of the proposed Project has been optimised to minimise the duration of the Construction Phase in order to lessen the duration of potential environment impacts, while ensuring that the areas surrounding the work sites remain operational and functional. Work will run concurrently at all MetroLink site locations to ensure the Project is delivered in an effective and timely manner.</p> <p>Once a contractor has been appointed, TII will seek to further optimise the programme with a view to reducing the overall duration of works at the proposed Mater Station. TII will consult with BSTA and other stakeholders on any such proposals received from the contractor.</p> <p>Traffic Management</p> <p>Chapter 5 of the EIAR, MetroLink Construction Phase, explains that traffic management plans for the construction phase of the Project have been developed to minimise the impact on road users, and to maintain access to businesses and other premises. Prior to implementation, all traffic management measures will be agreed with the relevant local authority (FCC or DCC) and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. The design of traffic management measures and highways works is based on achieving the key objective of maintaining continual access to all properties during the works. Where necessary, a safe alternative route will be provided for pedestrians and vulnerable road users, such as children, and persons with restricted mobility, to maintain pedestrian access to premises. Where detour routes are required, these will be kept as short as possible and detour signage will be clear and easy to understand. All construction sites will be designed to be as unobtrusive as possible.</p> <p>EIAR Chapter 9, Traffic and Transport, section 9.7.1.2 includes for a Scheme Traffic Management Plan (STMP) to manage traffic movements during the construction phase to ensure traffic congestion is minimised. The Plan will include measures such as the establishment of Local Community forums which will cover areas local to each station, where stakeholders will have an opportunity to inform the traffic management element of the project. Other measures include the control of construction vehicles in terms of their hours of operation and restrictions on vehicle size and weight.</p> <p>Regards parking availability, this is also covered by the EIAR in Chapter 9, section 9.6.1.2.4.5, Parking and Loading Construction Impact Assessment, with particular detail provided in EIAR Appendix A9.5 Scheme Traffic Management Plan, section 7.7:</p> <p>There will be slight impacts for loading and parking during the Enabling Works associated with Mater Station. These are in the form of a loss of parking bays for both on street loading facilities and general parking. This loss of parking will at its peak be approximately 7 parking spaces, however generally only one or two spaces will be lost through the phasing of the work. During Phase 1 of the Main Works, the Pay and Display parking spaces along the eastern side of Berkeley Road will be removed, resulting in the removal of 12 on-street parking spaces. Approximately 5 on-street Pay and Display and Resident Permit parking spaces will be removed from the western side of Berkeley Road. A temporary location for the taxi rank will be agreed with DCC.</p> <p>During Phase 2 and 3 of the Main Works at Mater Station, the Pay and Display parking spaces along the eastern side of Berkeley Road will be removed. This will result in the removal of 12 on-street parking spaces. On the west side of Berkeley Road, five on-street Pay and Display and Resident Permit parking spaces will be removed as well as a loading bay that will be relocated.</p> <p>A summary of Mitigation Measures in Construction Phase are presented in Table 9.147 of the EIAR Chapter 9 (Traffic & Transport). The mitigation measure for Berkeley Road for general traffic, parking and loading is to monitor if closures are required at all stages of the construction phase, or if spaces can be reinstated temporarily throughout the works.</p>
---	---------------	---	--	--

