

Luas Finglas

Railway Order Statutory Consultation

Response to Submissions Received

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Acronyms Used

Acronym	Term
AASR	Appropriate Assessment Screening Report
AIA	Archaeological Impact Assessment
ALARP	As low as reasonably practicable
APAs	Action Planning Authorities
BIA	Basement Impact Assessment
BIM	Building Information Modelling
BTEG	Barry Transportation Egis Consortium
CAF	Common Appraisal Framework
CAP	Climate Action Plan
CCTV	Close circuit television
CDM	Cycle Design Manual
CDP	City Development Plan
CEMP	Construction Environmental Management Plan
CIE	Córas Iompair Éireann
CNVMP	Construction Noise and Vibration Management Plan
CoP	Code of Practice for Archaeology
CPO	Compulsory Purchase Order
CRR	Commission for Railway Regulation
CTMP	Construction Traffic Management Plan
DCC	Dublin City Council
DMURS	Design Manual for Urban Roads and Streets
DPPDC	DCC Drainage Planning, Policy and Development Control
DPROs	Disabled Persons Representative Organisations
DSU	Data Storage Unit
DTTaS	Department of Transport, Tourism and Sport
DWF	Discharged Water Flow
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
END	Environmental Noise Directive
EPA	Environmental Protection Agency
EPD	Environmental Protection Division
EPR	Emerging Preferred Route
ERO	Enforceable Railway Order
EU	European Union
FCC	Fingal County Council
FYRC	Finglas Youth Resource Centre

Acronym	Term
GDA	Greater Dublin Area
GDPR	General Data Protection Regulation
HGV	Heavy Good Vehicle
HSA	Health and Safety Authority
ICW	Integrated Constructed Wetland
LAP	Local Area Plan
LOD	Limits of Deviation
LRT	Light Rail Transit
LRV	Light Rail Vehicle
MANDs	Major Accidents and Disasters
MASP	Metropolitan Area Strategic Plan
MCA	Multi Criteria Analysis
MHGLH	Minister for Housing, Local Government and Heritage
NGA	National Graves Association
NGOs	Non-Governmental Organisations
NIAH	National Inventory of Architectural Heritage
NIS	Natura Impact Statement
NMBs	Noise Mapping Bodies
NMS	National Monuments Service
NMU	Non-Motorised Users
NSPC	Non-Statutory Public Consultation
NTA	National Transport Authority
NTS	Non-Technical Summary
OCS	Over Contact Systems
OHLE	Overhead line equipment
PR	Preferred Route
PSCS	Project Supervisor Construction Stage
PSDP	Project Supervisor Design Process
QIs	Qualifying Interests
RIAI	Royal Institute of the Architects in Ireland
RO	Railway Order
ROW	Right of Way
RPS	Record of Protected Structures
SCI	Special Conservation Interest
SDRAs	Strategic Development and Regeneration Areas
SPAs	Special Protection Areas
SUDS	Sustainable Urban Drainage Systems
SWMP	Surface Water Management Plan

Acronym	Term
TAG	Transport Advisory Group
TII	Transport Infrastructure Ireland
VVI	Voice of Vision Impairment
WHO	World Health Organisation
ZAP	Zone of Archaeological Potential

Executive Summary

Submissions Received

The Luas Finglas Railway Order Statutory Public Consultation took place from 22 November 2024 to 20 January 2025. On 5th February 2025, An Bord Pleanála issued 46 documents to Transport Infrastructure Ireland (TII), comprising over 597 pages of unique individual submissions containing observations made in response to the Luas Finglas Railway Order application. TII appreciates the time and effort spent by all third parties in preparing these submissions. Each submission has been thoroughly reviewed, and TII has endeavoured to address the issues raised appropriately.

The purpose of this document is to provide a summary overview of the submissions received and TII's responses to these submissions, as requested by An Bord Pleanála pursuant to Section 47D (1) of the Transport (Railway Infrastructure) Act 2001. Section 1 includes an introduction and the purpose of this document. Section 2 provides a reminder of the proposed Scheme as defined in the Environmental Impact Assessment Report (EIAR) and its benefits. Section 3 presents an overview of the issues raised during the statutory consultation. Section 4 contains a summary of TII's responses to the submissions, organized by thematic and geographic areas. Detailed individual responses to all 46 submissions are included in section 5.

To manage and respond to the volume of information received, submissions were grouped geographically and into six categories: (1) Statutory and public bodies; (2) Elected representatives; (3) Community associations/groups and NGOs; (4) Residents associations and groups, residential property owners, residents, and their representatives; (5) Business and commercial operations; and (6) Leisure Centres or Sport Clubs, Hospitals, Schools, or Universities. A qualitative analysis was conducted to understand the types, frequency, and geographic location of observations made. This analysis allowed us to group all submissions thematically and geographically to gain a clear understanding of the observations received (both positive and negative). This qualitative analysis has been used to inform the summary of observations and TII responses presented below in sections 3 and 4.

Analysis of Submissions

The submissions received, observations made, and the number of individuals represented demonstrate both a strong interest in and a good understanding of the proposed Scheme. Notably, 48% of all submissions expressed support for the proposed Scheme. While many submissions included concerns about perceived local issues, there is strong overall support for the proposed Scheme and the benefits it will deliver.

Submissions were received from a wide range of sources, with resident submissions accounting for 11% of all submissions received. Of the 46 submissions received, 23 (50%) were related to land take.

Broadly speaking, submissions were either strategic in nature (covering subjects such as transport planning, route selection, options and alternatives, consultation, planning policy, and accessibility) or specific to a location or local community. The latter tended to focus on specific environmental impacts (construction and operation) that may occur. Examples of subjects raised included program duration, noise and vibration, traffic and transport, land and property acquisition, landscape and visual impacts, and anti-social behaviour. There was inevitably some crossover between strategic and specific local observations; for example, land take may be linked to a recommendation for an alternative location.

The most common themes covered by submissions were focused on the consideration of alternatives, particularly for land take, and the potential impacts arising from the construction phase of the proposed Scheme.

TII Submissions

Each submission, along with the individual statements and observations it contains, has been carefully reviewed by TII. The main sections of this document provide a summary of TII's responses to the issues raised in those observations, organized by theme and geographic location in section 4. Where appropriate in these summary responses, TII has cross-referenced the application documents, particularly the EIAR, to assist the reader. Section 5 contains TII's response to each of the 46 submissions received.

Many observations raised common issues across the proposed Scheme. These have been grouped and addressed under the following headings: Strategy and Decisions, Construction Phase, Operational Phase, Strategic Planning, Railway Order (RO) Process, and RO Documentation. Where there are observations unique to a particular location, a summary response has been provided for that area.

The summary list below highlights some of the specific observations raised by submissions and TII's responses. This list is neither exhaustive nor detailed and is only intended to provide a high-level overview of some of the observations covered by the submissions received. For further detail, please refer to sections 4.2, 4.3, and 4.4, and section 5 of this document. TII would also like to emphasize that all submissions received in response to the RO application have been treated equally, regardless of the source or the overall number of observations received regarding a particular matter. The summary below should not be viewed as an indication of TII's assessed importance of the observations raised by submissions.

Summary of Responses to Route Wide Observations

- **Disturbance and Nuisance.** Noise, vibration, and traffic disturbances and nuisances will be addressed. The EIAR specifies that almost all construction-related impacts will be reduced to residual levels that will not cause significant disruption. Similarly, all operational impacts will be mitigated to levels that are not significant.
- **Excessive land and property take.** The planned acquisition of land and property has been thoroughly evaluated and aims to obtain only what is essential for the construction and operation of the proposed Scheme. Temporarily acquired land will be returned to the owner as soon as possible, and compensation will be provided for all land and property acquisitions in accordance with the applicable statutory compensation process.
- **Construction Timelines.** The construction schedule for the proposed Scheme has been optimised to balance the need for an adequate timeframe for construction with awareness of the potential environmental impact duration. The proposed working hours, along with the phased approach to the work, will ensure the proposed Scheme is completed efficiently and promptly.

Summary of Responses to Location Specific Observations

- **Disruption to Broome Bridge Road:** TII acknowledges that there will be some changes in internal vehicle movement or circulation to adjacent properties, representing a slight permanent negative impact. However, TII emphasises that the extent of land acquisition has been minimised as much as possible while still allowing sufficient space for cycle/pedestrian paths, the Luas tracks, and the continued two-way function of Broombridge Road. The proposed Scheme will bring positive impacts by increasing accessibility to public transport and providing additional means for access to active travel.
- **Disruption at Ravens Court:** TII has designed the LRT crossing outside Ravens Court to ensure adequate visibility for pedestrians. These measures comply with the Light Rail Safety and Standards Board (LRSSB) Non-Motorised LRT Crossing Guidance. LRVs will approach at low speeds near Ravens Court due to the tight curvature needed to join Mellowes Road, enhancing pedestrian safety. This design ensures that LRVs are more predictable and visible, reducing the risk of accidents.
- To mitigate noise and vibration, TII proposes using floating slab track in areas with tight curvature, such as near Ravens Court, as well as a solid 2-metre-high boundary wall incorporated into the design to screen Ravens Court from the Luas tracks. The noise impact at Ravens Court has been thoroughly assessed in the EIAR submitted with the RO. Mitigation measures, including the floating slab track, have been provided to ensure that the noise impact is not significant.

- **Disruption to Finglas Village.** The Finglas Village stop will be located within a new plaza in front of the Leisure Centre, creating an attractive, car-free environment. The loss of public parking is necessary to facilitate the Luas alignment and Finglas Village stop. In the longer term, the operational Luas will provide an alternative to car use. The proposed Scheme aims to enhance public transport connections and cycling infrastructure, making the Finglas Sports and Leisure Centre more accessible to a larger catchment area. The Luas Stop will have standard safety attributes and procedures common to all Luas stations. LRVs will operate at low speed near the Finglas Stop due to track curvature. The stop will be located within a safer, car-free environment of a new civic plaza, providing natural surveillance, good lighting, security cameras, and emergency help buttons. Increased activity will provide passive surveillance. The environment will be open, and the various services and facilities will be very visible from the stop, making them much easier to locate and access.

What Happens Next?

Should an Oral Hearing be called, TII will present the proposed Scheme, provide expert evidence as required by An Bord Pleanála, and respond to questions from those who make submissions at the Oral Hearing. Anyone who has made a submission is entitled to attend the Oral Hearing and pose questions to the Luas Team. The Luas Team continues to engage with stakeholders, and where agreements are reached regarding issues raised, An Bord Pleanála will be informed of any necessary changes to the RO Application in response to those issues.

1 Introduction and Document Purpose

1.1 Submission of Luas Finglas Railway Order Application (Planning Reference Number: NA29N.321278)

On 13 November 2024 newspaper notices were published providing notification of TII's intent to lodge Luas Finglas RO application on 18 November 2024, along with information on the Statutory Public Consultation process that would follow. This was immediately followed by writing to circa 350 property owner/occupiers that had been identified along the proposed Luas Finglas route that could potentially be impacted by Luas Finglas, providing information on the proposed Scheme, information relevant to their property, and a copy of the aforementioned newspaper notice.

On 18 November 2024, TII submitted the Luas Finglas RO Application to An Bord Pleanála that comprised of:

1. Application (Letter to An Bord Pleanála);
2. Draft Railway Order;
3. Railway Order Book of Reference;
4. Railway Order Plan / Drawings;
5. Environmental Impact Assessment (EIAR); and
6. Appropriate Assessment Screening Report (AASR) and Natura Impact Statement (NIS).

This information was also made available on the Luas Finglas Railway Order website, <https://www.luasfinglasro.ie/>, as well as the above items (2) to (6), being placed on display in hard copy for public inspection at the locations below for the duration of the RO Statutory Public Consultation:

- An Bord Pleanála's offices, 64 Marlborough Street, Dublin 1;
- Dublin City Council office at Civic Offices, Wood Quay, Dublin 8;
- Fingal County Council offices at County Hall, Main Street, Swords, County Dublin;
- Fingal County Council offices at Grove Road, Blanchardstown, Dublin 15.
- Transport Infrastructure Ireland offices at Parkgate Business Centre, Parkgate Street, Dublin 8; and
- National Transport Authority offices, Haymarket House, Haymarket, Dublin 7.

The RO Statutory Public Consultation was set at eight weeks to accommodate the Christmas holiday period.

On 5th February 2025, An Bord Pleanála issued to TII 46 unique individual submissions containing observations in relation to the Luas Finglas RO application.

1.2 Purpose of Document

The purpose of this document is to provide a summary overview and understanding of the submissions received and observations made in response to the RO application along with TII's responses to the individual submissions made, both in summary by thematic and geographic grouping, and individually. The document has been structured as follows:

- A summary of Luas Finglas and its predicted benefits, in Section 2;
- An overview of the submissions received and key observations, including how they have been reviewed and analysed, in Section 3;
- TII's summary response to submissions and observations received, based on both thematic and geographic grouping, in Section 4; and
- TII's responses to individual submissions received, in Section 5.

Where appropriate, cross reference (in the right-hand margin) has been made to key aspects of RO Application and the accompanying EIAR, NIS and Planning Report that relate to the responses provided to assist the reader.

1.3 Role of An Bord Pleanála under the Transport Railway Infrastructure Act 2001 (as amended) (the 2001 Act)

As An Bord Pleanála (herein after referred to as “the Board”) will be aware, applications for a RO under the 2001 Act are treated somewhat differently to typical planning applications. Before deciding on an application for a RO, the Board must consider, amongst other things, the following: the application, the draft RO and documents that accompanied the application, submissions received and TII’s response to them, the report of any oral hearing and recommendations (if any) of the Inspector, the likely consequences for the proper planning and sustainable development in the area in which it is proposed to carry out the railway works and for the environment of such works, as well as the matters referred to in section 143 of the Planning and Development Act 2000 as amended.

After considering these matters, having taken into account its reasoned conclusion, and being satisfied it remains up to date, then, if it is of opinion that the application should be granted, the Board will make an RO. That RO will authorise TII to construct, maintain, improve and, operate the railway or the railway works specified in the RO in such manner and subject to such conditions (including conditions regarding monitoring measures, parameters to be monitored and the duration of monitoring), modifications, restrictions and requirements (and on such other terms) as the Board thinks proper and specifies in the relevant schedule to the RO. Importantly, the 2001 Act vests a very wide discretion in the Board between the making of the initial application (which also includes the submission of a draft RO), and the granting of a RO. This flexibility and broad discretion are tempered by the fact that the Board must do so in such manner and subject to such conditions (including environmental conditions i.e. conditions regarding monitoring measures, parameters to be monitored and the duration of monitoring), modifications, restrictions and requirements (and on such other terms) as the Board thinks proper and then specifies in any RO granted.

1.4 Privacy and Personal Data

This document has been prepared in accordance with the EU General Data Protection Regulation 2016/679 (GDPR) and Data Protection Acts 1988 to 2018.

1.4.1 Property Details

In order to comply with legal and regulatory obligations in seeking a RO in respect of Luas Finglas, TII was required in accordance with Section 40 of the Transport (Railway Infrastructure Act) 2001 as amended to compile the owners, assumed owners and occupiers of lands impacted by the proposed Scheme (the “Book of Reference”) including by reference to property records (e.g. from the Land Registry and the Registry of Deeds). The Book of Reference is contained in the RO Application. This document was required to be displayed by TII for the public consultation period. As this public consultation period is now over, TII has removed this document from its public display areas (including its website).

1.4.2 Submissions to An Bord Pleanála

As part of the statutory public consultation process, submissions and/ or observations to the Board were furnished to TII for its response. Certain personal data has been voluntarily provided by those individuals who lodged submissions to the Board in accordance with RO Application process. In preparing documentation for the oral hearing, TII is required to show that it has responded to any submissions and observations to the Board. TII has had to refer to the name and address of persons making submissions and other personal data in their submission in order that the Board can identify which of TII’s responses relate to each submission.

TII confirms that the legal basis for processing this data is pursuant to Article 6(1)(e) of General Data Protection Regulation (GDPR) is where such processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in TII. Under section 11(1)(a) of the Transport (Railway Infrastructure) Act 2001, TII's functions include the provision of light railway and metro railway infrastructure. Ongoing stakeholder engagement is essential to the successful delivery of such metro railway infrastructure.

For further information on how TII collects and processes personal data and how it is used, please refer to Luas Finglas Data Protection Notice which is available through the Luas Finglas website www.luasfinglas.ie.

2 The Luas Finglas Scheme

2.1 Need for Luas Finglas

The Greater Dublin Area (GDA) must meet growing demand for public transport derived from population growth and to meet policy goals for sustainable mobility and climate action. Public transport is a key consideration in supporting the planning and supply of residential development required to meet Dublin's housing challenge. To avoid unsustainable urban sprawl associated with car dependency, improved public transport is required within the footprint of existing urban areas for the benefit of existing and future communities.

Luas Finglas addresses the urgent need for enhanced public transport capacity in the Finglas area, as identified in the Northwest Corridor Study and the GDA Transport Strategy. The study concluded that Light Rail Transit (LRT) is essential to support the sustainable growth of the area. The current public transport services are insufficient to meet future demand, and without intervention, increased road traffic congestion, unmet transport emissions targets, and reduced quality of life for residents are inevitable. The proposed Scheme is integral to Dublin's broader transport network, which includes MetroLink, BusConnects, and DART+, aiming to provide a reliable, integrated public transport system.

The proposed Scheme is crucial for accommodating the forecasted population growth in the Finglas study area, projected to reach 56,000 by 2040. It aims to address the challenges posed by increased transport demand, climate action targets, and the need for sustainable economic growth. The proposed Scheme will alleviate traffic congestion, reduce journey times, and improve the quality of life for residents. It aligns with national policies, including the National Development Plan and the Climate Action Plan, supporting Ireland's commitment to reducing greenhouse gas emissions by 51% by 2030 and achieving net zero by 2050.

The Luas Finglas Scheme is designed to support community regeneration and improve accessibility for all. It will connect more people to employment, education, and recreational services, particularly benefiting those without access to a car. The proposed Scheme will enhance the attractiveness of the area for developers, supporting higher-density and more sustainable development. It will also provide significant economic benefits by improving connectivity, reducing business costs, and boosting worker productivity. The proposed Scheme includes integrated cycle lanes and cycling infrastructure, promoting multimodal "cycle-LRT trips" and encouraging sustainable travel behaviours.

The proposed Scheme also emphasises the environmental benefits of reducing reliance on private cars. By offering a high-capacity, reliable public transport alternative, Luas Finglas will contribute to the decarbonization of transport, reducing harmful emissions and supporting Ireland's climate goals. The proposed Scheme includes extensive sustainability measures, such as the creation of ecological habitats and the integration of grass tracks to minimise visual impact. Overall, Luas Finglas is a vital infrastructure project that will support Dublin's sustainable growth, improve public transport capacity, and enhance the quality of life for residents.

2.2 Luas Finglas Overview

In January 2021, a Barry Transportation EGIS (BTegis) Consortium was appointed by TII to develop a preliminary design for the proposed Scheme and prepare the EIAR, AA Screening Report, NIS and all the required materials for the submission of a RO Application under Section 37 of the Transport (Railway Infrastructure) Act 2001 (as amended).

The proposed Scheme comprises a high-capacity, high-frequency light rail running from Broombridge to Charlestown, connecting Finglas and the surrounding areas with Dublin's wider public transport network by providing a reliable, and efficient public transport service to the city centre via Broombridge.

As shown in Figure 2-1, starting from Broombridge, the proposed Scheme travels northwards, crossing the Royal Canal and the Maynooth railway line adjacent to Broome Bridge. It then runs adjacent to the east of Broombridge Road and the Dublin Industrial Estate. It then crosses the Tolka Valley Park before reaching the proposed St Helena's Stop and then proceeds northwards towards the proposed Luas Finglas Village Stop. From here, the route passes through a new corridor created within the Finglas Garda Station car park, making its eastern turn onto Mellowes Road. The route then proceeds through Mellowes Park, crossing Finglas Road, towards the proposed St Margaret's Road Stop. Thereafter, the proposed line continues along St Margaret's Road before reaching the terminus Stop proposed at Charlestown.

The proposed Scheme has been designed to integrate with the existing and future transport network, providing connections with bus services at all new Stops, mainline rail services at Broombridge, and a Park and Ride facility to intercept traffic on the N/M2. In addition, the proposed Scheme through the inclusion of integrated cycle lanes and cycling infrastructure sets out to facilitate multimodal "cycle- light rail transit (LRT) trips" as a key aspect of the Luas Finglas scheme.

The overall proposed Scheme aims to deliver the following objectives:

- Serve existing and future transport demand;
- Provide a safe, frequent, reliable, efficient and sustainable public transport connection from Charlestown and St Margaret's Road (where it will also serve a strategic Park & Ride facility) to the city centre, via Finglas;
- Reduce public transport journey times between Charlestown, Finglas and the city centre compared to private car trips;
- Contribute to the Climate Action Plan targets for the decarbonisation of transport; and
- Promote economic growth for the residents and businesses of Charlestown, Finglas and the surrounding areas.

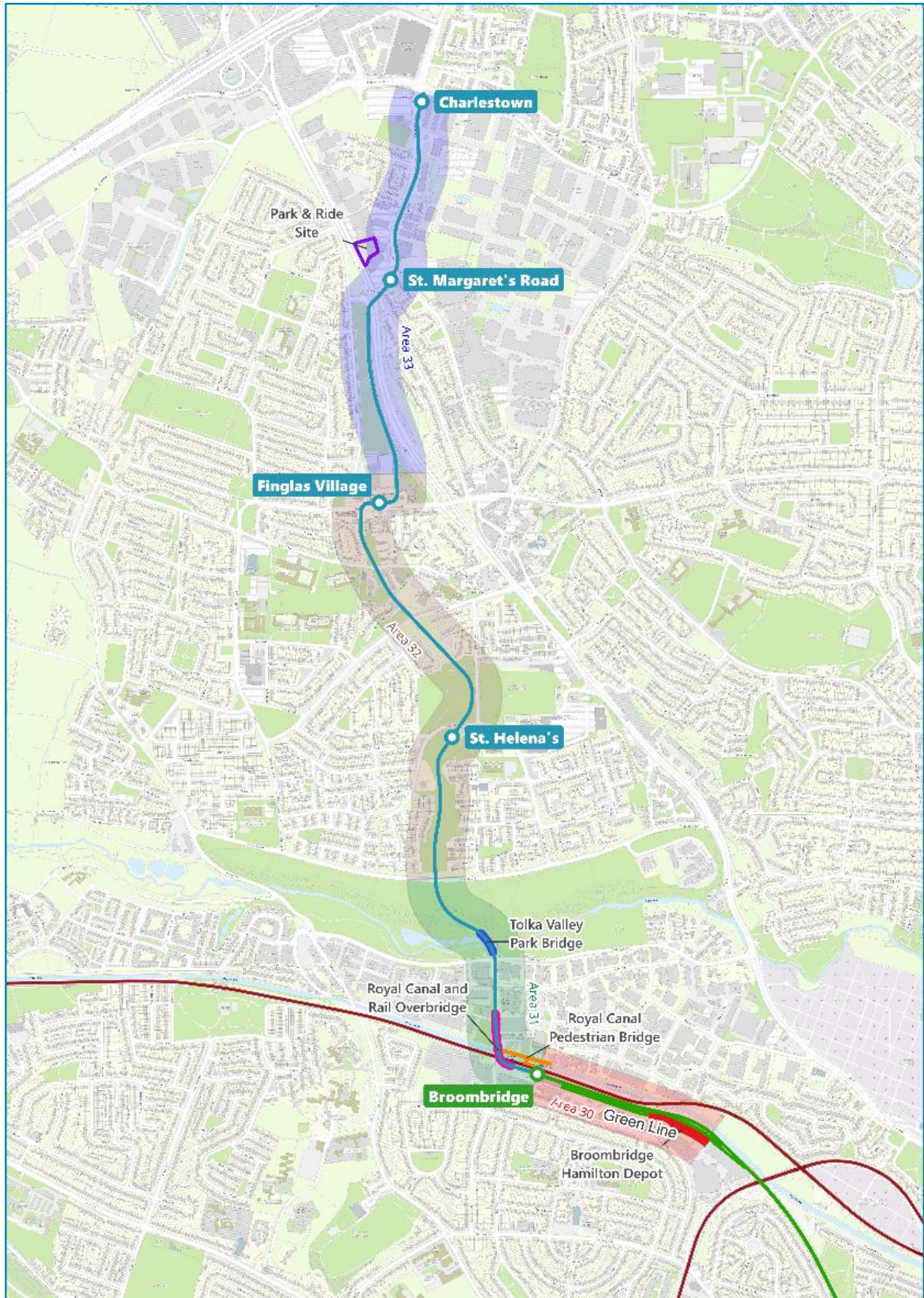


Figure 2-1 Map of Luas Finglas

2.3 Benefits of Luas Finglas

The Luas Finglas Scheme offers numerous benefits that address current and future transportation needs, while also supporting broader economic, environmental, and social objectives. The proposed Scheme will deliver economic, environmental and social benefits, including physical and psychological human health benefits, whilst making a significant positive contribution to reducing environmental emissions. It will offer:

- High frequency services with connections to other public transport modes;
- Sustainable transportation which will aid Ireland in meeting its Climate Goals;
- Provide capacity for transport demand within the study area, supporting existing and future development; and
- Improve accessibility to socially deprived areas within the study area by providing enhanced opportunities to access education and employment facilities.

2.3.1 Transportation Benefits

One of the primary advantages is the enhancement of public transport capacity in the Finglas area. As the population in this region is projected to grow significantly, the existing public transport network is insufficient to meet the anticipated demand. The Luas Finglas will provide a high-capacity, reliable, and efficient transport service, reducing journey times and congestion, and offering a viable alternative to private car use. This will help mitigate traffic congestion, reduce journey times, and improve the overall quality of life for residents. In its opening year (assumed to be 2035), it is estimated that Luas Finglas will contribute to an annual increase of around 3.7 million public transport boardings within its 1km catchment area. This is an increase of 46% when compared to a scenario without the delivery of Luas Finglas. Whilst some of these boardings will be interchanges from existing bus services, the Luas will support significantly higher levels of demand for public transport.

2.3.2 Environmental Benefits

Another significant benefit of the Luas Finglas is its contribution to environmental sustainability. By providing a sustainable transport option, the proposed Scheme supports Ireland's climate action goals, including the reduction of greenhouse gas emissions. The proposed Scheme is designed to facilitate a modal shift from private cars to public transport, thereby reducing the environmental impact of transportation. The integration of cycle lanes and pedestrian infrastructure along the route further promotes sustainable travel modes. The proposed Scheme aligns with national policies aimed at decarbonising transport and achieving net-zero emissions by 2050, contributing to a significant reduction in harmful emissions.

2.3.3 Economic Benefits

The economic impact of the Luas Finglas is also noteworthy. The proposed Scheme is expected to stimulate economic growth and support urban regeneration in the Finglas area. By improving connectivity and accessibility, it will attract investment and development, particularly in designated Strategic Development and Regeneration Areas (SDRAs) like Jamestown. The improved public transport infrastructure will make the area more attractive for residential and commercial development, leading to increased property values and higher-density, sustainable urban growth. Additionally, the proposed Scheme will create job opportunities during the construction phase and beyond, supporting local employment and economic vitality.

2.3.4 Social Benefits

Lastly, the Luas Finglas will enhance social inclusion and accessibility. The proposed Scheme will improve access to employment, education, and healthcare services for residents, particularly those in disadvantaged areas. The design of the proposed Scheme ensures high levels of accessibility for all users, including those with mobility impairments. By providing a reliable and efficient public transport service, the Luas Finglas will help reduce social exclusion and improve the quality of life for residents in the Finglas area. The inclusion of walking and cycling infrastructure will also encourage physical activity, contributing to better health and well-being for the community.

3 Overview of Submissions and Observations Received

Important: The observations quoted or represented in this document represent the views of persons and organisations who have made submissions, and do not necessarily reflect the views of Transport Infrastructure Ireland (TII) or imply that TII agrees or disagrees with submissions or observations made, except where a response is provided to an observation made. TII would also note that it does not attest to the accuracy of the details provided by submissions but have responded to observations made in good faith.

3.1 Introduction

Through the two non-statutory public consultation periods in July 2020 and December 2021 and individual stakeholder consultation meetings, the Luas Team has engaged with most affected parties along the route and has complied with the Aarhus Convention.

During the non-statutory public consultation on the Emerging Preferred Route from July 2020 to September 2020, over 600 submissions were received from affected parties, a further 363 submissions were received following the second non-statutory public consultation on the Preferred Route in December 2021. After each of these non-statutory consultations a 'consultation feedback report'¹² was published along with supporting documentation and the design was reviewed and refined. The EIAR Chapter 1³ provides further detail with regards these consultations.

<https://www.luasfinglas.ie/#consultation>

The purpose of this section is to explain the approach and methodology adopted to analyse the submissions received and provide an overview of what that analysis is showing. Section 4 provides a more granular level of detail in terms of the specific observations raised and TII response, whilst section 5 provides TII's specific responses to the issues raised by each of the individual submissions received.

At the conclusion of the RO Statutory Consultation, Luas Finglas received 46 submissions, of which some were one or two pages long while some submissions included more than 50 pages of text, maps, and drawings. Considering the scale of the proposed Scheme, and that circa 350 property owner/occupiers along the proposed route were written to notifying them of TII's intention to lodge the Luas Finglas RO application, it is perhaps noteworthy that 46 submissions received in response to the RO application is a relatively small number.

This is further contextualised in terms of scale by the fact that 14 submissions—representing 30% of all received—pertained to the proposed Scheme at St Margaret's Road/North Road. Additionally, 26% (12 individuals) of the submissions came from Public Bodies and Elected Representatives in support of the proposed scheme, while 19% (9 individuals) addressed concerns regarding the impact of Luas Finglas on residents at Ravens Court.

Overall, submissions received showed general support for Luas Finglas as a key solution for the regeneration of the Finglas area and addressing the lack of investment in local public transport network in the area. They also highlighted its significant contribution to climate action and reducing Dublin's carbon footprint, while reflecting a strong awareness of Luas Finglas, its benefits and potential impacts. However,

¹ EPR Consultation Report - EIAR Volume 5 - Appendix A1.1

² PR Consultation Report – EIAR Volume 5 - Appendix A1.2

³ EIAR Chapter 1, section 1.9.3, 1.9.4 and 1.9.6

some submissions were more critical, questioning the justification for the proposed Scheme, its current alignment and concerns regarding the local environmental impacts during both construction and operation.

3.2 Analysis Methodology

This section summarises the approach taken to help analyse and understand the submissions received.

3.2.1 Geographic Division of the Luas Finglas Route

The analysis of the submissions received parallels the structure of the submitted EIAR, both in terms of thematic analysis, namely the EIAR Chapters and geographic division of the route as defined by the EIAR 'Areas'. This is to ensure that the review and analysis of submissions received is aligned with the submitted RO application and the analysis presented in the EIAR. It also helps to improve the understanding of observations, both supportive and otherwise, based on the locations they refer to along the alignment. These 'Areas' are illustrated and summarised below by Figure 3-1 and Table 3-1.

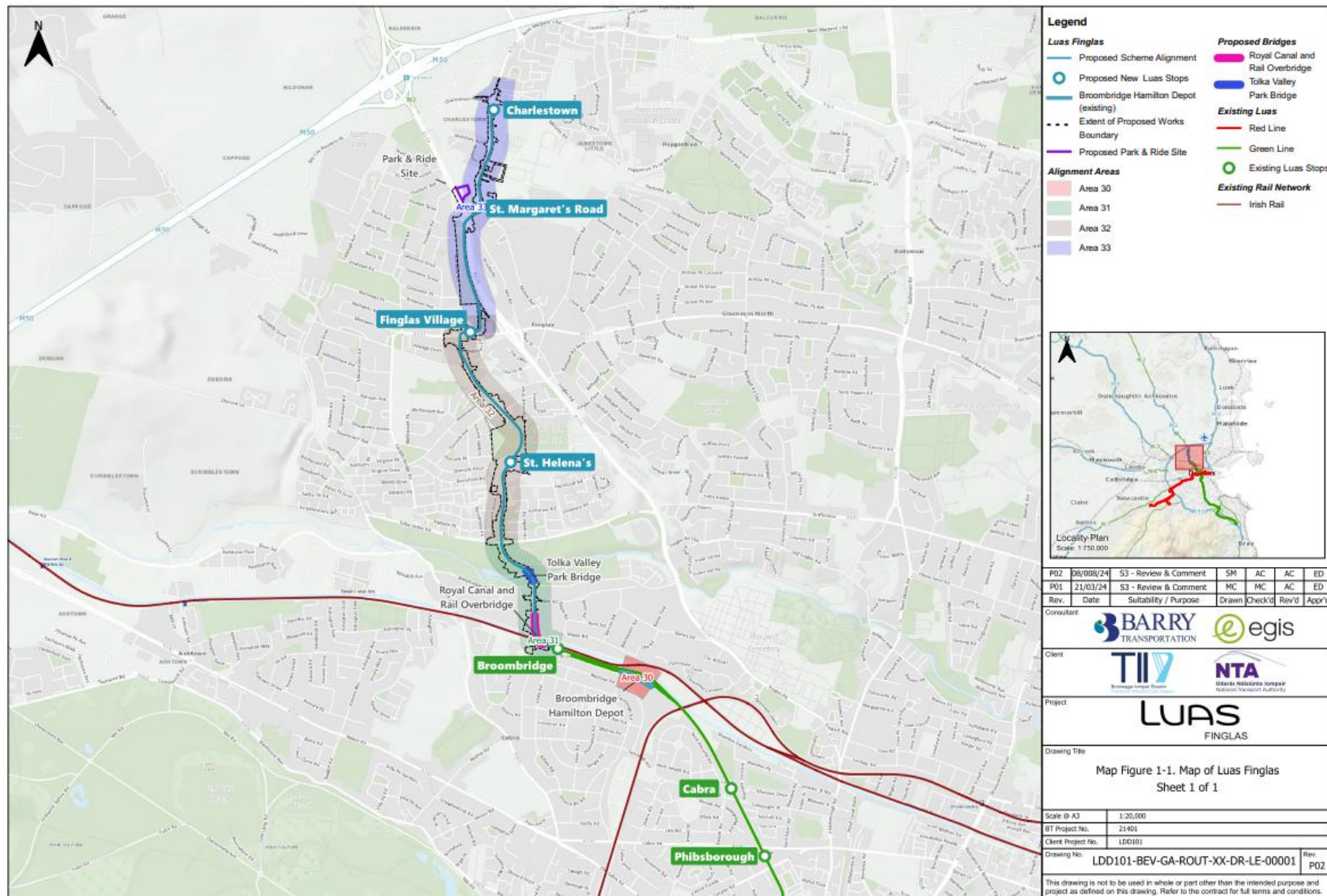


Figure 3-1: Geographical Division of Luas Finglas

Table 3-1: Geographical Division of Luas Finglas

Area	Geographical Section	Geographical Section Description
Area 30	Broombridge Depot	A previously industrial site, now overgrown, at Bannow Road was chosen for the additional stabling area. The site requires re-levelling, a retaining wall, and a new boundary fence. The facility will accommodate eight LRVs and include track modifications, lighting, signalling, water supply, and extended CCTV.
Area 31	Broombridge to Tolka Valley Road	This area is approximately 850m long, extending from the existing Luas Green Line at Broombridge to Tolka Valley Road. This section will include two major structures: the crossing of the existing Maynooth Railway line, Royal Canal and Greenway; and the crossing of Tolka Valley Park and River Tolka. No new Luas Stops are included in this section.
Area 32	Tolka Valley Road to Finglas Village Stop	This area is approximately 1.45km long including St Helena's Road, Patrickswell Place and Mellowes Road. There are two new Stops proposed in this area: St Helena's and Finglas Village Stop. This area also includes the first of two traction substations which are required for the extension of the system.
Area 33	North of Finglas Village Stop to the Terminus (Charlestown Stop).	This area is approximately 1.42km long including St Margaret's Road. There are two Stops in this area: St Margaret's Road and Charlestown terminus. This area also includes a major road junction with the N2, and the section along St Margaret's Road. A new Park & Ride facility will be established near St Margaret's Road.

3.2.2 Grouping of Submissions by Type or Organisation

To assist with managing and understanding the number of submissions received, interpreting the analysis and ensuring the necessary technical experts were deployed to review submissions, the submissions were categorised into one of the six groups below:

- Group 1: Statutory and Public Bodies;
- Group 2: Elected Representatives;
- Group 3: Community Associations / Groups, Non-Governmental Organisations (NGOs);
- Group 4: Residents associations and groups, residential property owners, residents and their representatives;
- Group 5: Business and commercial operations; and,
- Group 6: Leisure Centres or Sport Clubs, Hospitals, Schools or Universities.

3.2.3 Qualitative Analysis

A 'Coding' methodology was used to analyse the qualitative data contained within each submission to help with identifying the overall frequency, types, and geographic location of observations made, and thus their grouping thematically and geographically.

Every individual submission has been carefully read and examined and coded against the themes of the EIAR chapters and associated RO documentation, and the geographic areas described in section 3.2.1. It is common for several different codes to be assigned to a single submission reflecting that a submission will often make observations on a number of matters. This approach has enabled TII to complete a thematic and geographic analysis of the submissions received to develop an in depth understanding of the observations made and to enable detailed responses to individual submissions.

As noted previously, a large volume of written qualitative information has been received (over 600 pages) and thus the analysis of this information does present some challenges since it is not exact and precise in nature. For example, it is not uncommon for a sub-theme to appear across several headline themes. Therefore, it is important to consider what the data is indicating holistically across the whole analysis. Quoted

numbers should therefore be viewed in this context, recognising they are not generated by exact data and should be considered in terms of scale, in aggregate and relatively.

It is also important to remember that by way of example, whether TII has one observation concerning one subject, and in excess of 20 with regards to another subject, irrespective, both observations sets are treated with equal importance by TII. Therefore, while an indication of consensus or scale of views is of interest, it does not influence how TII deals with the matter. All observations are treated equally.

3.2.4 Reviewing and Responding to Individual Submissions

All 46 submissions have been reviewed and statements identified and extracted into a tabular format against which TII has provided a specific response to each observation made (see section 5).

It is important to appreciate this when reading sections 4.2 and 4.3 which seek to summarise TII responses to observations received. The purpose of the summary is to provide the reader with an overview of the observations made and TII's response, but it is important for the reader to note that there are also individual specific responses to each of the submissions and their associated observations contained at section 5.

3.2.5 Combining Qualitative Analysis with the Responses to Individual Submissions

Both the 'Qualitative Analysis' (see 3.2.3) and the 'Reviewing and Responding to Individual Submissions' (see 3.2.4) have provided important and critical insight into the submissions received. The submission observations reported in 3.3, and the responses provided in Sections 4 and 5 take account of the understanding and knowledge gleaned from both these work streams.

3.3 Analysis of Submissions and Observations

This section analyses the submissions received, and the subjects covered by the observations made within these submissions. To assist with understanding what the submissions received are showing, the information received has been presented in several ways: grouping of submissions by type / organisation; number of individuals represented by submissions; submission categorisation by project phase (construction or operation); support for Luas Finglas; submission themes; and submissions by geographic area.

3.3.1 Number of Submissions Received by Type of Organisation

Figure 3-2 below summarises the split of the 46 submissions received across the six groups.

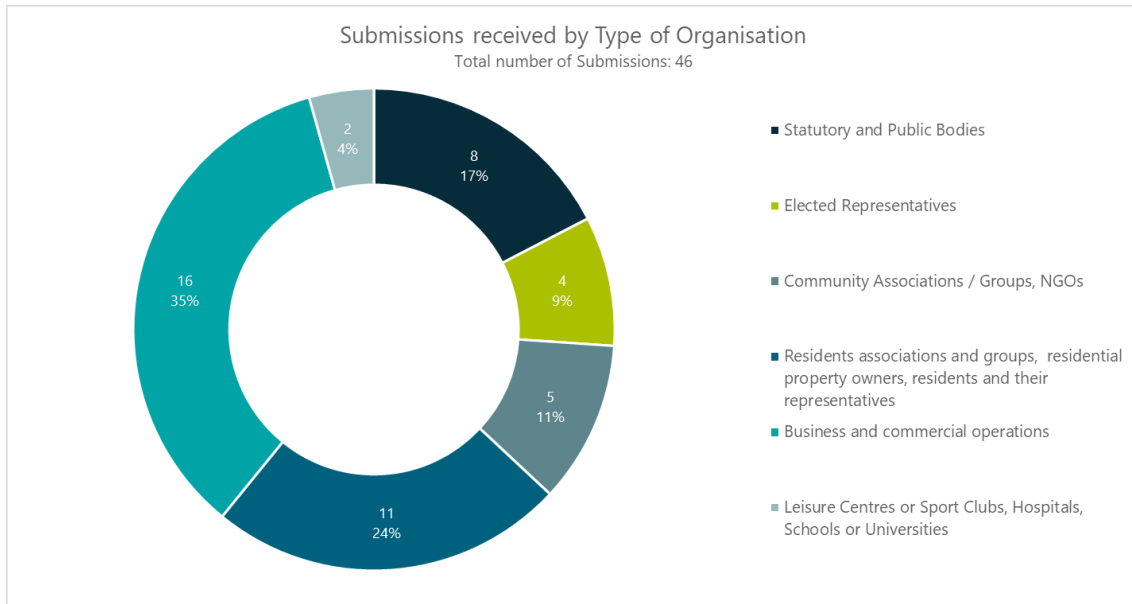


Figure 3-2: Percentage Split of Submissions by Type of Organisation

Approximately, 16% of the submissions received are from business and commercial operators, followed closely by 11% of submissions received by residents' owners and their representatives.

Approximately, 56% of Group 5 (businesses) submissions received related to St Margaret's Road or North Road. Similarly, 82% of the Group 4 (residents) submissions received related to Ravens Court.

3.3.2 Submissions Categorised by Construction and Operational Phase

Figure 3-3 shows the split of submissions received in terms of project phase covered by a submission. 60% of submissions received cover both the construction and operational phases of the proposed Scheme, with the remaining, split across construction or operational phase only.

