

Date | 31 January 2025
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Your ref | ABP-314724-22

By Email: e.reilly@pleanala.ie
CC: k.mcgettigan@pleanala.ie; n.thornton@pleanala.ie

Eimear Reilly
Executive Officer
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Railway (Metrolink – Estuary to Charlemont Via Dublin airport) Order [2022] Metrolink. Estuary through Swords, Dublin airport, Ballymun, Glasnevin, City Centre to Charlemont, County Dublin
Our client: Transport Infrastructure Ireland (TII)

Dear An Bord Pleanála

We refer to your letter dated 14 November 2024 in which An Bord Pleanála under section 47D(1)(a) of the Transport (Railway Infrastructure) Act, 2001 (as amended) invited TII to respond to the submission made by Ms Joyce Kemper/Wild Ireland Defence (the **WID Submission**). We further refer to your letter dated 6 December 2024 in which you confirmed an extension of time to 31 January 2025. Please see **attached** our client's response, with appendices to follow via due to their size.

We are providing the Board with three “stand-alone” documents as follows:

1 **WID Response Document**

This document provides a comprehensive response to the points raised by Ms Joyce Kemper / Wild Ireland Defence in their submission. It is accompanied by several appendices and we have set these out for ease of reference:

- **Appendix A:** Wild Ireland Defence CLG and Ms Joyce-Kemper Submission to An Bord Pleanála dated 27 March 2024
- **Appendix B:** Matrices Assessment
- **Appendix C:** MetroLink PFAS Management Strategy for Dublin Airport Report (which in turn has a number of appendices)
- **Appendix D:** Review of Dublin Airport Campus Planning Applications

As noted above, the MetroLink PFAS Management Strategy for Dublin Airport Report is 33 pages and includes several appendices that contain further technical details (e.g. baseline data, construction phase information, a conceptual site model and assumptions, treatment options for soil and water, a PFAS Material Handling and Transport Strategy, operational phase details and an updated Environmental Impact Assessment Report).

2 Updated Cumulative Effects Assessment (CEA)

The CEA has been updated to 15 December 2024 to assist the Board in carrying out its assessment since the closing of the Oral Hearing.

3 Appropriate Assessment (AA) Update Report

This Report comprises an updated AA report and in-combination assessment from Scott Cawley. It addresses the concerns raised in the WID Submission and provides the Board with the most up-to-date information available to its Appropriate Assessment.

We will upload this documentation to the MetroLink RO website under two distinct headings: (i) Response to Wild Ireland Defence Submission and (ii) Updates to Cumulative Effects Assessment and Appropriate Assessment (AA) Update Report. Our client's consulting engineers (Jacobs) will arrange for hard copies of the documents referred to in this letter to be delivered to the Board's offices next week.

We trust that TII's response will assist An Bord Pleanála in its assessment of the issues raised by Ms Joyce Kemper/ Wild Ireland Defence.

Should you require any further information or clarification, please do not hesitate to contact Alan Roberts or Mark Thuillier of this office.

Yours faithfully



A&L Goodbody LLP

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