Submission No.			19	
Organisation Name or Name of Submitter			Berkeley Road Services and Traders Association (BSTA)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
On behalf of the Berkeley Road Services and Traders Association (BSTA), we would like to make the following submission identifying our concerns regarding the proposed metro link project.				
		(1) continued		<p>Once MetroLink is operational, to accommodate the station entrance, the current footways and traffic lanes on Eccles Street will be realigned as part of the proposed Project. The realignment of Eccles Street, and the widening of the footway on Berkeley Road will result in the loss of on-street parking at both locations. Approximately 20 on-street parking spaces will be lost on Eccles Street, while approximately 14 spaces will be lost on Berkeley Road, due to the provision of a signalised crossing in proximity to the Station entrance. While there will be a loss of commercial and residential parking and loading infrastructure as a result of the proposed Project, the modal shift from road to public transport when the proposed Project is in place will reduce the overall demand on parking and loading facilities, thus reducing the severity of the impact.</p> <p>TII are committed to working with BSTA and the local business community to ensure that disruption to normal business operations are kept to a minimum.</p> <p>Noise and Vibration</p> <p>Potential impacts associated with noise and vibration during the construction and operational phase of MetroLink are addressed in EIAR Chapter 13, Airborne Noise & Vibration, with mitigation measures proposed where required. EIAR Chapter 14, Ground-borne Noise and Vibration includes the specific control measures proposed across the Project to control vibration sources with the potential to result in disturbance to building occupants or building damage.</p> <p>In summary:</p> <p>Airborne Noise and Vibration EIAR Appendix 14.5 Groundborne Noise and Vibration Blasting Modelling Results presents predicted groundborne noise and vibration levels during the construction phase of the project for buildings on Berkeley Road. The assessment of airborne noise and vibration during the construction of Mater Station includes the consideration of a number of receptors on Berkeley Road. Table 13.64 of Chapter 13 presents the potential significant airborne noise impacts, which includes receptors on Berkeley Road with predicted Moderate to Significant, and Significant to Very Significant impacts during some of the work phases. In order to manage and mitigate airborne noise, the Contractor will be required to set this out in their Construction Environmental Management Plan (CEMP), an outline of which is included in EIAR Appendix A5.1.</p> <p>Should an Enforceable Railway Order be granted by An Bord Pleanála, maximum permissible noise levels and limits on the hours of operation may be conditioned for the construction of MetroLink. Prior to the commencement of any construction works, a detailed noise assessment for each work site will be undertaken based on the most up to date information for each site. Additionally, the contractor undertaking the construction of the works will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228-1 (BSI 2014a).</p>

Submission No.	19
Organisation Name or Name of Submitter	Berkeley Road Services and Traders Association (BSTA)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
-----------------	---------------------	-----------------	------------------------------	---------------------

On behalf of the Berkeley Road Services and Traders Association (BSTA), we would like to make the following submission identifying our concerns regarding the proposed metro link project.

		(1) continued		<p>Groundborne Noise and Vibration Predicted levels of groundborne noise during TBM passage is up to 49 dB LASmax, which is above the 45 dB LASmax threshold, resulting in a significant impact during the relatively short duration of the TBM's passage.</p> <p>Predicted levels of groundborne vibration during TBM passage is 0.264 ms-1.75, which is lower than the Vibration Dose Value (VDV -which is a parameter that combines the magnitude of vibration and the time for which it occurs) Threshold Level of 1.0 ms-1.75, resulting in a not significant impact on building residents.</p> <p>Predicted levels of groundborne noise during the mechanical excavation of Mater Station is up to 35 dB LASmax, which is below the 40 dB LASmax threshold, resulting in a not significant impact.</p> <p>Predicted levels of groundborne vibration during mechanical excavation of Mater Station is 0.003 ms-1.75, which is lower than the VDV Threshold Level of 0.8 ms-1.75, resulting in a not significant impact on buildings or its residents.</p> <p>Predicted levels of vibration during blasting at Mater Station is up to 4.2 mm/s PPV, which is lower than the Threshold Level of 8 mm/s PPV, resulting in a not significant impact.</p> <p>Unfortunately, there are no effective methods available to reduce groundborne noise or vibration from the TBM at source, but noting that the duration of this impact will be temporary and of the order of up to two-weeks as the TBM passes. TII will undertake advanced consultation and stakeholder engagement to prepare people for the passing of the TBM.</p> <p>Air Quality</p> <p>EIAR Chapter 16, Air Quality, assesses the likely effects of the Project on Air Quality during the construction phase with mitigation measures proposed where required. Air Quality during the construction phase will be impacted by traffic and dust emissions resulting from construction activities at the Mater Station site from Earthworks, Construction and Trackout (Maximum Daily HGV Movements). Section 16.5.2.6, Regional Air Quality Assessment – Construction Phase Southern Peak Scenario, has assessed traffic emissions pre-mitigation as being overall Neutral, Not Significant and short-term.</p> <p>Table 16.44 presents a summary of predicted dust emission magnitudes from the main construction sites, the results for the Mater Station site being: - Earthworks - Large; - Construction - Small; - Trackout – Large;</p> <p>This has resulted in defining the site-specific mitigation level as High and thus mitigation will be required. A detailed list of Dust Mitigation Best Practice Measures for each construction activity is presented in Appendix 16.4 Dust Management Plan.</p> <p>Before commencing relevant works, an Air Quality Management Plan will be prepared, considering the air quality assessment undertaken and any conditions imposed by An Bord Pleanála, and submitted for approval to the relevant local authority, in this case DCC. The plan will include all appropriate dust and emissions mitigation measures applicable to the circumstances of the relevant site, based on the local authority requirements and industry best practices. A plan will be developed by the contractor for each worksite, including Mater.</p> <p>Strict dust prevention will be in place at all times to minimise any potential emissions and these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.</p> <p>Where it is clearly demonstrated that excessive dust gathering on the external surfaces of business properties is a consequence of MetroLink works, the contractor will be required to engage with BSTA and other business representatives to affect a clean up of the affected area.</p>
--	--	---------------	--	---