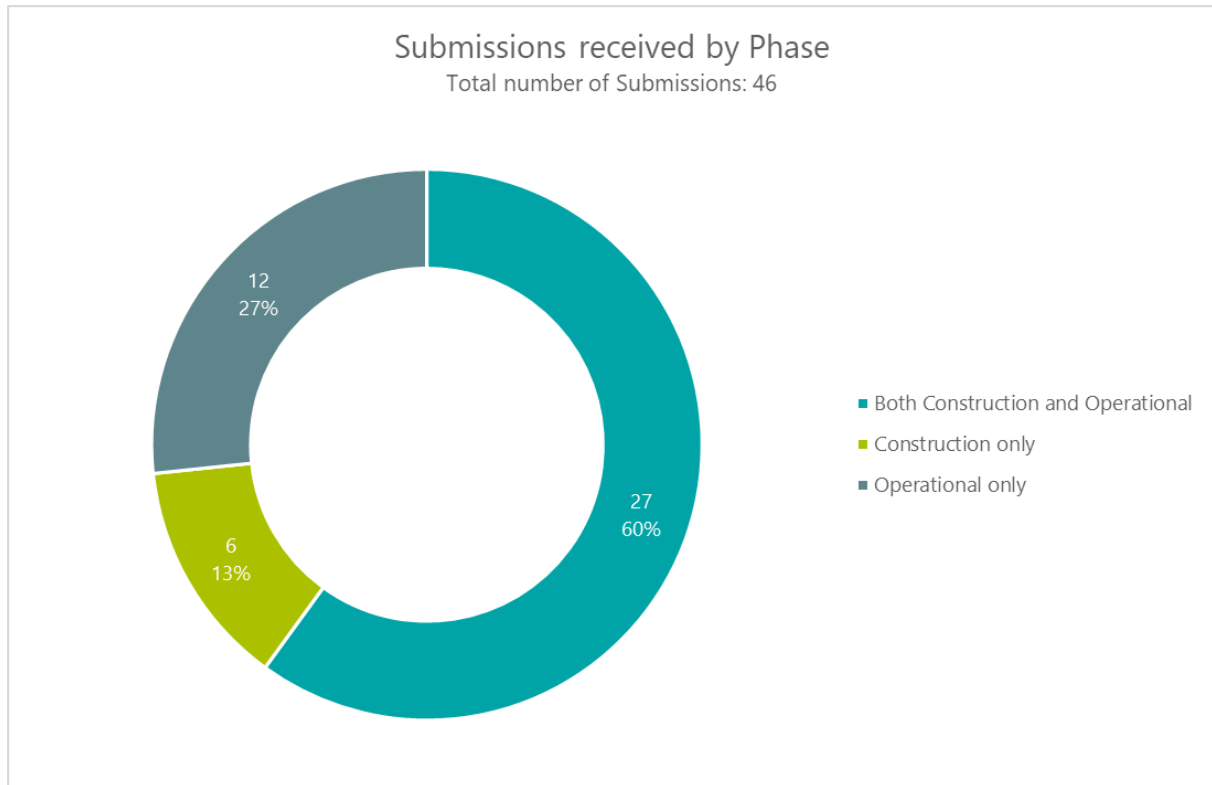


Figure 3-3: Split of Submissions by Construction or Operation Phase

3.3.3 Support of Luas Finglas

The submissions received have been analysed in terms of support for the proposed Scheme (Figure 3-4 and Figure 3-5). Of the submissions, 48% (22 of submissions) expressed general support for the overall proposed Scheme but raised observations to specific elements, most often in the immediate locality of the observer. Meanwhile, 37% (17 submissions) objected to the proposed Scheme in its entirety.

For context, EIAR Chapter 3 outlines that the forecast population for Finglas study area (Luas Finglas catchment area) is expected to exceed 56,000 by 2035⁴. Of this population, 431 individuals are directly impacted by the proposed Scheme, with 6% of these individuals not supporting it – primarily residents and businesses directly impacted.

⁴ EIAR Chapter 3, section 3.2.2.1

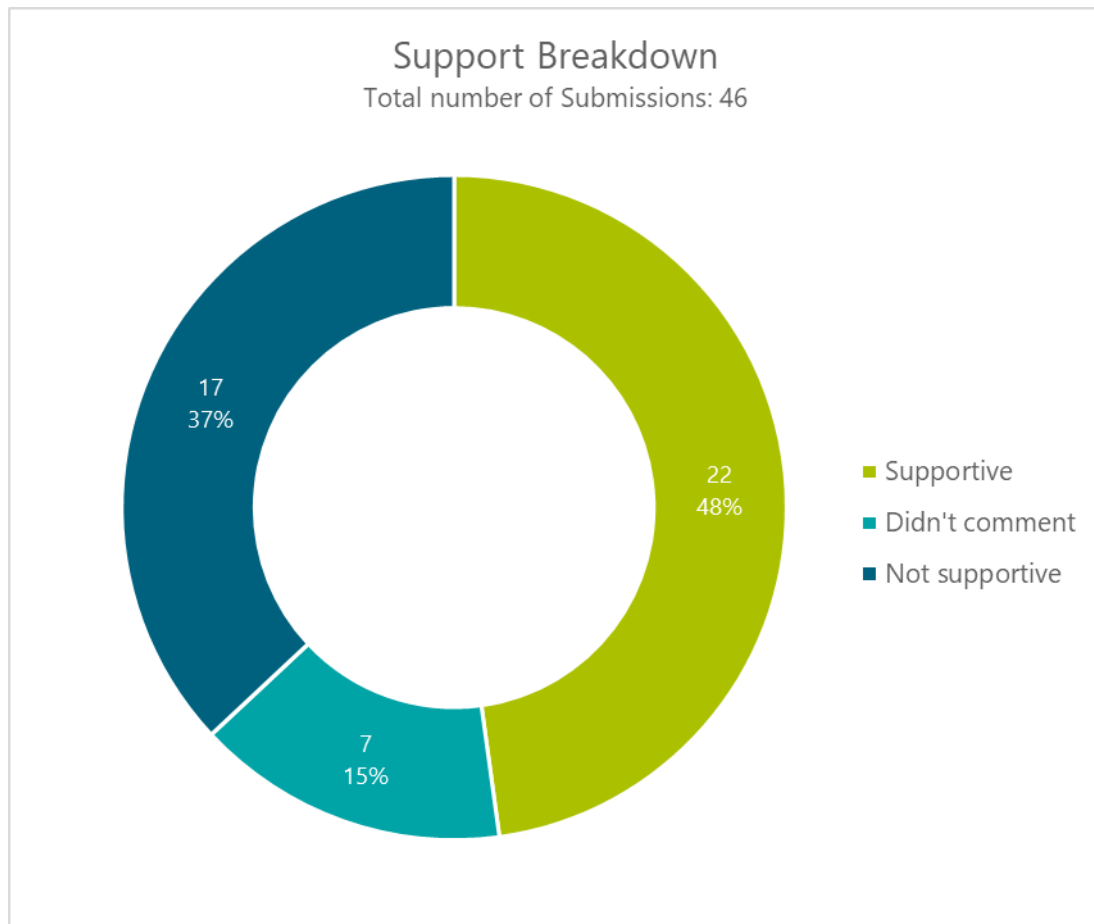


Figure 3-4: Percentage Split of Submissions in Terms of Support for the proposed Scheme

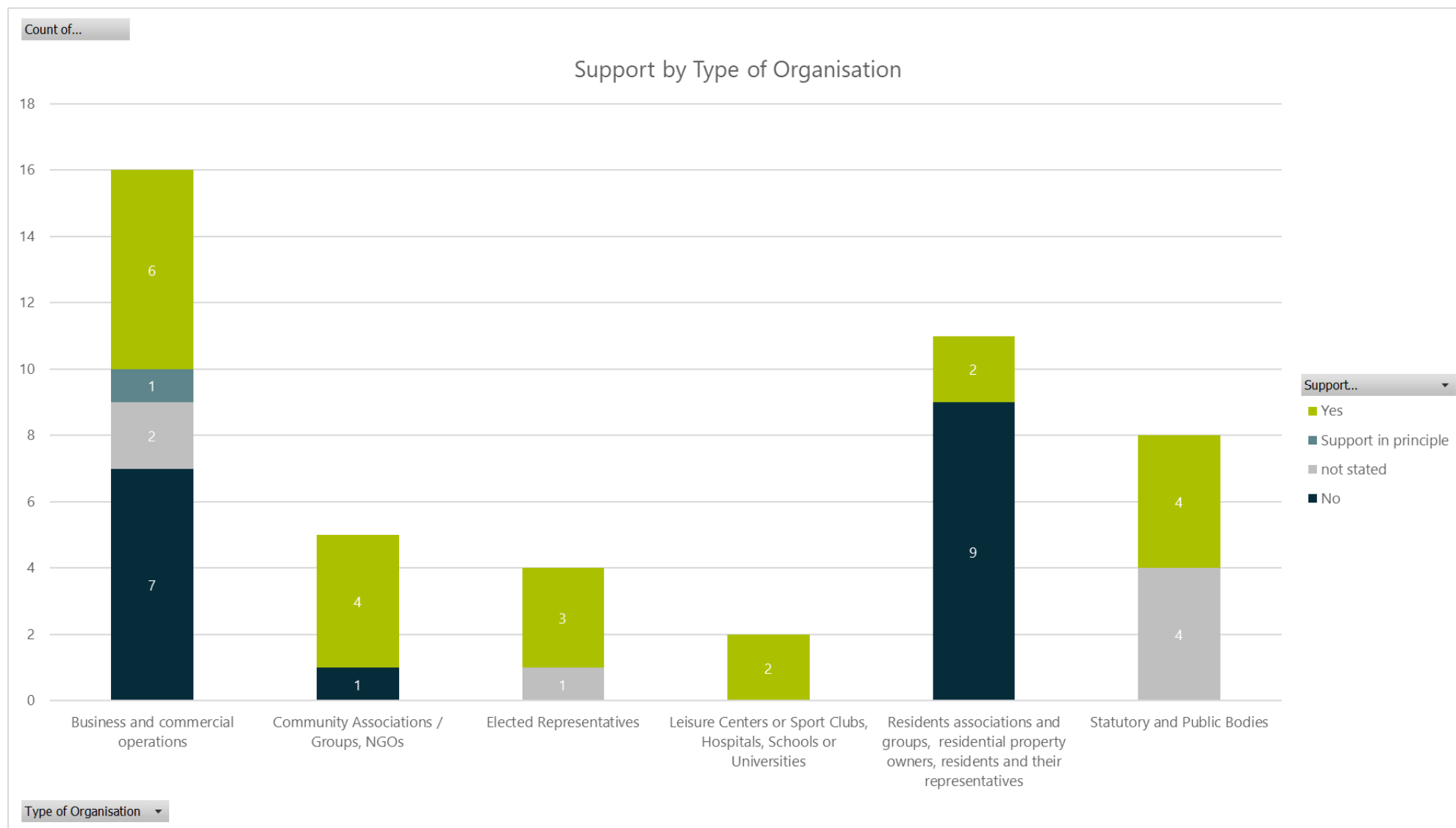


Figure 3-5: Support to the proposed Scheme Breakdown by Type of Organisation

3.3.4 Submissions Received by Area

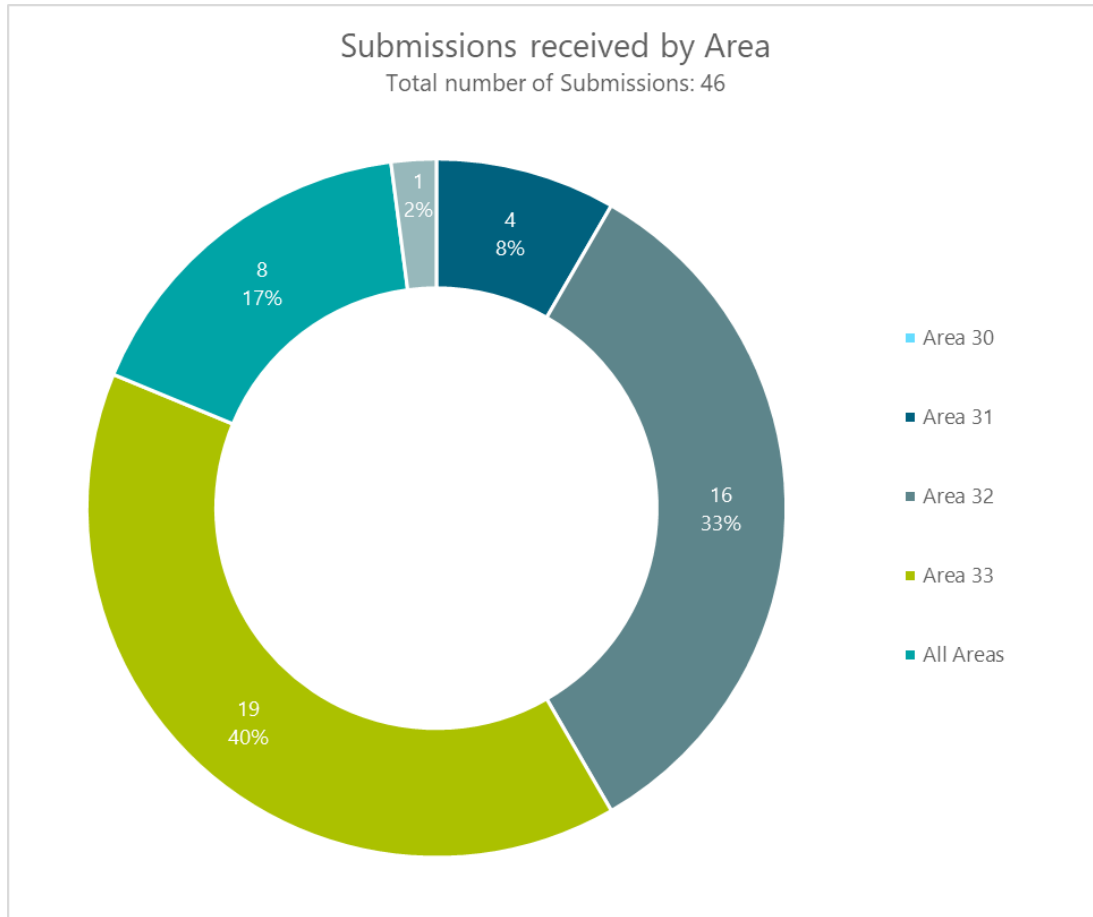


Figure 3-6: Split of Submissions by Area

3.3.5 Submissions Themes

The submissions received covered a wide range of themes which corresponded to the chapter of the EIAR and other RO documentation.

A number of submissions raised more strategic transport planning type subjects such as route selection and considerations of proposed alternatives, whilst others were very specific to the impact on a specific location or local community, such as local noise levels and the loss of local green spaces.

The most common themes covered by submissions were focused on the consideration of options and alternatives and decisions made, and the predicted environmental impacts during the construction phase. A number of other themes, for example traffic and transport, land take, noise and vibration had a significant overlap with the construction phase theme.

Many of the submissions that covered the construction phase were understandably focused on issues which concerned local residents / businesses. These included noise and air quality, the perceived impact on quality of life and human health, and the duration of the construction phase. Disturbance to normal daily life was also raised, including the impact of construction traffic on local access and existing parking provision, alongside the impact on businesses and their operations during the construction phase. Similar observations in terms of environmental impact, albeit to a lesser degree, were also raised for the operational phase.

Figure 3-7 provides a summary of our analysis of the themes covered by the submissions received, showing the number of submissions received in relation to a particular theme.

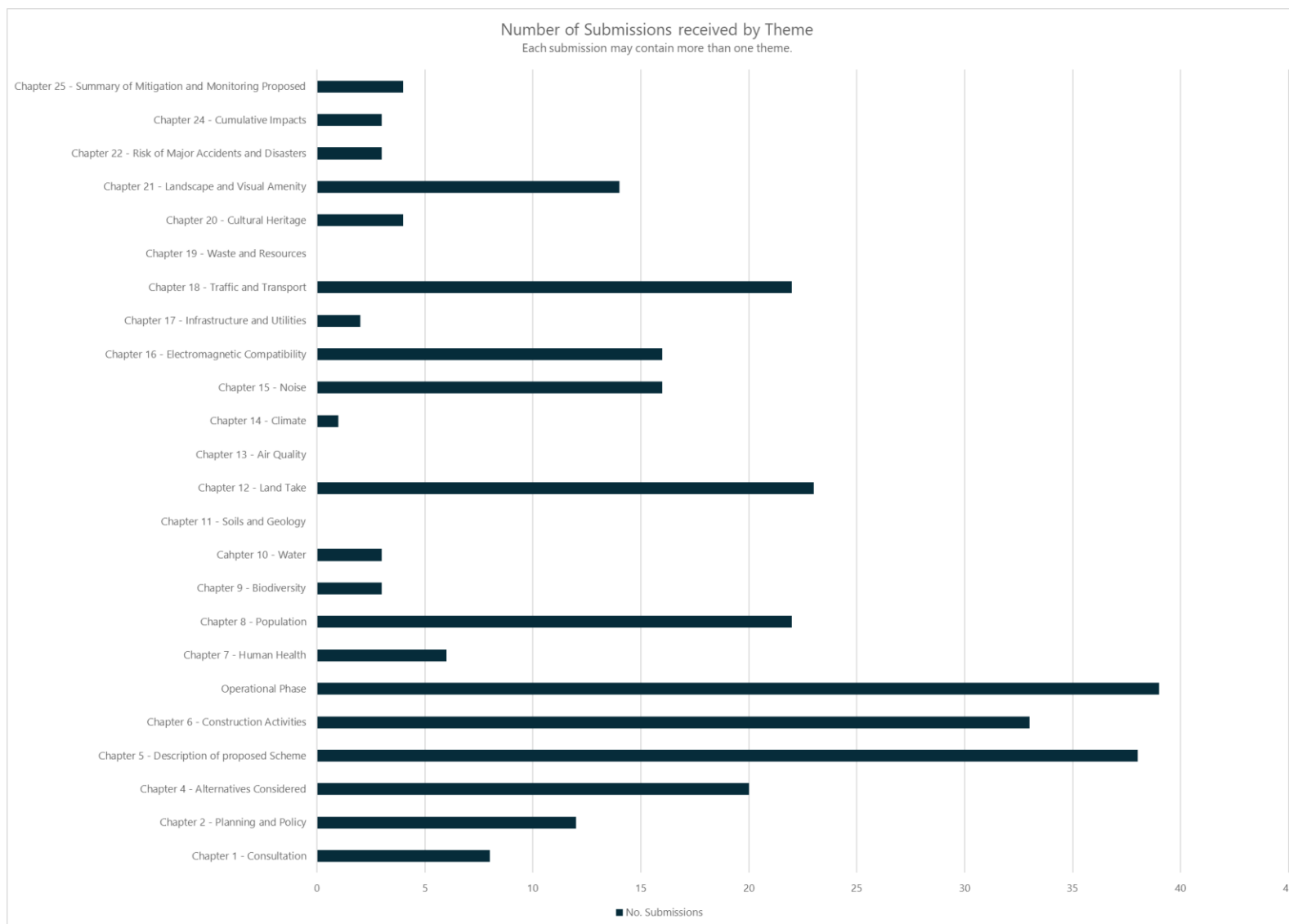


Figure 3-7: Number of Submissions and Observations Received by Theme

Based on the information presented in Figure 3-7 and the detailed review and response to individual submissions (section 5), the findings of the thematic analysis have been summarised below under five main subject headings.

3.3.5.1 Strategy and Decisions

A few observations were made around the subject of alternatives and options considered, and their evaluation leading to decisions taken and the applied for RO.

- **Support for Luas Finglas (also see section 3.3.3)** – Nearly 50% of submissions support the need for the proposed Scheme as a whole and the benefits it will deliver, although many submissions qualify their support by referencing matters which they consider require further consideration.
- **Preferred Route and Consideration of Alternatives** – Observations that relate to the analysis of alternatives, options and conclusions drawn, the assessed benefits that the proposed Scheme will deliver, the selection of the preferred route and Stops locations. A small number of observations identify that the alignment chosen for Luas Finglas is incorrect as it passes through/near residential and commercial buildings and should instead be confined to transport corridors. Observations have been raised regarding the decision to terminate the proposed Scheme at Charlestown, with some observations suggesting that the alignment should terminate further north, linking with Luas Finglas and Dublin Airport. There is also a concern that a Stop at Finglas Village may not be practical due to anti-social behaviour in the area. Residents at Ravens Court also suggest that the alignment chosen is not suitable due to removal of existing amenity space and its associated impact on their estate.

3.3.5.2 Construction Phase

Construction phase environmental impacts are amongst the greatest concerns expressed in the submissions. While some submissions distinguished between advanced enabling and main works, most submissions understandably grouped these collectively under construction.

- **Construction Timeline** – Queries raised as to the commencement and duration of the proposed Scheme and associated impacts.
- **Noise and Vibration** – The potential for disturbance from construction generated noise and vibration is a common issue raised. There were also submissions which identified some individuals as being more vulnerable to environmental impacts, such as those working from home. There were also concerns raised that construction generated vibration could damage property.
- **Traffic and Transport** – Residential and businesses have concerns with regards the impact of the construction works on all modes of transport. These include the impact of traffic management proposals on general traffic, pedestrian and cyclist safety, and parking and access (particularly where road closures or removal of on-street parking is proposed).
- **Land & Property (including temporary acquisition)** – Land use observations are generally location and owner specific and relate to the duration and physical extent of the land to be acquired on a temporary basis to deliver the works, noting in some cases observers feel the extent of land take is excessive. Associated with this are the potential impacts on green spaces, trees and vegetation, access, public realm, business continuity, the inability to develop temporary land until final hand-back, details of how relocation will work, and compensation (including the process) provided for the temporary acquisition of, or damage to property, including loss of business.

3.3.5.3 Operational Phase

For the operational phase, observations were mainly concerned with the following:

- **Anti-Social Behaviour** - A perceived potential for anti-social behaviour around the Luas Stops, and in the surrounding public realm, particularly late at night.
- **Traffic and Transport** – The impacts of increased traffic as a result of the Park and Ride facility. There is also a concern where loss of on-street parking is permanent.
- **Accessibility** – The importance of ensuring a high level of accessibility to Luas Finglas for all, including consideration of people with restricted mobility, passenger wayfinding, and safety for vulnerable users.

This included reference to provision of cycle parking that is accessible to all, infrastructure and systems that are designed taking account of voice, hearing and vision impairment.

- **Safety** – Some submissions raised a perceived safety concern regarding HGVs manoeuvrability for business operations and the safety of residents living near the LRT tracks.
- **Noise and Vibration** – For those with properties in close proximity to the Luas Finglas alignment, observations raised concerns regarding noise and vibration impacts from LRVs movements on property.
- **Landscaping and Visual Impact** – Some observations commented on the perceived loss of green areas.
- **Future Development** – A number of submissions questioned how development of Luas Finglas could affect the ability to develop their sites under either existing planning permissions or future proposals. The observations relate to the perceived lost potential to develop such land, and the impact on developments for which planning permission has either been granted or applied for, or in relation to an intention to seek planning permission. This covers new developments and existing property that is intended to be extended and/or refurbished.
- **Land & Property (including permanent acquisition)** - Predominately related to the physical extent of the permanent land acquisition proposed, noting in some cases observers consider the extent of land take to be excessive. Other concerns expressed included loss of land and green space such as playing fields, trees and vegetation; loss of access or access constraints, timescale and duration of impacts; the compensation process and arrangements (including legal); constraints on future development and the permanent devaluation of land and property located close to Luas Finglas infrastructure.

3.3.5.4 Strategic Planning

Some observations asserted that Luas Finglas was in contravention to planning policy. Chapter 2, submitted as part of the RO documentation provides an overview of planning policy context, as well as detailing the local planning context within which Luas Finglas fits, as of the date of lodgement of the RO application.

- **Planning Policy Context** – The compatibility of the Luas Finglas proposals with national and regional policies was questioned, including compatibility with the Dublin City Development Plan 2022-2028 and the Jamestown Masterplan among others. In particular, observations have been made regarding the disruption of business, and the conflict of such disruptions with zoning objectives.

3.3.5.5 Railway Order (RO) Process and RO Documentation

Observations have been raised in relation to the RO application and process, including comments on consultation and engagement undertaken throughout the development of the proposed Scheme, the documentation provided to support the application, and the Oral Hearing process.

- **Consultation and Engagement** – Perceived lack of communication with, and information provided to property owners affected by the proposed Scheme. One submission raised concerns regarding lack of accessible documentation. There is perceived to be a lack of feedback from TII consultation events, with observations suggesting that previous submissions and comments were not considered in the development of the proposed Scheme.
- Requests have also been made for a commitment from TII to further consult with affected residents and business owners along the alignment.
- **Adequacy of the EIAR** – Observations are made in relation to the details that have been included in the EIAR, with some requests for more detail or more localised assessments such as local traffic modelling, or local assessments of specific properties affected. Some observations centre on the accuracy and clarity of the assessments, with requests for the RO to be amended to include full and clear information, and requests for better mitigation measures.
- **Adequacy of Design / Drawings** – The adequacy of the drawings and plans provided as part of the RO is commented on, with observations questioning the suitability of the scale selected and level of detail provided.

3.3.6 Observations particular to an 'Area'

The following provides a summary of observation topics particular to an 'Area'. The intention of this section is to supplement and not to repeat section 3.3.5 which has provided an overview of observation themes that are applicable across the proposed Scheme.

Note that there are six number of submissions that are general in nature and cover the entire scheme (Areas 30 to 33), rather than being specific to any particular area.

3.3.6.1 Area 31 Broombridge to Tolka Valley Road

(5 submissions)

In this section, the proposed Scheme alignment passes through mainly commercial areas / industrial estates and green park and as such most submissions in this area were received from, or on behalf of, businesses.

Observations were predominantly focused on the construction phase and half were generally supportive of the Luas Finglas overall. Observations relate to both temporary and permanent land take, access to and from business premises and the associated impacts on business continuity, customer experience and potential loss of income. Some observers also highlight the scale and length of time their referenced land is required for, and the impact of this on commercial development.

3.3.6.2 Area 32 Tolka Valley Road to Finglas Village Stop

(16 submissions)

Along this section of the route, the proposed Scheme passes through amenity, residential and commercial areas. Nine submissions in this area were received from, or on behalf of, residential dwellings, with another seven received from elected representatives, community groups and schools.

Elected representatives and community groups express support for the proposed Scheme; however, the latter have raised some concerns regarding the potential impacts during the construction phase and the loss of car parking.

Residents' observations relate to the location of the alignment through existing residential areas and its impact on green space, amenity and car parking locations. In particular, residents at Ravens Court are of the opinion that the Luas tracks blocking their only access/egress to the estate will make the area less safe. Residents at Ravens Court opposed the proposed Scheme, stating that route alignment decisions were primarily based on engineering and cost considerations. They consider the impact and long-term disruption of the proposed route on their community have not been adequately considered and detailed in the EIAR.

3.3.6.3 Area 33 North of Finglas Village Stop to the Terminus (Charlestown Stop)

(19 submissions)

Along this section of the route, the proposed Luas Finglas alignment passes through amenity, residential and commercial / industrial areas. Two submissions in this area were received from, or on behalf of, residential dwellings, with another eleven received from businesses and developers. A small number of submissions were received from elected representatives and public bodies.

Residents' observations relate to the location of the alignment through existing residential areas and its impact on green space, amenity and car parking locations. They consider the impact and long-term disruption of the proposed route on their community have not been adequately considered and detailed in the EIAR.

The majority of submissions from businesses came from those located along St Margaret's Road and North Road. Issues raised primarily related to construction timelines, compliance with Jamestown Masterplan, business disruption, access and increased traffic volumes.

4 Summary of TII Responses to Submissions

4.1 Approach

This section summarises TII's responses to the 46 submissions and observations received, noting that every submission received, and the observations made within each submission had individual responses prepared and documented (see section 5). The summary is to assist the reader to understand at a high level, TII's response to the main issues raised as summarised in section 3. Cross reference is made to the EIAR where relevant to the response provided to assist the reader.

The summary of TII responses to the submissions and observations received comprise the following:

- Summary response to observation themes (see section 4.2);
- Summary responses to observations specific to a geographic area (see section 4.3); and
- Summary of some specific individual responses not fully covered elsewhere (see section 0).

The reason for splitting responses by theme and geographic area is to explain TII's general approach, whilst also acknowledging there are responses that are particular to a geographic area.

Attention is also drawn to the fact that in all cases, if an enforceable RO is granted, the contractors that will be employed by TII to deliver the proposed Scheme will be legally obliged by contract to adhere to all mitigation measures committed to in the EIAR and the NIS, all conditions set by the Board in that enforceable RO, and all applicable health and safety legislation.

4.2 Summary of Responses to Observation Themes

The summary of responses mirrors the same order and structure of section 3.3.5:

- Strategy and Decisions;
- Construction Phase;
- Operational Phase;
- Strategic Planning; and
- Railway Order (RO) Process and RO Documentation.

To provide context to the response, the observation subjects are restated at the top of each response.

4.2.1 Strategy and Decisions

Support for Luas Finglas – Nearly 50% of submissions support the need for the proposed Scheme as a whole and the benefits it will deliver, although many submissions qualify their support by referencing matters which they consider require further consideration.

TII Response:

TII welcomes and is appreciative of the support for the proposed Scheme. TII is also grateful for the acknowledgment of the importance of the proposed Scheme in providing a reliable and sustainable public transport system for the Dublin area, specifically the Finglas area. TII appreciates there is potential for impacts, particularly during the construction phase, and that this is of concern to many along the alignment. Construction impacts will be temporary or relatively short-term and mitigated to reduce their effects as far as practicable, while operational impacts will be mitigated to eliminate any long-term significant residual impacts.

Once construction is complete, the benefits delivered by Luas Finglas will make a significant contribution to the Greater Dublin Transport Strategy 2022-2042.

Preferred Route and Consideration of Alternatives – Submissions querying whether the alternatives assessment concluded with the right public transport option, alignment, Stop locations, termination point and required land take.

TII Response:

The assessment of Alternatives Considered and associated appendices provide details of the alternatives considered, the decision making that has led to the selection of an option, and follow-on design development⁵. This includes the more strategic consideration of options in terms of type of public transport system, and route and Stop locations, right down to individual location specific options along the alignment.

Luas Finglas provides the best medium and long-term transport project capable of meeting the future passenger demand along the Finglas to Dublin City Centre corridor, while facilitating compact, sustainable growth along the alignment at a scale unattainable with other transport options.

Luas Finglas will divert 440,000 car trips per annum in the opening year, contributing to an annual increase of around 3.7 million public transport boardings within its 1km catchment area. Subsequently, there will be a strong modal shift along all sections of the alignment, with a 46% increase in public transport usage in trips to/from the northern section of the proposed Scheme⁶.

A robust decision-making process has led to the selection of the preferred alignment designed in accordance with the Aarhus Convention, consolidated EIA Directive requirements and requirements of national law. The key non-statutory consultation milestones in determining the alignment proposed by the RO application, that is now endorsed by the Greater Dublin Transport Strategy 2022-2042, are:

- Emerging Preferred Route (EPR) – first non-statutory consultation on the development of the EPR over a period of eight weeks from 28 July 2020 to 17 September 2020.
- Preferred Route – this non-statutory consultation took place over an eight-week period from 7 December 2021 to 31 January 2022.
- In addition to the above, over 200 meetings were undertaken between January 2020 and July 2024⁷ which were taken account of in informing the design of Luas Finglas.

The alternatives assessment process included a comprehensive assessment of a range of alignments and stop locations. The identification of a preferred alignment, park and ride facility and stop locations took account of the interchange capability of a location with other modes of transport, including buses; the existing rail commuter services; and the future proposed DART+ network. Other criteria were also utilised, such as potential trip demand, key trip attractors in the area, directness of route, impact on the environment, and cost. In terms of the impacts of the proposed Scheme on adjacent property, this is covered further under the 'Construction Phase' and 'Operational Phase' sections below.

⁵ EIAR Chapter 4

⁶ EIAR Chapter 3, section 3.7

⁷ EIAR Chapter 1, section 1.9

4.2.2 Construction Phase

Construction Timeline – Queries raised as to the commencement and duration of the proposed Scheme and associated impacts.

TII Response:

Certainty concerning when works will commence is dependent on the proposed Scheme progressing successfully through the Statutory Approval Process, necessary budget approvals and in line with National Development Policies.

The programme for construction of the proposed Scheme has been optimised so that it provides an appropriate envelope to enable construction whilst being cognisant of the duration of potential environment impact. The proposed working hours, combined with the phasing of the works will ensure the proposed Scheme is delivered in an effective and timely manner.⁸

In some cases, there is a perception that the environmental impacts of construction will be the same for the entire 3.5 years duration of the construction programme, when in fact the reality is that heavy civil engineering work in one section i.e., excavation and construction of primary supporting structures will typically take from 12 to 18 months. After that much lighter and quieter works will be undertaken for fit out i.e., architectural, mechanical and electrical followed by the installation of the railway systems, power and trial running.

On appointment of the Contractor(s) to deliver the detailed design and construction of Luas Finglas, there will be more opportunities to optimise the schedule as a result of design and construction methodology details being finalised.

TII will ensure continuity of access for businesses and residents while the works take place.⁹ Details regarding local temporary access provisions will be discussed with stakeholders prior to construction starting in the area.¹⁰

Noise and Vibration – disturbance from construction generated noise and vibration, vulnerable receptors, property damage due to vibration concerns.

TII Response:

A comprehensive and detailed assessment of both noise and vibration is presented in the EIAR.¹¹ Where required to mitigate effects, mitigation measures focus on a reduction at source through the selection of appropriate plant, methods of construction and the limiting of working hours.

As stated in the EIAR, a key lesson learned from the Luas Green Line project was the importance of thorough consultation with all stakeholders. Accordingly, the proposed Scheme team will engage in regular meetings to discuss the approach to noise management during construction.

⁸ EIAR Chapter 6, sections 6.2 and 6.3.3

⁹ Volume 5 – Appendix A6.1

¹⁰ Volume 5 – Appendix A6.2

¹¹ EIAR Chapter 15, section 15.4

The EIAR assessment has concluded that no vibrations (either at construction or operational phase) will exceed a limit that will cause structural damage to property.¹²

Comprehensive environmental monitoring throughout the construction phase will ensure the works are being undertaken within environmental limits. These measures are set out in the EIAR chapters and appendices.

Please refer to the Construction Environmental Management Plan (CEMP) included as Volume 5 – Appendix A6.1. A Construction Noise and Vibration Management Plan (CNVMP) is contained in Section 1.8.5 of the CEMP.

Traffic and Transport – concerns with regards the impact of the construction works on all modes of transport. These include the impact of traffic management proposals on general traffic, pedestrian and cyclist safety, and parking and access (particularly where road closures or removal of on-street parking is proposed).

TII Response:

A hierarchical approach to traffic management has been adopted with provision for the needs of pedestrians, cyclists, public transport and commercial vehicles taking preference over private car usage, with the key objective of maintaining continual access to all adjacent properties during the works.¹³ Prior to implementation, all traffic management measures will be agreed with the relevant local authority, and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken.

Traffic modelling¹⁴ and environmental assessment¹⁵ have been undertaken to ensure construction traffic does not have an unacceptable impact on the existing road network in terms of congestion and delay, air quality and noise. Construction traffic entering and leaving construction sites will also be marshalled to maintain a safe environment.

Where the existing level of pedestrian or cycle service cannot be maintained in the vicinity of construction sites, alternative routes will be designated to minimise the risk to vulnerable users. All access provided will be safe and segregated from Luas Finglas works, and access to properties and businesses maintained.

Where it is necessary to implement road closures, or reduce on-street parking, this will be for the minimum amount of time required and will be reinstated as soon as practicable. TII and its contractors will also ensure road surfaces are maintained clean of dust and or dirt deposits arising from Luas Finglas construction.

¹² EIAR Chapter 15, sections 15.2.4.7 and 15.4.1.5

¹³ EIAR Chapter 6 and Appendix A6.2

¹⁴ Volume 5 – Appendix A18.1

¹⁵ EIAR Chapter 18

Land & Property (including temporary acquisition) – duration and physical extent of the land to be acquired, extent of land take to be considered excessive, potential impacts on green spaces, trees and vegetation, access, public realm, business continuity, the inability to develop temporary land until final hand-back, details of how relocation will work, and compensation (including the process) provided for the temporary acquisition of, or damage to property, including loss of business.

TII Response:

It is important to provide adequate space so that construction can be delivered safely, efficiently and effectively, so that the duration of environmental impacts is not unnecessarily extended and or methods of construction become constrained to the extent they extend the programme; such as not to introduce unnecessary cost, or possibly result in an element of the proposed Scheme being unbuildable.

The land to be acquired, including construction compounds; the duration for which it is required; and the physical extent of land has been carefully assessed as part of the design so that it provides both appropriate time¹⁶, and space to deliver the proposed Scheme, while being cognisant that the proposed Scheme does not want to retain land any longer than is necessary to minimise the impact on landowners.

This has involved the careful consideration of how the design and construction methodology influence one another, how duration and extent can be reduced, and an iterative process between the two to determine the optimum extent and duration for which land is required to enable construction of the proposed Scheme.

The majority of temporary land take, noting that permanent land take is utilised for construction as well, is for the purpose of creating access to compounds and undertaking the works, as well as to ensure continual access to properties (including business continuity) along the alignment as the works progress. In some instances, land is taken on a temporary basis for the purpose of mitigating local amenity impacted by the proposed Scheme and is returned for use prior to commencing the main construction phase. It is the intention of TII to return all land that it does not need permanently, as soon as practicable.

The impact assessment of temporary land take acquisition has been dealt with in the EIAR.¹⁷

The impact on property value and the process for relocation, compensation, acquisition and return of land and property; compensation for loss of business; as well as how damage to land and property caused by Luas Finglas is dealt with, are all covered under section 4.2.3 'Operational Phase – Land & Property (including permanent acquisition)' below.

4.2.3 Operational Phase

Anti-social Behaviour - A perceived potential for anti-social behaviour around the Luas Stops, and in the surrounding public realm, particularly late at night.

TII Response:

While the Luas Stops will increase the number of people passing through an area, this will, in itself, provide for passive surveillance with regard to anti-social behaviour. It is important to note that individuals using Luas will be moving quickly in and out of the area.

¹⁶ EIAR Chapter 6, section 6.3.3

¹⁷ EIAR Chapter 12, section 12.4.2.2

The Stops themselves have been carefully designed to discourage anti-social behaviour, for example through attractive setting, use of public lighting, open sightlines, and avoidance of areas where individuals and groups of people can hide. A focus on inclusive design, urban integration¹⁸, and safety considerations will ensure these areas remain secure while also serving as high-quality, sustainable transport hubs.

CCTV will also be installed (and monitored by the Operational Control Centre) throughout the Luas system, to provide general security and surveillance. In the event that the Operational Control Centre observes or is notified of antisocial behaviour, they will dispatch Luas security staff immediately to manage the situation and notify An Garda Síochána if deemed appropriate.

Traffic and Transport – The need for localised traffic modelling to assess traffic volumes to and from the Park and Ride facility. There is also a concern where loss of on-street parking is permanent.

TII Response:

Luas Finglas will provide significant benefits not only to those who choose to use it, but also to other transport system users, by reducing the demand for scarce road space, and so creating the opportunity for the road transport system to achieve optimum levels of efficiency and effectiveness.

Traffic modelling and analysis has been undertaken, including taking account of localised traffic movements around the Park and Ride facility, that shows a reduction in traffic volume along the North Road as a result of the proposed Scheme.¹⁹

There are some isolated areas where there is a permanent loss of non-private on-street parking due to the proposed Scheme, including Finglas Village Stop and along St Margaret's Road. This should be considered in the context that the proposed Scheme is designed to reduce private car usage and the demand for private car park spaces.

Accessibility – The importance of ensuring a high level of accessibility to Luas Finglas for all, including consideration of people with restricted mobility, passenger wayfinding, and safety for vulnerable users. This included reference to provision of cycle parking that is accessible to all, infrastructure and systems that are designed taking account of voice, hearing and vision impairment.

TII Response:

The design of Luas Finglas has been developed with a strong focus on accessibility, ensuring that all users, including those with mobility, visual, hearing, and sensory impairments, can navigate the system with ease. The project follows established accessibility guidelines and standards, including the Design Manual for Urban Roads and Streets (DMURS) and current guidelines for pedestrian and cycling infrastructure. The principal source of guidance on the design of cycle facilities is the National Cycle Manual (NCM) (NTA, 2023). The Design Manual for Bicycle Traffic, 2016, 'CROW-Fietsberaad', a Dutch national standard for cycle track design, was used for areas of design not covered by the National Cycle Manual. The Cycle Design Manual (NTA, 2023) (CDM) was published after completion of the Reference Design. Any updates to the cycle design to comply with the CDM will be incorporated into the detailed design stage and will not have any greater impacts than assessed in the EIAR.

¹⁸ EIAR Volume 5 - Appendix A21.2

¹⁹ EIAR Chapter 18, section 18.4.3.8

A key element of the design is the prioritisation of vulnerable road users, with a focus on reconfiguring road space to create safer, more accessible environments. Road upgrades will reduce wide traffic lanes to standard DMURS widths, reallocating the space for wider footpaths, dedicated cycle tracks, and improved landscaping. Traffic calming measures, such as road narrowing and junction tightening, will further enhance safety. In addition, all footpaths will be kept level and continuous, ensuring smooth transitions across private entries, commercial access points, and priority junctions. This design approach will significantly improve accessibility for wheelchair users, people with mobility scooters, and parents with strollers.

For cyclists, the design ensures safe, dedicated spaces with clear separation from pedestrian pathways, as well as secure and easily accessible bicycle parking near Luas Stops to encourage cycling as a viable transport option.²⁰

Finally, developing and constructing Luas Finglas will support improvement through increased accessibility to work, education, health and community facilities. It will provide direct connectivity to Dublin city centre, and in general bring education, jobs, and leisure activities within greater reach of a significant number of currently disadvantaged residents. Through an integrated public transport network, the proposed Scheme will support accessibility to major destinations beyond the direct catchment of the extension. With a strong emphasis on legible and physical accessibility to stops and level boarding to the Luas vehicles, accessibility will be significantly increased for all users, including those with mobility, visual, hearing and sensory impairments.²¹

TII is committed to ongoing engagement with key stakeholders, including Dublin City Council, Fingal County Council, and advocacy groups, to continuously refine and enhance the accessibility features of the proposed Scheme.