Submission No.	19
Organisation Name or Name of Submitter	Berkeley Road Services and Traders Association (BSTA)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
-----------------	---------------------	-----------------	------------------------------	---------------------

On behalf of the Berkeley Road Services and Traders Association (BSTA), we would like to make the following submission identifying our concerns regarding the proposed metro link project.

			(1) continued	<p>Utilities</p> <p>Chapter 22 of the EIAR assesses the impact of the proposed Project on Infrastructure and Utilities during the construction phase, with mitigation measures proposed where required. Construction works required to divert utilities have been detailed in Chapter 5 (MetroLink Construction Phase). Where there is interaction between the proposed Project and existing infrastructure, the locations of the interactions have been identified and planned for, and therefore the potential for service disruption is limited.</p> <p>Utility diversions and any required strengthening works will most likely be undertaken as part of the Enabling Works, prior to commencement of the Main Civil Works. In some cases, planned service disruptions will be required to facilitate the connection of existing services to the newly diverted services. In such cases, consultation with and cognisance of the requirements of those premises served by the utility will be taken in determining the type, duration and phasing of the planned disruption. The duration of service interruption will be agreed with the relevant utility provider, in accordance with their service level/business requirements, however in most cases the duration of disruption should be no more than a number of hours.</p> <p>TII/NTA do not have a policy of compensation for local business for disruption during the construction stage. As with the installation of Luas line throughout the City, TII believe that any short term disruption to businesses during the works is offset by the eventual benefits of owning and operating a business in close proximity to a Luas or in this case Metro line.</p>
2	BSTA Concerns	3	In addition the presence of hoarding on the street while providing a function for the construction company will have an antibusiness effect which needs to be addressed. We need to ensure that our business remain viable and can survive through this period with support financially and otherwise, we are not prepared to be sacrificial lambs for the greater good.	<p>As identified in EIAR Appendix A9.5, pedestrian routes will be maintained throughout the construction period around the construction sites.</p> <p>Designated access and pedestrian routes around the construction sites, particularly at and/or along the hoarding lines will be designed so that it is not perceived as uninviting by pedestrians. The environment around the sites will be designed to ensure that pedestrians feel they are entering a safe and accessible environment. This will ensure that the impact to businesses and shops adjacent to the works areas is minimised. Temporary pathways will be installed where appropriate, and provision will be made to ensure access for persons with restricted mobility is maintained. Where the existing level of service cannot be maintained in the vicinity of a construction site, an alternative route will be provided. This route will be clearly signed, visible, and safe, and will provide a level of service (capacity) required to cater for the pedestrian demand.</p> <p>TII will work closely with local business to ensure impacts to normal business operations are minimised and to ensure access to and visibility of local businesses are maintained where practical.</p>

Submission No.	19
Organisation Name or Name of Submitter	Berkeley Road Services and Traders Association (BSTA)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
-----------------	---------------------	-----------------	------------------------------	---------------------

On behalf of the Berkeley Road Services and Traders Association (BSTA), we would like to make the following submission identifying our concerns regarding the proposed metro link project.