Safety – Some submissions raised a perceived safety concern regarding HGVs manoeuvrability for business operations and the safety of residents living near the LRT tracks.

TII Response:

Light rail is an attractive form of travel and will result in a modal shift away from car-dependency thereby reducing the number of private cars on the road network as motorists opt for the convenient, fast journeys that Luas offers. For pedestrians and cyclists, the provision of new complementary infrastructure will allow active travel journeys to be made segregated away from busy roads resulting in a reduced chance of collision with motorised vehicles. The cycle and pedestrian components of the proposed Scheme are designed with everyone in mind, adopting principles of universal design to achieve the highest possible levels of accessibility for all, promote multimodal “cycle-LRT trips” and to mitigate any exposure to safety risks associated with the proposed Scheme.

The proposed Scheme incorporates the road design principles outlined in DMURS to enhance safety, particularly by controlling vehicular speeds through measures such as lane narrowing, compact junctions, slip lane removal, and traffic calming. While parts of the proposed Scheme are located in industrial and commercial zones, the design accounts for the manoeuvring needs of heavy goods vehicles in public roads by adjusting junction radii and setting back stop lines at signalised intersections, balancing the needs of both commercial drivers and vulnerable road users.

Cycling infrastructure is designed to be safe and accessible, with segregated cycle tracks protected at all signalised junctions. Pedestrian-cyclist conflicts are minimised through horizontal separation or level

²⁰ EIAR Chapter 5, section 5.3.6

²¹ EIAR Chapter 3, section 3.5.6

differences, along with distinct paving materials for footpaths and cycle tracks. Bevelled kerb edges further enhance safety by reducing trip hazards for cyclists and pedestrians.

The design follows best practices from DMURS and the Cycle Design Manual to create a people-focused street environment that prioritises safety for children, the elderly, and those with reduced mobility. Additionally, light rail safety regulations are governed by the Commission for Railway Regulation (CRR), with operational safety ensured through driver training, clear lines of sight, and appropriate speed controls based on track layout and junction interactions.

Traffic interactions with the Luas line are carefully managed, with most at-grade crossings controlled by traffic signals. Only two crossings operate on a priority control basis, Ravens Court and ESBN, both serving cul-de-sac accesses. Overall, the proposed Scheme's design integrates well-established safety measures to ensure a secure and efficient transport environment for all users.

Where specific access to the Luas corridor is required, the proposed Scheme design has been developed to provide at least minimum required visibility distances. These enhancements ensure that both drivers and pedestrians can assess their surroundings effectively and make safe, informed decisions before entering the Luas corridor.

TII acknowledges that some businesses will be impacted by the proposed Scheme. TII has engaged and will continue to engage with businesses to minimise the impact of their operations.

Noise and Vibration – For those with properties in close proximity to the Luas Finglas alignment, observations raised concerns regarding noise and vibration impacts from LRVs movements on property.

TII Response:

All sources of potential operational noise and vibration have been considered, and the design incorporates measures to ensure no unacceptable residual impacts²², including:

- Vibration levels will not be significant. However, the curved embedded track section near the Finglas Village Stop may generate adverse vibration levels in nearby buildings (Garda Station building and Finglas Youth Resource Centre). To mitigate this risk, a floating slab track detail is being implemented in this area to minimise vibration transfer;
- Rail noise will not be significant when added to the prevailing noise environment, except at St Helena's Childcare. To address this, a new solid sound boundary treatment is to be installed, with a minimum height of 2.25m and at the western edge of the childcare centre;
- Noise levels from the traction substations and LRT stop cubicles are not significant when added to the prevailing noise environment;
- Noise associated with passengers accessing the Luas Stops will form part of the existing soundscape of the prevailing environment and will therefore not be significant; and
- Noise associated with the Park & Ride car park activities and traffic flows within the same are considered to not be significant.

²² EIAR Chapter 15, Section 15.4.1.5

Landscape and Visual Impact – loss of green areas.

TII Response:

Landscape proposals have been developed to create a unified and harmonious whole for each Local Landscape Character Area to assist in the visual assimilation of the proposed Scheme with the existing environment.²³ Appropriate enhancement opportunities have been identified along the route, with 72% of the proposed Scheme featuring grass track, alongside targeted improvements at key nodal locations. These enhancements focus on upgrading paving materials, extending planting, decluttering of streetscape and fostering a high-quality public realm.

The RO drawings, supported by the Materials Palette,²⁴ provide comprehensive proposals for the hard and soft landscape works, including tree and hedgerow planting, that will also offset the effects of net loss.

TII recognises that some areas will experience a reduction in green area space and, where this occurs, landscape site specific proposals have been (or will be) developed. These plans will prioritise the retention of mature trees wherever feasible and incorporate tailored hard and soft landscaping solutions.²⁵

Details of planting proposals will be provided in advance of the construction phase and agreed with the relevant authority. Plans will include: details of the tree species mix, numbers, density and sizes proposed; the tree preparation, presentation, transportation, lifting and placement techniques proposed; the proposed ground preparation, root ball securing technique, backfill materials and methods; and the establishment of specific maintenance proposals for each.

Future Developments – A number of submissions questioned how development of Luas Finglas could affect the ability to develop their sites under either existing planning permissions or future proposals. The observations relate to the perceived lost potential to develop such land, and the impact on developments for which planning permission has either been granted or applied for, or in relation to an intention to seek planning permission. This covers new developments and existing property that is intended to be extended and/or refurbished.

TII Response:

Luas Finglas will be a catalyst for, as well as providing the opportunity to support future development and regeneration.

Dublin City Council (DCC) has expressed strong support for Luas Finglas, highlighting its alignment with the Dublin City Development Plan 2022–2028 and its critical role in facilitating planned urban regeneration.

DCC acknowledges that the proposed Luas Finglas will underpin major regeneration efforts in the north of the city, particularly in areas such as Jamestown, Finglas, Ballyboggan and Glasnevin. The Council has noted that these locations have substantial potential for housing and economic growth, but their development will be heavily reliant on the provision of high-capacity public transport infrastructure. The Jamestown Masterplan was explicitly designed with the Luas Finglas in mind, ensuring integration between

²³ EIAR Chapter 5, section 5.8.11

²⁴ Volume 5 – Appendix A21.2

²⁵ EIAR Chapter 21 sections 21.4 and 21.5, Appendix A21.1, Appendix A21.2 and Appendix A21.3

future development and sustainable mobility solutions. Similarly, the Ballyboggan Masterplan, currently in preparation, aligns with the Luas extension to ensure a coherent and sustainable regeneration framework.

Additionally, DCC has outlined how the proposed Scheme aligns with its broader vision for compact and sustainable urban growth. The development of a high-frequency and high-capacity transport link is essential for achieving the objectives of the Dublin Metropolitan Area Strategic Plan (MASP) and national policy frameworks. The project also enhances connectivity within the city and the wider region, providing greater accessibility to employment, education, and recreational opportunities.

Similarly, TII welcomes the general submission of Fingal County Council in respect of the Railway Order which confirms their full support for the proposed Scheme noting that it will provide high-capacity, high frequency sustainable transport infrastructure linking Charlestown to Dublin City Centre enhancing integration with the wider public transport network and will bring about a “transformative change for residents, commuters, and visitors within the area from a social, economic and environmental perspective”.

The proposed Scheme aligns closely with the objectives of the Fingal County Council Development Plan, which emphasises the importance of sustainable transport solutions in supporting population growth, economic development, and climate resilience. By expanding the Luas network into Fingal, the proposed Scheme will contribute to the Council’s strategic goals of reducing car dependency, improving connectivity, and fostering sustainable urban development. The extension will also support key policy objectives related to compact growth, accessibility, and enhanced public realm, reinforcing the commitment to a more integrated and efficient transport system for the region.

TII will be required to make submissions in relation to future planning applications for proposed future developments adjacent to Luas Finglas. TII will require, in the usual way, that the design of such proposed development is consistent with essential engineering constraints. Luas Finglas is committed to engaging with development proposals as they emerge with the intent of facilitating such developments to the maximum extent consistent with the safe operation of the proposed Scheme.

In the meantime, TII is dealing with known development proposals on a case-by-case basis. TII will work with stakeholders in the future to assist with the wider development of sites.

Land & Property (including permanent acquisition) - Predominantly related to the physical extent of the permanent land acquisition proposed, noting in some cases observers consider the extent of land take to be excessive. Other concerns expressed included loss of land and green space such as playing fields, trees and vegetation; loss of access or access constraints, timescale and duration of impacts; the compensation process and arrangements (including legal); constraints on future development and the permanent devaluation of land and property located close to Luas Finglas infrastructure.

TII Response:

Luas Finglas requires the permanent acquisition of certain lands within which Luas infrastructure (Stops, the depot, the Park & Ride facility, the tracks and other element) will be permanently located. This proposed permanent land take has been carefully assessed and only seeks to acquire the land and easements that are necessary to build, access and operate Luas Finglas.

Following the completion of Luas Finglas works it may be possible to return part or a portion of the acquired land to the original landowner. Such arrangements will be made through entering into appropriate legal agreements with the parties concerned.

The design includes for a limit of deviation²⁶ which is required to allow for unforeseen obstructions and construction tolerances which may necessitate a change to the alignment. In the highly unlikely event that this were to occur, any resulting environmental impacts will comply with the limits set by the enforceable RO.

To facilitate construction and operation of Luas Finglas, following the granting of a RO a requirement will arise for the acquisition of land and property, either permanently or temporarily, along the proposed alignment. TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.

TII has published:

- a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and
- a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired.

This information can be accessed on the Luas Finglas project website here: <https://www.luasfinglas.ie/#cpo>

Regarding property value, once the Luas Finglas is operational, evidence from literature associated with previous light rail schemes in Ireland²⁷ shows that introduction of a high-quality LRT system greatly benefits established residential areas and will thus see property value increase, especially those in close proximity to Luas Stops. It is also acknowledged in the EIAR that the value of properties can also fall if subject to negative environmental effects by virtue of being in very close proximity to tracks. The outcome for Ravens Court is therefore subject to a degree of uncertainty, in that, while the estate is located close to the LRT, it is also located within five minutes' walk of the proposed Finglas Village Stop.

In the event that the RO is granted by the Board and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.

Therefore, in applying the appropriate test for compulsory acquisition, the Board can be satisfied that it can grant the RO including the acquisition of permanent lands, as its acquisition is proportionate and necessary for giving effect to the RO.²⁸

²⁶ EIAR Volume 5 – Appendix A5.2

²⁷ EIAR Chapter 8, section 8.6.3.1

²⁸ EIAR Chapter 12, section 12.5.2

4.2.4 Strategic Planning

Planning and Policy Context – Luas Finglas compatibility with national and regional policies

TII Response:

Chapter 2 of the EIAR considered how the proposed Scheme complies with the planning policy in force at that date. The proposed Scheme is fully in accordance with the statutory planning policy for the area in which it is situated, at national, regional and at local level.

Current policy from national to local level is supportive of the proposed Scheme and it is included in the National Planning Framework (Government of Ireland 2018)²⁹, Greater Dublin Area Transport Strategy 2022-2042 (NTA, 2021)³⁰, and the National Development Plan 2021-2030 (Government of Ireland, 2020).³¹ Luas Finglas will contribute to the response to the challenges of compact growth, sustainable mobility, enhanced regional connectivity and transition to a low carbon and climate-resilient society. It will enhance amenity and heritage, maximise sustainability gains, promote a strong economy and enhance access to quality childcare, education and health services.

At a local level, it has been demonstrated that the proposed Scheme is compliant with the principles of the statutory development plans in Fingal and Dublin City (including Variation No. 4 Jamestown Masterplan)³² and its relevant zoning objectives for the lands through which it passes.

Chapter 2 of the EIAR further confirms that the extension of Luas to Finglas is supported directly under Policy SMT22 and that the design of Luas Finglas will inform the master planning of the Jamestown Lands.³³ Furthermore, Chapter 6 of the Jamestown Masterplan identifies that lands that are situated in the Phase 2 development area, with the following key infrastructure requirement: “Luas Finglas either under construction or operational before the granting of planning permissions for residential developments”.

Having regard to the above, the Luas Finglas scheme is fully aligned with the Jamestown Masterplan. TII also notes the submission made by Dublin City Council that confirms that regenerative mixed use development proposals along the proposed route at, inter alia, Jamestown, “have / are being developed to ensure compatibility with the project delivery and future operation” of the Luas.

As noted above (see 4.2.3 ‘Future Development’), site development will not be necessarily constrained by Luas Finglas infrastructure.³⁴

²⁹ EIAR Chapter 2, section 2.2.3.1

³⁰ EIAR Chapter 2, section 2.2.4.2

³¹ EIAR Chapter 2, section 2.2.3.3

³² EIAR Chapter 2, sections 2.2.5.1 and 2.2.5.2

³³ EIAR Chapter 2, section 2.2.5.1

³⁴ EIAR Chapter 3, section 3.5.4.2

4.2.5 Railway Order Process and RO Documentation

Consultation and Engagement – lack of communication, information or feedback provided, lack of accessible documentation. Requests for further consultation with affected parties.

TII Response:

TII consider non-statutory public consultation to be an essential part of the development of public infrastructure schemes. Consultation has been undertaken throughout the development of the proposed Scheme, including but not limited to the EPR Consultation,³⁵ EIA Scoping Consultation³⁶ and Preferred Route (PR) Public Consultation.³⁷

Ongoing consultation and stakeholder engagement has taken place since 2020 with landowners, businesses, and residents associations, among many others. This has allowed the design to evolve and improve to the point it is at now, as submitted in the RO application.

The EIAR,³⁸ lists over 200 consultation meetings that have taken place over the period January 2020 to July 2024. EIAR Chapter 1 provides further detail with regards these consultations.

Throughout the above consultations TII has adopted recognised best practice, as summarised below, and have remained committed throughout to meaningful, transparent and accessible public consultation in compliance with the Aarhus Convention regarding public participation in decision making. Engagement with stakeholders is continuing in response to the issues raised in the submissions received.

Keys aspects of how the non-statutory public consultations were managed include:

- To generate awareness of the proposed Scheme and to facilitate public participation, a wide range of communications tools were used to publicise the non-statutory public consultation, including advertisements in national and local press and radio, engagement through media and social media; updates to the proposed Scheme website; distribution of flyers; a dedicated information service; targeted consultation events for elected members, the media and members of the public and other interested stakeholders; and a dedicated phone line, email and postal address.
- Publishing and making information available via a variety of channels to ensure it was accessible to as many individuals as possible, including:
 - The Luas Finglas website, www.luasfinglas.ie.
 - Meetings. The Luas Team was available to meet with all interested stakeholders.
 - Phoneline. A dedicated Luas Finglas phone line was manned from Monday to Friday for the duration of the public consultation to assist stakeholders.
 - Social media. The NTA and TII social media channels were used to promote the consultation period and to inform people about the information events. They also provided links to documents and served to remind users of the closing date of the consultation.
 - Luas Finglas email was used to receive submissions and to answer questions
- Accessibility: Information on the proposals was made available in a number of formats to maximise accessibility. All materials were written in plain language. The EPR booklet and website were available

³⁵ EIAR Chapter 1, section 1.9.3 and Appendix A1.1

³⁶ EIAR Chapter 1, section 1.9.5 and Appendix A1.3

³⁷ EIAR Chapter 1, section 1.9.4 and Appendix A1.2

³⁸ EIAR Chapter 1, section 1.9.6

in both Irish and English language versions. The consultation materials were also available upon request in alternative formats, including easy read, large print and braille. During the consultation no alternative formats were requested. Furthermore, for visually impaired users, screen readers were accommodated by the virtual consultation room

- Publishing a Consultation Document at the commencement of the consultation on the Luas Finglas website that detailed the information that was being consulted upon.
- The public were encouraged to make submissions in the most convenient way possible by providing options for the public to make submissions, including a dedicated page on www.luasfinglas.ie or by post, email or at the public consultation events.
- All feedback received was acknowledged and recorded by the Luas Team, and a Public Consultation Feedback Report was published that collated the feedback received from the various public consultation open days, stakeholder meetings and through project information channels.

All submissions received in response to the non-statutory consultation were analysed and the feedback received has influenced the design and development of the proposed Scheme.

To assist with aiding understanding of the proposed Scheme, a Non-Technical Summary (NTS) has been provided as well as individual property packs to potentially impacted owners/occupiers that include property drawings showing how their particular property relates to the proposed Scheme.

Additionally, to support individuals with visual impairments, an accessible version of the NTS was included in the RO application. While certain images within the document could not be fully conveyed through text, descriptions of these images were incorporated into their respective titles. A text-only version of the document was also made available upon request.

TII acknowledges that requests for accessible versions were made at an earlier stage; however, the documentation was not in a finalised state for dissemination until the RO application was formally submitted. Prior to this submission, updates on progress were shared during Luas User Group Meetings and in more detail through direct Bilateral Meetings between Luas Team members and Voice of Vision Impairment in April 2024 and December 2024.

Furthermore, in response to an accessibility-related concern raised by an individual in late December 2024, extracts from the EIAR, which is not itself in an accessible format, were provided in an accessible manner via email to offer further clarification on the issue.

The Luas Team has responded to the previous submissions and feedback received during the non-statutory consultation periods, and, when the RO application process is complete, the consultation undertaken will have fully met the requirements of the Aarhus Convention, Codified EIA Directive and Irish national legislation as well as adhering to best practise principles.

TII is committed to continuing positive engagement throughout the project. Luas prides itself on being an accessible system, and TII rely on close collaboration and feedback from stakeholders such as VVI, on the existing operating network and on new planned schemes.

Adequacy of the Environmental Impact Assessment Report (EIAR) – requests for more localised assessments such as local traffic modelling, or properties affected. Accuracy and clarity of assessments, with requests for the RO to be amended to include full and clear information.

TII Response:

The EIAR follows advice set out in the Guidelines on the Information to be contained in EIARs (EPA, 2022) by presenting information in a rational and systemic manner, such that it is clear how the EIAR meets the mandatory requirements and enables the Board to undertake the EIA for the proposed Scheme. The EIAR takes into account information compiled through desk-based assessment, field surveys and consultation with the public, relevant stakeholders and organisations.

It comprises a very detailed environmental impact assessment, carried out for the full length of the alignment, that has identified and assessed the potential environmental impacts of Luas Finglas and proposed mitigations for these impacts where necessary.

As such, the EIAR comprehensively details the assessment, and is appropriate for the RO application made for this proposed Scheme.

Assessments have been undertaken in accordance with industry recognised practice and at a level of detail appropriate to inform the RO application. Where a submission has raised a particular observation(s) in this regard, TII has responded to it directly (see section 5 - Responses to Individual Submissions).

Adequacy of Design / Drawings – adequacy of Railway Order drawings (scale, not fully design and misleading)

TII Response:

The proposed Scheme has been designed to such a level of detail that warrants the assessment of environmental impacts in line with requirements of the EIA Directive, as is evident for the contents of the EIAR. The level of design has been developed to a degree that is appropriate for the planning stage, ensuring it meets the necessary requirements for assessment and decision-making. The detailed design phase will follow planning approval, during which the proposed Scheme will be fully developed.

The drawings provided illustrate in detail the relationship between the proposed works and the surrounding communities, outline the scale and extent of the infrastructure, including its footprint in relation to the surrounding environment and property, and the alignment and location of surrounding utilities. The drawings are clear and at an appropriate scale for this type of linear project and are consistent with other RO applications previously made.

4.3 Summary of Responses to Observations particular to a Geographic Area

Sections 4.3.1, 4.3.2 and 4.3.3 provide summary responses that mirror the order and structure of section 3.3.6, noting the summary responses are unique to observations raised for a specific geographic area. It is not the intention of this section to repeat section 4.2 which has provided responses to observation themes that are applicable across the proposed Scheme. To avoid unnecessary repetition but to provide context to the response, the observation subjects are restated at the top of each geographic response.

4.3.1 Area 31 Broombridge to Tolka Valley Road

Table 5-2 provides a list of the submissions specific to this Area.

The submissions mentioned potential impacts on business operations due to the proposed land acquisition.

TII acknowledges that there will be some changes in internal vehicle movement or circulation, representing a slight negative permanent impact. However, TII emphasises that the extent of land take has been minimised as far as possible while allowing sufficient space for cycle/pedestrian paths, the Luas tracks, and the continued two-way function of Broombridge Road.

Some businesses expressed concerns about the impact of the proposed scheme on access and parking.

Regarding Brooks Timber & Building site, the permanent land take will result in a reduction in paved area at the gable end of the building to the extent that vehicular access will no longer be possible past the gable end and the existing anti-clockwise traffic circulatory system will also not be possible. Access around the site would therefore be based on 2-way traffic movement.

TII proposes a centrally located new access point for Colorman Ltd to facilitate daily operations at the site. This access is designed to align with Colorman's main east-west internal roadway, providing a more direct connection between Broombridge Road and the central core for both cars and commercial vehicles. By redirecting traffic away from the main office building's frontage, this arrangement enhances site efficiency and minimises disruption. TII considers this centrally positioned access to offer significant advantages for the site's future development potential.

For Fashionflo Ltd, TII plans to introduce a new access off Lagan Road to accommodate all car and mid-sized commercial vehicle traffic, while large HGVs will use a gated access at the site's corner, adjacent to an existing property entrance on Lagan Road.

With regard to HPC Sales Ltd, the existing access space will be reduced by the proposed permanent scheme and circa 5m width space will be retained between the eastern gable end of building and edge of proposed property boundary along Broombridge Road. It is accepted that this will restrict vehicle accessibility to the eastern gable end of building, and paved areas at the gable end that are currently being used for storage may need to be cleared.

For each of these different sites, TII checked that vehicle movements were still possible for the proper operation of the various activities. Please see details in Section 5.

The anticipated reduction in parking spaces is expected to be manageable, particularly with the addition of the proposed Scheme and enhanced active travel infrastructure. These improvements are expected to provide alternative transport options, reducing overall parking demand across the affected sites.

The submissions raised concerns about safety and traffic management.

For the Colorman site, TII responds that the revised internal layout will make the frontage car park area less busy compared to the existing situation. The new layout will improve safety by reducing traffic in certain areas and managing HGV deliveries effectively.

Fashionflo also expressed concerns about traffic hazards and safety within the property. TII responds that the likelihood of conflicts occurring within the car park is low due to the limited opportunity for drivers to gain speed. The car park is a low-risk environment. TII acknowledges that there will be less space available for HGV movements but mentions that solutions were explored with Fashionflo to minimise these impacts. Based on our assessment, the proposed solution is the least impactful arrangement, and TII will continue to engage with Fashionflo to ensure disruption is minimised.

Similarly for Brooks Timber & Building, the impacts on access will result in a change in how stock is delivered and how customers collect purchases. This is a low speed / low volume environment and characterised by a mixing of pedestrians and vehicles where increased awareness is required by all. Changing to 2-way traffic will make no difference to safety.

The detailed responses in the section 5 outline the necessity and proportionality of the land acquisition for the Luas Finglas project, the measures taken to mitigate impacts on businesses and residents. TII remains committed to addressing the concerns raised by the businesses of this commercial area through ongoing

engagement and consultation. Construction activities will be phased to minimise disruption. Detailed construction traffic management plans will be agreed upon with local authorities. Regular communication with affected parties will ensure they are informed of construction timelines and access arrangements.

4.3.2 Area 32 Tolka Valley Road to Finglas Village Stop

4.3.2.1 Cardiff Castle Road

Table 5-2 provides a list of the submissions specific to this Area.

Residents expressed concerns about the increased risk of collisions due to frequent tram traffic and the presence of blind spots near the cul-de-sac, which pose risks for children.

TII has designed the LRT crossing outside Ravens Court to ensure appropriate visibility for pedestrians. Specific visibility distances are provided: a Y-distance of 30m to the right and 33m to the left for pedestrians crossing the Luas line. These measures comply with the Light Rail Safety and Standards Board (LRSSB) Non-Motorised LRT Crossing Guidance. LRVs will approach at low speeds near Ravens Court due to the tight curvature needed to join Mellows Road, enhancing safety for pedestrians. This design ensures that LRVs are more predictable and visible, reducing the risk of accidents. The proposed Scheme has been designed to ensure that pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards. The safe operation of a light railway is regulated in Ireland by the CRR, and TII is obliged to engage with them to ensure safety performance is of the highest standard.

Residents are concerned about the loss of communal green space used for children's play and social activities, as well as the aesthetic and functional impact on the estate.

TII acknowledges the loss of green space and proposes additional landscape design measures to enhance the remaining space. These include feature tree planting along the western boundary of the courtyard, evergreen flowering climbing plants, street furniture, and grasscrete paving within the parking spaces. A pathway will be provided from Ravens Court to the green space to the south. This pathway will allow residents to access green spaces without crossing the LRV tracks, ensuring safety and connectivity.

As part of the detailed design stage, a comprehensive landscape plan will be prepared and agreed upon with residents. This plan will include additional mitigation measures to enhance the quality of the semi-private open space in terms of functionality and aesthetics.

Residents are concerned about increased noise levels from tram operations, especially during turns, and potential structural damage and disturbance from vibrations during construction and operation.

Detailed assessments indicate that daytime noise levels will range from 45-51 dB LAeq,16hr and night-time noise levels from 40-46 dB Lnight, which are within acceptable limits. The assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design to screen Ravens Court from the Luas tracks. The noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO. Mitigation measures, including the floating slab track, have been provided to ensure that the noise and vibration impact are not significant.

Residents are concerned about potential delays for emergency vehicles due to LRT operations and access for services.

Emergency services will have priority access over regular traffic, including Luas LRVs. Operational protocols are designed to ensure minimal disruption and quick response times. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. Footpaths alongside the tracks

will allow emergency services personnel to reach the estate on foot if needed. The design allows for maintaining pedestrian access even in the unlikely event of a LRVs breakdown. During construction, local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses. Details regarding temporary access provisions will be discussed with residents prior to construction starting in the area.

Residents are concerned about the loss of parking spaces and increased difficulty in manoeuvring within the estate, as well as increased congestion on Cardiff Castle Road.

TII's assessments indicate minimal changes in traffic volume on Cardiff Castle Road, with an increase of less than 100 vehicles combined in both directions. This threshold aligns with an approximate 1 vehicle per minute increase per direction on any given road, which is deemed to be "Not Significant."

According to the RO Landscape Drawings, the proposed scheme does not encroach into the paved areas of the estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged.

The proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.

Residents are concerned about the stress and anxiety due to the loss of green space and increased noise, impacting their mental health, particularly those with existing conditions.

The potential effect on mental health has been extensively discussed in the Human Health Chapter of the EIAR. The assessment includes the psychological impacts of both the construction and operational phases, with references to sections 7.2.2.8, 7.4.2.1, and 7.4.2.2. While it is accepted that some loss of space and amenity is unavoidable, particularly during the construction phase, this will be minimised where possible. It should also be noted that there are potential positive psychological effects in the operational phase, with some of the greatest benefits available to residents who live close to the line.

Residents are concerned about the potential devaluation of properties due to proximity to the Luas line.

Section 8.6.3.1 of the Population chapter of the EIAR describes the possible impact on local property prices based on a review of the literature associated with previous light rail schemes in Ireland. Typically, it has been found that property prices tend to rise in the vicinity of Stops. In the event that the RO is approved and TII exercises its powers of acquisition, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation. This will be determined by a Property Arbitrator in accordance with the relevant statutory provisions.

Residents feel there was a lack of adequate consultation and consideration of their feedback, and concerns about the transparency and thoroughness of the planning process.

TII has engaged in multiple meetings and communications with Ravens Court residents. This includes a series of online meetings held on December 8, 2021, February 28, 2023, October 29, 2024, and an in-person meeting on January 8, 2022. Additionally, several meetings have taken place to discuss alternative alignments and gather further input. Feedback from residents has been carefully reviewed, leading to

several changes in the route and design. TII has communicated these changes and updates through various channels, ensuring that residents were informed, and their concerns are addressed.

TII commits to continuing respectful engagement with impacted stakeholders, addressing concerns and providing updates on the proposed Scheme. According to TII records, there were 81 communications between TII and Ravens Court residents, demonstrating continuous engagement.

4.3.2.2 Finglas Village Stop

Table 5-2 provides a list of the submissions specific to this Area.

Concerns were raised about the removal of non-private on-street parking in front of the Finglas Youth Resource Centre at Finglas Village. Need for alternative parking arrangements.

The proposed Scheme aims to enhance public transport connections and cycling infrastructure, making the Finglas Sports and Leisure Centre more accessible to a larger catchment area. This includes a new cycle lane and covered bicycle parking facility. An ESB e-bike charging facility has already been installed outside the Leisure Centre.

The loss of car parking is acknowledged but necessary to facilitate the Luas alignment and Finglas Village Stop. This loss will be partly compensated by new parking at the rear of the building, providing safer access from Cardiff Castle Road.

In the longer term, the operational Luas will provide an alternative to car use. This strategic decision supports sustainable transport, climate action goals, and reduces traffic congestion. The Finglas Village Stop will be located within a new plaza in front of the Leisure Centre, providing an attractive and car-free environment.

TII will work with Dublin City Council (DCC) and other stakeholders to minimise impacts during the construction phase and explore parking solutions. TII is committed to minimising disruption throughout the construction phase, and these details will be further explored with contractors once appointed.

Concerns were raised about the timeline and access arrangements during construction. Greater clarity is needed regarding accessing the entrance and exit at the rear of buildings, such as the DCC building and FYRC for parking. Public right of way. Ensure that proper pre-construction measures are in place to account for the health and safety of those using the existing facilities.

Public right of way will be maintained throughout construction, ensuring safe access. Pedestrian access will continue via the plaza area around the Luas Stop, and vehicular access will be via the proposed car park in front of the Centre and Cardiff Castle Road to the rear.

There will be no need for relocation or cessation of operations. The external area will need to be temporarily closed for a short period to facilitate the construction of Luas Finglas, but this will not affect the Centre's operation.

Specific arrangements will be communicated during the detailed design and construction phases. Temporary parking and access provisions will be discussed with affected parties. The proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area. Continuity of access is to be maintained to FYRC as identified in the Construction Traffic Management Plan (t).³⁹

³⁹ Volume 5 – Appendix A6.2

Compliance with the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations 2013, and other relevant Irish and EU safety legislation will be maintained. A Health and Safety Plan will be formulated by the Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS), addressing health and safety issues from design through to completion. TII will continue to engage with stakeholders to ensure business concerns are considered. The Health and Safety Plan will be reviewed as the proposed Scheme progresses.

Consideration should be given to the safety of people accessing the buildings, especially young people, who may have to cross the Luas tram lines.

The Luas Stop will have standard safety attributes and procedures common to all Luas stations. Trams will operate at low speed near the Finglas Stop. The Stop will be located within a safer, car-free environment of a new civic plaza, providing natural surveillance, good lighting, security cameras, and emergency help buttons. The environment will be open, and the Resource Centre will be very visible from the stop, making it easy to locate.

Concerns regarding noise levels and disruption were raised.

Noise levels due to Luas operation will be lower than existing road traffic noise. Mitigation measures, such as floating slab track, will be implemented to minimise noise impacts. The noise impact has been assessed as not significant. The calculated noise levels during operation of the proposed Scheme are lower than the threshold for daytime noise, and the new noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment.

Concerns regarding anti-social behaviour and security concerns.

Increased activity will provide passive surveillance. Adequate lighting, security cameras, and emergency help buttons will enhance security. TII will continue to consult with FYRC regarding security measures.

4.3.3 Area 33 North of Finglas Village Stop to the Terminus (Charlestown Stop)

Table 5-2 provides a list of the submissions specific to this Area.

Concerns were raised about the proposed Scheme's alignment with the Jamestown Masterplan. The observations suggests that Luas Finglas does not comply with the masterplan, particularly regarding the provision of access roads and the overall urban structure.

In response, TII emphasises the strategic approach and policy context outlined in the Dublin City Council Development Plan 2022-2028. This plan aims to develop a low carbon, sustainable, climate-resilient city. Key strategic transport projects, including Luas line extensions, are identified as crucial for expanding an integrated public transport system for the Dublin region. These projects have the potential to transform travel modes over the coming years. Policy SMT22 directly supports the extension of Luas to Finglas, and the design of Luas Finglas will inform the Master planning of the Jamestown Lands. This includes a strategic pedestrian and cycle amenity link, aligned with key desire lines to the proposed Luas extension. This link forms part of the green infrastructure network, providing a key connection between proposed open spaces.

In February 2024, Dublin City Council adopted Variation No. 4 of the Dublin City Development Plan 2022-2028. This variation related to SDRA 3 Finglas Village Environs and Jamestown Lands and incorporated the Jamestown Masterplan 2023 into the Development Plan by way of a new appendix. These lands are identified in the Jamestown Masterplan 2023 for future 'residential led mixed use,' considering their location along the Luas corridor.

TII is committed to maintaining access to businesses and properties within the Jamestown area throughout the construction and operation of the Luas Finglas project, in full coordination with the implementation of the Dublin City Council Jamestown Masterplan.

Please also refer to extract below from the DCC submission on the Luas Finglas Railway Order Application, with TII emphasis added **in bold**:

*“The Jamestown Masterplan is a detailed refinement of the Development Plan’s SDRA for 43 hectares of Jamestown Industrial Estate lands at Jamestown Road, St Margaret’s Road / McKee Avenue, Finglas, Dublin 11. The Jamestown Masterplan was approved by the elected members of Dublin City Council on 3 July 2023 following a public consultation process. The Jamestown Masterplan represents an urban designed and evidence-based approach to the mixed-use regeneration of this strategic land bank, **capitalising on significant planned state investment in public transportation (Luas Finglas and BusConnects) in accordance with national and regional policy objectives relating to compact and sustainable growth.** Accordingly, the area has significant capacity to deliver new homes, create and support jobs, and provide associated supporting community and educational uses.*

Following a statutory consultation process, the Jamestown Masterplan was included in Appendix 20 of the Development Plan by a statutory variation, constituting Section B of SDRA 3 (February 2024).

***The masterplan was developed with an awareness of the Luas Finglas in recognition that future growth in the area will be enabled and sustained by its delivery.** The masterplan area includes one Luas stop and a Park & Ride facility. Section 5 of the masterplan outlines that the overall strategy for the land use function is based on two hubs, namely: a sustainable mobility hub to the northwest of the lands proximate to the proposed Luas Stop on St Margaret’s Road, and a community hub located to the centre of the lands proximate to the public open space and school site. Residential, employment/commercial led mixed uses, and a school site are indicated towards the centre of the masterplan, and proximate to the Luas to reinforce the community and sustainable mobility hubs. **The delivery of the Finglas Luas is fundamental to ensuring the successful delivery of regeneration at Jamestown** based on planned and coherent integration between public transport infrastructure, land use and function.”*

Details of the Jamestown Masterplan are here: www.dublincity.ie/sites/default/files/2024-03/appendix-20_jamestown-masterplan-2023.pdf

Phasing and sequencing are described in Section 6 of the Masterplan on page 24. Extract from the Masterplan provided below.

Figure 6.2: Development Phases



In addition, Table 6.1 of the Masterplan on sequencing states that Phase 2 is contingent on the following infrastructure requirement: *“Luas Finglas either under construction or operational before the granting of planning permissions for residential developments.”* The Luas Finglas project design and construction phasing have been developed, in close coordination with DCC, landowners and businesses, to accommodate the potential scenarios outlined in the Jamestown Masterplan. Specifically:

- Phase 1 of Jamestown Masterplan (in advance of Luas Finglas): Should Phase 1 of the Jamestown Masterplan (including the new planned "Local streets", described further below) be implemented prior to Luas Finglas construction, the Luas project design already incorporates these new streets, ensuring continued access to existing businesses still in operation.
- Phase 1 - Maintaining Access to Businesses: If, at the point of Luas Finglas construction, businesses, are still operating and have not transitioned to new access points as outlined in the Masterplan, Luas Finglas has provisions to provide the planned "Local streets" and maintain access for their continued operation.
- Phase 2 of Jamestown Masterplan: As noted above, Phase 2 of the Jamestown Masterplan is contingent upon the construction of Luas Finglas. The Luas project will, therefore, facilitate the implementation of this later phase.

The access provision included in the design of Luas Finglas, aligns with DCC's Phase 1 "Specific Measures to support existing uses while facilitating change" described within the Masterplan, on page 26.

Extracts from the Masterplan provided below:

"Specific Measures to support existing uses while facilitating change (refer to figure 6.4):

- A. Access to Manhattan Peanuts and Murdock's site to be provided from a new access off McKee Avenue to property boundary, if Luas Finglas operations prevents the continuation of access from St Margaret's Road. Any proposed expansion of Manhattan Peanuts and Murdock's existing

business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site.

- B. Access to Polonez and Finglas Auto Parts to be provided from the north, aligned with the urban structure set out, if Luas Finglas operations prevents the continuation of access from St Margaret's Road."

Figure 6.4: Phase 1 - facilitating change



TII will ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the Jamestown Masterplan, where existing access will be directly impacted by the proposed Scheme.

Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in EIAR Chapter 6 (Construction Activities). The sequencing of the programme is shown in Figure 6-2: Construction Programme, Section 6.3.3. Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP. Specific measures for St, Margaret's Road are also included in the A6.1 CEMP Table A6 1-5 including Mitigation number PM-23 "TII will ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the

Jamestown Masterplan, where existing access will be directed impacted by the proposed Scheme. Provide highly visible signage to direct customers and suppliers to this new access".

TII is actively engaging, and will continue to engage, with DCC, landowners, and businesses within the Jamestown area to ensure a coordinated approach to both the Luas Finglas project and the evolving Jamestown Masterplan. This includes ongoing discussions regarding access arrangements, construction phasing, and the long-term integration of the Luas line within the redeveloped Jamestown area.

The Masterplan includes measures to support existing uses while facilitating envisaged masterplan changes in the area. For example, the Adrez lands are located in area B with specific measures identified: "Access to Polonez and Finglas Auto Parts to be provided from the north, aligned with the urban structure set out, if Luas Finglas operations prevent the continuation of access from St Margaret's Road." Plan no. D1-GA 33 C-D illustrates that the Luas Finglas scheme will make provision for a new access alignment south of Finglas Auto Parts. This access is existing, and while it is not shown on the Jamestown Masterplan, it is required under the Luas Finglas scheme to ensure continuous access to existing properties at this location. Section 6 of the Jamestown Masterplan does not restrict the provision of such an access to service established businesses: "Any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site." Having regard to the above, the Luas Finglas scheme is fully aligned with the Jamestown Masterplan. The submission made by Dublin City Council confirms that regenerative mixed-use development proposals along the proposed route at Jamestown "have / are being developed to ensure compatibility with the project delivery and future operation" of the Luas. This detailed explanation highlights how the proposed Luas Finglas scheme aligns with the strategic goals and specific provisions of the Jamestown Masterplan, ensuring that the development supports both existing uses and future growth in the area.

Acquisition of Internal Road as per the Railway Order Property Drawings (Plan Numbers - D1-GA 33 1-2 and D1-GA 33 C-D)

TII confirms that acquiring the internal road is necessary for the construction and operation of Luas Finglas. This acquisition will ensure continuous access to existing properties and businesses in Jamestown Little Industrial Estate, which remains a cul-de-sac but with no vehicular access to St Margaret's Road. The existing informal paved surface will be formalised into a roadway to ensure free flow movement of two-way traffic. A swept-path analysis was conducted during the design development process to assess vehicle access and manoeuvrability for the existing properties. This analysis considered the volume and type of traffic movements required for Jamestown Little Industrial Estate and Polonez/Saphire. The proposed Scheme will facilitate the necessary vehicle movements while improving access conditions compared to the existing situation.

In terms of safety, the proposed Scheme includes a 7.0m-wide road corridor through Jamestown Little Industrial Estate, designed to accommodate the necessary access requirements. The nature of this road will be similar to access routes within a car park, featuring a continuous paved surface with road markings, in keeping with the industrial setting. The available land provides sufficient space for a well-designed road that meets functional and safety standards. Regarding safety, several factors contribute to a safe access design. The absence of a through-road, the layout's ability to naturally moderate vehicle speeds, and the anticipated low level of use, all support a safe and controlled traffic environment. These elements collectively contribute to minimising potential road safety concerns.

4.4 Summary of Some Specific Individual Responses Not Fully Covered Elsewhere

In order to properly introduce the detailed responses to the observations issued by DCC and FCC in section 5.2, which presents a point-by-point analysis, this section responds in advance to the various supports that these major stakeholders have developed.

4.4.1 Dublin City Council

Transport Infrastructure Ireland (TII) appreciates Dublin City Council's support for the proposed Luas Finglas extension. This project is a significant step towards enhancing Dublin's public transport network, and TII is committed to ensuring that it aligns with statutory and planning contexts while meeting environmental impact standards. TII looks forward to continued collaboration with Dublin City Council to achieve these goals and deliver a project that benefits the entire community.

TII acknowledges the alignment of the Luas Finglas project with national, regional, and city policies. The organisation is dedicated to supporting sustainable mobility and regeneration efforts, recognising the importance of integrating transport infrastructure with land use planning. By working closely with Dublin City Council, TII aims to ensure that the project meets these policy objectives and contributes to the broader goals of sustainable urban development.

TII is pleased to support the regeneration and sustainable growth of key areas in Dublin. The Luas Finglas extension is designed to enable significant housing delivery and economic growth in the north of the city. The organisation appreciates Dublin City Council's efforts in developing the Jamestown Masterplan and Ballyboggan regeneration plans in anticipation of this project. These plans are crucial for maximising the potential of the Luas extension, and TII is committed to facilitating their successful implementation.

TII is committed to contributing to Ireland's climate action goals. The Luas Finglas extension will play a crucial role in reducing transport-related carbon emissions and supporting Dublin City Council's Climate Change Action Plan. By providing a reliable and sustainable public transport option, the project will help reduce reliance on private cars, thereby lowering greenhouse gas emissions. TII is dedicated to achieving the targets set out in the Climate Action and Low Carbon Development Act and is proud to be part of Dublin's efforts to combat climate change.