3	BSTA Requirements	3	<p>We require,</p> <p>1) Clarification on what exactly will be involved during the construction phase with its likely impact on the residences and businesses. The proposed plans to be presented in a simple non-technical manner. That our issues are addressed by planning stipulations put in place and are agreed by us. All possible remedies need to be available such as relocation or financial compensation.</p>	<p>The Non Technical Summary (submitted as part of the EIAR) provides an overview of the proposed plans in a simple non-technical manner.</p> <p>Potential impacts associated with the construction phase activities of the proposed Project on the residences and businesses are addressed in Chapter 11 (Population & Land Use) of the EIAR, with mitigation measures proposed where required. The construction site will be located in Four Masters Park. This will give rise to inconveniences and disturbances affecting activities and services at a localised level and Berkeley Street in particular. This includes potential noise and vibration impacts from construction activities as detailed in Chapter 13 (Airborne Noise & Vibration) and Chapter 14 (Groundborne Noise & Vibration), disturbances to the local road network as detailed in Chapter 9 (Traffic & Transport), and dust risk as detailed in Chapter 16 (Air Quality).</p> <p>Measures to mitigate and monitor these impacts as a result of construction activity across the proposed Project are detailed in Chapter 5 (MetroLink Construction Phase) and summarised in Chapter 31 (Summaries of the Route Wide Mitigation & Monitoring Proposed). Please also refer to response (1) above that also summarises the assessed impacts and proposed mitigations.</p> <p>Additionally, the appointed contractor will prepare detailed design and construction methodologies in the form of a detailed Construction Environmental Management Plan (CEMP) to ensure all environmental impacts are managed and mitigated in accordance with the EIAR and Railway Order, assuming an Enforceable Railway Order is granted. This detailed CEMP(s) will be provided to DCC for consultation and approval in advance of any construction works on site. An Outline CEMP is included in Appendix A5.1 of the EIAR that will be developed further by the appointed contractors. Monitoring instrumentation will also be used throughout the works to monitor potential environmental impacts, including those discussed above to ensure that acceptable limits are not breached.</p> <p>TII/NTA do not have a policy of compensation for local business for disruption during the construction stage. As with the installation of Luas line throughout the City, TII believe that any short term disruption to businesses during the works is offset by the eventual benefits of owning and operating a business in close proximity to a Luas or in this case Metro line.</p>
---	-------------------	---	--	---

Submission No.		19		
Organisation Name or Name of Submitter		Berkeley Road Services and Traders Association (BSTA)		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
On behalf of the Berkeley Road Services and Traders Association (BSTA), we would like to make the following submission identifying our concerns regarding the proposed metro link project.				
4	BSTA Requirements	3	2) A mechanism such as an intermediate to be established to allow communication between the parties where concerns can be voiced and addressed.	It is TII's intention to continue to consult with Local Business and Residents through the establishment of local community forums for residents and local business forums for businesses.
5	BSTA Requirements	3	3) Issues to be addressed seriously and effectively taking into consideration the concerns of the residences and businesses.	TII have undertaken extensive consultation across the route of MetroLink and has listened carefully to the concerns of stakeholders and the community, as documented by EIA Chapter 8, as well as undertaking a detailed and an extensive Environmental Impact Assessment that identifies and addresses environmental concerns as evidenced by the submitted EIA, including proposed mitigations to reduce environmental impacts, that accompanies the MetroLink RO application. As mentioned early it is TII's intention to continue to consult with Local Business and Residents through the establishment of local community forums for residents and local business forums for businesses.
6	BSTA Concerns	3	To date there has been little or no attempt to involve the businesses in a manner that would allow them to fully understand the implications as to how this project is to be undertaken and the likely impact of same.	TII carried out extensive non statutory public consultation during the development of the Emerging Preferred and Preferred route development stage. In addition there have been several meetings with local residents during the development of preliminary design stage for the scheme. Since the submittal of the Railway Order Application TII have engaged with the local business community and explained the sequencing of works and environmental impacts as set out in the Railway Order submission. TII are committed to addressing the concerns of the local business community that are detailed in the BSTA submission and to continue to address their concerns throughout the projects construction stage through one on one engagement and through the soon to be established local business forum. TII confirm they will continue to liaise closely with BSTA to ensure they remain informed of MetroLink plans and disruption is kept to a minimum.
7	BSTA Concerns	3	With the publication of a voluminous technical document the planners of this undertaking appear to assume that all relevant questions would be addressed and that it could be taken as a "fait de comply". Hence we wish to give notice of our objection to the development until we are properly informed of the proposal and our concerns addressed.	TII would like to reassure BSTA that they do not consider this RO application a "fait de comply" and that TII respect the planning process and the need to respond to observations made against the planning application submitted. As noted by our response to (4) and (6) above, TII are committed to engaging with and listening to the views and concerns of BSTA, and working with BSTA to manage any impacts resulting from MetroLink construction.