TII recognises the importance of enhancing Dublin's competitiveness through improved public transport connectivity. The Luas Finglas extension will support economic growth, particularly in the Jamestown, Finglas, and Dublin Industrial Estate areas. By improving access to these key areas, the project will attract investment, create jobs, and support local businesses. TII is committed to ensuring that the project maximises these economic benefits and contributes to Dublin's long-term prosperity.

TII is dedicated to ensuring that the Luas Finglas project positively impacts urban design and public realm. The organisation will use high-quality materials and design to enhance the cityscape, particularly with the bridge constructions at Broombridge and Tolka Valley. TII appreciates Dublin City Council's input on these aspects and will address any concerns raised in the departmental reports. By prioritising excellence in design, TII aims to create infrastructure that not only serves functional needs but also enhances the aesthetic and social value of the urban environment.

TII values the extensive consultation and engagement with Dublin City Council over the years. The organisation will carefully consider the suggested conditions to ensure the development is carried out to the highest standards. TII is committed to addressing the concerns and recommendations from various departments and technical divisions, recognising that their expertise is vital for the project's success. This collaborative approach will help ensure that the Luas Finglas extension meets the needs and expectations of all stakeholders.

TII acknowledges the relevance of the planning applications along the proposed route. The organisation will ensure that the Luas Finglas project is compatible with these applications and aligns with the overall

planning strategy for the area. By coordinating with Dublin City Council and other relevant authorities, TII aims to integrate the project seamlessly into the existing urban fabric, minimising disruptions and maximising benefits for the community.

TII appreciates Dublin City Council's confirmation that the Luas Finglas project is compatible with zoning objectives and land use definitions in the Development Plan. The organisation will continue to ensure that the project supports the development and growth of Finglas Village as a Key Urban Village. By aligning with the principles of the 15-minute city, the Luas extension will enhance accessibility and connectivity, making it easier for residents to access essential services and amenities.

TII agrees with the recommendation to establish a Project Liaison Office for ongoing collaboration and engagement. The organisation is committed to maintaining close cooperation with Dublin City Council regarding construction traffic management, licenses, agreements, and other procedural matters. This proactive approach will help address any issues that arise during the project's implementation and ensure that the development proceeds smoothly and efficiently.

TII is grateful for Dublin City Council's support for the Luas Finglas project. The organisation shares the vision of facilitating sustainable growth and improved transport integration in Dublin. By working together, TII and Dublin City Council can ensure the successful delivery and operation of the Luas Finglas extension, creating a more connected, sustainable, and vibrant city for all residents. TII looks forward to ongoing collaboration with Dublin City Council to achieve these shared goals and deliver a project that will benefit Dublin for generations to come.

4.4.2 Fingal County Council

Transport Infrastructure Ireland (TII) appreciates Fingal County Council's support for the proposed Scheme and the comprehensive feedback provided and is committed to addressing the various topics raised to ensure the successful implementation of this strategic infrastructure development.

TII is pleased to note Fingal County Council's endorsement of the proposed Scheme, recognising its potential to promote sustainable travel and enhance the social, economic, and environmental assets of Charlestown and Fingal. TII shares your vision of achieving compact urban growth, reducing congestion, and lowering emissions through this initiative.

The alignment of Luas Finglas with Project Ireland 2040, the National Development Plan 2021-2030, and the National Sustainable Mobility Policy is crucial. TII is committed to delivering key infrastructure projects that support these national objectives, including the enhancement of the Luas network. The proposed Scheme is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031. TII will continue to work closely with regional stakeholders to optimise infrastructure and promote sustainable urban settlement patterns. The Fingal Development Plan 2023-2029 provides a robust framework for climate action, connectivity, and movement. TII will ensure that the proposed Scheme aligns with these local policies, facilitating sustainable growth and improved public transport provision.

TII will work collaboratively with Fingal County Council to ensure that the proposed Scheme supports the vision for town and district centres, open spaces, general employment, and residential areas. TII is committed to reserving public transport connections and corridors free from inappropriate development, as outlined in the Fingal Development Plan. TII will adhere to these standards to maintain the integrity of the public transport network.

TII recognises the importance of enhancing community integration through improved access to education, healthcare, employment, and amenities. The Luas Finglas project will play a pivotal role in achieving these objectives, fostering vibrant and walkable communities. The proposed Scheme aims to reduce private car use, lower greenhouse gas emissions, and promote sustainable mobility. TII will implement measures to ensure these environmental benefits are realized, contributing to a low-carbon society.

TII appreciates Fingal County Council's suggestions regarding community gain conditions. TII is open to incorporating conditions that support sport, recreation, leisure, and community development initiatives, ensuring that the project delivers tangible benefits to the local community. TII will work with Fingal County Council to generate financial contributions towards transport infrastructure under Section 48 and Section 49 of the Planning and Development Act, 2000. These contributions will support the capital costs of providing local and strategic transport infrastructure.

TII is committed to the successful delivery of the proposed Scheme, recognising its transformative potential for Charlestown and the wider area. TII values the support and collaboration of Fingal County Council and looks forward to working together through the RO process and subsequent design and construction stages.

5 Responses to Individual Submissions

The following section details TII's response in alphabetical order to each of the 46 submissions received from the statutory consultation. Section 5.1 provides the index for TII's response to each individual submission and section 5.2 provides TII's response to each individual submission received.

5.1 Submissions Index

To assist the reader, Table 5-1 presents an index that reflects the alphabetical order of the submissions and the order in which they are presented in this document with the exception of those submissions noted below. These submissions have been grouped together as they cover the same subject matter and have thus been responded to under a single response to avoid unnecessary duplication:

- Submissions No's - 6 and 13;

The response to these grouped submissions has been placed in the order of its lowest number.

A second index, Table 5-2, is provided that groups the submissions in accordance with the categorisation set out by section 3.2.1, and sections 4.3 and 0 of this document.

Table 5-1: Index - Submissions Received in Response to RO Application Statutory Consultation (Alphabetical Order)

No. Submission	Submitted by:	Area / Location
1	Aldi Stores Ireland Ltd.	Area 33 - St. Margaret's Road (west)
2	Adrez Ltd.	Area 33 - St. Margaret's Road (east)
3	An Post	Area 33 - Jamestown Business Park DSU facility
4	Appian Holdings Ltd. & Mongey Plunkett Motors	Area 33 - North Road
5	Atlas Autoservice Ltd.	Area 33 - St. Margaret's Road (east)
6	Brooks Timber & Building Supplies Ltd.	Area 31 - Broombridge Road (east)
7	Cllr Mary Callaghan	Areas 32 and 33 - along the proposed Scheme
8	Colorman Ltd	Area 31 - Broombridge Road (east)
9	Commission for Railway Regulation (CRR)	All areas
10	Córas Iompair Éireann (CIE)	All areas
11	Dessie Ellis TD	Area 32 - Finglas Village Stop (Mellowes Road)
12	Development Applications Unit (DAU)	All areas
13	Downshire Propco Ireland	Area 31 - Broombridge Road (east)
14	Dublin City Council	All areas
15	Dublin Commuter Coalition	All areas
16	Fashionflo Ltd	Area 31 - Broombridge Road (east)
17	Fingal County Council	Area 33
18	Finglas Counselling Service Board of Management	Area 32 - Mellowes Road
19	Finglas Youth Resource Centre	Area 32 - Mellowes Road

No. Submission	Submitted by:	Area / Location
20	Firethorn Ltd. (Manhattans Peanuts Ltd.)	Area 33 - McKee Avenue / St. Margaret's Road (east)
21	Heetland Ltd.	Area 33 - Jamestown Business Park
22	HPC Sales Ltd.	Area 31 - Broombridge Road (west) / Ballyboggan Road
23	Jack & Lily O'Neill	Area 32 - Ravens Court (unit 2)
24	Jennifer Caul & Jason Neeson	Area 32 - Ravens Court (unit 3)
25	Joe Duffy Property Company Ltd	Area 33 - North Road
26	John Duffy	Area 32 - Ravens Court (unit 4)
27	Lidl Ireland	Area 33
28	Mary Davitt	Area 32 - Ravens court
29	Megan Coughlan	Area 32 - Ravens Court
30	Megrick Limited	Area 33 - McKee Avenue / St. Margaret's Road (east)
31	Mellow Spring Childcare Development Centre	Area 32 - Finglas Village Stop
32	Michael Coughlan	Area 32 - Ravens Court
33	Michael Liam Coughlan	Area 32 - Ravens Court
34	Murdock Builders Merchants (Ireland) Limited	Area 33 - Charlestown stop
35	Niamh Mooney & Darren Hanlon	Area 32 - Ravens Court
36	NTA	All areas
37	Paul McAuliffe TD	Areas 32 and 33 - Farnham Pitches, Ravenscourt and Cardiff Castel Road, Finglas Village Stop, Mellows Park, St Margarets stop, Jamestown lands
38	Rory Hearne TD	Areas 32 and 33 - St. Margarets Road, St Margarets Court, Ravens Court, Finglas Youth Resource Centre
39	Sport Ireland, Connolly Hospital Blanchardstown & TUD	Outside Luas Finglas area
40	Susan Coughlan	Area 32 - Ravens Court
41	Tempside Limited (Polonez Finglas)	Area 33 - St. Margarets Road (east)
42	The National Graves Association (NGA)	Area 33 - Liam Mellows Memorial Garden
43	Tricia Everitt & Tony Jones	Area 33 - St. Margarets Court (units 1-4)
44	Turlough Hamil & Micheal Cosgrove	Area 33 - St. Margarets Road
45	Uisce Éireann	All areas
46	Voice of Vision Impairment	All areas - Broombridge Station and Throughout

**Table 5-2: Index - Submissions Received in Response to RO Application Statutory Consultation
(Grouped by 'Area')**

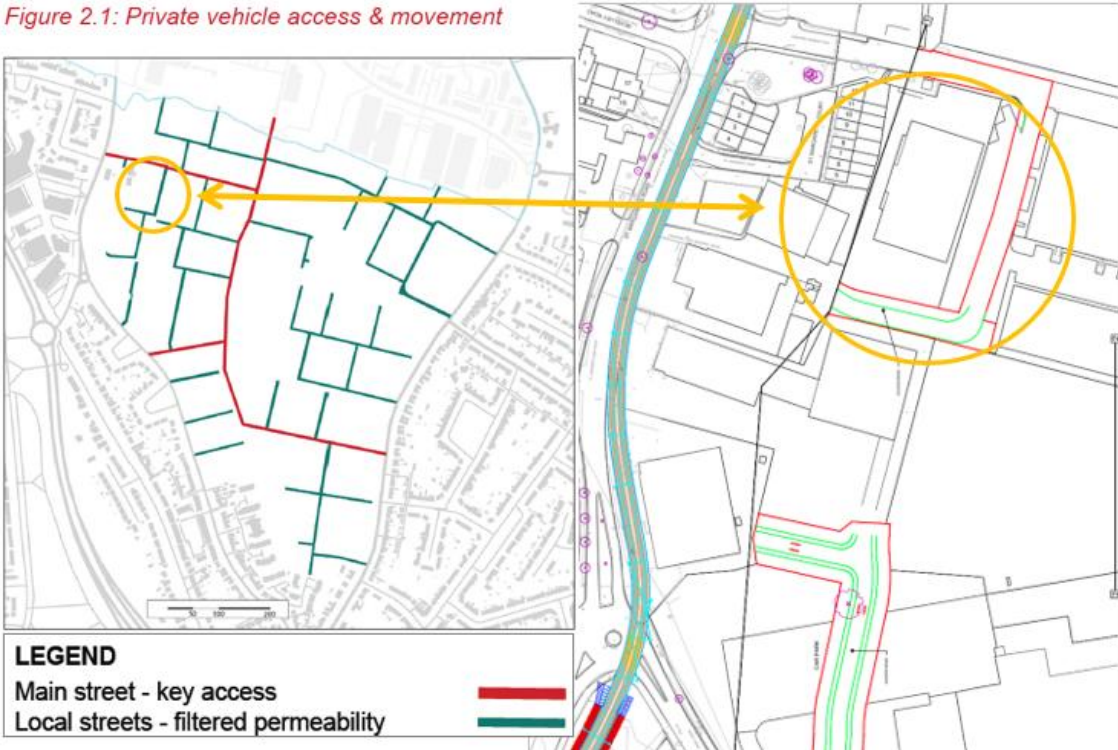
Submission No.	Submitted by:	Location / Area
6	Brooks Timber & Building Supplies Ltd.	Area 31 - Broombridge Road (east)
8	Colorman Ltd	Area 31 - Broombridge Road (east)
13	Downshire Propco Ireland	Area 31 - Broombridge Road (east)
16	Fashionflo Ltd	Area 31 - Broombridge Road (east)
22	HPC Sales Ltd.	Area 31 - Broombridge Road (west) / Ballyboggan Road
11	Dessie Ellis TD	Area 32 - Finglas Village Stop (Mellows Road)
18	Finglas Counselling Service Board of Management	Area 32 - Mellows Road
19	Finglas Youth Resource Centre	Area 32 - Mellows Road
23	Jack & Lily O'Neill	Area 32 - Ravens Court (unit 2)
24	Jennifer Caul & Jason Neeson	Area 32 - Ravens Court (unit 3)
26	John Duffy	Area 32 - Ravens Court (unit 4)
28	Mary Davitt	Area 32 - Ravens court
29	Megan Coughlan	Area 32 - Ravens Court
31	Mellow Spring Childcare Development Centre	Area 32 - Finglas Village Stop
32	Michael Coughlan	Area 32 - Ravens Court
33	Michael Liam Coughlan	Area 32 - Ravens Court
35	Niamh Mooney & Darren Hanlon	Area 32 - Ravens Court
40	Susan Coughlan	Area 32 - Ravens Court
1	Aldi Stores Ireland Ltd.	Area 33 - St. Margaret's Road (west)
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4	Appian Holdings Ltd. & Mongey Plunkett Motors	Area 33 - North Road
5	Atlas Autoservice Ltd.	Area 33 - St. Margaret's Road (east)
17	Fingal County Council	Area 33
20	Firethorn Ltd. (Manhattan Peanuts Ltd.)	Area 33 - McKee Avenue / St. Margaret's Road (east)
21	Heetland Ltd.	Area 33 - Jamestown Business Park
25	Joe Duffy Property Company Ltd	Area 33 - North Road
27	Lidl Ireland	Area 33
30	Megrick Limited	Area 33 - McKee Avenue / St. Margaret's Road (east)
34	Murdock Builders Merchants (Ireland) Limited	Area 33 - Charlestown stop
41	Tempside Limited (Polonez Finglas)	Area 33 - St. Margarets Road (east)
42	The National Graves Association (NGA)	Area 33 - Liam Mellows Memorial Garden

Submission No.	Submitted by:	Location / Area
43	Tricia Everitt & Tony Jones	Area 33 - St. Margarets Court (units 1-4)
44	Turlough Hamil & Micheal Cosgrove	Area 33 - St. Margarets Road

5.2 TII Responses to Individual Submissions

Submission No.	01		
Submitted by	Adrez Limited ⁴⁰ (Sudway & Company Limited Chartered Surveyors on their behalf)		
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1	3	<p>"I confirm my Clients are the owners of all the property outlined in red on the attached Ordnance Survey extract contained in appendix 1 currently 6 businesses operating from the buildings contained within this site. All of these properties have access to St Margaret's Road and there is a small narrow internal road contained within the site which provides for access to the buildings at the rear of the site. Currently it is possible to access the site via St Margaret's Road with an articulated lorry for deliveries.</p> <p>In relation to the proposed Scheme, it would appear that TII propose to acquire the internal road as indicated on the attached map (appendix 2) with a reference number of D133CA 11."</p>	<p>TII notes that the site outlined in red (Appendix 1 of the submission) appears to be currently occupied by Finglas Auto Parts & Square Fit, while the representative stating that the submission pertains to Adrez-owned property.</p> <p>TII confirms that acquiring the internal road marked as D1-33C-A11 owned by Adrez Ltd., as per the RO Property Drawings (Plan Numbers - D1-GA 33 1-2 and D1-GA 33 C-D), is necessary for the Luas Finglas scheme. This acquisition will ensure continuous access to existing properties and businesses in Jamestown Little Industrial Estate, which remains a cul-de-sac but with no vehicular access to St. Margaret's Road. The existing informal paved surface will be formalised into a roadway to ensure free flow movement of two-way traffic.</p>
2	3	<p>"This drawing only indicates the extent of the permanent and temporary acquisition and doesn't not provide any details of the road design or layout, the only drawings which may indicate anything remotely resembling a layout is contained in the Landscape section of the Environmental Impact and the Alignment Details Book see appendix 3. Neither of these drawings could be construed as being a detailed design."</p>	<p>The primary purpose of property drawings is to clearly identify the permanent and temporary land acquisitions necessary for the proposed Scheme. These drawings provide a detailed record of the affected properties, linking each parcel of land to its respective owner to ensure transparency and accurate communication. They serve as a crucial reference for stakeholders, including landowners, planners, and legal authorities, by outlining the extent of land requirements for the project.</p> <p>It is important to note that property drawings are not intended to illustrate road layouts. Instead, their focus is on landownership and acquisition details. The design and alignment of the road are comprehensively presented in the RO alignment drawings (D1-GA33-1-2 and D1-GA33-C-D), and the referenced landscape drawings which should be consulted for information related to the road layout.</p> <p>The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the EIAR. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and all stakeholders will be kept informed and advised in accordance with the procedures set out in Chapter 6 Construction activities and the CTMP.</p>
3	3	<p>"There appears to have been no traffic movement study carried out to assess whether this will facilitate the volume and type of traffic movements that are required for the existing properties."</p>	<p>A swept-path analysis was conducted during the design development process to assess vehicle access and manoeuvrability for the existing properties. This analysis considered the volume and type of traffic movements required for Jamestown Little Industrial Estate and Polonez/Saphire.</p> <p>For Jamestown Little Industrial Estate, the current entry from St. Margaret's Road is a narrow-gated opening (approximately 4.2m wide, based on the topographic survey). The largest vehicle that can currently access this site is a 10m rigid HGV, but manoeuvring remains tight. While a 3-point turn is possible, it may require the removal of parked cars at the end of the access road. With the proposed Scheme, access for 10m rigid HGVs will be significantly improved, as drivers will no longer need to navigate a restrictive gate opening. The ability to perform a 3-point turn will remain unchanged, with parked cars potentially needing to be cleared from paved areas.</p> <p>For Adrez, which has a single access off St. Margaret's Road, the current gate opening measures approximately 4.2m wide. The largest vehicle capable of entry is a 10m rigid HGV, though manoeuvrability is tight. A 3-point turn is currently feasible, but it requires some parking bays to be vacated. Under the proposed Scheme, 10m rigid HGVs will still be able to access the site, with the same manoeuvrability. However, a 7.5-tonne, 7.17m rigid HGV will be able to access and perform a 3-point turn with ease, as confirmed by swept-path analysis.</p> <p>The swept-path analysis undertaken as part of the design development demonstrates that the proposed Scheme will facilitate the necessary vehicle movements while improving access conditions compared to the existing situation.</p> <p>The new access road is a cul-de-sac with no through route for traffic onto St. Margaret's Road. As such, the road should experience similar volumes of traffic to those currently accessing the impacted properties directly off St. Margaret's Road. As outlined in Chapter 18 Traffic and Transport of the EIAR, TII's Traffic and Transport Assessment Guidelines (May 2014) define a threshold for assessment of 100 vehicles (combined 2-way flow) in the peak hours (Figure 18-30 of the EIAR). This threshold aligns with an approximate 1 vehicle per minute</p>

⁴⁰ Premises known as Finglas Auto Parts / Square Fit Ltd.

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			increase per direction on any given road. Where changes in traffic volumes as a result of the proposed Scheme are less than the 100-vehicle threshold (as is the case here), then the impacts are deemed to be “Not Significant” and a further traffic capacity analysis is not required as part of the EIA.
4	3	"TII have indicated in correspondence that they are of the view that the scheme as proposed is in compliance with the Jamestown Master plan see appendix 4. This is clearly not the case and I can confirm that my Clients engaged extensively with DCC, as did TII, in the preparation of the Master plan and we were clear that we did not require a public road through our site as it would destroy and future development of the site. This was accepted in the development plan and can be seen in the map attached in appendix 5 which shows the road to the rear terminating at our boundary."	<p>Chapter 2 Section 2.2.5.1 of the submitted EIAR sets out the overarching strategic approach to the Dublin City Council Development Plan 2022-2028 ‘to develop a low carbon, sustainable, climate resilient city’. The Plan identifies that key strategic transport projects, including Luas line extensions, will ‘continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years. The Chapter confirms that the extension of Luas to Finglas is supported directly under Policy SMT22 and that the design of Luas Finglas will inform the master planning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing Adrez lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network, providing a key link between proposed open spaces. It is further added that future development ratios, densities and height will be formed in this area to avail of this proposed public transport infrastructure and the development of a sustainable and compact urban form.</p> <p>Chapter 2 of the prepared EIAR acknowledges that in February 2024, Dublin City Council adopted Variation No. 4 of the 2022 Dublin City Development Plan. This variation related to SDRA 3 Finglas Village Environs and Jamestown Lands and the incorporation of Jamestown Masterplan 2023 into the Development Plan by way of a new appendix. The ‘Adrez’ lands are identified for future ‘residential led mixed use’ having regard to their location along the Luas corridor.</p> <p>Chapter 2 of the Masterplan establishes the urban structure for the future development of the area. Figure 2.1 establishes the ‘private vehicle access & movement strategy’ for the area. As illustrated, the Proposed Development complies with the adopted movement strategy and will deliver a local street consistent with the Masterplan framework (refer to plan no. D1-GA 33 1-2).</p> <p><i>Figure 2.1: Private vehicle access & movement</i></p>  <p>Furthermore, Chapter 6 of the Jamestown Masterplan identifies that the Adrez lands are situated in the Phase 2 development area, with the following key infrastructure requirement: “Luas Finglas either under construction or operational before the granting of planning permissions for residential developments”.</p>

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			<p>It follows that the future redevelopment of the site will only be considered once Luas Finglas is under construction or operational.</p> <p>The Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. The subject lands are located in area B with the following measures identified:</p> <p><i>“Access to Polonez and Finglas Auto Parts to be provided from the north, aligned with the urban structure set out, if Luas Finglas operations prevents the continuation of access from St Margaret’s Road”.</i></p> <p><i>Figure 6.4: Phase 1 - facilitating change</i></p> <p>Plan no. D1-GA 33 C-D illustrates that the Luas Finglas scheme will make provision for a new access alignment south of Finglas Auto Parts. This access is existing, and whilst it is not shown on the Jamestown Masterplan, it is required under the Luas Finglas scheme to ensure continuous access to existing properties at this location. In this regard, TII notes that Section 6 the Jamestown Masterplan does not restrict the provision of such an access to service established businesses:</p> <p><i>“Any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site”.</i></p> <p>Having regard to the above, the Luas Finglas scheme complies with the Jamestown Masterplan. TII notes the submission made by Dublin City Council, that confirms that regenerative mixed use development proposals along the proposed route at, inter alia, Jamestown, “have / are being developed to ensure compatibility with the project delivery and future operation” of the Luas.</p>
5	4	“It is clear that the scheme as proposed as it effects my client’s property has not been fully considered or designed...”	Refer to response in Items No. 2 and No. 3 above
6	4	“...and it is clear from the correspondence from TII, there is uncertainty as to when the new access roads will be provided. In which case it is our view that it would be premature for the Bord to approve the scheme as currently being proposed.”	<p>Chapter 6 Sections 6.2 and 6.3 of the EIAR, particularly Figure 6-2, outlines the construction activities and programme of works. The implementation of the works is to be phased to ensure continuity of access is maintained during construction. As noted in Table A6 1-5 of the CEMP (Volume 5 - Appendix A6.1) mitigation number PM-15, the contractor is to “Ensure continuity of access for businesses on the east side of St Margaret’s Road.” Therefore, TII confirms that the existing access will remain in place until the new road and access are fully available for use.</p> <p>In addition, Section 1.3.1 of the CTMP (Volume 5 - Appendix A6.2), states that “When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works,</p>

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			at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area."
7	4	"We would also take issue with their contention that their scheme is in compliance with the Jamestown Master plan, this is clearly incorrect as can be seen in the extract from the plan as provided in appendix 4 which indicates the road should stop at our boundary. This would allow my Client the flexibility to redevelop our site in the future should we choose to and may allow for some limited use of the existing commercial premises. The construction of a public road through the site as currently proposed will have the effect of making all uses of the existing premises impossible."	Please refer to response in Item No. 4 above.
8	4	"It is our view if TII are of the opinion that this road will be sufficient for vehicular traffic to service the existing uses on site then they are incorrect. There simply will not be enough room in the land available to provide a properly designed road that will be safe given that one of the Tenants is a retail shop with a lot of traffic movements for deliveries and customer. The proposed road will not in our view be safe and TII have not demonstrated how it would work for deliveries to the units at the front of the site especially during the works when the temporary land acquisitions are considered, as there will be no room to turn a vehicle, especially a truck which are vital to the existing Tenants."	<p>The proposed Scheme includes a 7.0m-wide road corridor through Jamestown Little Industrial Estate, designed to accommodate the necessary access requirements. The nature of this road will be similar to access routes within a car park, featuring a continuous paved surface with road markings, in keeping with the industrial setting. The available land provides sufficient space for a well-designed road that meets functional and safety standards.</p> <p>Regarding safety, several factors contribute to a safe access design. The absence of a through-road, the layout's ability to naturally moderate vehicle speeds, and the anticipated low level of use, all support a safe and controlled traffic environment. These elements collectively contribute to minimising potential road safety concerns.</p> <p>For details on how deliveries will be accommodated, refer to Item No.4 above.</p> <p>The temporary land acquisition is essential to provide adequate working space for constructing a new boundary treatment to St. Margaret's Road and for restoring paved surfaces within affected properties. The contractor's occupation of these temporary land areas will be limited to the duration required for these specific works, ensuring minimal disruption (Refer to response to Item No. 7 above). However, it is acknowledged that turning manoeuvres for larger vehicles may be more challenging during this period of temporary land use.</p>
9	4	"Neither has there been any consideration of how pedestrians would use the proposed road to access the retail unit, as there is no indication that there will be any footpaths and it would clearly be unsafe to have pedestrians walking on a road with vehicular traffic including trucks and Delivery vans."	A footpath is proposed between the new Luas tracks and the property boundary. Pedestrian access will be facilitated directly from St. Margaret's Road to the retail unit in question.
10	4	"It is our opinion that the environmental impact assessment is defective and does not address the environmental impacts on my client's property. We were therefore request that the Board should refuse permission for this scheme currently proposed."	The Environmental Impact Assessment (EIA) has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme. TII does not agree that the Environmental Impact Assessment is deficient, inadequate or missing information. The RO application comprises a very detailed environmental impact assessment that has identified and assessed the potential environmental impacts of Luas Finglas and proposed mitigations for these impacts where necessary.
11	4	"In relation to the compulsory acquisition of my clients lands it is our view that the acquisition as currently proposed is excessive insofar as the lands being acquired to create a public roadway through my clients property are not required for the actual scheme itself namely the provision of a railway and that therefore the board should either modify the order by removing this land take or in the event that they feel that this is not within their power then they should refuse permission for the entire compulsory purchase order as it exceeds what TII should be entitled to take from my clients, as the extent of the acquisition indicated in the CPO as currently being proposed is in breach of my client's constitutional right to their quiet enjoyment of their property as it involves acquiring lands that are not strictly required for TII to carry out their scheme, namely to construct a railway line."	<p>TII consider the acquisition of lands both temporary and permanent to be reasonable and proportionate. The existing vehicular access onto St. Margarets Road cannot be maintained for operational reasons (this applies also to the adjacent properties to the immediate north and south of the subject premises) meaning the works are required as part of the construction and operation of the light railway. Alternative access to the premises is facilitated by the new road arrangement making use of the current access through Jamestown Business Park and as is aligned with the DCC masterplan (please also refer to response to item 3 above). Further refinement at the detailed design stage will be undertaken and it should be noted that the masterplan is subject to modification/further planning application changes. The exact timeline of the works is dependent on a number of factors including approvals, and third-party developments and construction tendering. TII will continue to engage with stakeholders at all stages of the process to ensure disruption is minimised to the fullest extent possible as set out in EIAR Chapter 6 Construction Activities and the CTMP.</p> <p>The lands proposed to be compulsorily acquired from Adrez Limited are required for the provision of the Luas line and associated footpath along St Margaret's Road plus the new access road.</p> <p>The proposed new road referred to in the Adrez Submission is specifically mentioned in the Eleventh Schedule to the draft RO (New Roads which may be constructed). Item no. 3 mentioned in the Eleventh Schedule is as follows: "Construct new access road east off St Margaret's Road to the north of Match Line C as shown on Plan No. D1-AL 33 C-D. Article 9 of that draft RO confirms that TII may, subject to section 50 of the Transport (Railway Infrastructure) Act 2001 (as amended) (the "2001 Act"), construct the new roads specified in the Eleventh Schedule.</p>

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			<p>Therefore, it is clear that the RO may specify lands, the acquisition of which is, in the opinion of the Board, necessary for giving effect to the order. The lands that may be compulsorily acquired under a RO are not limited just to the railway line or tracks themselves but encompass lands which the Board is of the opinion are necessary for giving effect to the RO.</p> <p>Therefore on the basis of the above and the specific statutory powers contained in the 2001 Act, the lands proposed to be compulsorily acquired from Adrez Limited for the purposes of the construction of a new access road, which is required for the purposes of the proposed railway, cannot therefore in any way be characterised as “excessive” or in any way “not required for the actual scheme itself”.</p> <p>Further with respect to the contention that “the CPO as currently being proposed is in breach of Adrez Limited’s constitutional right to their quiet enjoyment of their property” again this contention, founded on the misunderstanding that the proposed acquisition from Adrez Limited “involves acquiring lands that are not strictly required for TII to carry out their scheme, which as demonstrated above is not the case, is again wholly misplaced. There is no question of any breach of the constitutional rights of Adrez Limited.</p> <p>The proposed compulsory acquisition for the access road is necessary for the implementation of Luas Finglas as direct access for Adrez and neighbouring properties.</p> <p>In the event that the RO is granted by the Board and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>As explained by the Supreme Court in Reid, a CPO must be “carried out in such a way that the impairment of the individual’s rights does not exceed that which is necessary to attain the legitimate object sought to be pursued”. Indeed, it is axiomatic that the acquisition of land and rights over land will result in interference with the use of those lands by owners/lessees/occupiers. However, in this instance, such interference is entirely proportionate to the legitimate aim being pursued by Luas Finglas, in the interests of the common good.</p> <p>Therefore, in applying the appropriate test for compulsory acquisition, the Board can be satisfied that it can grant the RO including the acquisition of Adrez’s lands, as its acquisition is proportionate and necessary for giving effect to the RO.</p>
12	5	<p>“We would also like to formally request that the board hold an oral hearing into this matter and that we reserve the right to attend such hearing and to make further submissions in respect of the matter. We would point out that the timing of the making of this order in November has meant that over the Christmas period when most people are off work a lot of the time allowed to consider this matter and to make the objections and submissions was lost to affected landowners and we therefore feel that an oral hearing is warranted in this instance.”</p>	<p>The consultation period was extended to allow for the Christmas period, ensuring that affected parties had a sufficient window to engage with the process.</p> <p>The public display for the proposed Scheme was set from 22nd November 2024 to 20th January 2025, a period of 8 weeks. This time frame effectively accommodated the Christmas break and ensured that the statutory requirement for a 6-week consultation period was met, providing stakeholders ample opportunity to review the documents and make submissions to the Board.</p>

Submission No.	02		
Submitted by	Aldi Stores (Ireland) Limited (John Spain Associates on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
1	3	<p>"Acquisition, temporary possession and extinguishing of private rights REF: D1-33B-A47 - LAND WHICH MAY BE ACQUIRED REF: D1-33C-A12 - LAND WHICH MAY BE ACQUIRED REF: D1-33C-A16 - LAND WHICH MAY BE ACQUIRED REF: D1-33C-A18 - LAND WHICH MAY BE ACQUIRED REF: D1-33B-T18 - LAND OF WHICH TEMPORARY POSSESSION MAY BE TAKEN REF: D1-33B-T20 - LAND OF WHICH TEMPORARY POSSESSION MAY BE TAKEN REF: D1-33C-T5 - LAND OF WHICH TEMPORARY POSSESSION MAY BE TAKEN REF: D1-33C-T18 - LAND OF WHICH TEMPORARY POSSESSION MAY BE TAKEN REF: D1-33C-T11 - LAND OF WHICH TEMPORARY POSSESSION MAY BE TAKEN REF: D1-33C-A16-PRIVATE RIGHTS WHICH MAY BE EXTINGUISHED"</p> <p>"We note that part of our client's lands (references above) is subject to acquisition, temporary possession and extinguishing of private rights as part of the draft Railway Order and therefore the fee is waived on that basis."</p>	Noted. TII confirms that all land references listed are relevant to Aldi.
2	3	<p>"In summary, our client has serious concerns in relation to the proposed Luas Finglas extension development and the implications of this for the operation of the existing Aldi store at St. Margaret's Road, Finglas. As demonstrated in the plans provided to Aldi by TII in their letter dated 15th November 2024, the route of the Luas line and associated cycle and pedestrian infrastructure will significantly encroach upon the eastern edge of the Aldi store, resulting in a loss of 19 car parking spaces at the very minimum. The construction phase will also have a substantial impact upon the trading environment for the Aldi store and its accessibility from St. Margaret's Road."</p>	<p>TII does not agree with the contention that there will be a significant decrease in car parking spaces. There will be both a temporary and permanent total loss of 11 parking spaces (9 from the front gable end of the Aldi store and 2 from the main Aldi Centre car park). There are 171 existing car parking spaces currently at the site servicing the supermarket and retail units. It is not proposed to increase or replace lost parking on a permanent basis. TII notes that planning permission has been granted for redevelopment of the site showing a total of 154 spaces (Application ref 3278/22) none of which are impacted by the Luas scheme.</p> <p>The nearby Luas Stop will improve overall access to the premises in the long term and will be expected to reduce the requirement for parking spaces. Furthermore, the proposed scheme segregated cycle tracks along St. Margaret's Road and signalised crossing on St Margaret's Road at Aldi, will encourage customers to use active travel.</p> <p>Access from St Margaret's Road to Aldi will be maintained throughout construction. To mitigate impacts of Traffic Management arrangements, advance public consultation and stakeholder engagement will take place which will greatly reduce the significance of traffic management arrangements on access to businesses. As set out in 1.3.20 of the CTMP "Not less than 7 days prior to commencement of the works the Licensee/Contractor shall advise all local property owners/occupiers likely to be adversely affected by the works and shall enter into discussions as necessary regarding the avoidance/mitigation of impacts arising from the works. The Licensee/Contractor shall use its best endeavours to minimise the impact of the works on property owners/occupiers. Access to all houses and premises to be maintained save with the prior approval of the property owner. Any such agreement shall ensure that adequate provision is maintained for Emergency Service access to the affected properties during the works." Also, in Chapter 6 Section 6.12.1 further Communications measures are set out.</p> <p>TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in this EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works. In the case of works required in response to an emergency, the local authority, local residents and businesses will be advised as soon as reasonably practicable. All notifications will include a local helpline number. In addition, information on the works will also be available on the proposed Scheme website.</p> <p>TII will further develop the Community Engagement Plan to encompass the Construction and Operational Phases of the proposed Scheme.</p> <p>An overall Communications Plan will be prepared by the contractors in advance of construction works which will be cognisant of the Community Engagement Plan and will ensure proper notification and engagement with all residents, businesses and stakeholders in advance and during the construction works.</p> <p>TII will further develop the Community Engagement Plan to encompass the Construction and Operational Phases of the proposed Scheme.</p>

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			An overall Communications Plan will be prepared by the contractors in advance of construction works which will be cognisant of the Community Engagement Plan and will ensure proper notification and engagement with all residents, businesses and stakeholders in advance and during the construction works.
3	3	"Aldi has concerns regarding the lack of detail provided by TII within the draft Railway Order in relation to the impact upon the accessibility to the existing Aldi store during the construction phase and the potential commercial impact of this."	<p>As noted previously in item 3 above access from St Margaret's Road to Aldi will be maintained throughout construction. A key consideration made is traffic management during the construction stage so as to minimise the impact on the local community and traffic network, the works will be carried out in accordance with Volume 5, Chapter 6 of the EIAR and Appendix A6.2 the CTMP. Specifically, continuity of access will be maintained throughout construction. As noted in Section 1.3.1 "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. No impact is envisaged to traffic and delivery movements in the permanent scheme, and this will be maintained through construction.</p> <p>Traffic control measures to be maintained for St Margaret's Road are outlined in the CTMP, Volume 5 Appendix A6.2 Table 6-2 of the EIAR. Phased lane closures will be required for the works. Some limited road closures will be required for works along St. Margarets Road also. These will be undertaken as night works to reduce disruption.</p>
4	3	"Our client is concerned about the implications of the proposed design and acquisitions of lands as it affects the Aldi store. This will ultimately result in a loss of at least 19 car parking spaces..."	Refer to response provided to Item No. 2 above.
5	3	"Our client is concerned about the implications of the proposed design and acquisitions of lands as it affects the Aldi store. This will ultimately result in a relocated entrance"	TII does not agree with the assertion that a relocated entrance is required. The proposed scheme will move St Margaret's Road closer to the Aldi Centre and the width of St Margaret's Road will be reduced, resulting in a slight reduction in accessibility. This will have negligible impact on customer traffic. 16.48m articulated heavy goods vehicles will be able to use the main Aldi Centre access, however it will require careful manoeuvring.
6	3	"Potentially require a planning application for a revised layout at the Aldi development."	TII notes planning permission has been obtained in April 2024. Luas Finglas has been checked against the existing and proposed layouts and is compatible with both. Planning permission would not be required for minor pavement works, removal of parking bays and road markings.
7	3	"In relation to the temporary acquisition of lands, the duration of this is unclear from the submitted documents and requires to be clarified with Aldi. The encroachment of the temporary land take extends to the eastern elevation of the Aldi store and will disrupt the primary access to the development, including the retail units to the north."	The expected overall construction programme for the main works is identified in Section 6.3.3 of Volume 5, Chapter 6 of the EIAR as 3.5 years. However, this is the overall timescale for the entire project and the construction works which will directly impact Aldi will be shorter. Volume 5, Chapter 6, Section 6.3 and Figure 6-2 of the EIAR identifies the estimated phased durations of the work in this area. The overall works duration within S33.3 and S33.4 along St Margaret's Road are estimated to be 18 months in total. This is considered comparable to similar projects for the complete scope of work within these sections. As noted in Section 6.3.3 "The programme for the construction of the proposed Scheme has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional."
8	3	1.6 "Our client seeks to engage with Transport Infrastructure Ireland in the immediate future to discuss the implications of the Railway Order and to mitigate to the greatest extent possible the impacts on the existing Aldi store."	TII confirms their intention to continued engagement with the stakeholder and their representatives in this respect during the detailed design and construction stages. Please also refer to response in Item No.2,3, and 7 above.
9	6	3.2 "It is noted that the submitted documents estimate the construction phase of the proposed development to be c. 3.5 years, however it may be likely that this timescale may be greater in reality given the complexity of large-scale infrastructure projects. Our client is greatly concerned regarding the impact of the timescale of the construction phase on the trading environment of the Aldi store and consequential commercial impacts on store revenue during this phase."	<p>The expected overall construction programme for the main works is identified in Section 6.3.3 of Volume 5, Chapter 6 of the EIAR as 3.5 years. This is the overall timescale for the entire project and the construction works which will directly impact Aldi will be shorter. Volume 5, Chapter 6, Section 6.3 and Figure 6-2 of the EIAR identifies the estimated phased durations of the work in this area. The overall works duration within S33.3 and S33.4 along St Margret's Road are estimated to be 18 months in total. This is considered comparable to similar projects for the complete scope of work within these sections. As noted in Section 6.3.3 The programme for the construction of the proposed Scheme has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board.</p>

Submission No.	02		
Submitted by	Aldi Stores (Ireland) Limited (John Spain Associates on their behalf)		
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			<p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p> <p>Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary, proportionate and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p>
10	6	<p>3.3 "As illustrated in the submitted drawings, the lands identified for permanent and temporary acquisition include a significant portion of the eastern edge of the existing Aldi lands. The area designated for permanent acquisition extends to 576 sqm, with the lands for temporary possession covering a greater area. This will impact upon the economic value of the lands within Aldi's ownership and will also greatly affect the attractiveness of the store to customers during the construction phase, with a decrease in revenues anticipated throughout this stage of works. Following construction, a 'bedding in' period will be expected, with trading patterns and customer numbers likely to readjust to 'normal' c.4 years following the beginning of construction. This is not acceptable to Aldi as the construction phase will have a significant and real impact on the commercial viability of the store."</p>	<p>As regards the impact during construction of the proposed temporary works areas at Aldi these are necessitated to allow construction of the new boundaries and access arrangements. These will solely be required for this purpose and the duration to complete this element of works will be limited. Use of the temporary areas will be discussed with Aldi prior to construction starting in the area so as to minimise any impact relating to temporary areas during construction. Continuity of access will be maintained throughout construction. As noted in Section 1.3.1 of the CTMP (Volume 5 – Appendix A6.2) "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.</p> <p>See also responses to Items No. 2, 3, 7 and 9 above.</p>
11	6	<p>3.4 "The landscape plan extract above shows that the main entrance to the store from St. Margaret's Road will be impacted which has obvious implications for deliveries to the store which have the potential to be disrupted, leading to a substandard trading environment and delay of products reaching the shelves for customers. Aldi is concerned at the lack of detail provided by the submitted documents in relation to the management of traffic and delivery movements to and from the St. Margaret's Road store and would seek greater levels of clarity in this respect. Aldi seek to ensure that delivery vehicles and customers will be able to maintain unimpeded access to the store throughout the construction phase to mitigate impacts upon the ability of the store to trade normally."</p>	<p>Please refer to response to Item No.3 above.</p>
12	6	<p>3.5 "The proposed acquisition including the proposed area for temporary possession will severely restrict HGV movements on the site, significantly restricting operational activity for the business. In addition, restriction on truck movements will also pose a health and safety issue, from both a work and public/customer car parking perspective."</p>	<p>Please refer to responses to Items No.2, 3 and 7 above.</p> <p>Where the works are taking place on footpaths or pedestrian routes then alternative measures for pedestrians will be facilitated on site. The measures set out in Section 8.2.8 of the Traffic Signs Manual will be implemented, wherever practicable, to ensure the safety of all road users, in particular pedestrians (including able-bodied pedestrians, wheelchair users, mobility impaired pedestrians, pushchair users) and cyclists. Therefore, where footpaths or cycle tracks are affected by construction, a safe route will be provided past the work area, and where practicable, provisions for matching existing facilities for pedestrians and cyclists will be mandated.</p> <p>TII will appoint a Contractor/Planning Supervisor Construction Stage (PSCS). The PSCS shall co-ordinate the implementation of the developed Traffic Management Plan during construction of the works including ensuring safe temporary traffic management measures are put in place for the public in implementing the works. Where measures within the site require temporary signage, road markings, barriers, flagman/marshall control, these will be implemented.</p>

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Submitted by	Aldi Stores (Ireland) Limited (John Spain Associates on their behalf)		
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13	7	<p>3.6 "Mitigation Number PM15 includes the measures to address the "effect of works on attractiveness of shopping and on direct access to businesses".</p> <p>3.7 "Table 25-4 states the residual impacts as a result of the construction phase works as 'Slight to moderate'. Aldi considers that the impacts are likely to be of greater magnitude having regard to the extent of the permanent acquisition and temporary possession of our client's lands and the c. 3.5-year duration of the construction phase of the Luas development."</p>	<p>The expected overall construction programme for the main works is identified in Section 6.3.3 of Volume 5, Chapter 6 of the EIAR as 3.5 years. This is the overall timescale for the entire project and the construction works which will directly impact Aldi will be shorter. Volume 5, Chapter 6, Section 6.3 and Figure 6-2 of the EIAR identifies the estimated phased durations of the work in this area. The overall works duration within S33.3 and S33.4 along St, Margaret's Road are estimated to be 18 months in total. This is considered comparable to similar projects for the complete scope of work within these sections. The duration for works directly impacting the Aldi Store within these sections will be less again. To minimise the traffic impacts to public during construction, the works along public roads including St Margaret's Road will be phased so as to first complete the demolition works, and road alignment works outside the existing roads. After that, more space can be provided to facilitate the construction works and the existing traffic lanes can be shifted to the new space in order to maintain the number of traffic lanes as far as possible.</p> <p>As noted in EIAR Chapter 6 Section 6.3.3 "The programme for the construction of the proposed Scheme has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional. The significance of impacts of the finished scheme are considered slight or moderate as the property can continue to operate with minimal impact on the character of the property.</p>
14	7	<p>3.8 "Our client considers the impacts during the construction phase shall be much greater than stated on the operation of the Aldi store. The mitigation measures set out above from Table 25-4 refer specifically to businesses on the east side of St. Margaret's Road. Our client has serious concerns regarding the impacts of the construction works on the Aldi store located on the west side of the road which the application does not appear to mitigate. Aldi respectfully requests that Chapter 25 of the EIAR required to be revisited and amended to ensure that impacts of the Aldi store are properly mitigated. Details of the mitigation measures should be included for clarity and illustrated by relevant drawings and documentation."</p>	<p>It should be noted Luas Finglas EIAR 2024 Chapter 25 table referring specifically to eastern side of road the following also applies for the west side:</p> <p>Temporary crossing facilities are to be maintained across St. Margarets Road at the McKee Avenue Junction throughout construction. Where there are pedestrian footpaths on streets subject to the works it is the responsibility of the PSCS/Contractor to maintain them for the duration of the works. Where the works are taking place on footpaths then alternative measures for pedestrians will be facilitated on site. The measures set out in Section 8.2.8 of the Traffic Signs Manual will be implemented, wherever practicable, to ensure the safety of all road users, in particular pedestrians (including able-bodied pedestrians, wheelchair users, mobility impaired pedestrians, pushchair users) and cyclists. Therefore, where footpaths or cycle tracks are affected by construction, a safe route will be provided past the work area, and where practicable, provisions for matching existing facilities for pedestrians and cyclists will be made.</p> <p>Access to the premises will be maintained throughout construction.</p> <p>Utility supplies will be maintained throughout construction. Chapter 17 details the mitigation measures that will be implemented during the construction phase and includes careful planning of where works to utility infrastructure is required by the appointed contractor to mitigate any impact to end users.</p> <p>Please refer to responses to Items No. 2, 3 and 7 above regarding construction stage communication and traffic management.</p>
15	7	<p>3.9 "Our client is concerned on the likely detrimental impacts of the proposed scheme on the Aldi store and its business operations which has the potential to impact upon employment at the store to the disadvantage of the local area."</p>	<p>TII has taken into consideration the potential impacts of the proposed scheme on the Aldi store and its business operations. Communications will be at the forefront during construction. As identified in Section 6.12.1 of Volume 5, Chapter 6 of the EIAR "TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in this EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works. In the case of works required in response to an emergency, the local authority, local residents and businesses will be advised as soon as reasonably practicable. All notifications will include a local helpline number. In addition, information on the works will also be available on the proposed Scheme website."</p> <p>Please also refer to Luas Finglas EIAR 2024 Chapter 8: Population which addresses the impacts on local area employment.</p>
16	7	<p>3.10 "Aldi would welcome engagement with TII to discuss appropriate mitigation measures which would assist with ensuring the normal business operations throughout the construction phase of works."</p>	<p>TII confirms their intention to continue to engage with the stakeholder and their representatives in this respect as referenced in Luas Finglas EIAR 2024 Chapter 6 Construction Activities and the CTMP. Please refer to responses to Items No. 2, 3 and 7 above.</p>
17	8	<p>3.12 "As illustrated above, the area to be permanently acquired extends to 576 sqm and encroaches upon the eastern edge of the Aldi site at St. Margaret's Road. The area for temporary possession extends to c. 800 sqm at the eastern elevation of store and includes the primary entrance and car parking area. "</p> <p>3.13 "The resulting impacts upon the existing layout will reduce the current car parking provision by 19 no. spaces at the minimum across the site, including accessible spaces. This is a significant decrease in parking</p>	<p>Please refer to response to Item No.2 above.</p>

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Submitted by	Aldi Stores (Ireland) Limited (John Spain Associates on their behalf)		
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		facilities for the store and neighbouring retail units which should be provided for elsewhere on the site or adjacent and referred in the Railway Order."	
18	8	3.14 "The application fails to provide sufficient information in respect of use of the lands for temporary possession during the construction phase which is vital to the operation of the Aldi store. Our client respectfully requests that sufficient information be provided to confirm the purpose of this temporary possession and in what form this will take in practice i.e. will the lands be utilised to assist construction as a compound, provide parking etc. These details are sought to allow Aldi to make provision for same throughout the c. 3.5-year construction stage."	The proposed land takes both Permanent and Temporary are proportionate and necessary for the road widening due to the insertion of the LRT alignment and the associated upgrades to the footpaths and landscaping. The temporary land take is required for construction of new boundary treatment, landscaping and utility services relocation which are all detailed in the alignment, utilities and landscape drawings and Luas Finglas EIAR 2024. Chapter 12: Land Take Table 12-11: Land take Impact Assessment in Area 33, included in the application. The temporary land take will also accommodate protective fencing/hoarding and provide some safe working space for the construction to take place as detailed in Luas Finglas EIAR 2024 Chapter 6 Construction Activities. It should be noted that the overall project duration is approximately 3.5 years however the works in the immediate vicinity of the Aldi premises will be for a much shorter duration (refer also to response to item 9 above). The exact timeline of the works is dependent on a number of factors including approvals, and third-party developments and construction tendering. TII will continue to engage with stakeholders at all stages of the process to ensure disruption is minimised to the fullest extent possible as detailed in the CTMP in Chapter 6 Appendix A6.2 of the Luas Finglas EIAR 2024.
19	8	3.15 "The temporary and permanent acquisition of Aldi lands may also require our client to submit a planning application to regularise the amended layout and any other associated changes resulting from the Luas Finglas proposals. It is requested that our client is compensated arising in this regard."	Please refer to response to Item No. 9 above.
20	8	3.16 "As noted above, Chapter 25 of the EIAR fails to provide adequate mitigation measures for the impacts of the proposed development and construction works on business premises and associated car parking, including the Aldi store, on the west side of St. Margaret's Road."	Please refer to response to Item No. 14 above.
21	8	3.16 "It is respectfully requested that compensatory car parking be provided to Aldi during the construction phase to ensure normal operations can maintained. Aldi welcome engagement with TII in this regard."	During the construction phase there will be a temporary loss of parking space (as per references in Luas Finglas EIAR Chapter 8 – Population, Chapter 12 Land Take and Chapter 6 – Construction Activities). Where possible alternative temporary parking will be arranged. TII is committed to ongoing engagement with stakeholders during the detailed design and construction stages regarding this issue.
22	8	3.17 "Our client acknowledges the long-term, positive impacts of the proposed Luas Finglas to the wider Finglas area in terms of accessibility, connectivity and footfall. However, our client has serious concerns regarding access to the store for deliveries, staff and customers during the construction phase of the development in particular. Aldi respectfully requests a greater level of detail and clarification is provided within the draft Railway Order to ensure that full access to the store will be retained throughout the construction phase as normal."	Please refer to response to Items No. 2, 3 and 7 above.
23	8	3.18 "Section 18.4.2.4 of Chapter 18 - Material Assets: Traffic and Transport states that "All road closures and diversions will be submitted to Dublin City Council and Fingal County Council where relevant for granting a Temporary Closing of Roads Order. The need for temporary access provisions will be confirmed with residents and businesses prior to their implementation". "Aldi requests further details and engagement with TII in relation to road closures and potential impacts on accessibility to the St. Margaret's Road store and retail units. Where road closures are required, our client is required to be consulted and informed of same well in advance. This is to ensure that deliveries can be coordinated and managed during times of limited/ constrained access to the store. Aldi seeks a firm commitment from the applicant that access to the Aldi store will be maintained at all times during the construction phase."	TII confirms that prior communications will be at the forefront during construction. As identified in Section 6.12.1 of Volume 5, Chapter 6 of the Luas Finglas EIAR 2024. "TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in the EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works. In the case of works required in response to an emergency, the local authority, local residents and businesses will be advised as soon as reasonably practicable. All notifications will include a local helpline number. In addition, information on the works will also be available on the proposed Scheme website." Traffic control measures are necessitated to deliver the proposed Scheme in the most efficient manner. As noted in Section 6.3.3 of Chapter 6 "The programme for the construction of the proposed Scheme has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional. " The traffic control measures which are to be maintained for St Margaret's Road are as outlined in the CTMP, Volume 5 Appendix A6.2 Table 6-2 of the EIAR. Phased lane closures will be required for the works. Some limited road closures will be required for works along St. Margarets Road also. The intention is these will be undertaken as night works to reduce disruption. Please also refer to response to Items No. 2, 3 and 7 above.
24	9	3.19 "We refer TII to the accompanying letter prepared by Aldi Transport Consultant TPS M Moran & Associates which states that the proposed Luas "will have a demonstrable impact on the existing operation of the Aldi store in this location during both the construction of this LUAS Extension and associated infrastructure works and	The drawings provided are to illustrate the proposed Scheme for the planning process and to inform the Luas Finglas EIAR 2024. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the EIA to be carried out by the Competent Authority, being

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Submitted by	Aldi Stores (Ireland) Limited (John Spain Associates on their behalf)		
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		when in operation. This view is based on the lack of technical information which has been submitted to Aldi (Stores) Ireland Ltd to enable a proper assessment of this LUAS Extension. "	the Board. Further detailed design will take place following completion of the planning process, and all stakeholders will be kept informed and advised in accordance with the procedures set out in Luas Finglas EIAR 2024 Chapter 6 Construction activities and CTMP. Please refer also to Luas Finglas EIAR 2024 Chapter 8: Population Section 8.4.2 and Chapter 12 – Land Take Table 12-11: Land take Impact Assessment in Area 33.
25	9	3.20 "No technical information has been provided in relation to the LUAS works schedule during construction and how these works will impact on the Aldi trading operation."	Please refer to response to Item No.13 above.
26	9	3.20 "No technical information has been provided how the existing Aldi vehicular site access from St Margaret's Road will be designed, or how this new access will connect with the internal customer parking within the site."	Preliminary design details are presented on RO Landscape Drawing Pack (drawing no. LDD101-BEV-GA-GZ33-XX-DR-AL-00106.)
27	9	3.20 "No technical information is provided to indicate if the Aldi site access from St Margaret's Road can accommodate the Aldi (or other) heavy service vehicles."	Preliminary analysis of swept path and site access designs were presented by TII and discussed with Aldi representatives during the non-statutory consultation process in June 2022 and have been taken into account in the layout included with the application as illustrated on the alignment and landscape drawings. TII confirms its intention to continue to engage with the stakeholder and their representatives during the detailed design and construction stages to minimise impacts to the fullest extent possible. Please also refer to responses to Items No.2, 3 and 7 above.
28	9	3.20 "No information has been provided indicating if the existing Aldi vehicular and non-car customer access points will be maintained or relocated or if a series of temporary access arrangement will operate throughout these works."	Existing Aldi vehicular and Non-Motorised Users (NMU) access points will be maintained throughout construction. As noted in Section 1.3.1 of the CTMP "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." Please also refer to responses to Items No. 2, 3 and 7 above.
29	9	3.20 "A substantial number of customer parking spaces and parking aisles will be removed to facilitate the land take for the LUAS Extension. No details are provided where these customer parking spaces, and parking aisles will be replaced."	Please refer to response to Item No. 2 above. TII does not propose to replace permanently removed car parking spaces. The Luas service will provide a fast efficient alternative public transport means for access to the lands as well as the provision of new cycleways encouraging active travel.
30	9	3.20 "No technical details have been provided to indicate how the realigned St Margaret's Road will provide pedestrian access, access for cyclists, and access for the non-able bodied from this road to the Aldi site during construction or when completed."	Preliminary design details are presented on drawing no. LDD101-BEV-GA-GZ33-XX-DR-AL-00106 illustrating the permanent works. As identified in Luas Finglas EIAR 2024: Chapter 6 Construction Activities, Section 1.2.3 of the CTMP - To minimise the traffic impacts to public during construction, the works along public roads, including St Margaret's Road, will be phased so as to first complete the demolition works, and road alignment works outside the existing roads. After that, more space can be provided to facilitate the construction works and the existing traffic lanes can be shifted to the new space in order to maintain the number of traffic lanes as far as possible. This will allow space to provide temporary provisions of facilities for NMUs from this road to the Aldi site during construction. Please also refer to response to Item No. 28 above.
31	9 & 10	4.4 "As detailed above, our client has concerns regarding the operational impacts of the construction phase of the proposed Luas Finglas upon the existing Aldi store at St Margaret's Road. This includes access to the store for deliveries, staff and customers as well as access to car parking. The Aldi lands for permanent and temporary acquisition extend to c. 1,300 sqm which is a significant loss for our client and will result in a loss of at least 19 no. car parking spaces. The works to the eastern side of the Aldi lands will encroach upon the existing site layout including the main entrance to the store from St. Margaret's Road."	Access to store and carpark - Existing Aldi vehicular and NMU access points will be maintained throughout construction. This is set out in Luas Finglas EIAR 2024: Chapter 6 Construction Activities, Section 1.3.1 of the CTMP. When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. Please also refer to response to Items No.2, 3, 7 and 9 above.
32	10	4.5 "Our client is seriously concerned regarding the lack of detailed information regarding mitigation measures during the construction phase related to access and car parking to ensure normal business operations can be maintained for the Aldi store."	Please refer to response provided in Item No.14 above.

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Submitted by	Aldi Stores (Ireland) Limited (John Spain Associates on their behalf)		
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33	10	4.6 "Each of these issues will undoubtedly have significant negative effects upon our client's lands and the ability of the Aldi store to continuing trading unimpeded throughout the proposed works and also when the Luas is operational."	Please refer to individual responses above. The impacts on the current business and proposed Aldi redevelopment have been assessed as part of the Luas Finglas EIAR 2024. TII assess that the impacts will not be significant either during construction or operational stages. Indeed, the operational stage of the proposed Schemepost construction will bring significant benefits.
34	10	4.7 "Aldi Stores (Ireland) Limited would welcome engagement with TII in the immediate future to determine if suitable mitigation measures are implemented during the construction phase of works to maintain normal business operations and to minimise impacts on the existing store for staff, customers and deliveries."	Please refer to response provided in Item No. 8 above.
35	10	4.8 "The information supplied by TII is incomplete and may change."	Please refer to response provided in Item No. 24 above.
36	43	"No technical information has been provided in relation to the LUAS works schedule during construction and how these works will impact on the Aldi trading operation."	Please refer to response provided in Item No. 9 above.
37	43	"No technical information has been provided how the existing Aldi vehicular site access from St Margaret's Road will be designed, or how this new access will connect with the internal customer parking within the site."	Please refer to response provided in Item No. 26 above.
38	43	"No technical information is provided to indicate if the Aldi site access from St Margaret's Road can accommodate the Aldi (or other) heavy service vehicles."	Please refer to response provided in Item No. 27 above.
39	43	"No information has been provided indicating if the existing Aldi vehicular and non-car customer access points will be maintained or relocated or if a series of temporary access arrangement will operate throughout these works."	Please refer to response provided in Item No. 28 above.
40	43	"A substantial number of customer parking spaces and parking aisles will be removed to facilitate the land take for the LUAS Extension. No details are provided where these customer parking spaces, and parking aisles will be replaced."	Please refer to response to Item No. 2 above. TII does not propose to replace permanently removed car parking spaces. The Luas service will provide a fast efficient alternative public transport means for access to the lands as well as the provision of new cycleways encouraging active travel.
41	44	"No technical details have been provided to indicate how the realigned St Margaret's Road will provide pedestrian access, access for cyclists, and access for the non-able bodied from this road to the Aldi site during construction or when completed."	Please refer to response provided in Item No. 30 above.

Submission No.	03		
Submitted by	An Post (RMLA Planning Consultants on their behalf)		
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1	4	"Unrestricted vehicular access to postal facilities, e.g. the DSU in Jamestown Business Park is critical importance to the operation of the service provided by An Post and any limitations and impacts, such as road closures etc, can have serious knock-on impacts on the ability of An Post to meet the postal needs of the public and service their legal agreements with the State."	<p>TII acknowledges An Post's concerns regarding the potential operational and commercial impacts of road closures on their services, particularly the critical need for unrestricted vehicular access to the DSU facility in Jamestown Business Park. TII understands that any limitations, such as road closures, could have significant knock-on effects on An Post's ability to meet public postal needs and fulfil legal agreements with the State.</p> <p>Vehicular and pedestrian access to An Post facilities will be maintained throughout the duration of the works.</p> <p>A key consideration made is traffic management during the construction stage so as to minimise the impact on the local community and traffic network, the works will be carried out in accordance with Table 6-2 of the EIAR Chapter 6 (Volume 2) and Appendix A6.2 the CTMP. Specifically, continuity of access will be maintained throughout construction to the DSU and Jamestown Business Park. As noted in Section 1.3.1 of the CTMP (Appendix A6.2) "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." No impact is envisaged to traffic and delivery movements in the permanent scheme, and this be maintained through construction.</p> <p>While phased lane closures will be necessary, any required road closures, particularly on St. Margaret's Road, will be minimised and scheduled as night works to reduce disruption. As detailed in Section 1.3.1 of the CTMP (Appendix A6.2), some temporary alterations may occur, but measures will be taken to mitigate impacts.</p> <p>Road closures and diversions will be planned in accordance with Chapter 8 of the Traffic Signs Manual and will require consent from Dublin City Council (DCC) and Fingal County Council (FCC), in consultation with An Garda Síochána. Emergency vehicle access will be maintained at all times.</p>
2	4	"While An Post welcomes the proposal, it is requested that TII, during all stages of the planning and development process associated with the project, carefully considers the operational requirements of the Jamestown Business Park DSU facility. An Post's operational requirements including interalia HGV's deliveries, early/late operational hours etc. Are of critical importance to the public service they provide. In this regard, any impact on the ability of An Post to access their facility could have serious consequences on the national postal service."	<p>As detailed in section 1.3.1 of the CTMP (Appendix A6.2 of the EIAR) When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.</p> <p>Section 1.3.16 deals with road closures - Road closures and diversions will need to be carried out during the Construction Phase of the proposed Scheme; however, these measures will be minimised wherever possible. Where necessary, road closures and diversions will take into consideration the impact on road users, residents, businesses etc. Road closures and diversions will be carried out with regard to Chapter 8 of the Traffic Signs Manual. All road closures and diversions will be consented to DCC and FCC, in consultation with the local authority and An Garda Síochána, as necessary. Access will be maintained for emergency vehicles along the proposed Scheme, throughout the Construction Phase.</p>
3	4	"An Post welcomes this opportunity to comment to engage with the preparation of the project and expresses their interest in direct engagement with TII. In this regard, it its requested that TII consider the operational requirements of An Post, specifically Maintaining Vehicular and Pedestrian Access to An Post facilities. It is further requested that advance notice of any planned closures is communicated to An Post to minimise as much as possible any disruption to An Post's operations and their employees in the area."	<p>Vehicular and pedestrian access to An Post facilities will be maintained throughout the duration of the works. An Post will be consulted regarding any planned access restrictions, and the opportunity to engage will be availed of throughout the process. TII will ensure that advance notice of any impacts on access is provided well in advance of any disruptions.</p>

Submission No.	04		
Submitted by	Appian Holdings Limited and Mongey Plunkett Motors (Hughes Planning & Development Consultants on their behalf)		
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1	4	"Evidently this type of land use is heavily reliant on the surrounding road network for its successful day to day operations, which includes but is not limited to the delivery and transportation of vehicles by HGV's, the arrival and departure of customers via car to view stock, get repair works or to make a purchase. Thus, it is imperative that unimpeded access to our client's site via North Road is available at all times. Upon review of the applicant documentation submitted as part of the current Railway Order it apparent that there are significant works to be undertaken in the vicinity of our clients premises, with existing rights of way on neighbouring sites proposed to be acquired and a significantly scaled park and ride facility to be situated in the neighbouring Discount D.I.Y store site at Unit 1 B, North Road. Road works are also proposed along the existing North Road. Our client's primary concern is that the construction phase of these proposed works, associated with the Luas extension, will impact adversely upon our client's business."	<p>Existing vehicular and pedestrian access to the business will be maintained for the duration of the works. Proposed permanent works on North Road are not expected to extend to the property in question.</p> <p>The contractor will ensure access via North Road is available throughout the works. This is identified in Luas Finglas EIAR 2024 Chapter - Section 1.3.1 of the CTMP: "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." Traffic control measures will be required to facilitate construction as per those outlined for in Table 6-2 of the CTMP. Phased lane closures will be required for the works along North Road.</p> <p>Communications will be at the forefront during construction so as inform business owners in advance of works. As identified in Section 6.12.1 of Volume 5, Chapter 6 of the EIAR "TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in this EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works."</p>
2	4	"In addition, the uplift in vehicular traffic along North Road as a result of the provision of a sizeable Park and Ride facility to the south of our clients' lands is a cause of significant concern."	<p>The EIAR, Chapter 18 Traffic, describes the traffic impacts during the construction phase including the assessment on contributory construction traffic volumes on the existing road network during construction works, in addition to the impact of temporary traffic management arrangements. The CTMP which has been prepared will be further developed and implemented by the appointed contractor and will be agreed with the respective local authorities prior to the commencement of the construction phase.</p> <p>Section 18.4.3.8 of Chapter 18 of the EIAR outlines the General Traffic Impact Assessment during the operational phase of the proposed Scheme. To determine the impact that the proposed Scheme has in terms of general traffic redistribution on the study area, the Local Area Traffic Model has been used to identify the difference in general traffic flows between the Do Minimum and Do Something scenarios. Figure 18-31 and 18-32 of the EIAR illustrate the flow differences on road links within the study area as a result of the proposed scheme in the opening year (2035) AM and PM peak hours. The results indicate a reduction in traffic volume along the North Road – 339 vehicle reduction in the AM peak (Table 18-30) and 152 vehicle reduction in the PM (Table 18-33). The reduction in traffic volumes along North Road as a result of the proposed Scheme are attributed to the following:</p> <ul style="list-style-type: none"> Mode share impact and usage of Luas Finglas: Section 18.4.3.6 outlines the impact of proposed Scheme in terms of mode shift to sustainable travel, increase in public transport patronage and associated overall reduction in vehicles on the road network. Localised traffic redistribution: The signalisation of the R135 / St Margaret's Road junction as part of the proposed Scheme leads to some localised redistribution of traffic away from the North Road as outlined in Section 18.4.3.8 of the EIAR. Nature of Park & Ride: The purpose of the Park & Ride site is to capture traffic which would normally use the North Road and transfer them onto Luas. So, whilst the Park & Ride can accommodate a large volume of vehicles, it should not significantly increase traffic movements along the North Road. It will accommodate traffic using the North Road to park and continue their journey via public transport. In the Do Minimum scenario (without the proposed Scheme), this traffic would continue to use the North Road and remain in their vehicle to complete their journey.
3	4	"Having regard to the foregoing assessment, to the nature of the works and the proximity of these works to our client's site, our client considers the Railway Order to present direct and indirect impacts to the commercial operation of their business at this location, by virtue of addition traffic generation and disruption during construction and operation."	Please refer to response provided to Item No.2 above.
4	4	"It is considered that the proposed development will directly and indirectly compromise the daily operation of the existing commercial business upon the subject site and surrounding sites to the extent that may result in the loss of employment at this location."	<p>TII is satisfied that the proposed development will not directly nor indirectly compromise the daily operation of the existing commercial business.</p> <p>This business is outside the development boundary.</p> <p>The proposed scheme will provide much improved accessibility for prospective employees from the catchment to the north and interconnections with other public transport. The availability of a new public transport option</p>

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Submitted by	Appian Holdings Limited and Mongey Plunkett Motors (Hughes Planning & Development Consultants on their behalf)		
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			will also reduce pressure on the demand for on-site car parking. In addition, please refer to response provided to Item No. 2 above.
5	4	"In addition to the above, there is an existing long-standing right of way located along the eastern and southern boundaries of the Joe Duffy car dealership site to the immediate south of our client's premises. These established rights of way which facilitated access along these routes and to the south-eastern boundary our client's premises will be extinguished as per the current proposal as submitted."	The ROW area referred to is not used for accessing the premises referred to and has no links to roads. The existing Rights of way as referred to are to be extinguished by acquisition. This is required to facilitate the construction and operation of the Park and Ride Facility and to avoid any disruption to the safe and secure operation of the same in future. Chapter 12, specifically, Table 12-11 of the EIAR assesses the impact of this permanent acquisition of (D1-33B-A39 and D1-33B-A44).
6	8	"Whilst the extended Luas line does not traverse the front of our client's property, there are works associated with same, including works to the North Road roadway and the addition of a sizeable park and ride facility to the immediate south, the construction phase associated with which will inevitably have an impact on the day to day operations of our clients premises."	Chapter 6 Sections 6.2 and 6.3 of the Luas Finglas EIAR 2024, particularly Figure 6-2, outline the construction activities and programme of works. Section 1.3.1 of the CTMP (Volume 5 - Appendix A6.2), states that "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area"
7	10	"As a park and ride facility is proposed on a neighbouring site, clearly a significant amount of additional traffic will be diverted along North Road to access and egress from this facility. Our client is concerned that this significant uplift in traffic movements will create a safety and congestion issue."	<p>Section 18.4.3.8 of Chapter 18 of the Luas Finglas EIAR 2024 outlines the General Traffic Impact Assessment during the operational phase of the proposed Scheme. To determine the impact that the proposed Scheme has in terms of general traffic redistribution on the study area, the Local Area Traffic Model has been used to identify the difference in general traffic flows between the Do Minimum and Do Something scenarios. Figure 18-31 and 18-32 of the EIAR illustrate the flow differences on road links within the study area as a result of the proposed scheme in the opening year (2035) AM and PM peak hours. The results indicate a reduction in traffic volume along the North Road – 339 vehicle reduction in the AM peak (Table 18-30) and 152 vehicle reduction in the PM (Table 18-33). The reduction in traffic volumes along North Road as a result of the development of the proposed Scheme are attributed to the following:</p> <ul style="list-style-type: none"> Mode share impact and usage of Luas Finglas: Section 18.4.3.6 outlines the impact of proposed Scheme in terms of mode shift to sustainable travel, increase in public transport patronage and associated overall reduction in vehicles on the road network. Localised traffic redistribution: The signalisation of the R135 / St Margaret's Road junction as part of the proposed Scheme leads to some localised redistribution of traffic away from the North Road as outlined in Section 18.4.3.8 of the EIAR. Nature of Park & Ride: The purpose of the Park & Ride site is to capture traffic which would normally use the North Road and transfer them onto Luas. So, whilst the Park & Ride can accommodate a large volume of vehicles, it should not significantly increase traffic movements along the North Road. It will accommodate traffic using the North Road to park and continue their journey via public transport. In the Do Minimum scenario (without the proposed Scheme), this traffic would continue to use the North Road and remain in their vehicle to complete their journey. <p>In the Dublin City Development Plan 2022-2028 (CDP) the subject site is zoned Z6 - Employment/Enterprise with the objective to:</p> <p>'provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'</p> <p>Section 14.7.6 of the Dublin City Development Plan 2022-2028 establishes 'permissible' and 'open to consideration' uses on lands zoned Z6 Employment/Enterprise. It confirms that a 'park and ride facility' is a permissible use on such lands. It follows that there is no basis to the claim that the proposed use at this location is not compliant with the land use zoning objective.</p> <p>This section of the Dublin City Development Plan 2022-2028 confirms that "uses in this zone are likely to generate a considerable amount of traffic by both employees and service traffic. Sites should, therefore, have good vehicular and public transport access". The provision of Luas Finglas will directly deliver on this by means of high frequency public transport.</p>
8	10 and 11	"By its nature our client's premises is a vehicle dependant use, in addition there are two other car dealerships within a 230metre distance of the subject site, together with a garage and grocery shops. The addition of a further car dependant use in the form of a park and ride facility will significantly increase traffic movements and congestion along North Road, leading to a completely car dominated environment."	Please refer to response provided to Item No.7 above.
9	11	Concern about "The proposed acquisition of long-standing and established rights of way"	Please refer to response provided to Item No. 5 above.

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Submitted by	Appian Holdings Limited and Mongey Plunkett Motors (Hughes Planning & Development Consultants on their behalf)		
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10	13	"As is evident from the above images the park and ride facility are a significant multistorey structure which will accommodate a large volume of vehicles and will result in a significant uplift in traffic movements along North Road. This is of critical concern to our client both in terms of the construction related traffic that will be resultant during construction stage and additional vehicular congestion along this route during the operational phase."	Please refer to response provided to Item No.7 above.
11	14	"We would respectfully request that the location of the park and ride facility along North Road is strongly reconsidered as it will undoubtedly result in increased traffic congestion and will cause significant disturbances to existing buildings during the construction phase, both of which have the potential to negatively affect the commercial viability of our client's business."	Please refer to response provided to Item No.7 above.
12	14	"We would seek assurances from Transport Infrastructure Ireland in this regard that such affects will be mitigated so far as possible."	Please refer to response provided to Item No.7 above.
13	14	"Our client considers the Railway Order to present direct and indirect impacts to the commercial operation of their business at this location, by virtue of addition traffic generation and disruption during construction and operation."	Please refer to response provided to Item No.7 above.
14	14	"In addition, as per Schedule 2 and 10 of the Railway Order documents submitted it is apparent that established and long-standing rights of way which could be availed of by existing landowners at this location, are proposed to be acquired as part of the works, it is therefore of importance that the loss of these private rights are appropriately compensated for."	<p>The existing Rights of way as referred to are to be extinguished by acquisition. This is required to facilitate the construction and operation of the Park and Ride Facility and to avoid any disruption to the safe and secure operation of the same in future.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the Luas Finglas EIAR 2024, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p> <p>Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p>
15	15	"It is considered that the proposed development will directly and indirectly compromise the daily operation of the existing commercial business upon the subject site and surrounding sites to the extent that may result in the loss of employment at this location. Accordingly, it is considered that the subject proposal is not compliant with the applicable zoning objective which governs the future development of this area."	<p>In the Dublin City Development Plan 2022-2028 (CDP) the subject site is zoned Z6 - Employment/Enterprise with the objective to:</p> <p>'provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'</p> <p>Section 14.7.6 of the Dublin City Development Plan 2022-2028 establishes 'permissible' and 'open to consideration' uses on lands zoned Z6 Employment/Enterprise. It confirms that a 'park and ride facility' is a</p>

Submission No.	04		
Submitted by	Appian Holdings Limited and Mongey Plunkett Motors (Hughes Planning & Development Consultants on their behalf)		
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			<p>permissible use on such lands. It follows that there is no basis to the claim that the proposed use at this location is not compliant with the land use zoning objective.</p> <p>This section of the Dublin City Development Plan 2022-2028 confirms that “uses in this zone are likely to generate a considerable amount of traffic by both employees and service traffic. Sites should, therefore, have good vehicular and public transport access”. The provision of Luas Finglas will directly deliver on this by means of high frequency public transport. [Also please refer to Item No. 2 above]</p> <p>The ROW area referred to is not used for accessing the premises referred to and has no links to roads and its acquisition will have no impact on the daily operation of the existing commercial business.</p>
16	15	"In relation to the proposed works as part of the Luas extension, in the vicinity of our clients lands it is considered that all viable alternatives should be reconsidered in order to maintain the existing and established rights of way that are proximate to our clients' lands, and which surrounding businesses have the benefit of availing of."	<p>The existing Rights of way as referred to are to be extinguished by acquisition. This is required to facilitate the construction and operation of the Park and Ride Facility and to avoid any disruption to the safe and secure operation of the same in future.</p> <p>The ROW area referred to is not used for accessing the premises referred to and has no links to roads and its acquisition will have no impact on the daily operation of the existing commercial business.</p>
17	15	"The addition of a multistorey park and ride facility will substantially increase traffic congestion along North Road where businesses are entirely dependent on the surrounding road network for their businesses to successfully operate."	Please refer to response provided to Item No.7 above.
18	15	"It is considered that a reduction in the scale of this facility or an alternative suitable location should be contemplated ahead of a decision being made on this case."	Please refer to response provided to Item No.7 above.
19	4	"Evidently this type of land use is heavily reliant on the surrounding road network for its successful day to day operations, which includes but is not limited to the delivery and transportation of vehicles by HGV's, the arrival and departure of customers via car to view stock, get repair works or to make a purchase. Thus, it is imperative that unimpeded access to our client's site via North Road is available at all times. Upon review of the applicant documentation submitted as part of the current Railway Order it apparent that there are significant works to be undertaken in the vicinity of our clients premises, with existing rights of way on neighbouring sites proposed to be acquired and a significantly scaled park and ride facility to be situated in the neighbouring Discount D.I.Y store site at Unit 1 B, North Road. Road works are also proposed along the existing North Road. Our client's primary concern is that the construction phase of these proposed works, associated with the Luas extension, will impact adversely upon our client's business."	<p>Existing vehicular and pedestrian access to the business will be maintained for the duration of the works. Proposed permanent works on North Road are not expected to extend to the property in question.</p> <p>The contractor will ensure access via North Road is available throughout the works. This is identified in Luas Finglas EIAR 2024 Chapter - Section 1.3.1 of the CTMP: "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." Traffic control measures will be required to facilitate construction as per those outlined for in Table 6-2 of the CTMP. Phased lane closures will be required for the works along North Road.</p> <p>Communications will be at the forefront during construction so as inform business owners in advance of works. As identified in Section 6.12.1 of Volume 5, Chapter 6 of the EIAR "TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in this EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works...."</p>
20	4	"In addition, the uplift in vehicular traffic along North Road as a result of the provision of a sizeable Park and Ride facility to the south of our client's lands is a cause of significant concern."	<p>The EIAR, Chapter 18 Traffic, describes the traffic impacts during the construction phase including the assessment on contributory construction traffic volumes on the existing road network during construction works, in addition to the impact of temporary traffic management arrangements. The CTMP which has been prepared will be further developed and implemented by the appointed contractor and will be agreed with the respective local authorities prior to the commencement of the construction phase.</p> <p>Section 18.4.3.8 of Chapter 18 of the EIAR outlines the General Traffic Impact Assessment during the operational phase of the proposed Scheme. To determine the impact that the proposed Scheme has in terms of general traffic redistribution on the study area, the Local Area Traffic Model has been used to identify the difference in general traffic flows between the Do Minimum and Do Something scenarios. Figure 18-31 and 18-32 of the EIAR illustrate the flow differences on road links within the study area as a result of the proposed scheme in the opening year (2035) AM and PM peak hours. The results indicate a reduction in traffic volume along the North Road – 339 vehicle reduction in the AM peak (Table 18-30) and 152 vehicle reduction in the PM (Table 18-33). The reduction in traffic volumes along North Road as a result of the proposed Scheme are attributed to the following:</p> <ul style="list-style-type: none"> Mode share impact and usage of Luas Finglas: Section 18.4.3.6 outlines the impact of proposed Scheme in terms of mode shift to sustainable travel, increase in public transport patronage and associated overall reduction in vehicles on the road network.

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Submitted by	Appian Holdings Limited and Mongey Plunkett Motors (Hughes Planning & Development Consultants on their behalf)		
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			<ul style="list-style-type: none"> Localised traffic redistribution: The signalisation of the R135 / St Margaret's Road junction as part of the proposed Scheme leads to some localised redistribution of traffic away from the North Road as outlined in Section 18.4.3.8 of the EIAR. Nature of Park & Ride: The purpose of the Park & Ride site is to capture traffic which would normally use the North Road and transfer them onto Luas. So, whilst the Park & Ride can accommodate a large volume of vehicles, it should not significantly increase traffic movements along the North Road. It will accommodate traffic using the North Road to park and continue their journey via public transport. In the Do Minimum scenario (without the proposed Scheme), this traffic would continue to use the North Road and remain in their vehicle to complete their journey.

Submission No.	05		
Submitted by	Atlas Autoservice Ltd & Katherine Cooney (Kellarch Ltd on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
1	2	"The outline of both referenced plans are superimposed and clearly demonstrate that 16 spaces would no longer be available to service the business. This would have an unsustainable impact on the car servicing business."	<p>The proposed land takes both Permanent and Temporary are necessary for the road widening due to the insertion of the LRT alignment and the associated upgrades to the footpaths and landscaping. The temporary land take is required for construction of new boundary treatment, landscaping and services relocation. It will also accommodate protective fencing/hoarding and provide some safe working space for the construction to take place.</p> <p>RO Property Drawing Plan Number D1-P33 B-C lands to be acquired - D1-33B-A38 and D1-33B-T16.</p> <p>TII met with Atlas Autoservice on 9 December 2022. Atlas was presented with the reference design which clearly illustrates permanent and temporary land take. Atlas was made aware this would result in the temporary loss of some parking spaces, but once the land was returned it leaves the potential to reinstate most car parking. The permanent land take line is set back in the order of 700mm to 1m behind the current property boundary line (back of footpath / bollards). Car parking spaces 10 to 19 in the submission can be re-installed with ample room between the car parking spaces and the building for vehicular circulation. Can parking spaces 7 to 9 may have to be provided parallel to the new boundary potentially resulting in the loss of 1 to 2 spaces. Similarly spaces 20, 21 and 22 will have to be reconfigured potentially resulting in the loss of 1 to 2 spaces.</p> <p>TII discussed the many benefits the light rail scheme will bring to the area and the care taken during design to minimise impact on all stakeholders and beneficiaries of the project. TII will continue to engage with stakeholders at all stages of the process to ensure disruption is fully minimised.</p>
2	3	"It is further noticed from the Railway order alignment works drawing, Plan No. D1GA 33 B-C that the major realignment of the St. Margarets Road, and its junctions, cannot be executed without disruptions. A high level of site management and agreement will be required to mitigate this disruption."	<p>In the realignment of the St. Margarets Road, and its junctions traffic management required to complete the works have been set out to limit them to those necessary to complete the works. The traffic controls are as outlined in Table 6-2 of the CTMP. Continuity of access will be maintained throughout construction. Phased lane closures will be required for the works. Some limited road closures may be required for road works along St. Margarets Road also. The intention is these will be undertaken as night works to reduce disruption.</p> <p>A high level of site management and agreement has also been identified to mitigate this disruption. This is primarily set out in A6.1 CEMP. The purpose of the CEMP is to set out the management framework for the delivery of the proposed construction works and to illustrate how the proposed Scheme could be delivered in a logical, sensible, and safe sequence with the incorporation of specific environmental commitments.</p> <p>As identified in Section 1.5.2 of the CEMP a site management team will be put in place by the TII in the form of "an Employer's Representative team with appropriate competence to administer and monitor each construction contract for compliance with the Employer's Requirements." The agreement of the CTMP will be subject to it being further developed and implemented by the appointed contractor and agreed with the respective stakeholders prior to the commencement of the construction phase. The detail of communications as set out in Section 1.3.20 of A6.2 CTMP includes advising and discussing measures in advance of the works taking place.</p>
3	3	"An extract from this drawing is attached which appears to show that the present back of footpath of the Atlas site will not be altered. "	<p>The permanent land take line is set back in the order of 700mm to 1m behind the current property boundary line (back of footpath / bollards). The back of the proposed footpath will coincide with the permanent land take line.</p> <p>The permanent land take is required for the Luas LRT line plus the realignment of St Margaret's Road along with the provision of footpath, cycle tracks and landscaping.</p>

Submission No.	06		
Submitted by	Brooks Timber & Building Supplies Ltd. (Hughes Planning & Development Consultants on their behalf)		
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1	3	"It is strongly contended that the proposed development has not had regard to the daily operations and development capacity of our client's lands at Brooks Timber & Building Supplies Ltd"	<p>TII does not agreed with the suggestion that the proposed Scheme has not had regard to the daily operations and development capacity at Brooks Timber & Building Supplies Ltd. Please refer to responses below.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p>
2	7	"Significant extent of land acquisitioned for permanent or temporary use - directly compromising the daily operation of our client's commercial business."	<p>The proposed land takes both Permanent and Temporary are proportionate and necessary for the road widening due to the insertion of the LRT alignment and the associated upgrades to the footpaths, cycleways, roads and landscaping. The temporary land take is required for construction of new boundary treatment, landscaping and utility services relocation which are all detailed in the alignment, utilities and landscape drawings and Luas Finglas EIAR 2024. Chapter 12: Land Take Table 12-10: Land take Impact Assessment in Area 32 included in the application. The temporary land take will also accommodate protective fencing/hoarding and provide some safe working space for the construction to take place as detailed in Luas Finglas EIAR 2024 Chapter 6 Construction Activities.</p>
3	7	"Reduced attractiveness for existing/potential customers due to reduced operational efficiency."	<p>TII acknowledges that a change to the current circulation and access arrangement is required, and this is recognised in our proposed scheme and assessments as detailed in Luas Finglas EIAR Chapter 12 – Land Take, and Luas Finglas EIAR 2024 Chapter 8 – Population and during our discussions with the stakeholders when alternative circulation, storage, and parking etc was discussed.</p> <p>The permanent land take will result in a reduction in paved area at the gable end of the building to the extent that vehicular access will no longer be possible past the gable end and the existing anticlockwise traffic circulatory system will also not be possible. Access around the site would therefore be based on 2-way traffic movement. TII does not agree with the contention that this could result in reduced attractiveness for existing/potential customers.</p>
4	7	"Increased operating costs due to hiring additional personnel for traffic management."	Please refer to response to Item No.3 above.
5	7	"It is considered that the above concerns together present a material rationale for the seeking of compensation in the event that Transport Infrastructure Ireland does not see fit to make appropriate amendments to the subject scheme to ensure no detrimental impact to our client's commercial operations and the associated monetary value of same."	<p>As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over</p>

Submission No.	06		
Submitted by	Brooks Timber & Building Supplies Ltd. (Hughes Planning & Development Consultants on their behalf)		
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			<p>land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof. Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p> <p>Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p>
6	10	"We would consider the Railway Order to present direct impacts to the commercial operation of our client's property by virtue of permanently disrupting the longstanding way our clients have operated their site by removing the ability of HGVs to circumnavigate the site,"	Please refer to response to Item 1 above.
7	10	"By removing several vehicular parking spaces and.."	TII acknowledges that a change to the current circulation and parking and storage arrangements is required and this is recognised in our proposed scheme and assessments as detailed in Luas Finglas EIAR Chapter 12 – Land Take, and Luas Finglas EIAR 2024 Chapter 8 – Population and during our discussions with the stakeholders when alternative access, parking etc was discussed as referred to in Luas Finglas EIAR Chapter 1 - Introduction , Table 1-10: Key stakeholders and number of meetings held between 2020 and 2024.
8	10	"...by removing a significant quantum of external storage areas."	Please refer to Item No. 7 above.
9	10	"The various impacts will directly compromise the ease in which our client's commercial premises operates and by association will lower the value of this property."	Please refer to response to Item No. 1 above.
10	10	"The extent of land acquisition along the eastern site boundary will result in the loss of this long-standing turning feature and will directly compromise the way the subject site operates."	Please refer to response to Items No. 3 and 7 above.
11	10	"With regards to site operation, we note that the subject proposal will result in a significant extent of land along the eastern site boundary which accommodates overflow vehicular parking areas and external storage being lost thus resulting in increased pressure on existing parking spaces and storage areas."	Please refer to response to Items No. 7 above.
12	10	<p>"The slower turnaround times for deliveries and collections, which arises because of altered traffic flows and increased manoeuvring times for HGVs on site, will result in:</p> <ul style="list-style-type: none"> Frustration and inconvenience for customers, who rely on timely service for their projects and businesses. Increased likelihood that customers seek alternative suppliers who can offer more efficient service, resulting in a loss of business and revenue for Brooks Glasnevin. <p>The disruption to the commercial operations and the associated risk of losing customers due to delayed service adds significant urgency to the need for suitable modifications to the proposed plans. Timely and efficient service is a cornerstone of our client's business, and any delays or inefficiencies caused by the proposed changes could:</p> <ul style="list-style-type: none"> Damage the reputation of our client's business as a reliable supplier in the industry. 	Please refer to response to Items No. 1, 3 and 7 above.

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		<ul style="list-style-type: none"> Drive customers to seek alternative suppliers who can meet their needs without delay. Result in long-term financial and operational setbacks that could harm our competitive position in the market. <p>We cannot overstate the importance of addressing these risks. Failure to do so will not only compromise operational integrity of our client's business but will also erode the trust and confidence their customers have in their services. "</p>	
13	10 & 11	<p>"The proposed works will directly alter the flow and distribution of vehicular traffic within our client's commercial premises. Specifically, the shift from a long-standing and controlled one-way system for heavy goods vehicles (HGVs) to a new requirement for reversing manoeuvres onto incoming traffic which will present significant safety risks. This change will:</p> <ul style="list-style-type: none"> Expose staff and customers to increased hazards due to the unpredictable movement of HGVs in areas with pedestrian activity. Heightened likelihood of vehicular collisions and personal injuries due to the complexity of manoeuvres in restricted spaces." 	<p>Please refer to response to Item No. 3 above.</p> <p>The impacts on access outlined in response to Item 3 will result in a change in how stock is delivered and how customers collect purchases. TII does not agree with the contention that there will be an increased risk of collisions. This is a low speed / low volume environment and characterised by a mixing of pedestrians and vehicles where increased awareness is required by all. Changing to 2-way traffic will make no difference to safety. One-way systems however can encourage excessive speed as drivers are less concerned about meeting opposing traffic. Articulated HGV turning at the front of the site may require management/supervision, depending on how busy the store is at the time of the delivery.</p>
14	11	<p>"In light of the above issues, it will be necessary to allocate additional resources to mitigate safety risks. To ensure safe operations post-construction, our client will be compelled to allocate personnel for traffic management including assisting HGVs in reversing and navigating through incoming traffic, an activity fraught with challenges - particularly during peak hours. The additional resource allocation required for such activities represents a newly created operation cost to our client's business. Moreover, it places undue strain on staffing resources, diverting them from their primary roles and responsibilities, and likely requiring site-specific instruction and training procedures."</p>	<p>Please refer to response to Items No. 3 and 6 above.</p> <p>The restrictions on movement for the proposed scheme as described in response to Item 3 may require personnel for traffic management of articulated HGV deliveries to the north side of the site. Deliveries involving smaller vehicles such as the 10m length 13/18 tonne rigid heavy goods vehicle or the 7.2m length approximately 7.5 tonne rigid heavy goods vehicle will have less risks associated with them due to their smaller size and greater ability to turn and are less likely to require supervision.</p>
15	11	<p>"The proposed changes conflict with long-established safety standards on site and best practices for traffic management in commercial and industrial zones. Reversing HGVs into incoming traffic is widely recognised as a high-risk activity that should be minimised or avoided altogether in well-planned operations. Guidance from the Health and Safety Authority (HSA) and other road safety organisations consistently advises against reversing as a routine operation due to the heightened risk of accidents. The proposed changes ignore these best practices, leaving our client's business exposed to liability and creating unsafe conditions for all stakeholders."</p>	<p>The restrictions on movement for the proposed scheme as described in response to Item 3 may require personnel for traffic management of articulated HGV deliveries to the north side of the site. In designing for deliveries, 16.48m long articulated HGVs are typically considered the largest vehicle type to be accommodated. Other typical commercial delivery vehicles such as the 10m length 13/18 tonne rigid heavy goods vehicle or the 7.2m length approx. 7.5 tonne rigid heavy goods vehicle will have less risks associated with them due to their smaller size and greater ability to turn.</p>
16	11	<p>Legal and Financial Implications</p> <p>"The implementation of the proposed works will have significant financial repercussions for Brooks Timber & Building Supplies Ltd. These include:</p> <ul style="list-style-type: none"> The cost of hiring additional personnel for traffic management. Potential liability costs arising from accidents or injuries caused by the altered traffic flow. Reduced operational efficiency and associated economic losses. <p>Furthermore, we wish to highlight that these changes may contravene relevant provisions under the Safety, Health, and Welfare at Work Act 2005, as they compromise our client's ability to maintain a safe working environment."</p>	<p>The potential impacts of the altered traffic layout at this location have been fully assessed and considered in the EIAR. In particular in "The potential impacts of the altered traffic layout at this location have been fully assessed and considered in the EIAR referred to in particular in Luas Finglas EIAR 2024 Chapter 5 : Description of the proposed Scheme , Luas Finglas EIAR 2024 Chapter 8: Population, Luas Finglas EIAR 2024 Chapter 12: Land Take - Table 12-9: Land take Impact Assessment in Area 31 and as described in the proposed Scheme Alignment, Landscape and property drawing accompanying the application.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p>

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Submitted by	Brooks Timber & Building Supplies Ltd. (Hughes Planning & Development Consultants on their behalf)		
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			<p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p> <p>Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p> <p>In terms of any alleged specific costs/losses mentioned in this submission, it should be noted that if a Notice to Treat is served and a claim submitted by the owners/occupiers that thereafter any such claim will be appropriately considered and assessed in accordance with the statutory compensation legislation and the various acceptable heads of claim and in default of agreement, by the Property Arbitrator."</p>
17	11	"The proposed works, as they relate to our client's site, represent the worst-case scenario for our client in terms of the redevelopment of Broombridge Road with the works requiring a concerning large portion of our client's lands."	Please refer to Items No. 1, 3 and 7 above.
18	11	"Furthermore, it is clearly evident that the works to Broombridge Road are wholly accommodated by virtue of the extension of this road westwards with the extent of land acquisition illustrated on the eastern side of Broombridge Road incomparable."	The proposed Scheme design and Environmental Impact Assessment (EIA) has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme and following an extended public consultation process as evidenced in Luas Finglas EIAR Chapter 1 - Introduction and Luas Finglas EIAR 2024 Volume 1: Non-Technical Summary Section 6: Consultation. The proposed Scheme has been designed to minimise as far as possible impacts on existing occupied premises on either side of the alignment. Please see also Chapter 4 – Alternatives Considered Section 4.9.2 Broombridge Road Minor Realignment.
19	11	"It is at the request of our client that an alternative solution to the proposed works is found to ensure the protection of the existing business which, by virtue of the existing plans, will be subject to an entirely revised operational system, thus affecting site safety, customer satisfaction and commercial operating costs."	See responses to Items No. 17 and 19 above.
20	11	"It is considered that the proposed development will directly compromise the daily operation of the existing commercial business upon the subject site to the extent that may result in the loss of employment at this location. Accordingly, it is considered that the subject proposal is not compliant with the applicable zoning objective which governs the future development of this area."	<p>It is suggested that the proposed Scheme is not compliant with the applicable zoning objective which governs the future development of this area. In the Dublin City Development Plan 2022-2028 (CDP) the subject site is zoned Z6 - Employment/Enterprise with the objective to: 'provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'</p> <p>Section 14.7.6 of the Dublin City Development Plan 2022-2028 confirms that uses in areas Zoned Z6 "are likely to generate a considerable amount of traffic by both employees and service traffic. Sites should, therefore, have good vehicular and public transport access". This builds on objectives contained in Chapter 8 Sustainable Movement and Transport of the Development Plan to encourage provision of sustainable transport in areas with, inter alia, high concentrations of employment. It is added that any "challenges presented by the construction of new public transport infrastructure will be approached as an opportunity to work with residents, employees and other stakeholders to support changes in travel behaviour during the plan period". Under Chapter 8, it is underlined that public transport is crucial for the city and that Dublin as a capital city and a regional employment centre must accommodate significant movement requirements on a daily basis. It is a clear objective of the Development Plan to deliver additional and extended public transport routes to service newly developed and existing areas, to address gaps in existing areas, to improve access to public transport stops and services and to improve the integration between high density development and public transport nodes.</p> <p>The development of the proposed Scheme is not precluded under the zoning objectives of the Dublin City Development Plan 2022-2028, rather it is evident that it will contribute positively to the realisation of development aspirations for the area, namely maximising access to public transport connections to serve the need of existing and future employees in the area.</p>

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			<p>In addition, the zoning map contained in the Dublin City Development Plan 2022 - 2028 includes a note “1. Map to be read in conjunction with the written statement” and in the written statement itself there is specific policy (Policy SMT22) which provides as follows:</p> <p>“To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular, the following projects subject to environmental requirements and appropriate planning consents being obtained (...) delivery of Luas to Finglas.”</p> <p>Therefore, the zoning map cannot be read in isolation but must clearly be read in conjunction with the written statement, and within that written statement there is a specific policy which supports the delivery of Luas Finglas.”</p>
21	12	“We urge the Board to consider the following measures to address our concerns: Retain the existing one-way system for HGVs, ensuring predictable and safe traffic flow.”	Please refer to response to Item No. 3 above.
22	12	“Implement alternative design solutions that avoid the need for reversing HGVs into incoming traffic.”	Please refer to response to Item No. 3 above.
23	12	“Require the applicant to conduct a comprehensive and site-specific traffic impact assessment to evaluate the safety and operational implications of the proposed works relative to our client's site.”	TII confirms their intention to continued engagement with the stakeholder and their representatives during the detailed design and construction stages.
24	12	“Mandate the inclusion of appropriate safety infrastructure, such as barriers, signage, and designated pedestrian zones, to mitigate risks associated with any unavoidable changes.”	TII confirms their intention to continued engagement with the stakeholder and their representatives in this respect during the detailed design and construction stages.
25	12	“It is our position that the existing ability to circumnavigate the site should be maintained in situ insofar as the subject site does not prejudice the delivery of the primary objective of the Railway Order.”	Please refer to Items No. 13, 14 and 15 above.
26	12	“It is considered reasonable that Transport Infrastructure Ireland should engage directly with our client in relation to identifying appropriate mitigation measures to ensure the safeguarding of the commercial viability of their property.”	<p>TII has previously engaged directly with the business owners to explore alternative access arrangements including operational proposals for vehicle circulation and customer parking as referenced in Luas Finglas EIAR Chapter 1 - Introduction, Table 1-10: Key stakeholders and number of meetings held between 2020 and 2024.</p> <p>TII confirms continued commitment to engage with the stakeholders during detailed design and construction stages of the process to ensure impacts are minimised to the fullest extent possible.</p>
27	12	“In the absence of comprehensive mitigation measures to prevent undue accessibility impacts arising because of the subject scheme, our client would seek compensation to offset potential impacts to the monetary value of their property.”	Please refer to Items No. 1, 6 and 17 above.
28	12	“With the proposed permanent acquisition of approximately 0.0945 hectares, being the acquisition of a section of lands as contained in Folio DN990F and being an essential portion of lands, in respect of the operation of the property and the business carried out therein, it is believed the overall property is severely affected by the proposed project.”	TII does not agree with the statement. The use of the building can continue with modifications to the circulation, storage and access as referred to above. A high impact arises only when the use of the property cannot continue. Please refer to Table 12-4: Criteria for Assessment of impact magnitude of Luas Finglas EIAR Chapter 12 – Land Take and Luas Finglas EIAR Chapter 8 – Population.
29	13	“It fails to supply accurate information regarding the affect that the proposal will have on the affected landowner due to the design and construct nature of the project.”	The nature of the contract type has no bearing on the assessment of impacts. Please also refer to Item No.19 above.
30	13	“That the true assessment of the impact of the scheme as it affects the property is challenged without accurate final design drawings, thus limiting the scope of the objection here lodged.”	<p>Certain allegations are raised in the submission from Brooks Timber & Building Supplies Ltd with respect to the alleged lack of final design drawings, such being that without such drawings the scope of the objection lodged is limited and that the CPO is intrinsically flawed. No basis is given for either of these allegations.</p> <p>The documents which comprise the application to the Board including the EIAR (along with its extensive appendices), comply with all legal requirements including under the EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended). The submission by Brooks Timber & Building Supplies is extensive in nature running to some 12 pages (excluding appendices) and they have not specified what information or data was alleged to be missing. The drawings contained in the EIAR are sufficiently detailed for the likely significant effects on the environment to be considered and assessed in accordance with the EIA Directive. Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p> <p>The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the EIAR. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent</p>

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			Authority, being the BoardFurther detailed design will take place following completion of the planning process, and all stakeholders will be kept informed and advised in accordance with the procedures set out in EIAR Chapter 6 Construction activities and CTMP.
31	13	"That should the proposed Compulsory Purchase Order be confirmed by An Bord Pleanála without detailed factual final design drawings being at the Bord's disposal, such an order is intrinsically flawed."	For the reasons set out above, there is simply no substance to the allegation that the CPO is somehow "intrinsically flawed" The RO and drawings clearly identifies all the lands and rights in lands required for the construction and operation of Luas Finglas (including in relation to Brooks Timber & Building Supplies Ltd). Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive. Please refer to response to item No. 31 above.
32	13	"The Environmental Impact Statement is and remains incomplete, due to the lack of proper information regarding the design and construction methods to be employed if the proposed scheme is confirmed."	Please refer to response to Item No. 31 above.
33	13	d) "The proposed scheme is of a "Design and Build" type project, thus if the project is constructed within the boundary of the land acquired, the actual detailed design of the completed scheme is unavailable. It is noted that on previous design and build type contracts, the design and location of certain structures, elevations, horizontal and vertical sections as described by the Environmental Impact Statement and the drawings attaching thereto do not conform to the final structures constructed. These alterations occur during the design and construction phase without consultation with the affected landowner."	The level of design provided is intended to facilitate the planning process and inform the EIAR. While it does not represent a detailed design, it has been developed to a degree that is appropriate for the planning stage, ensuring it meets the necessary requirements for assessment and decision-making. The detailed design phase will follow planning approval, during which the proposed Scheme will be fully developed. The design and construction methods to be employed if the proposed scheme have been considered in detail and this is described in Chapter 6 of the EIAR. As noted in Section 6.2, "The design of the proposed Scheme has been developed to a stage where the expected construction activities to be undertaken have been identified." And in Section 6.1.1 "A general description of the construction activities proposed in each area along the proposed Scheme (i.e., how the construction activities will be conducted in each section) is presented then in section 6.4; A general description of the construction methodologies to be carried out scheme wide (i.e. how the proposed Scheme wide construction activities will be built) is presented in section 6.5;" Chapter 6 of the EIAR Section 6.3.2 identifies the procurement strategy for the proposed Scheme. The contract type for the main contract is not specified and is to be confirmed. Appendix A5.2 (Volume 5) deals with limits of deviation wider effects. Section 1.4 of this report identifies a number of locations where it is not possible not apply LODs due to constraints in the immediate vicinity of the proposed Scheme. This restriction includes the alignment along Broombridge Road – there is minimal scope for horizontal deviation due to the requirement to provide the Luas alignment and realigned Broombridge Road within the proposed Scheme land take.
34	13	"The scheme will have a severe and detrimental effect on the business enterprise, the enjoyment of the property and the ability to sustain, develop and diversify the business practices when required to maintain the commercial viability of the property."	Section 8.4.2.1 (Economic Activity and Employment) of EIAR Chapter 8 (Population) states that a slight negative effect is likely due to "small losses of internal yard space at Brooks and T.J. O'Mahony [which] will require some changes in internal vehicle movement or circulation representing a slight negative permanent impact." The extent of Land Take has been minimised as far as possible while allowing sufficient space for cycle / pedestrian paths, the Luas tracks and the continued two-way function of Broombridge Road. The presence of the Proposed Scheme will also have a positive effect on the business by increasing people familiarity with its location. Also, please refer to response to Item No.1 in relation to compensation.
35	13	"It is considered that the proposed works, specifically those affecting the section of Broombridge Road north of the Royal Canal have been designed without due regard to the subject lands within our client's ownership."	The proposed works have been designed with due regard to the subject lands. Three separate meetings were held with Brooks Timber and Supplies Limited during the design development.
36	13	"The proposal, as per the submitted drawings show a significant loss of land to facilitate the provision of the access/public realm infrastructure along Broombridge Road. This intervention will significantly impact on the daily operation of our client's commercial business."	The proposed land takes both Permanent and Temporary are proportionate and necessary for the road widening due to the insertion of the LRT alignment and the associated upgrades to the footpaths, cycleways, roads and landscaping. The temporary land take is required for construction of new boundary treatment, landscaping and utility services relocation which are all detailed in the alignment, utilities and landscape drawings and Luas Finglas EIAR 2024. Chapter 12: Land Take Table 12-10: Land take Impact Assessment in Area 32 included in the application. The temporary land take will also accommodate protective fencing/hoarding and provide some safe working space for the construction to take place as detailed in Luas Finglas EIAR 2024 Chapter 6 Construction Activities. Please also refer to response to Item No. 3 above.

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37	13	"A generic solution is proposed by Transport Infrastructure Ireland as opposed to an engineered site-specific solution. Given the lack of a detailed design of the proposed development and the lack of a site-specific mitigation measure showing how the existing business is to operate, it is our view that it would be premature for the Board to approve the proposed development at this juncture."	<p>The level of design provided is intended to facilitate the planning process and inform the EIAR. While it does not represent a detailed design, it has been developed to a degree that is appropriate for the planning stage, ensuring it meets the necessary requirements for assessment and decision-making. The detailed design phase will follow planning approval, during which the proposed Scheme will be fully developed.</p> <p>The provided design is sufficient to inform the impacts of the proposed scheme.</p>
38	13	It is strongly contended that the proposed development has not had regard to the daily operations and development capacity of our client's lands at Brooks Timber & Building Supplies Ltd	<p>TII does not agree with the suggestion that the proposed Scheme has not had regard to the daily operations and development capacity at Brooks Timber & Building Supplies Ltd. Please refer to responses below.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p>

Submission No.	07		
Submitted by	Cllr. Mary Callaghan		
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1	3	<p>"I would like to make it clear, from the outset, my strong support for the extension of the Luas Green Line to Finglas...At the same time, this vital project must be delivered while taking into account the legitimate concerns of those in Finglas who could potentially be inadvertently negatively impacted by its delivery. It is paramount that every possible effort is made by TII, the NTA and An Bord Pleanála to find practical solutions to the issues raised by residents affected. I recognise that, notwithstanding issues with consultation with residents and local groups during the earlier stages of the Luas Finglas plans, significant effort has been made to engage with stakeholders and people in Finglas. I would strongly emphasise the need for this engagement and consultation to continue as the project moves to its next phase. My submission seeks to reflect the issues and concerns raised by my constituents, which I have grouped into the following categories:</p> <ul style="list-style-type: none"> St. Margaret's Court Ravens Court Finglas Youth Resource Centre Extension to Ballymun" 	<p>There has been engagement throughout the process with residents who may be affected by the construction and/or operation of Luas Finglas as referenced in Chapter 1 - Introduction Section 1.9 Consultation.</p> <p>TII will continue with engagement and consultation as the project moves to detailed design and construction stages.</p>
2	4	<p>"There are several houses on St. Margaret's Road, opposite the entrance to McKelvey, which will have some of their driveways/front gardens removed under the current plans. To accommodate for this, these residents are due to get their own parking spaces at the back of estate and will, to my knowledge, will be assisted financially in this regard. It is important that stakeholders engage with these residents in relation to where exactly their parking spaces will be and how exactly this arrangement will operate."</p>	<p>Numerous alternative layouts have been developed and discussed with residents. TII will continue to engage with the stakeholders at all stages of the process to ensure disruption is fully minimised.</p> <p>Section 4.9.10 of EIAR Chapter 4 summarises the alternatives considered for this location. TII engaged with St Margaret's Court residents on three occasions. These meetings aimed to better understand residents' concerns and identify the most suitable solution.</p> <p>The key reasons for the option chosen was:</p> <ul style="list-style-type: none"> Improved accessibility to secure parking. Enhanced green space and landscaping compared to the alternatives. The number of car parking spaces will increase from 24 to 32. <p>TII will continue to liaise with residents with respect to their car parking spaces and their operation.</p> <p>With regard to compensation, as set out in section 12.5.2 of Chapter 12: Land Take of the Luas Finglas EIAR 2024, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p>

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			Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.
3	4	"Residents living at the back of St. Margaret's Court (in the cul-de-sac) have also expressed serious concerns regarding the potential loss of their green space. This green space is often used by the residents for socialising, for children to play, for hosting birthday parties, and it generally improves residents' wellbeing. I would strongly urge a solution which results in this green space being retained or provided elsewhere in the cul-de-sac."	<p>The proposed solution (Landscape RO drawing D1-AL 33 C-D) offers an overall increase in the green space available to the residents along with additional/relocated car parking and new landscaping works. This is due to the relocation of the northern boundary wall to include the tree and grass area adjacent to the Road (Road leading to Jamestown Business Park).</p> <p>Changes to the residential amenity within St. Margaret's Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 12 properties in St Margaret's Court are referred to as visual receptors (R151) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR. The impact on landscape character in this area will be a Slight, Permanent and Negative impact.</p>
4	4	"These same residents are also very concerned about the possible lack of availability of parking in the estate because of the current plans. Residents of this estate already have issues with non-residents using the estate to park their cars, and they are fearful that the existing Luas Finglas plans will exacerbate this issue."	<p>Please refer to response to Item No. 2.</p> <p>TII will continue to liaise with the residents with regard to current and future security of parking.</p>
5	4	"It is crucial that the outstanding issues in terms of parking and outdoor amenities be addressed well in advance of construction work and that ongoing consultation with residents continues."	TII is committed to working with residents with regard to maintenance and improvement of green spaces within the estate and engagement is ongoing regarding reconfiguration of parking spaces in conjunction with Dublin City Council, which has taken St Margaret's Court in charge.
6	4	"Residents (St Margaret's Court) are also querying what will be done in relation to the noise of LRVs operating in such close proximity to their homes."	<p>The submission has raised concerns regarding noise impacts on St Margarets Court premises during the operation of the Luas. Section 15.4.1.5 of Volume 3 of the EIAR assesses the operational phase noise impacts of the proposed Scheme. Specifically, noise model receptor R151 is located at the external façade of the St Margarets Court facing the proposed tracks. Figure 15.2 of Volume 4 of the EIAR illustrates the location of this and all other noise model receptors.</p> <p>The calculated noise level during operation of the proposed Scheme at R151 is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr <p>In the case of receptor R151 in the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas is 60 dB LAeq,16hr while the night-time noise level is 54dB Lnight.</p> <p>This absolute daytime noise level is higher than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night the noise level exceeds the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise at St Margarets Court for both the average and peak hour of day or night-time operation is slight as the overall noise increase is less than or equal to 1dB above baseline. Therefore, no mitigation is required at this location.</p>
7	4	"Those living in Ravens Court have also raised the matter of a potentially significant loss of green space in their estate. Further to the above in relation to the green space at St. Margaret's Court, such green spaces are of vital important to communities and are used for a range of activities and purposes which serve to improve residents' health and overall wellbeing."	<p>Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit smaller in size. As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents.</p>
8	5	"I am concerned about access to the estate under the current proposals. LRVs passing the entrance to the estate every few minutes could make entering and exiting the estate very dangerous, particularly for young	The proposed Scheme has been designed to ensure that both drivers exiting Ravens Court and pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards. The available sight distances will exceed the minimum requirements set out in national guidelines.

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		children. Every possible mitigation risk should be put in place in this respect and, if sufficient mitigation measures cannot be introduced to address these safety concerns, the route may need to be further revised."	The proposed Scheme design has been developed to provide visibility distances well above the required minimums. These measures ensure that both drivers and pedestrians can make safe and informed decisions before entering the Luas corridor.
9	5	"Residents also want to know what will be done to alleviate their concerns about a severe lack of parking spaces in their estate. They fear that the current proposals will make this issue much worse."	According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.
10	5	"Another serious concern of residents is that access for emergency services vehicles may be impacted by the current proposals."	A Communications Plan will be put in place to ensure emergency services are kept fully informed of works and traffic management measures prior to them commencing (Section 6.12.1 of Chapter 6). As identified in A6.2 CTMP Section 1.3.16 "Access will be maintained for emergency vehicles along the proposed Scheme, throughout the Construction Phase." This is regardless of the traffic control measures required for the works. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.
11	5	"Ravens Court's residents have also made representations regarding the potential of significant disruption, including in the form of noise from LRVs passing by, and would like to be informed of how this disruption would be significantly mitigated or addressed in full."	Section 15.4.1.5 of Volume 3 of the EIAR assesses the operational phase noise impacts of the proposed Scheme. Specifically, noise model receptors R076 to R080 are located at the external façades of the Ravens Court residences. Figure 15.2 of Volume 4 of the EIAR illustrates the location of these and all other noise model receptors. The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels, <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight. This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR. The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.
12	5	"Finglas Youth Resource Centre (FYRC), which is such a vital service for the people of Finglas, particularly its younger people, has made detailed representations in respect of the railway order and the current plans. FYRC is highly concerned about disruption to its services as part of the 2nd, 4th, 9th and 10th schedules under the railway order."	Please refer to responses provided to Items No. 13, 14 and 15 below.
13	5	"In terms of the second schedule, land required includes the car park outside the FYRC building which is an essential resource for the Centre's staff. FYRC would like alternative parking arrangements considered so that staff are not negatively impacted during the 2nd schedule and going forward."	A loss of public parking is needed to facilitate the Luas alignment and Finglas Village stop. In the longer term, once operational Luas will provide an alternative to car use. TII will continue to work with DCC and other stakeholders to minimise impacts in the area during the construction phase, before Luas is operational. TII is committed to minimise disruption throughout the construction phase and these details will be further explored with Contractors once appointed.
14	6	"FYRC also has questions about when the land will be under temporary possession under the 4th schedule and whether access to the front of the building will be restricted. If access to the front of the building is to be restricted, the Centre is asking that rear access be made available."	TII reassures FYRC that there is no requirement for the Centre to close, either temporarily or permanently. Access to the Centre will be maintained at all times throughout the construction process. As per RO Property Drawing D1-P32-DO, there will be a short-term need to cease use of the external area to adjust the boundary wall, but this will not affect the Centre's operation.

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			<p>The details of these adjustments, including the timing and any necessary access arrangements, will be further developed during the detailed design stage. At the construction phase, communication will be provided to FYRC regarding the timescale and any specific arrangements for access, safety, and other relevant factors, in line with the Construction Activities outlined in Table 6-2 of Chapter 6 and Section 1.3.1 of the CTMP (Appendix A6.2).</p> <p>The proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area. A public right of way is to be maintained throughout construction.</p> <p>Specific parking arrangements is addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12. "The appointed Contractor will provide temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare / Mellow Spring Childcare Centre to compensate for existing spaces lost during construction. Consideration will be given to the car parking needs of employees of the Finglas Resource Centre to avoid competition for remaining places."</p> <p>TII will continue to engage with the stakeholders at all stages of the process to ensure disruption is minimised to the fullest extent possible.</p>
15	6	"In respect of public and private rights of way being extinguished under the 9t h and 10t h schedules, FYRC is asking about the possibility of the Centre having to cease operations or relocate. The Centre has reiterated how significant an impact this scenario would have on its service users who have developed such strong ties to the building and to its staff. If temporary or permanent shutdowns are expected, these disruptions must be notified to FYRC well in advance."	<p>A public right of way will be maintained throughout construction to ensure safe access to FYRC, meaning the centre will not need to close at any stage. However, the external area will need to be temporarily closed for a short period to facilitate adjustments to the boundary wall. This will be further developed during the detailed design phase, and during construction, clear communication will be provided regarding timelines, access, and safety arrangements, in accordance with Chapter 6 (Construction Activities) and the CTMP. Additionally, specific parking arrangements and implementation measures are addressed in A6.1 CEMP Table A6 1-5</p>
16	6	"Construction as part of the Luas Finglas project could also introduce significant risks for the young people who use the FYRC. FYRC has requested that risk assessments be carried out and that regular health and safety meetings take place to identify and mitigate potential hazards."	<p>As identified in Section 6.9 of Chapter 6 of the EIAR "The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated by the Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS) which will address health and safety issues from the design stages through to the completion of the Construction Phase. This plan will be reviewed as the proposed Scheme progresses. The contents of the Health and Safety Plan will follow the requirements of the Regulations. In accordance with the Regulations, a PSDP has been appointed and PSCS will be appointed as appropriate."</p> <p>This will include ensuring arrangement are put in place for the safety of the public.</p> <p>TII will continue to engage with the stakeholders at all stages of the process to ensure business concerns are considered to the fullest extent possible.</p> <p>In the operational phase, LRVs in the vicinity of the Finglas Stop will operate at low speed due to the curvature of the track at this location. The stop itself will be located within a safer car free environment of a new civic plaza. The environment will be open, and the Resource Centre will be very visible from the stop and so easy to locate. It is likely that the stop will result in greater footfall, and this will have a mixture of implications for sensitive subsets of the population. The number of people alighting at the stop will, in itself, provide for natural surveillance with regard to anti-social behaviour, combined with the provision of good lighting, security cameras and emergency help buttons. The Centre will itself need to decide on how to adapt to this footfall with the support of the operators of the service. Overall, the Finglas Stop will greatly improve the Centre's accessibility, making it easier to reach using public transport from a larger catchment than at present and so strengthening its ability to cater for the needs of young people.</p>
17	6	"FYRC also wants to ensure that its building continues to be a safe and supportive environment for its users and the community, even after Luas Finglas is operational. While FYRC appreciates the proposal to plant additional trees near the counselling and training rooms, the Centre is concerned that this measure will not adequately mitigate noise."	<p>In the case of receptors R086 and R087 only the daytime noise levels are relevant as the building is not operated at night. The daytime noise levels due to operation of the Luas range from 50 – 52dB LAeq,16hr at R087 on the southern facade and are of the order of 59 dB LAeq,16hr at R086 on the southern facade. This absolute noise level is lower than the threshold of 60dB for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for commercial properties.</p> <p>Furthermore, to put the calculated noise level in context reference is made to the noise monitoring described in Section 15.3.1 of Volume 3 of the EIAR. The closest monitoring location to the FYRC was AT6, as illustrated in Figure 15.1 of Volume 4 of the EIAR, which is on Mellowes Rd adjacent to the Finglas Counselling Service. Noise levels measured at this location were of the order of 68dB during the daytime. Therefore, the new noise</p>

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			from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic.
18	6	"If assurances cannot be given that the building's interior will remain unaffected by LRV noise, it is essential that FYRC's requests for soundproofing measures such as cladding and soundproof windows are heard. Every effort should be made to avoid disruption of essential activities like counselling, meditation, and training in the Centre."	The assessment contained within Chapter 15 of Volume 3 of the EIAR submitted has demonstrated that the residual noise and vibration impact of both the operation and construction of the proposed Scheme is not significant and in many cases the impact is slight. Sound insulation measures to buildings along the proposed Scheme are therefore not required.
19	6	"The Centre also wants to make sure that the Finglas Village stop being positioned at the heart of the new line, thus increasing footfall at the centre, does not lead to additional risk for the Centre and its users. To align with child protection and safety guidelines, the Centre has stated that it may need to transition from an open-door policy to an invitation-only one. Under these circumstances, the Centre maintains, the front door requires modifications and enhanced security features so that it is fit-for-purpose. The Luas development should enhance and support the Centre as a safe haven for its users."	<p>Within EIAR Chapter 8, Section 8.4.2.1 and Table 8-3 acknowledge the high sensitivity of the Resource Centre. This section also refers to the loss of car parking spaces (including disabled parking) during construction. Table 8.10 refers to a short-term significant negative effect on general amenity (use) of the centre during the construction phase. Section 8.4.3.2 states that the proposed Scheme will provide an additional positive impact for disadvantaged groups, parents, children and older people as it will connect to community facilities which are disproportionately accessed by these population subsets, including childcare, family resource centres and schools. Section 8.5.2 (Mitigation) proposes that "temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare/Mellow Spring Childcare Centre [be provided] to compensate for existing spaces lost during construction. Consideration should be given to the car parking needs of employees of the Finglas Resource Centre to avoid competition for remaining places."</p> <p>There will be a need to ensure the safety of users of the Resource Centre during the construction phase that could involve the use of hoarding and the short-term re-routing of access within a small area, but there will be no need for loss of access. Measures will also be taken to ensure the continued safe and convenient access of persons with disabilities. During the operational phase, the proximity of the Finglas Stop will greatly improve the Centre's accessibility and its ability to cater for the needs of young people. A new cycle lane will be provided with a covered cycle storage facility.</p> <p>In the operational phase, LRVs in the vicinity of the Finglas Stop will operate at low speed due to the curvature of the track at this location. The stop itself will be located within a safer car free environment of a new civic plaza. The environment will be open, and the Resource Centre will be very visible from the stop and so easy to locate. It is likely that the stop will result in greater footfall, and this will have a mixture of implications for sensitive subsets of the population. The number of people alighting at the stop will, in itself, provide for natural surveillance with regard to anti-social behaviour, combined with the provision of good lighting, security cameras and emergency help buttons. The Centre will itself need to decide on how to adapt to this footfall with the support of the operators of the service. Overall, the Finglas Stop will greatly improve the Centre's accessibility, making it easier to reach using public transport from a larger catchment than at present and so strengthening its ability to cater for the needs of young people.</p>
20	7	"I must reiterate the disappointment expressed by so many people in the area about the omission of Ballymun from the Green Line extension. The limited scope of the Luas Finglas project is quite concerning and represents a missed opportunity to link the Luas Green Line and the proposed Metrolink. This would have provided unprecedented connectivity with the airport for Finglas and the greater Dublin area, as well as a quick and easily accessible link between the communities of Ballymun and Finglas, and Ballymun cross-city. The above also lends to the greater issue of a clear imbalance between the North and South of Dublin in respect of public transport. One can look at the length of the existing Green Line heading in the opposite direction as evidence of this. . . I would therefore request that TII, the NTA and An Bord Pleanála look immediately at extending the Luas Green Line to Ballymun, as a comprehensive public transport rail link for the north of the city."	<p>There is currently no policy supporting the extension of the green line to Ballymun or Metrolink and this is beyond the scope of this application.</p> <p>The Transport Strategy for the Greater Dublin Area, as approved by the Minister for Transport in January 2023, provides the statutory basis for investment in transport infrastructure and services for Dublin up to 2042. The proposals therein were derived on the basis of a comprehensive assessment of forecast transport demand over the next 20 years. In the case of Finglas and Ballymun, the analysis confirmed that both areas would be required to be served by the pre-existing proposals. In the case of Finglas, it was determined that demand on this corridor would be accommodated by a combination of high-frequency bus and Luas, the latter of which would also cater for some longer-distance demand via a Park and Ride at St. Margaret's Road. In the case of Ballymun, the MetroLink which will also serve the major town of Swords and Dublin Airport has long been planned to be routed through this suburb with a stop in the Town Centre and will be complemented by the BusConnects network.</p> <p>Extending Luas Finglas, which is approximately 4km in length by a further 3km eastwards from Charlestown to Ballymun was not considered for the following reasons:</p> <ul style="list-style-type: none"> It would add significantly to the cost of the project; The demand for travel between Finglas and Ballymun would be unlikely to justify investment in light rail and is currently being met by the N6 and N4 bus services; and Demand from Ballymun to the City Centre will be met by MetroLink and the recently approved BusConnects project.

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			<p>Both Luas Finglas and MetroLink have been through extensive public consultation processes and changes to their routings, alignments and detailed designs over the last number of years. RO applications have been made to the Board and in the case of MetroLink, an oral hearing has occurred. As both projects are currently under consideration by the Board, no material changes to either can be made.</p> <p>NTA and TII, intend to deliver both rail projects once the ROs are approved, subject to funding availability.</p> <p>Under the Dublin Transport Authority Act, the Transport Strategy for the Greater Dublin Area is reviewed every 6 years.</p>

Submission No.	08		
Submitted by	Colorman (Ireland) Ltd. (Hughes Planning & Development Consultants on their behalf)		
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1	4	"From the outset, this submission requests that An Bord Pleanála duly consider the negative implications arising on our client's lands as a result of the proposal. Our client has, at every opportunity, engaged with Transport Infrastructure Ireland (TII) in relation to the proposal and has articulated their significant concerns regarding the proposals impact on their site. Whilst we acknowledge and accept that TII have made amendments to the alignment on the southernmost portion of Broombridge Road it is not considered that these amendments go far enough to safeguard the operational viability of the Colorman site."	<p>TII does not agree to the contention that the design does not go far enough to safeguard the operational viability of the Colorman site. The design of the alignment and road in this location has to take cognisance of geometric constraints and the relative positions of the proposed new bridge and existing rail/Canal bridge (a historic structure), the new road alignment and configuration. A relocation further west is not possible (see Chapter 4: Alternatives Considered, section 4.9.12 Broombridge Tie-In Options).</p> <p>Stakeholder engagement meetings have taken place with Colorman on 6 occasions (See Table 1-10: Key stakeholders and number of meetings held between 2020 and 2024 of Chapter 1 - Introduction) where alternatives for access, parking and internal circulation were discussed. In particular, the proposed access solution from Broombridge Road beneath the proposed bridge was the result of constructive on-site engagement with Colorman, their engineering representative and TII, where a solution to adjust the alignment (of rail and road) and positioning of bridge piers was then further explored.</p> <p>The Construction sequencing proposes a staged approach and is designed to minimise the duration and limit the property take to the minimum possible. All alternative access arrangement will be in place before existing access is removed see Luas Finglas EIAR 2024 Chapter 6: Construction Activities and CTMP.</p>
2	4	"It is strongly contended that the proposed development does not have full regard to the daily operations and development capacity of our client's lands at the existing Colorman Ireland site, located on the eastern site of Broombridge Road, and to the immediate north of the Royal Canal Way towpath."	<p>TII does not accept the contention that the proposed development does not have full regard to the daily operations and development capacity of the site.</p> <p>The proposed land acquisition will involve the lands to the frontage of Colorman, along its western boundary to Broombridge Road and which is currently being used for circulation, car parking or green space. The proposed scheme will remove the existing Broombridge Road access and provide an alternative access to the south. This access is aligned with Colorman's main east-west running internal access road, thereby facilitating daily operations at the site. The centrally located new access will provide a more direct route between Broombridge Road and the central core area of the site for both cars and commercial vehicles and avoids sending this traffic along the frontage area for the main office building. It is our view that the centrally located new access presents more opportunities than disadvantages for the future development capacity of the site. Furthermore, the proposed scheme will create a 13m long paved access between Broombridge Road and the proposed boundary for Colorman underneath the Luas line, with associated benefits for those entering and leaving the property.</p>
3	4	"Whilst we acknowledge and accept that TII have made amendments to the alignment on the southernmost portion of Broombridge Road it is not considered that these amendments go far enough to safeguard the operational viability of the Colorman site."	Please refer to responses in items No. 1 and 2 above.
4	4	"Our client is not opposed this public transport upgrade initiative but is extremely concerned about the undoubted effects that the line extension will have on their business, and in addition the implications that the lengthy construction period will have on their current operations. This is a long-standing an established business which has operated successfully at this location for many years, and as such it is important that its continued viability is protected."	Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in Chapter 6 Construction Activities of the EIAR and is illustrated in Figure 6-2: Construction Programme. The sequencing of the Programme is described in Section 6.3.3 where works along Broombridge road are estimated to be undertaken in the initial 18 months of the programme. The construction of the bridge structure will be predominately active throughout this period. However, the temporary lands indicated further south of the bridge structure will not be required continuously and this will allow access to be maintained throughout construction.
5	4	"As will be outlined in the proceeding sections of this report, there is a significant amount of Colorman owned lands identified as part of the Railway Order which are proposed for permanent and temporary acquisition, our client calculates that the total land take (temporary and permanent) in the order of c.1, 900sq.m, this is of critical concern."	TII does not agree that the amount of Colorman lands to be acquired is significant. The Land Take assessment of the impact (pre mitigation) has been assessed as significant (See Chapter 12 Land Take - Table 12-9: Land take Impact Assessment in Area 31) with the significance of residual impacts being slight. The permanent land take within Colorman's boundary is circa 891m2 (less than 7%) and the temporary take is circa 939m2 (7%) of the total site area of 13,312sq.m. Note that the land registry plots extend to the middle of the Broombridge Road and along the Royal Canal's towpath and thus falls outside the current boundary of the business the total land take referred to by the submission seems to include these areas.
6	4	"If the lands indicated for temporary acquisition are required at the same time, for a sustained and undefined period, it has the potential to force Colorman into long periods of shut down as they would be unable to move raw materials, work in progress, finish goods and send them to their destination. This would be completely damaging and devastating to the business and would seriously jeopardise its commercial viability."	Please refer to response in item No.4 above.
7	9	"The mixed-use development application referred to above under Dublin City Council Reg. Ref. 4865/22 and ABP Ref 315286-22 was submitted following the publication of the initial Preferred Route selection process for the Luas Finglas extension, which showed the Luas line extension directly crossing the western portion of the Colorman site and having a devastating impact on the overall site. This application accommodated a set-back	TII understands and acknowledges the importance for commercial property owners to be able to plan their affairs with as much notice and certainty as possible. The proposed Scheme EIAR has taken into account the operational requirements of Colorman at both construction and operation stage and TII is firmly of the opinion that the impacts have been mitigated to allow the business to continue functioning at this location. TII is

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		<p>along the western site boundary to accommodate the Luas extension and was made in attempt to raise the necessary revenue to facilitate the relocation of the business elsewhere, as a result of the detrimental impact the initial preferred route would have on same. However, the site proposal was ultimately refused at application and appeal stage with one common and relevant refusal reason relating to the Luas extension as follows:</p> <p>Having regard to the preferred route for the extension to the Luas Green Line, it is considered that the proposed development would be premature pending the finalisation of the design for the Luas extension and bridge/viaduct alignment. In the absence of sufficient and appropriate information regarding the interaction between the Luas extension, route alignment, and the proposed development, it is considered that the proposed development would fail to safeguard the delivery of the extension of the Luas Green Line (Broombridge - Finglas), would be contrary to Policy SMT22 (Key Sustainable Transport Projects) of the Dublin City Development Plan 2022-2028 and would, therefore, be contrary to the proper planning and sustainable development of the area.</p> <p>Ultimately, the proposed Luas extension and the works proposed to facilitate this extension within and in proximity to our client's lands places a significant degree of uncertainty in terms of the company's future at this location."</p>	<p>committed to continue close engagement with Colorman prior to and following any grant of the RO by An Board Pleanála.</p>
8	10	<p>"As per the map extract overleaf, the new the extended Luas line traverses the western boundary of the Colorman site. From a review of the associated plans the Luas will pass our clients property via a new rail bridge structure which continues along the full extent of the western site boundary. It is noted and annotated by TII that 'a new vehicular access is to be provided for the business premises beneath the bridge', this includes the Colorman premises. It is strongly considered that the necessary works to facilitate the proposed development will significantly hinder the ability of our clients lands to carry out their daily operations by impeding access to the site and resulting in complications for the future development of the site."</p>	<p>As set out in Section 1.2.3 of the CTMP, to minimise the traffic impacts during construction, the works along Broombridge Road will be phased so as to first complete the demolition works, and road alignment works outside the existing roads. As set out in Section 1.2.3 of the CTMP, to minimise the traffic impacts during construction, the works along Broombridge Road will be phased so as to first complete the demolition works, and road alignment works outside the existing roads. After that, more space can be provided to facilitate the construction works and the existing traffic lanes can be shifted to the new space in order to maintain the number of traffic lanes as far as possible. This will facilitate maintaining access to the Colourman site during construction.</p> <p>As set out in Section 1.3.20 of the CTMP "The Licensee/Contractor shall use its best endeavours to minimise the impact of the works on property owners/occupiers. Access to all houses and premises to be maintained save with the prior approval of the property owner. Any such agreement shall ensure that adequate provision is maintained for Emergency Service access to the affected properties during the works."</p>
9	10	<p>"Our clients business is entirely reliant on unimpeded access for staff and larger HGV's for deliveries and the movement of large equipment, whilst we accept that a new access point onto Broombridge Road is proposed by TII there is a very apparent lack of details as part of the Railway Order Application as to when this new access will be provided and the design specifics associated with same."</p>	<p>As set out in Section 6.3 Construction Phasing in Chapter 6 of the EIAR works along Broombridge road are estimated to be undertaken in the initial 18 months of the programme. Provision of the more permanent new access will be towards the end of the estimated 18- month period. However, during this time temporary access arrangements will be facilitated as necessary.</p> <p>The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the EIAR. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and all stakeholders will be kept informed and advised in accordance with the procedures set out in Chapter 6 Construction activities and CTMP. Further detailed design will take place following completion of the planning process, and all stakeholders kept informed and advised in accordance with the procedures set out in Chapter 6 Construction activities and CTMP. Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p>
10	10	<p>"Also we note the presence of a secondary access to the Colorman site of Boyne Road to the east (rear) of the site. However, this access is in no way suitable in its current form to accommodate both staff/visitor vehicles and larger goods vehicles whilst the Luas extension works are being undertaken. This is a substantial concern for our client."</p>	<p>Noted.</p>
11	13	<p>"Significant extent of land proposed to be acquired on a permanent and temporary basis -directly compromising the daily operation of our client's long-established commercial business."</p> <p>"With regards to the temporary acquisition, there is no definitive clarity on the period of time that these lands will be required."</p>	<p>Please refer to responses in items No. 1.2 and 4 above.</p>

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12	13	"The suggested acquisition required for this project together with the temporary acquisition required along the southern boundary of the Colorman premises as part of the Dart+ West project will result in a virtually unworkable on-site situation for our client."	The Luas Finglas temporary take does not restrict the access to the buildings along the Southern (Royal Canal) boundary have considered the cumulative effects of the adjacent Dart + project (See Chapter 24 Cumulative Impacts and in particular section 24.5.6.1 Construction Phase). The Luas Finglas temporary take does not restrict the access to the buildings along the Southern (Royal Canal) boundary. TII has considered the cumulative effects of the adjacent Dart + project (See Chapter 24 Cumulative Impacts and in particular section 24.5.6.1 Construction Phase). Close coordination between both projects will ensure impacts are minimised. See also responses to items 1, 2 and 4 above.
13	13	"The amount of land take required to facilitate this project has a very real potential of forcing the Colorman premises into period of prolonged shutdowns."	Please refer to response in items No. 1 and 4 above.
14	13	"Loss of the main site access off Broombridge Road and existing staff and visitor parking along the site's western frontage - whilst it is noted as part of the Railway Order that a new access will be provided there no definitive timeframe provided for the delivery of this infrastructure."	Please refer to response in Item No. 4 above.
15	13	"Due to the nature of its operations, the Colorman premises requires unimpeded access for HGV vehicles and staff/visitor vehicles at all stages of the day. The business employs in excess of 200 persons, and receives and issues delivery's regularly throughout the day, the business effectively manages these vehicular movements at present, however the loss of significant amounts of land to permanent and temporary acquisition will have a detrimental impact on the business and the safety of movement throughout the premises."	TII does not agree with the contention that there will be a significant loss of land for permanent and temporary acquisition. Please refer to response to item 5 above. TII does not agree with the assertion that the permanent property acquisition will have a detrimental impact on the business. Please refer to responses to items no. 1,2 and 4 above. TII does not accept the contention that the proposed Scheme will have a detrimental impact on the safety of movement throughout the premises. The revised internal layout for Colorman will make the frontage car park area less busy compared to the existing situation where all Colorman traffic entering from Broombridge road must pass through the frontage car park, except for HGV access to the northwest corner. Note also that there are currently considerable mixed private car parking / commercial vehicle scenarios elsewhere throughout the Colorman site. TII does not agree with the assertion that the temporary property acquisition will have a detrimental impact on the business and the safety of movement throughout the premises. Please refer to responses in 1, 2 and 4 above.
16	13	"Reduced attractiveness of the business due to reduced operational efficiency and potential congestion issues due to required road works on Broombridge Road and potential closures during the construction phase."	The traffic management measures necessary to facilitate the works along Broombridge Road are set out under Section S31.1 in table 1-2 of A6.2 CTMP. Some limited road closures are required to facilitate road pavement works and construction of Tolka Valley River Bridge and to facilitate material deliveries (i.e. structural elements). These will be undertaken as overnight works so as to reduce disruption. Please refer to responses in items No. 1, 2 and 4 above.
17	13	"There is a lack of clarity regarding the effect of the proposed works on the existing boundary treatment and what will be proposed in its place in order to secure our clients premises."	TII does not accept that there is a lack of clarity regarding the effect of the proposed works on the existing boundary treatment. The level of design presented is consistent with what is required for a RO planning application. A boundary treatment will be provided to provide at least the current level of security for the site. Boundary treatment type is indicated on the landscape drawings (D1-31 AL O-A and D1-31 AL A-B) and in the Architectural Urban insertion report, Chapter 21 - Landscape and Visual Amenity, Appendix A21.2 - Urban Integration Report. All boundary treatments are subject to detailed design and subsequent landowner consultation.
18	13	"Upon review of the detailed documentation submitted by Transport Infrastructure Ireland as part of the Railway Order together with the document pack posted directly to the site owner, Colorman, the following acquisitions were identified in the second schedule as affecting or potentially affecting our clients' lands, on a permanent or temporary basis: <ul style="list-style-type: none"> Plan No. D1-P 31 O-A (Ref No. D1-31O-A10)(82.1sq.m of land) Plan No. D1-P 31 O-A (Ref. No. D1-31O-A11)(505.5sq.m of land) Plan No. D1-P 31 O-A (Ref No. D1-31O-A13)(54.2sq.m of land) Plan No. D1-P 31 O-A (Ref No. D1-31O-A14)(14.9sq.m of land) Plan No. D1-P 31 O-A (Ref No. D1-31O-A16)(94.3sq.m of land) Plan No. D1-P 31 A-B (Ref No. D1-31A-A1)(298.8sq.m of land) Plan No. D1-P 31 A-B (Ref No. D1-31A-A2)(179.6sq.m of land) Plan No. D1-P 31 A-B (Ref No. D1-31A-A3)(65.9sq.m of land) 	Confirmed. These are correct.

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		<ul style="list-style-type: none"> Plan No. D1-P 31 A-B (Ref No. D1-31A-A5)(42.5sq.m of land) Plan No. D1-P 31 A-B (Ref No. D1-31A-A7)(1 ,319.6sq.m of land) Plan No. D1-P 31 A-B (Ref No. D1-31A-A8)(202.5sq.m of land) Plan No. O1-P 31 O-A (Ref No. D1-31O-A13)(54.2sq.m of land) Plan No. D1-P 31 O-A (Ref No. D1-31O-T10)(86.8sq.m of land) Plan No. D1-P 31 O-A (Ref No. D1-31O-T12)(526sq.m of land) Plan No. D1-P 31 O-A (Ref No. D1-31O-T15)(134sq.m of land) Plan No. D1-P 31 A-B (Ref No. D1-31A-T2.1)(78.2sq.m of land) Plan No. D1-P 31 A-B (Ref No. D1-31A-T3)(278.6sq.m of land) <p>The above referenced lands are outlined, relative to our client's lands, on the property map extracts below and overleaf:" (Figures 9 and 10)</p>	
19	15	<p>"Overall from our assessment of the above maps and associated schedules it is evident that approximately 891 sq.m of lands within the Colorman site will be subject to permanent acquisition by TII to facilitate the proposed Luas extension, whilst over 1,000sq.m will be subject to temporary acquisition. This is a significant land take which will eradicate a number of on-site car parking spaces required for Colorman staff, the existing site entrance and sections of the entrance way route. It is considered that a more suitable alternative must be considered further by TII which poses less detrimental impacts to existing businesses, including the Colorman premises along Broombridge Road."</p>	<p>Please refer to response in Item No. 5 in relation to significance of land acquisition. TII believes that the impact of loss of parking for Colorman is overstated in this case. The Colorman site is quite large and has extensive areas of paved surfaces, such as to the rear of the site, that have the potential to be used for parking. The location of the proposed Broombridge Luas station beside Colorman, together with proposed active travel infrastructure on Broombridge Road and beyond, will offer people travelling to the Broombridge Road area alternative ways to travel and encourage a modal shift away from car dependency. This should mean a lower requirement for parking at the Colorman site and less likelihood of traffic congestion inside the site. The existing site entrance will be replaced with a new site entrance ideally positioned towards the centre of the site. The proposed access location has been carefully chosen by TII to be as far north as possible so as to tie in with the level of Broombridge Road; being constrained by minimum headroom requirements of the elevated LRT structure; to tie in with Colorman's internal road system; and based on consultations with Colorman as noted in item 1 above.</p>
20	15	<p>"For example, when looking at the Colorman site and its surrounding environment, there is a sizeable open area which immediately opposes our clients' lands on the western side of Broombridge Road. Given that these lands are free of any development at present, it is not clear why TII couldn't simply avail only of these lands on a temporary basis to facilitate construction and reduce the extent of lands within our client's ownership which are subject to temporary acquisition. It would be more appropriate if site compounds could be located in this open area."</p>	<p>No site compounds are proposed within the Colorman site. The proposed locations of site compounds are set out in section 6.5.7.1 of Chapter 6 of the EIAR. The temporary working areas within the Colorman site are required to facilitate the construction of the permanent works and in particular construction of boundary fencing, construction of the new access roadway and for utilities diversions and connections and set out in Chapter 12 – Land Take, Table 12-9: Land take Impact Assessment in Area 31.</p>
21	15	<p>"As outlined in the opening section of this submission it is strongly contended that the area of Colorman owned lands which are the subject of temporary and permanent acquisition is entirely excessive. If all portions of the lands indicated for acquisition are required at the same time, for a sustained, undefined period, it has a very real potential to force Colorman into long periods of shut down as they would be unable to move raw materials, work in progress, finish goods and move unimpeded into and out of the site. This would be detrimental to Colorman's operation and its financial stability."</p>	<p>Please refer to response in Item No. 5 above.</p> <p>Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in Chapter 6 of the EIAR. The sequencing of the Programme is illustrated in Section 6.3.3 where works along Broombridge road are estimated to be undertaken in the initial 18 months of the programme. Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP as referred to in a previous response.</p>
22	15	<p>"It is considered that the area of permanent and temporary acquisition on our clients lands is wholly unreasonable, and an alternative less land intensive alternative must be explored further."</p>	<p>Please refer to response in Item No. 5 regarding significance of land take.</p>
23	17	<p>"Referring to the EIAR submitted with the Railway Order Application, it is confirmed that a new access for Colorman will be provided beneath the proposed 212.Sm long Royal Canal rail bridge structure which traverses the full western extent of our client's property. A visualisation is provided overleaf showing what this bridge structure will look like in situ relative to the Colorman property. The existing Broombridge road is also to be realigned to facilitate the proposed works. Whilst we note this is an improvement on the initial preferred route presented by TII, it is still considered that there are significant impacts to our client's property which could be further considered and mitigated against by TII."</p>	<p>TII will continue to engage with the stakeholders at all stages of the process to ensure disruption is minimised to the fullest extent possible in accordance with Luas Finglas EIAR 2024 Chapter 6: Construction Activities and CTMP.</p>
24	18	<p>"Whilst all of the above is noted and acknowledged the detailed design of the proposed new entrance and its timeframe for delivery is not explicit as part of the submitted documentation". "It is imperative that clarity is provided on this by TII as it presents a significant degree of uncertainty for our client."</p>	<p>Please refer to response in Item No. 4 above.</p>

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25	18	"Given the lack of a detailed design of the actual scheme and the lack of detailed scheme mitigation measures showing how our clients business can continue to operate, it is our view that it would be premature for the Board to approve the scheme at this juncture."	The proposed works are illustrated on the Alignment drawings (D1-31 GA O-A and D1-31 GA A-B) and Landscape drawings (D1-31 AL O-A and D1-31 AL A-B) included with the RO submission. The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the EIAR. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and all stakeholders will be kept informed and advised in accordance with the procedures set out in Chapter 6 Construction activities and CTMP. Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisitions being excessive.
26	18	"It does not appear that there were any phasing plans submitted as part of the Railway Order and therefore the sequencing of the construction programme is unknown. This we believe is an oversight by the Applicant. As it stands, there are no measures to ensure that our client can access their site continuously, as the Luas extension is being constructed."	Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in Chapter 6 of the EIAR. The sequencing of the Programme is illustrated in Section 6.3.3 where works along Broombridge road are estimated to be undertaken in the initial 18 months of the programme (see Figure 6-2: Construction Programme) Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP as referred to in a previous response.
27	18	"Not only will be significant land take required for this project be detrimental for our clients' operations, but the lack of clarity regarding the access design and delivery timeframe places a significant degree of uncertainty as to whether it will be possible to continue with operations at this location. We would respectfully ask that a reduced degree of land in the ownership of our client is acquired and in the event of approval being issued we would at the very least request that a condition is applied which directs that access to the Colorman premises from Broombridge Road is maintained at all times."	Please refer to responses to items No. 1 and 5 above.
28	18	"Having regard for the nature of the proposed works and the proximity of these works to our client's site, we would consider the Railway Order, as submitted to present direct impacts to the commercial operation of our client's property by virtue of permanently disrupting the longstanding way our clients have operated their site, by removing and replacing the existing vehicular entrance, altering the internal roadway arrangement affecting the ability of HGVs and staff/vehicles to circumnavigate the site, and by removing several vehicular parking spaces. These various impacts together with the significant land take identified for temporary and permanent acquisition will directly compromise the ease in which our client's commercial premises operates and by association will lower the value of this property."	Please refer to response in items No. 1 and 5 above. As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof. Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006. TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible. TII has published: <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo

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			Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.
29	19	"As stated throughout this report the current access and internal road configuration at the Colorman premises is optimal for the successful day to day operation of the business. The existing Broombridge Road entrance allows access by staff and visitor vehicles with parking bays located long the internal access road. This access also accommodates larger HGV vehicles who can access off Broombridge Road and drive straight through to an existing loading area, without having to navigate around the buildings on site and through vehicular parking areas. The alignment proposed by TII as part of the Railway Order proposes to relocate this Broombridge Road entrance further south, meaning that larger HGVs will have to travel through the staff and visitor parking area to the front of the building to get to the loading area along the main building's northern elevation. There are significant concerns that this will create road safety issues on site."	<p>Please refer to response in Item No. 2 above.</p> <p>TII not accept the contention that the proposed new access location for Colorman will create road safety issues on site. The revised internal layout for Colorman will make the frontage car park area less busy compared to the existing situation where all Colorman traffic entering from Broombridge road must pass through the frontage car park, except for HGV access to the northwest corner. Note also that there is currently considerable mixed private car parking / commercial vehicle scenarios elsewhere throughout the Colorman site.</p>
30	19	"Further to the above and as referenced earlier in this submission, the Colorman business currently employs in excess of 200 staff members, therefore car parking is paramount on site. The current Luas alignment will result in the removal of a number of spaces which will undoubtedly put significant pressure on car parking that will remain in situ, creating potential congestion and safety issues. This has not been addressed as part of the submitted order and it is considered that a reduction in the land area to be acquired should be reduced to mitigate against these disruptions."	<p>TII believes that the impact of loss of parking for Colorman is overstated in this case. TII does not agree that the proposed Scheme will lead to congestion or raise safety issues. The Colorman site is quite large and has extensive areas of paved surfaces, such as to the rear of the site, that have the potential to be used for parking. The location of the proposed Broombridge Luas station beside Colorman, together with proposed active travel infrastructure on Broombridge Road and beyond, will offer people travelling to the Broombridge Road area alternative ways to travel and encourage a modal shift away from car dependency. This should mean a lower requirement for parking at the Colorman site and less likelihood of traffic congestion inside the site.</p> <p>Please refer to response in Item No. 5 above.</p>
31	19	"We would also note that the alterations required to the flow and distribution of vehicular movements within our clients commercial premises, as a result of the large extent of land to be acquired together with the removal and relocation of the main access will lead to a heightened likelihood of vehicular collisions and will also expose staff and visitors to increased hazards due to the unpredictable movement of HGVs in areas with pedestrian activity."	<p>Please refer to response in Item No. 2.</p> <p>The proposed scheme will require some alterations to how traffic is managed internally at the Colorman site, however TII considers these to be minor in nature. Overall, there are more benefits and opportunities associated with the proposed new entry location in terms of it being more centrally located with respect to the site.</p> <p>TII does not accept the assertion that this will lead to increased level of risk for staff or visitors on the basis that any modifications would likely be carried out primarily for safety reasons. The revised internal layout for Colorman will make the frontage car park area less busy compared to the existing situation where all Colorman traffic entering from Broombridge road must pass through the frontage car park, except for HGV access to the northwest corner. Note also that there are currently considerable mixed private car parking / commercial vehicle scenarios elsewhere throughout the Colorman site.</p>
32	19	"In light of the above it will be necessary to allocate additional resources on site to mitigate safety risks, this will come at a significant expense to the business."	<p>As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and

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			<ul style="list-style-type: none"> a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p> <p>Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p>
33	19	<p>"The implementation of the proposed works will have significant repercussions for Colorman including but not limited to:</p> <p>The loss of lands within their ownership on a temporary and permanent basis which may force prolonged shutdowns on site..."</p>	Please refer to responses in Items No. 1, 4 and 5 above.
34	19	<p>"...The implementation of the proposed works will have significant repercussions for Colorman including but not limited to:</p> <p>Reduced operational efficiency due to altered traffic flow on site and disruptions during the construction stage of the project. "</p>	<p>TII does not agree with the assertion that the proposed Scheme will have significant repercussions in terms of reduced operational efficiency and consider the impacts to be overstated. The proposed land acquisition will involve taking lands to the front of Colorman, along its western boundary to Broombridge Road and currently being used for car parking or green space. The proposed scheme will remove the existing Broombridge Road access and provide an alternative access to the south. This access is aligned with Colorman's main east-west running internal access road, thereby facilitating daily operations at the site. The centrally located new access will provide a more direct route between Broombridge Road and the central core area of the site for both cars and commercial vehicles and avoids sending this traffic along the frontage area for the main office building. The proposed scheme will create a 13m long paved access between Broombridge Road and the proposed boundary for Colorman underneath the Luas line, with associated benefits for those entering and leaving the property.</p> <p>A key consideration made is traffic management during the construction stage so as to minimise the impact on the local community and traffic network, is the works are to be carried out in accordance with Volume 5, Chapter 6 of the EIAR and Appendix A6.2 the CTMP. Specifically, continuity of access will be maintained throughout construction along Broombridge Road. As noted in Section 1.3.1 "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area."</p> <p>Traffic control measures to be maintained for Broombridge Road are outlined in the CTMP, Volume 5 Appendix A6.2 Table 6-2 of the EIAR. Phased lane closures will be required for the works. Some limited road closures will be required for works along Broombridge Road also. The intention is these will be undertaken as night works to reduce disruption.</p> <p>As set out in 1.3.20 of the CTMP "Not less than 7 days prior to commencement of the works the Licensee/Contractor shall advise all local property owners/occupiers likely to be adversely affected by the works and shall enter into discussions as necessary regarding the avoidance/mitigation of impacts arising from the works. The Licensee/Contractor shall use its best endeavours to minimise the impact of the works on property owners/occupiers. Access to all houses and premises to be maintained save with the prior approval of the property owner. Any such agreement shall ensure that adequate provision is maintained for Emergency Service access to the affected properties during the works." Also, in Chapter 6 Section 6.12.1 further Communications measures are set out.</p> <p>"TII and its appointed contractor(s) will ensure that local residents, occupiers, businesses, local authorities and all other stakeholders affected by the proposed construction works, as outlined in this EIAR, will be informed in advance of work taking place. The notifications will detail the estimated duration of the works, the working hours and the nature of the works. In the case of works required in response to an emergency, the local authority, local residents and businesses will be advised as soon as reasonably practicable. All notifications will include a local helpline number. In addition, information on the works will also be available on the proposed Scheme website."</p>
35	19	"Whilst we acknowledge and accept that TII have noted and attempted to address the concerns expressed by Colorman during the pre-submission consultation period, the proposed works will still have what our client	Please refer to response in Item No. 5 above.

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Submitted by	Colorman (Ireland) Ltd. (Hughes Planning & Development Consultants on their behalf)		
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		considers to be an adverse effect on the and operation of their business at this location. The works require a concerning large portion of our clients' lands which will severely hamper their current functionality."	
36	19	"Whilst we also acknowledge that the proposed works are to provide necessary infrastructure improvements to facilitate the expansion of the Luas network, it is at the request of our client that alternative solutions are carefully considered in order to reduce the significant land take that would be required from our client's property."	Please refer to response in Items No. 1 and 5 above.
37	19	"It is also considered that full details of the newly proposed access to Colorman should be furnished together with a timeframe for delivery so that the impacts of this relocation can be assessed in full."	<p>The documents which comprise the application to the Board including the EIAR (along with its extensive appendices), comply with all legal requirements including those set out under the EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended).</p> <p>The level of design provided is sufficiently detailed to facilitate the approval process and to inform the Environmental Impact Assessment to be carried out by the competent authority, the Board, and has been developed to a degree that is appropriate and sufficient in this regard. Therefore, the likely significant effects of Luas Finglas at this location are fully assessed based on the information provided.</p> <p>Please refer to responses in Items No. 4 and 21 above.</p>
38	20	"It is considered that the proposed development will directly and indirectly compromise the daily operation of the existing commercial business upon the subject site and surrounding sites to the extent that may result in the loss of employment at this location."	<p>Section 8.4.2.1 (Journey Characteristics and Connectivity – Construction) states that “there are likely to be temporary signalisation/flagman restrictions on access to some businesses including Colorman, Fashionflo and West Rock on the east side of Broombridge Road, and on Speedy Services and Ara on the west side, but the phasing of works will allow access to be maintained.” Under Economic Activity and Employment, it is noted that there will “be land take from the Colorman business, although this will not affect the industrial building, but is rather a moderate negative permanent impact on an area that is used for 13 car parking spaces. New vehicle access will be provided for Colorman from beneath the proposed Luas overbridge.” In Section 8.4.3.2 (Economic Activity and Employment – Operational) it is stated that “Continued vehicle and HGV access to the Colorman will be possible under the proposed Scheme bridge”.</p> <p>Continued vehicle and HGV access will be possible to Colorman from a new entrance point slightly further to the south on Broombridge Road. A relocated entrance is needed to accommodate height restrictions under the proposed Scheme. Although a temporary signalisation/flagman arrangement may be needed during the construction phase, continuous access will be provided.</p> <p>While issues have been raised regarding impacts on the daily operation of the business, which are addressed above, these do not amount to an impact that may result in a “loss of employment”. On the contrary, the proposed Scheme will provide much improved accessibility for prospective employees from the catchment to the north and interconnections with other public transport. The availability of a new public transport option will also reduce pressure on the demand for on-site car parking.</p>
39	20	"Accordingly, it is considered that the subject proposal is not compliant with the applicable zoning objective which governs the future development of this area."	<p>Loss of Employment - The submission considers that the proposed development compromises the operation of the existing commercial business upon the subject site which may result in the loss of employment at this location. The submission considered this is not compliant with the applicable zoning objective which governs the future development of this area.</p> <p>In the Dublin City Development Plan 2022-2028 (CDP) the subject site is zoned Z6 - Employment/Enterprise with the objective to:</p> <p>'provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'</p> <p>The existing commercial printing use on-site is in compliance with this zoning. Notwithstanding the extant use, planning permission was applied for in 2022 for the demolition of the existing warehouse / factory / office buildings, the removal of vehicular entrance and the construction of a mixed-use development comprising of 14 retail units, hotel, creche, office, 304 residential units, restaurant, bar, recreational areas and associated site works. This was subsequently amended at first party appeal stage from residential to hotel and office use.</p> <p>The application was refused in 2022 by Dublin City Council (4865/22) and ABP in 2024 (ABP-315286-22). Refusal grounds in both included prematurity pending the finalisation of the Luas Finglas alignment and the preparation of a Local Area Plan for the wider Z6 zoned lands of the Dublin Industrial Estate.</p> <p>ABP in their decision cited that it would be contrary to Policy SMT22: Key Sustainable Transport Projects of the Dublin CDP in which the Council confirms they will support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport</p>

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			<p>modes, serving the existing and future needs of the city and region. The Luas to Finglas extension is listed as one of the key transport projects.</p> <p>It is considered that, in principle, neither the construction or operational phases of the Luas Finglas development will compromise the on-going employment use of the 2.41-hectare site subject to the adoption of effective transport mitigation measures to safeguard appropriate customer, employee and delivery access and parking provision on-site.</p>
40	20	<p>"In relation to the proposed works required to facilitate the Luas extension we would encourage An Bord Pleanála to consider the following measures to address our clients concerns:</p> <p>Reduce the area of Colorman owned lands required for permanent and temporary acquisition..."</p>	Please refer to responses in Items No. 5, 9 and 20 above.
41	20	"Provide detailed design drawings of the proposed resided entrance arrangement together with a site-specific traffic assessment demonstrating how this access will allow the business to operate..."	<p>TII does not agree with the assertion that detailed design drawings of the proposed entrance arrangement are required. The level of design as presented is appropriate for Planning Stage. The production of a 3D animated model of the proposed Scheme demonstrates a desire on our part to go over and above what would normally be required, in order to better explain the proposed Scheme to affected parties and the general public.</p> <p>TII does not accept the assertion that a site-specific traffic assessment demonstrating how this access will allow the business to operate, is required at this stage. Stakeholder engagement will continue during detailed design stage and during construction to ensure any impacts are minimised.</p>
42	20	"Provide a detailed construction programme and timeframe for delivery of the proposed new access to the Colorman property..."	Luas Finglas EIAR 2024 Chapter 6: Construction Activities includes a construction programme - see Figure 6-2: Construction Programme. Provision of the permanent new access will be towards the end of the estimated 18-month period for construction in this section of the works. During this time temporary access arrangements will be facilitated as necessary. Further details of the detailed programme and liaison during the construction works period are contained in Chapter 6 Construction Activities and CTMP.
43	20	"Having regard for the identified issues which will compromise the operational capability of our client's property, it is considered reasonable that Transport Infrastructure Ireland should engage directly with our client in relation to identifying appropriate mitigation measures to ensure the safeguarding of the commercial viability of their property."	Please refer to responses in Items No. 1,2 ,4 9, and 28 above.
44	20	"In the absence of comprehensive mitigation measures to prevent undue accessibility impacts arising because of the subject scheme, our client would seek compensation to offset potential impacts to the monetary value of their property"	<p>"As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired

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			This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive."
45	20	"It is considered that the proposed works, specifically those impacting the southern section of Broombridge Road, including the Colorman Ireland premises, and the sizeable land acquisition required, will severely affect the operation of our clients long-established business at this location, placing an undue degree of certainty on the business' future and its ability to develop and diversify in the future."	Please refer to responses in Items No. 1,2, and 5 above.
46	20	"Whilst we acknowledge that some improvements have been made by TII, by way of an alternative access arrangement being provided for Colorman, the area or land take required is extremely concerning. "	Please refer to response in Item No. 5 above.
47	20	"Further the lack of detailed design drawings relating to the revised access arrangements and certainty in terms of the delivery timeframe for this infrastructure is also a cause of concern. In the absence of such detail, does not allow for a true assessment of the scheme as it affects our client's property, thus limiting the scope of this objection."	Please refer to response in Item No. 27 above.

Submission No.	09		
Submitted by	Commission for Railway Regulation		
Item No.	Page No.	Observation Statement	TII Response
1	2	<p>CRR Approval in accordance with the CRR's remit under the Railway Safety Act 2005 as amended.</p> <p>"With reference to the proposed project, the Commission for Railway Regulation (CRR) makes the following observations for your consideration for the project;</p> <ol style="list-style-type: none"> 1. The CRR acknowledge application for the Railway Order for Luas Finglas -Broombridge to Charlestown. 2. The CRR will engage with the applicant for approval in accordance with the CRR's remit under the Railway Safety Act 2005, as amended. " 	<p>TII confirm that they have commenced consultations with the CRR. TII will formally engage with the CRR under the Railway Safety Act 2005, as amended.</p>

Submission No.	10		
Submitted by	Coras Iompair Éireann (CIE)		
Item No.	Page No.	Observation Statement	TII Response
1	2	<p>Any interface between CIÉ and IÉ land shall be by way of agreement with CIÉ/IÉ and not by way of CPO</p> <p>"Caras Iompair Éireann ('CIE') and Iarnród Éireann ('IE') are required to maintain the operational safety and integrity of the railway network throughout the country. Compulsory purchase of railway lands is precluded by section 130 of the Transport Act 1944. Any interface between CIE/IE railway land and the proposed extension of the Luas line shall be by way of agreement with Caras Iompair Éireann and Iarnród Éireann and not by way of Compulsory Purchase Order. In similar situations the property requirements of the acquiring authority have been regularised by way of (a) Bridge Agreement(s). Subject to the foregoing Caras Iompair Éireann/Iarnród Éireann support the application of the Railway Order to extend the Luas line from Broom bridge to Charlestown and I understand that there has been liaison between the respective technical experts of CIE/IE and the applicant in this regard."</p>	<p>TII acknowledges that the compulsory purchase of railway lands is precluded by Section 130 of the Transport Act 1944. TII has initiated discussions with Córas Iompair Éireann (CIE) and Iarnród Éireann (IE) and will continue liaison and proceed with the necessary land acquisition through a formal Bridge Agreement.</p>

Submission No.	11		
Submitted by	Dessie Ellis T.D.		
Item No.	Page No.	Observation Statement	TII Response
1	3	"Firstly, it is proposed to remove all of the parking in front of the Civic Offices and the Finglas Youth Resource Centre. Located in the same area is the Finglas Leisure Centre which is a very popular and well attended Leisure centre, which amongst its facilities has a gym and swimming pool. Proposals to use the back of the building housing these facilities for parking is not a solution to the loss of the existing parking in the front of the buildings. There is not adequate space at the back to support the existing volume of cars of both staff and clients who would normally park at these facilities."	The proposed Scheme will provide a new public transport connection, together with connections to local bus services, making Finglas Sports and Leisure Centre more accessible to people within a larger catchment and enhancing its ability to serve as a public community facility. In addition, a new cycle lane is included in the design together with a covered bicycle parking facility. An ESB e-bike charging facility has already been installed outside the Leisure Centre. The combination of public transport and cycling infrastructure will be particularly beneficial to young people and others who are likely to have more limited access to private vehicles. The Finglas Village stop will be located within a new plaza in front of the Leisure Centre, providing an attractive and car-free environment. The negative effect of loss of car parking from outside of the Finglas Sports and Leisure Centre is acknowledged in Section 8.4.3. This loss will be partly compensated for by new parking to the rear of the building from where safer access can be provided from Cardiff Castle Road.
2	3	"There should be consideration given to examining the provision of additional parking spaces to properly serve the needs of these facilities."	Please refer to response to Item No. 1 above. A loss of public parking is needed to facilitate the Luas alignment and Finglas Village stop. In the longer term, once operational Luas will provide an alternative to car use. TII will continue to work with DCC and other stakeholders to minimise impacts in the area during the construction phase, before Luas is operational. TII is committed to minimise disruption throughout the construction phase and these details will be further explored with Contractors once appointed.
3	3	"Secondly, it should be ensured that a proper pre-construction is put in place that will take in account the health and safety of those using the existing facilities."	The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated by the Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS) which will address health and safety issues from the design stages through to the completion of the Construction Phase. This plan will be reviewed as the proposed Scheme progresses. The contents of the Health and Safety Plan will follow the requirements of the Regulations. In accordance with the Regulations, a PSDP has been appointed and PSCS will be appointed as appropriate. Throughout construction, the requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. TII will continue to engage with the stakeholders at all stages of the process to ensure business concerns are considered to the fullest extent possible.
4	3	"Thirdly, there should be greater clarity regarding accessing the entrance and exit at the rear of the buildings i.e. the DCC building and the FYRC for parking. "	Continuity of access is to be maintained during construction. The implementation of this and specific parking arrangements is addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12. "The appointed Contractor will provide temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare / Mellow Spring Childcare Centre to compensate for existing spaces lost during construction. Consideration will be given to the car parking needs of employees of the Finglas Resource Centre to avoid competition for remaining places." Pedestrian access will continue as it currently is but via the plaza area around the Luas Stop. Vehicular access will be via the proposed car park in front of the Centre and via Cardiff Castle Road to the rear of the Centre.
5	3	"Fourthly, there should be consideration given to the safety of people accessing the buildings, especially young people, who may also have to cross the Luas LRV lines to get to the facilities. "	The Luas Stop will have standard safety attributes and procedures common to all Luas stations in the city. In the operational phase, LRVs in the vicinity of the Finglas Stop will operate at low speed due to the curvature of the track at this location. The stop itself will be located within a safer car free environment of a new civic plaza. The environment will be open, and the Resource Centre will be very visible from the stop and so easy to locate. It is likely that the stop will result in greater footfall, and this will have a mixture of implications for sensitive subsets of the population. The number of people alighting at the stop will, in itself, provide for natural surveillance with regard to anti-social behaviour, combined with the provision of good lighting, security cameras and emergency help buttons. The Centre will itself need to decide on how to adapt to this footfall with the support of the operators of the service. Overall, the Finglas Stop will greatly improve the Centre's accessibility, making it easier to reach using public transport from a larger catchment than at present and so strengthening its ability to cater for the needs of young people.

Submission No.	12		
Submitted by	Development Applications Unit		
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1	3	"It is noted that the EIAR submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment (AIA), which was carried out in relation to the proposed development by John Cronin and Associates Ltd (EIAR Chapter 20; dated November 2024)."	<p>Noted and Agreed.</p> <p>Clarification: Chapter 20 of the EIAR relates to a comprehensive EIAR for the receiving cultural heritage baseline environment (archaeology, architectural and cultural heritage) for the proposed Scheme (refer to Section 20.1.1). This was based on a comprehensive desk-based assessment and supplemented by the results of various cultural heritage investigations as outlined in Volume 3: Chapter 20: Sections 20.2.3.2 and 20.2.3.3.</p> <p>Please note TII is the owner and publisher of the Luas Finglas EIAR. Therefore, in all TII correspondence, all references to the Cultural Heritage Chapter of the Luas Finglas EIAR will be as follows: Luas Finglas [Volume 3], Chapter 20 (TII 2024). No individual consultants will be referenced as authors.</p>
2	3	"In addition to a walkover survey, it is noted that the AIA has been informed by the results of Advance Archaeological Underwater/Wade Condition Surveys and Archaeological Monitoring of Advance Site Investigation Works."	<p>Noted and Agreed.</p> <p>Clarification: Volume 3: Chapter 20 of the EIAR identifies that the following investigations were undertaken to inform the Cultural Heritage Chapter of the EIAR:</p> <ol style="list-style-type: none"> 1. Field Surveys (Volume 3: Chapter 20: Section 20.2.3.2); 2. Archaeological Monitoring of Geotechnical Investigations: (Volume 3: Chapter 20: Section 20.2.3.2, Volume 5: Appendix A20.1); 3. Archaeological Monitoring and Excavation of Utility Slit Trench Works: <p>It is important to note that these works also included the excavation of targeted archaeological test trenches to investigate the archaeological potential of;</p> <ol style="list-style-type: none"> a. CHC027 (King William's Ramparts - RMP DU014-066008-; RPS_DCC_8733 (South Section); RPS_DCC_8734 (North Section); and b. CHC033 an Area of Archaeological Potential - identified as a potential burial ground by local residents. (Section 20.2.3.2, Volume 5: Appendix A20.1); <ol style="list-style-type: none"> 4. Underwater / Wade Condition Surveys of Royal Canal (Broome Bridge) and River Tolka (Finglas Wood Bridge): The underwater/wade condition surveys at these locations included structural condition surveys of Broome Bridge (CHC00.1.1; RPS_DCC_909), the Royal Canal (CHC003), the Royal Canal towpath (CHC003.1) and Finglas Wood Bridge (CHC009; RPS_DCC_906). Investigations of the River Tolka also included a metal detection survey (Dive Survey Licence 24E0146 and Detection Device Licence 24R0183). (Section 20.2.3.2).
3	4	"All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 20 of the EIAR (John Cronin and Associates Ltd; dated November 2024) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order."	<p>Agreed.</p> <p>All required mitigation measures, including those set out in Chapter 20 of the Luas Finglas EIAR and required through the granting of a RO, will be implemented in full. Please note this needs a legal confirmation as to terminology/definition 'this order' has not been granted.</p> <p>As per Item 1 above, all references will be to the Luas Finglas EIAR Chapter 20 (TII 2024).</p>
4	4	"A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion. "	<p>Noted and agreed. A project archaeologist has been assigned to the project since 30th June 2017.</p> <p>Transport Infrastructure Ireland (TII) operate under a 2017 'Code of Practice for Archaeology as agreed with the Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs' (now Minister for Housing, Local Government and Heritage; MHLGH). A Project Archaeologist (Emer Dennehy) was appointed to Luas Finglas on 30/06/2017 with the MHLGH advised in writing of same via notification to National Monuments Service (NMS), Department of Housing, Local Government and Heritage (DHLGH). As per the Code of Practice for Archaeology ('TII will', Item 3; Role of TII Project Archaeologist - The Project Archaeologist will, Item 2 and 5) the TII Project Archaeologist was appointed at feasibility stage, and will remain a member of the Project Design Team until project completion; the TII Project Archaeologist is responsible for the management of the archaeological implications and aspects of the proposed scheme.</p> <p>The role of the TII Project Archaeologist for Luas Finglas is referenced in:</p> <ul style="list-style-type: none"> Volume 2 Chapter 6: Section 6.5.2: 'In accordance with the 2017 Code of Practice for Archaeology (CoP), TII has appointed a Project Archaeologist to oversee and manage the likely cultural heritage impacts arising from the proposed Scheme.' Volume 3: Chapter 20 of the EIAR at the following locations: Sections 20.2.1; 20.2.3.4; 20.5.1 (A TII Project Archaeologist has been appointed to oversee and manage the archaeological elements of the proposed Scheme) and 20.5.2.3

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			<ul style="list-style-type: none"> The Code of Practice for Archaeology is referenced in: Volume 2 Chapter 6: Section 6.5.2 - as above Volume 3: Chapter 20: Section 20.2.2 Relevant Guidelines, Policy and Legislation
5	4	"The Project Archaeologist shall liaise with the National Monuments Service of the Department and the Planning Authority to agree in advance an overall strategy for archaeological works to be carried out both in advance of and in parallel with construction of the development."	<p>Noted and agreed.</p> <p>As per the Code of Practice for Archaeology ('TII will', Item 13) the TII Project Archaeologist is in regular engagement with the MHLGH office via the appointed counterpart in the NMS, DHLGH. In accordance with the Code of Practice for Archaeology the TII Project Archaeologist, via the NMS, DHLGH provides the MHLGH with a bi-monthly progress update on all cultural heritage issues relating to Luas Finglas. The TII Project Archaeologist also engages as needed with the NMS counterpart via email, phone and required meetings to discuss requirements for Luas Finglas archaeological works - in particular those listed in Item 2 above. Section 20.2.3.4 confirms the TII Project Archaeologist consulted with the NMS, DHLGH '...during the environmental assessment process...'. Consultation with NMS, DHLGH is also set out in Appendix A1.1 Emerging Preferred Route Consultation Report, [Appendix B]; Appendix A1.2 Preferred Route Consultation Report [Appendix B] and Appendix A1.3 EIA Scoping Report and Summary of Submissions Received and Responses (please refer to Table 2.1 and Table 2.2).</p> <p>The requirement to prepare an appropriate Archaeological Strategy in direct consultation with the Minister (note - not in consultation with the Planning Authority) is set out in the Code of Practice for Archaeology ('The Project Archaeologist will, Item 7: Ensure that appropriate archaeological investigations are carried out, where reasonably practicable prior to the commencement of construction. Where this is not reasonably practicable, an appropriate archaeological strategy will be developed in consultation with the Minister). Please note it is now TII policy to prepare Cultural Heritage Strategies addressing the management and protection of all cultural heritage constraints.</p> <p>As per Item 2 above, Volume 3: Chapter 20: Section 20.2.3.2, Volume 5: Appendix A20.1 and Appendix A20.1 identify that advance archaeological works were undertaken as a component of the Luas Finglas EIA process where feasible and practicable to do so.</p> <p>The Luas Finglas Cultural Heritage Strategy is referenced in Volume 3 Chapter 20, Section 20.5.1, Section 20.5.2.3 'Details of the reporting requirements will be contained within the Luas Finglas Cultural Heritage Strategy' and Volume 1; Chapter 6: Section 6.5.2:</p> <p>All Contractors and Cultural Heritage consultants appointed to the proposed Scheme shall comply with the TII Luas Finglas Cultural Heritage Strategy which will be prepared and agreed with the MHLGH in advance of receipt of an enforceable Railway Order (ERO).</p> <p>As an outcome of the CoP, the TII Project Archaeologist will, in consultation with the Department of Housing, Local Government and Heritage (DHLGH), prepare a 'Luas Finglas Cultural Heritage Strategy', which will be maintained as a live document throughout the Construction Phase of the proposed Scheme. This strategy will be informed by the various cultural heritage surveys undertaken to date, this EIAR, ongoing stakeholder liaison and in response to changes in the receiving baseline environment, inclusive of adjacent developments.'</p> <p>It is currently envisaged all cultural heritage works will take place at construction phase, but this will remain under constant review as the Luas Finglas Procurement Strategy evolves.</p>
6	4	"This shall include the scope of any Advance Test Excavation and Archaeological Monitoring as well as any additional mitigation measures that may be required to protect archaeological heritage."	<p>Agreed.</p> <p>Please note as per Item 2 above Advance Targeted Test Excavations were undertaken as a component of the archaeological monitoring and excavation of utility slit trench works Volume 3: Chapter 20: Section 20.2.3.2, Volume 5: Appendix A20.1. Additional mitigation measures were also undertaken as outlined in Item 2 above.</p> <p>All further mitigation measures will be discussed directly with the Minister via the NMS, DHLGH as per the Code of Practice for Archaeology, and will be set out in the Luas Finglas Cultural Heritage Strategy. The latter will detail how all mitigation measure identified in Volume 3; Chapter 20, Cultural Heritage, of the EIAR will be implemented.</p>
7	4	"This shall include the location, extent and method of demarcation for any Exclusion Zones around the external-most elements of vulnerable Heritage Assets that are to be preserved in situ (as identified in Chapter 20 of the EIAR or by any subsequent investigations associated with the project)."	<p>Chapter 20, Section 20.6.2 Table 20.9: identifies the following constraints CHC001.1 Broome Bridge (The section of the bridge structure adjacent to works), CHC003 Royal Canal (The section of the canal adjacent to works); CHC003.1 (the Royal Canal tow path) and CHC-009 Finglas wood Bridge to be protected by hoardings and signage during all works to prevent plant and machinery impacts. This is generally achieved by enclosing</p>

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			<p>the construction site, not the heritage constraint, with hoarding. This is to contain all plant and equipment within the construction site and to maintain public access to the heritage constraints throughout construction works.</p> <p>All proposed construction hoarding lines will be established by each appointed contractor at each relevant stage of construction and must demonstrate appropriate protection in situ measures to the satisfaction of TII, based on informed detailed design and analysis. All such measures will subsequently be agreed with the appropriate prescribed body in advance of commencement of construction works.</p>
8	4	<p>“The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 20 of the EIAR (John Cronin and Associates Ltd; dated November 2024) and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.”</p>	<p>The Cultural Heritage Strategy will set out the relevant archaeological or cultural heritage constraints which is required to be followed by all Contractors and Cultural Heritage consultants in accordance with the CEMP's mitigation no. ACHM-2 in Volume 5 appendix 6.1 of the EIAR</p> <p>In accordance with the Code of Practice for Archaeology a Luas Finglas Cultural Heritage Strategy will be prepared. The purpose of the Cultural Heritage Strategy is to set out how each mitigation measure will be implemented by each appointed Contractor, with requirements to comply with the Cultural Heritage Strategy is set out in the EIAR - Chapters 6 and 20, and, as per TII practice, will form a component of the Contract Requirements. This is separate standalone document to the CEMP. Inclusion in the CEMP will result in duplication of information required under the Code of Practice for Archaeology as agreed with the MHLGH.</p> <p>As outlined in Item 5 above The Luas Finglas Cultural Heritage Strategy is referenced in Volume 3 Chapter 20, Section 20.5.1 'All Contractors and Cultural Heritage consultants appointed to the proposed Scheme shall comply with the TII Luas Finglas Cultural Heritage Strategy which will be prepared and agreed with the MHLGH in advance of receipt of an enforceable Railway Order (ERO). All Contractors and Cultural Heritage Consultants shall liaise directly with the TII Project Archaeologist in relation to all cultural heritage requirements.... All Construction Phase mitigation measures will be carried out by the appropriate Contractor appointed to each phase of the works and as specified in the most up-to-date version of the TII Luas Finglas Cultural Heritage Strategy. This will be maintained as a live document throughout the Construction Phase of the proposed Scheme and will be updated in response to new information received from cultural heritage investigations, ongoing stakeholder liaison and in response to changes in the receiving baseline environment inclusive of adjacent developments and Volume 1; Chapter 6: Section 6.5.2: As an outcome of the CoP, the TII Project Archaeologist will, in consultation with the Department of Housing, Local Government and Heritage (DHLGH), prepare a 'Luas Finglas Cultural Heritage Strategy', which will be maintained as a live document throughout the Construction Phase of the proposed Scheme. This strategy will be informed by the various cultural heritage surveys undertaken to date, this EIAR, ongoing stakeholder liaison and in response to changes in the receiving baseline environment, inclusive of adjacent developments.'</p>
9	4	<p>“The planning authority and the National Monuments Service of the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.”</p>	<p>Part Agreed.</p> <p>Following submission to the National Monuments Service the final archaeological report will be made available online. In accordance with the Code of Practice for Archaeology, "TII will fund a balanced and cost-effective approach to archaeological assessment and mitigation as an integral element of project costs on the basis of the 'developer pays' principle and in keeping with the Minister's published policy in this regard.”</p> <p>Backup info:</p> <p>Reporting: It is a condition of the grant of any consent or licence for the undertaking of archaeological works in accordance with Sections 2, 3, 14, and 26 that a report on all works is submitted to the MHLGH via NMS, DHLGH and where applicable to the National Museum of Ireland. There is no statutory requirement to submit these reports to the Planning Authority (An Bord Pleanála) nor is there any agreement to do set out in the Code of Practice for Archaeology. The MHLGH does require, as a condition of the granting of licences and consents, in accordance with the National Monuments Act 1930 (as amended), that the results of works will be appropriately disseminated, while it is an agreement of the Code of Practice for Archaeology that 'TII will [Item10]' and the 'TII Project Archaeologist will [Item 15]' publish and/or disseminate, as appropriate, the archaeological results of TII Projects'. Reports will therefore not be provided to the Planning Authority, but the results of archaeological works will be made publicly and freely available. This is confirmed by Volume 3, Chapter 20, Section 20.5.2.3 of the EIAR states:' In order to fulfil licence conditions, a preliminary report and a final report on the findings are required. All reports will be produced in accordance with government guidelines.'</p> <p>Funding: It is a condition of the grant of a Section 26 Licence to Excavate in accordance with the National Monuments Act 1930 (as amended), that applications 'be accompanied by a letter from the person or body funding the excavation confirming that sufficient funds and other facilities are available to the applicant'</p>

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			https://www.archaeology.ie/sites/default/files/media/publications/excavation-license-info-funding.pdf In agreement with the MHLGH TII will provide 'Appropriate Arrangement' Letters to ensure funding is in place for archaeological works. It is an agreement of the Code of Practice for Archaeology that 'TII will [Item 9] Provide the necessary funding to fulfil the post-excavation and reporting requirement(s) of the project to a standard that is acceptable to the Minister'.
10	5	<p>"Having studied the documentation submitted in support of this application and in particular the EIAR, the Natura Impact Statement (NIS) and Construction Environmental Management Plan (CEMP), the Department notes that the proposed extension of the LUAS Green Line from Broombridge to Charlestown, Finglas, could result in significant effects on flora and fauna along and downstream of the extension's planned route."</p>	<p>As stated in the NIS, avoidance, design requirements and mitigation measures are set out within the NIS (and its appendices) and the effective implementation of these mitigation measures will ensure that any impacts on the site-specific conservation objectives of Natura 2000 sites will be avoided during the Construction and Operation Phases of the proposed Scheme, such that there will be no adverse effects on any Natura 2000 sites.</p> <p>It has been objectively concluded, following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the proposed Scheme and the effective implementation of the mitigation measures proposed, that the proposed Scheme will not adversely affect (either directly or indirectly) the integrity of any Natura 2000 site in view of the each sites' site-specific conservation objectives, either alone or in combination with other plans or projects, and there is no reasonable scientific doubt in relation to this conclusion.</p> <p>Measures to protect flora and fauna during the construction phase are set out in Luas Finglas EIAR, Chapter 6 Construction activities and in particular Appendix A6.1 CEMP.</p> <p>In addition, please refer to response provided to Item No. 14 below.</p>
11	5	<p>"Of most concern to the Department would be any potential adverse effects on otter frequenting the section of the Royal Canal adjacent to Broombridge Station..."</p>	<p>In relation to the DAU's concerns of Otter frequenting the Royal Canal at Broombridge, the EIAR's Biodiversity Chapter (9) outlines mitigations to safeguard the Otter population and their protected local resting site from the proposed Scheme (see Construction mitigation sub-sections 9.5.2-and Operational mitigations 9.5.3.</p>
12	5	<p>"Of most concern to the Department and on the ex-situ winter season usage by light-bellied brent goose, a Special Conservation Interest (SCI) bird species for the North Bull Island, South Dublin Bay and River Tolka Estuary and Baldoyle Bay Special Protection Areas (SPAs), of playing fields in the Farnham Drive area of Finglas."</p>	<p>Regarding the concern for internationally important Light-bellied Brent Geese in the Farnham Drive area, the EIAR's Biodiversity Chapter (9) outlines mitigations to ensure no disturbance to these SCI bird species during the construction of the proposed Scheme, and minimal disruption during the proposed Scheme's operations (see Construction mitigation sub-sections 9.5.2. and Operation mitigations 9.5.3.</p>
13	5	<p>"The Department also has concerns that pollutants mobilised into surface water runoff from the proposed LUAS extension particularly during its construction could result in adverse effects on the flora, fauna and habitats of the Royal Canal and the River Tolka or associated with European sites downstream of these water courses in Dublin Bay."</p>	<p>TII is committed to diligently implementing the measures outlined in the EIAR, the Natura Impact Statement (NIS), and the Construction Environmental Management Plan (CEMP). To ensure no detrimental impacts on flora and fauna, including Special Conservation Interest (SCI) bird species and other Qualifying Interests (QIs) for European sites, the implementation of these mitigation measures will be a condition of the Construction Contract Work's Requirements.</p> <p>In particular, the Surface Water Management Plan (SWMP) has been prepared to detail control and management measures aimed at mitigating significant adverse impacts on the surface water environment. As a condition of the Works Requirements, the successful contractor must, immediately following appointment, outline in the SWMP how they intend to effectively implement all applicable measures identified in the EIAR, along with any additional measures required by conditions imposed by the Board in any grant of approval. This will minimise the potential for pollutants to be mobilised via surface water runoff to the habitats of the Royal Canal and the River Tolka or the European sites downstream of these watercourses in Dublin Bay.</p> <p>Additionally, to address the concerns related surface water impacts to floral and fauna of the Royal Canal, River Tolka and the downstream designated sites, the EIAR's Biodiversity Chapter (9) outlines mitigation measures to protect these KERs within the Construction sub-section mitigations 9.5.2. and Operation mitigations 9.5.3</p>
14	5	<p>"However, the measures set out in the EIAR, NIS and CEMP to avoid any adverse effects on biota and important habitats due to the extension and operation of the proposed LUAS extension should, if diligently implemented, prevent any such detrimental effects on flora and fauna, including to SCI bird species and other Qualifying Interests (QIs) for European sites."</p>	<p>Agreed. TII is committed to diligently implementing the measures outlined in the EIAR, the Natura Impact Statement (NIS), and the Construction Environmental Management Plan (CEMP). To ensure no detrimental impacts on flora and fauna, including Special Conservation Interest (SCI) bird species and other Qualifying Interests (QIs) for European sites, the implementation of these mitigation measures will be a condition of the Construction Contract Work's Requirements.</p> <p>The Luas Team going forward will ensure that there is no variance to the specific ecological mitigation measures outlined within the EIAR, NIS and CEMP; aside from any additional mitigations measures that may be added as a result of the ecological data collected during the pre-construction surveys, as stated within the Biodiversity Chapter. This strategy will safeguard all known and potentially new key ecological receptors present within the physical footprint and zone of influence of the proposed Scheme.</p>

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15	5	"In the light of the above the Department, therefore, recommends that it should be a condition of any Railway Order in relation to the proposed construction and operation of the LUAS Green Line extension from Broombridge to Charlestown, Finglas, which may be made in response to the current application, that all the mitigation measures to avoid adverse effects on flora, fauna and important habitats set out in the EIAR, NIS and CEMP submitted in support of the application shall be implemented in their entirety."	Please refer to response provided in Item No. 14.

Submission No.	13
Submitted by	Downshire Propco Ltd. (Hughes Planning & Development Consultants on their behalf)
Please refer to responses provided to Brooks Timber & Building Supplies Ltd. (submission No.6)	

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Submitted by	Dublin City Council																	
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1	15	A (non-exhaustive) list of contextual and relevant planning applications along and adjacent to the route alignment is provided in Appendix 7.	<p>Looking at the list of relevant planning applications along and adjacent to the proposed Scheme provided in Appendix 7 to the DCC Submission, one such project was Dart+ West that was considered and assessed in the cumulative impacts chapter of the Luas Finglas EIAR and in this regard the cumulative impacts arising from the proposed Scheme in combination with other existing and/or approved developments during the Construction and Operational Phases has been robustly assessed in Volume 3 - Chapter 24 of the EIAR submitted with the RO. However, Dart+ West was subsequently approved by the Board with certain modifications and therefore in light of those modifications, that development as modified has again been considered and assessed cumulatively with Luas Finglas and there is no change to this pairwise assessment of Dart+ West and Luas Finglas either from an EIA or AA perspective as already set out in the EIAR and NIS and so having considered those modifications they did not affect the assessments already conducted from and EIA or AA perspective.</p> <p>For completeness there have been a number of other developments/applications (13 in total) along and adjacent to Luas Finglas that arose since the EIAR was finalised in June 2024 that should also be considered for any likely significant cumulative impacts on the EIA side or any likely significant in combinations effects on the AA side and therefore similar to the position on Dart+ West as above for completeness it was important that the environmental specialists conducted a comprehensive consideration and assessment of such applications/projects with potential for cumulative impacts, in accordance with the methodology detailed in Chapter 24 of the EIAR.</p> <p>The new applications and projects listed below (July 2024 – February 2025) were reviewed with the proposed Scheme and together with all of the other projects already identified in the Cumulative Chapter of the EIAR and the NIS considering their overall impact from an EIA and AA perspective. This review also includes application 3278/22 (Aldi site redevelopment), which was mistakenly left out of the cumulative impact assessment and has now been added to the post-RO project list. The assessment concluded that there are no overall or combined cumulative impacts with Luas Finglas.</p> <table><tr><td>3278/22</td><td>F23A/0636</td><td>WEB1256/25</td></tr><tr><td>320953</td><td>F25A/0011E</td><td>DSDZ4146/24</td></tr><tr><td>4034/24</td><td>LRD6057/24-S3A</td><td>F24A/0965E</td></tr><tr><td>4160/24</td><td>4410/24</td><td>F25A/0112E</td></tr><tr><td>F23A/0781</td><td></td><td></td></tr></table>	3278/22	F23A/0636	WEB1256/25	320953	F25A/0011E	DSDZ4146/24	4034/24	LRD6057/24-S3A	F24A/0965E	4160/24	4410/24	F25A/0112E	F23A/0781		
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4160/24	4410/24	F25A/0112E																
F23A/0781																		
2	17	"DCC acknowledges the complexities involved in the design and development of the Luas Finglas. It is highlighted that DCC has constructively engaged with TII over several years as part of TII's non-statutory consultation and scoping processes. However, while the Luas Finglas is strongly supported, it is important that the proposal adequately addresses inter alia conservation impacts along the route as well as the potential to improve green infrastructure and pedestrian and cycle connectivity and permeability."	Noted. TII confirms its intention to continue to maintain dialogue with the relevant DCC departments and other stakeholders during the detailed design and construction stages of the project in accordance with Luas Finglas EIAR 2024 Chapter 5 – Description of the proposed Scheme Section 5.3 Sustainable Design, Luas Finglas EIAR2024 Chapter 21 - Landscape and Visual Amenity Appendix A21.2: Urban Integration Report and Luas Finglas EIAR2024 Chapter 6: Construction Activities, and Luas Finglas EIAR2024 Chapter 8: Population.															
3	18	"The area along the proposed route includes lands with a number of zoning objectives. The proposal can be considered as a Public Service Installation" use class as per Appendix 15 Land Use Definitions. In areas, the proposed scheme is situated on lands within the existing public road. In such areas that do not have a distinct zoning provision, the scheme can be considered in accordance with the policies and objectives of the Development Plan, and compatibility with adjacent land uses and zonings."	Noted.															
4	18	"Should a RO be approved, the Luas Finglas success will require close ongoing collaboration between various agencies and DCC"	Please refer to response provided to Item No. 2 above.															
5	18	"It is recommended that a Project Liaison Office with multi-disciplinary input be established. Continual ongoing engagement will be required regarding construction traffic management, licenses, agreements and other matters etc."	Please refer to response provided to Items No. 2 above.															
6	19	"In the event that An Bord is satisfied that the RO should be approved, it is requested that this approval is subject to conditions to ensure that the development is carried out in accordance with the proper planning and sustainable development of the area and such suggested conditions are included in the relevant appendices attached. "	Noted.															
7	20	The City Architects Division "The RO includes Alignment drawings which overlay the proposed Scheme on existing O.S. maps. This facilitates a broad assessment of the impacts of the proposals on the existing public realm. However, we	Please refer to response provided to Items No. 2 above.															

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		note that there are transitions between new infrastructure and the existing condition which are not fully described by either the alignment or landscape drawings " The City Architects Division requests that through the inclusion of conditions the development be subject to continued engagement with relevant DCC departments, including the city architect's division during the detailed design stage and construction stages of the project.	
8	20	The City Architects Division "The final design of the public realm impacted by and adjacent to the works will be fundamental to the success of the Proposed Scheme. The RO submission provides an extensive illustration of the full proposal but does not provide sufficient detailed information for an assessment of its impact on the public realm...The City Architects Division requests that through the inclusion of conditions the development be subject to continued engagement with relevant Dublin City Council departments, including the city architect's division during the detailed design stage and construction stages of the project."	Please refer to response provided to Items No. 2 above.
9	20	The City Architects Division "The drawings do not adequately identify public space, landscape and structures to be taken in charge by DCC...The City Architects Division requests that through the inclusion of conditions the development be subject to continued engagement with relevant Dublin City Council departments, including the city architect's division during the detailed design stage and construction stages of the project."	The level of detail contained in the application is appropriate for the planning stage. Further dialogue is planned to refine the detailed design. Please refer to response provided to Item No.2 above. A line wide set of Operation and Maintenance drawings are being prepared, based on principles previously discussed with DCC and TII Operations. These drawings will clearly define Local Authority and TII maintenance responsibilities and facilitate discussions and agreements. On past projects this was not undertaken until a later stage, typically during construction. For Luas Finglas, it is intended to have these interfaces agreed in advance of tendering of construction works.
10	20	SUGGESTED CONDITIONS TO ASSIST IN CONSISTENCY OF QUALITY AND APPROACH TO THE DESIGN OF THE PUBLIC REALM RELATED TO INFRASTRUCTURAL PROJECTS IN DUBLIN CITY "City Architects recommend the inclusion of conditions (below) to activate ongoing consultation. 1. The Design and Construction teams shall continue to consult with the Dublin City Council Planning Department and the City Architect's Division of DCC to agree on the detailed design of the public realm prior to the tender of construction works and continuing post-tender and throughout the construction stage. Reason: In the interests of ensuring the delivery of a high-quality, fully coordinated and integrated public realm."	Noted. Co-ordinated drawings for all aspects of the landscaping works will be developed in accordance with the permitted RO design for agreement with DCC both prior to the tender of construction works and continuing post-tender and throughout the construction stage. Please refer to response provided to Item No.2 above.
11	20	2. "Fully coordinated and consolidated landscape drawings of the proposed scheme, at a minimum detail of 1:200 inclusive of, but not limited to, clear widths and dimensions, all above-ground utilities, street furniture, structures, buildings, utility cabinets, poles, access chambers, manholes, bus shelters, kerbs, trees, greening, changes in surface, changes in level, edge details, boundary details, entrance/gate locations, and any element existing or proposed that impacts on the public realm, with clear delineation between ground to be taken in charge by DCC depts. and ground to be maintained by Luas/TII shall be submitted to, and agreed in writing with, the City Architect's Division of DCC, prior to commencement of development. Reason: In the interests of ensuring the delivery of a high-quality, fully coordinated, accessible and usable integrated public realm."	Please refer to response provided to Item No.10 above.
12	20	3. "The material palette, including full technical specifications and samples, within the Proposed Scheme shall be submitted to, and agreed in writing with, the City Architect's Division of DCC, prior to the commencement of development. Reason: In the interests of ensuring the delivery of a high-quality, durable, accessible and safe to-use public realm."	Noted. The specification and samples of materials for use in the public realm will be developed in accordance with the permitted RO for agreement with DCC prior to the tender of construction works and continuing post-tender and throughout the construction stage. Please refer to response provided to Item No.2 above.
13	20	4. "A full palette of street furniture, including full technical specifications and samples, and their proposed locations across the extent of this Scheme, shall be submitted to, and agreed in writing with, the City Architect's Division of DCC, prior to commencement of development. Reason: In the interests of ensuring the delivery of a high-quality, durable, accessible and safe to-use public realm"	Please refer to response provided to Item No.12 above.
14	20	5. "Further illustration and detail including 30 visualisations of complex parts of the overall scheme including key LRV stops and their environs, bridges, structures and features within the public realm, shall be submitted to and agreed upon in writing with, the City Architect's Division of DCC, prior to commencement of development. Reason: In the interests of ensuring the delivery of a high-quality, fully coordinated, accessible and usable integrated public realm."	Details and 3D visualisations of LRV stops, bridges, and key public realm features will be developed in accordance with the permitted RO for agreement with DCC prior to the tender of construction works and continuing post-tender and throughout the construction stage. TII has developed a 3D BIM model of the entire Scheme, and this is available using VR technology to examine any location along the proposed alignment during the detailed design stage. Please refer to response provided to Item No.2 above.

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15	20	6. "The services and input of an RIAI-accredited grade 1 or grade 2 Conservation Architect or equivalent, shall be retained throughout detailed design and construction phases, and they shall prepare any conservation impact statement and any conservation method statement for any works, to and/or in close proximity, particularly of, but not limited to, the existing historic Broombridge and Tolka bridges, which shall be submitted to, and agreed in writing with, the Dublin City Council Planning Department prior to commencement of development. Reason: In the interests of ensuring an architectural conservation focus where applicable along the route and compliance with heritage protection legislation"	The likely significant impacts of the proposed Scheme on Protected Structures inclusive of Broome Bridge (CHC001.1), Finglaswood Bridge (CHC009) and St Helena's House (CHC020) were comprehensively evaluated and assessed within Chapter 20 of the Luas Finglas EIAR Sections 20.3.1.4; Table 20-8 and 20-9. Conservation method statements will be prepared by the appointed Contractors qualified professional with conservation expertise and accreditation and will be submitted to DCC. TII is committed to continued engagement with DCC Architects, Conservation and Archaeological Sections, and welcomes further discussion in relation to cultural heritage constraints during detailed design stage. Please also refer to response provided to Item No. 2 above.
16	20	7. "Plans of full scheme inclusive of identification of National Monuments, NIAH registered and/or RPS scheduled buildings and structures, including their curtilage, clearly illustrating proposed boundary reinstatement, with assessment of visual impact on the public realm, all carefully considered at detailed design, and agreed in writing with, the City Architect's Division of DCC, prior to commencement of development. Reason: In the interests of ensuring an architectural conservation focus where applicable along the route and full consideration of appropriate boundary reinstatement."	The location of all National Monuments, RMPS, RPSs, NIAHs and architectural and cultural heritage constraints are identified within Chapter 20 Volume 3 on Figures 20.1 Sheets 1-3 (Volume 4) of the Luas Finglas EIAR. The likely significant visual impacts of the proposed scheme on all heritage constraints are set out and assessed in Chapter 20 and Chapter 21 (Volume 3) of the EIAR. TII will develop details for agreement with DCC both prior to the tender of construction works, and post-tender throughout the construction stage. Refer also to response provided to Items No. 2 and 15 above.
17	20	8. "A detailed safety audit of the design at all junctions between pedestrians and cyclists, at cycle parking, within segregated and shared surfaces, and adjacent to bus and LRV stops, with reference to the NTA Cycle Design Manual and DMURS, to be submitted and agreed with the Dublin City Council Planning Department prior to commencement of development. Reason: In the interests of ensuring the delivery of walking and cycling infrastructure that prioritise the infrastructural hierarchy, and deliver clear widths, safe transitions and capacity for pedestrian, cyclists and public transport users."	Noted and agreed. TII is committed to ongoing engagement with DCC and will provide a detailed road safety audit of the whole scheme for consultation with Dublin City Council at the detailed design stage. Please also refer to response provided to Item No. 2 above.
18	20	9. "A Visual Impact study at detailed design stage, including cross sections and view of bridges from a number of vantage points, materials and detailing of new bridge, piers and landscaping at bridge/track level and base level to be submitted and agreed with the City Architect's Division of DCC prior to commencement of development. Reason: In the interests of ensuring the delivery of high-quality, durable, structures within an attractive public realm during the full operational phase of the public realm scheme."	Noted and agreed. Please also refer to response provided to Items No. 2 and 15 above.
19	20	10. "A detailed risk assessment for the operational phase of the suitability of proposed structures and their associated materials. This may include, but is not limited to, run-off/staining including runoff into river/canal/watercourses, runoff into soft landscaping, salt/de-icing risk to steel, vandalism risk including graffiti impact and management, glazing protection and general maintenance challenges, including full detail of proposals to mitigate, to be submitted and agreed with the City Architect's Division of DCC, prior to commencement of development. Reason: In the interests of ensuring the delivery of high-quality, durable, structures within an attractive public realm during the full operational phase of the public realm scheme."	Noted and agreed. Please also refer to response provided to Item No. 2 above.
20	20	11. "A detailed risk assessment for anti-social behaviour and public safety at locations along the route including, but not limited to boundary conditions, substations, spaces under bridges, control of access to parks, canals, etc., park and public realm structures, access onto roof of proposed structures etc. including full detail of proposals to mitigate, to be submitted and agreed with the City Architect's Division of DCC prior to commencement of development. Reason: In the interests of ensuring the delivery of a high-quality, safe public realm, including the environs of proposed structures within the public realm and public realm boundaries, during the full operational phase of the public realm scheme."	Noted and agreed. Please also refer to response provided to Item No. 2 above.
21	20	12. "The public realm shall be designed under universal design principles and an accessibility audit of the extent of the scheme, inclusive of landscape and structures, shall be submitted to, and agreed in writing with, the Dublin City Council Planning Department prior to commencement of development. Reason: In the interests of an appropriate integration of public art within the public realm, where applicable."	Noted and agreed. TII support the inclusion of universal design principles, and an accessibility audit has been carried out. TII will continue to engage with DCC and will address pertinent items raised in the accessibility audit in addition to integration of public art, at detail design stage. Please also refer to response provided to Item No. 2 above.
22	20	13. "Should physical art installation/s be an agreed part of the Percent for Art strategy the selection and location of artworks along the route, shall be reviewed and agreed with the local authority Arts Office and submitted to, and agreed in writing with, the Dublin City Council Planning Department prior to commencement of development. Reason: In the interests of an appropriate integration of public art within the public realm, where applicable"	Noted and agreed. The location and proposals for public art to be provided as part of Luas Finglas will be agreed with DCC and other stakeholders. A Luas Finglas public art advisory group, to include representation from TII, DCC and other stakeholders will be set up for this purpose. Please also refer to response provided to Item No. 2 above.
23	20	14. "Suitable locations for water drinking fountains and/or bottle filling stations should be identified and installed as part of the works along the route of the Proposed Scheme. This shall be submitted to, and agreed in writing with, the Dublin City Council Planning Department prior to commencement of development. Reason: In the interests of reducing plastic waste and promoting sustainability, and in response to Objective	The provision of such features is beyond the scope of the Railway scheme and are currently not included however TII has no objection to accommodating such works and will continue to engage in dialogue with DCC on this matter in relation to the provision, location and maintenance of drinking water fountains. Please also refer to response provided to Item No. 2 above.

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		CCUVO20 Civic Amenities in chapter 7 of the Dublin City Development Plan 2022-2028: (ii) To provide civic amenities such as accessible public toilet facilities and drinking water at suitable locations in new or redeveloped public realm."	
24	21	The City Architects Division "Reviewing the overall scheme at a scale of 1:500 does not fully resolve queries about the accommodation of all requirements while maintaining clear widths and space required for active travel and recreational enjoyment of the public realm. There is further detail required by DCC depts., including City Architects, to assess the scheme fully." Conditions Applying 1;2	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. TII will continue to engage in dialogue with DCC on this matter during the detailed design development. Please also refer to response provided to Item No. 2 above.
25	21	The City Architects Division "Utilities above ground: The siting of utility cabinets, poles and other above-ground utility infrastructure may have significant impacts on the space, visual impact and quality of the public realm. This issue has been a significant problem in previous transport infrastructure projects. Detailed design of the scheme must include fully designed detailed layouts of all above-ground infrastructure impacting spatially and visually on the public realm." Conditions Applying 1; 2; 5	Noted and agreed. TII agrees to continued engagement with the DCC departments and the city architect's division in relation to the layout and design of utility cabinets, poles and other above ground infrastructure during the detailed design stage and construction stages of the project. Please also refer to response provided to Item No. 2 above.
26	21	The City Architects Division "Utilities overhead: The design of the OHLE (overhead line equipment) can have a significant visual impact and is not shown clearly on the photomontages provided within the submission. Any impact or risk on siting of trees/greening posed by OHLE shall be considered in the detailed design of the scheme." Conditions Applying 1; 2; 5	Please also refer to response provided to Items No. 2 and 15 above.
27	21	The City Architects Division "Boundary Treatments: The proposals to retain and/or re-use re-positioned boundary walls, railings fences in the interests of the circular economy to be considered carefully along the scheme, in terms of visual impact, security to adjacent properties and practicality of re-use, at both detailed design and construction stage, e.g. boundary at St. Margaret's Court." Conditions Applying 1; 2; 5; 6	Please refer to response provided to Item No. 2 above. TII will retain and/or reuse boundary treatments in accordance with the Urban Integration Report submitted as part of the of Luas Finglas EIAR 2024 Chapter 21 - Landscape and Visual Amenity Appendix A21.2: Urban Integration Report 5.8.11 Landscape and Urban Realm Integration
28	21	The City Architects Division "Traffic signal and signage poles: The number of poles installed to provide traffic signals for pedestrians, cyclists, buses and other vehicles needs to be rationalised to the minimum required at each junction. Other required poles including but not limited to Garda CCTV, traffic CCTV, etc. to be considered in assessment of poles and obstructions within public realm." Conditions Applying 1; 2; 5	It is an objective of the proposed Scheme to rationalise the amount of street furniture as referenced in Luas Finglas EIAR 2024 Chapter 21 - Landscape and Visual Amenity Appendix A21.2: Urban Integration Report and Luas Finglas EIAR 2024 Chapter 5 – Description of the proposed Scheme Section.
29	21	The City Architects Division "Footpath widths & alignment: The provision of footpaths designed to the minimum width may not be sufficient in areas of high pedestrian traffic" Conditions Applying 1; 2; 5; 8	The proposed Scheme has generally adopted 2.0m footpath width as a minimum throughout. The minimum footpath width in DMURS is 1.8m. Proposed footpath widths will be reassessed at detailed design stage. Please also refer to response provided to Item No. 2 above.
30	21	The City Architects Division "Footpath widths & alignment: Where pedestrians and cyclist share a surface for any distance, a safety audit to inform the detailed design of the clear widths of shared surfaces and arrangement of transitions between pedestrian cyclist vehicular and LRV should be carried out. In addition to areas of shared surface, it was noted that in some locations bicycle storage/racks are located such that cyclists must cross pedestrianised area to access. This could create conflict." Conditions Applying 1; 2; 5; 8	It is the intention of TII at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and consider increasing the level of segregation between cyclists and pedestrians, and limit in so far as possible the provision of shared surfaces. A Stage 2 Road Safety Audit will be carried out as part of the detailed design process. Please also refer to response provided to Item No. 2 above.
31	22	The City Architects Division	Footpath width does account for congregations of passengers waiting in the vicinity of bus stops accessing LRV platforms entering and exiting buildings and pedestrians travelling along the footpath and will be reviewed as part of detailed design. Please also refer to response provided to Item No. 2 above.

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		"Footpath widths & alignment: Footpaths widths also need to account for congregations of passengers waiting in the vicinity of bus stops accessing LRV platforms entering and exiting buildings and pedestrians travelling along the footpath." Conditions Applying 1; 2; 5; 8	
32	22	The City Architects Division "Footpath widths & alignment: Where bus shelters and/or stops are proposed, with a cycle lane running through or in front of, the detailed setting out of the bus stop, and design of the cycle lane must have regard to providing sufficient space to pedestrians, cyclists and commuters using bus at these points. Insufficient information to confirm if bus stops and their relationship with cycle lanes comply with section 3 of the NTA Cycle design Manual 2023". Conditions Applying 1; 2; 5; 8	It is the intention of TII at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023. Please also refer to response provided to Item No. 2 above.
33	22	The City Architects Division "Footpath widths & alignment: Dimensioned setting out of the area around each bus stop to include: distance to kerb line; cycle path and footpath transition to, and relationship with, standing area at bus stop; relationship to any building entrance/exit or entrance to park or other pedestrian area, full details of the bus stop/shelter, and all other street furniture, utilities or obstructions for each location necessary for review of quality of public realm by DCC. " Conditions Applying 1; 2; 5; 8	Please refer to response provided to Item No. 2 above.
34	22	The City Architects Division: "Cycle Paths: The NTA Cycle Design Manual 2023, DCC's active travel network and DCC's plans for Improvements to Finglas Village, do not appear to be referenced in the documents reviewed. The integrated public realm design inclusive of cycle paths shall be designed in compliance with the cycle manual 2023, and the Greater Dublin Area Cycling Network 2022, including updates/revisions as they occur to ensure a consistent approach to the multi-modal means of transport along this scheme." Conditions Applying 1; 2; 5; 8	It is the intent of TII that detailed design will review all cycle track infrastructure for closer compliance with the Cycle Design Manual 2023. It is anticipated that any resulting changes will be insignificant and can be implemented within the lands being acquired. The cycle track infrastructure has been provided in accordance with the Greater Dublin Area Cycling Network Plan (2022); the DCC Active Travel Network (2022); and DCC's plans for improvements to Finglas Village area. Please also refer to response provided to Item No. 2 above.
35	22	The City Architects Division: "Accessibility: Universal Design Principles shall be prioritised within the public realm. An Accessibility Audit on the design does not appear to be included in the submission and should be undertaken to ensure equal access for all users to the full extent of the detailed design of this scheme." Conditions Applying 1; 2; 5; 8; 12	TII supports the inclusion of universal design principles, and an accessibility Audit has been carried with a view to informing the detailed design phase. TII will continue to engage in dialogue with DCC and relevant stakeholders including Voice of Vision Ireland, National Disability Authority and the Luas Users Group during detailed design and construction phases. Please also refer to response provided to Item No. 2 above.
36	22	The City Architects Division: "Local Public Realm Improvement Schemes: The proposed scheme includes limited information on the proposed public realm improvements at Broombridge Station and LRV stop, St Helena's LRV stop, and adjacent spaces, Ravens Court Finglas LRV stop, St Margaret's LRV stop, Charlestown LRV stop and its environs."	TII agrees to provide further information on the public realm improvements at each of the proposed Luas stops and environs, as well as at Ravens Court to City Architects during the detailed design phase. Please also refer to response provided to Item No. 2 above.
37	22	The City Architects Division: "Broombridge Station and LRV Stop: Landscape was insufficient in detail to fully assess and require a more detailed layout at the bridge, road and towpath level. <ul style="list-style-type: none"> Gates removed from the canal towpath on both sides of Broom bridge Rd to the north of the canal Path width with trees south of the proposed bike shelter may not be adequate in width for the bus stop, circulation and trees Anti-social behaviour risk assessment is required to determine the suitable use of materials. " 	TII agrees to continue to engage with DCC through the detailed design period and to provide further details of Broombridge station and LRV stop, and in particular in relation to matters around access to the tow path and risk assessments for materials in relation to anti-social behaviour. TII will also continue to liaise with Waterways Ireland in this regard, local to the Royal Canal. TII notes that trees in the footpath south of the bicycle store will have paved tree grilles thereby maximising circulation space at the bus stop. Please also refer to response provided to Item No. 2 above.
38	22	The City Architects Division: "St Helena's LRV stop and adjacent spaces: The challenge of anti-social behaviour was raised previously. Existing opportunities for passive surveillance may be compromised by planting and contouring proposals. Further detail is required on the relationship between St Helena's resource centre, childcare building and the LRV stop.	The inclusion of meanwhile uses in the form of coffee van at the west side of St Helena's LRV stop, as well as opportunity play space at the east side of the stop is intended to increase public use of the space, thereby increasing passive surveillance of the space. The planting and contouring are designed for amenity value and to encourage use as a public park. TII supports the further development of these spaces by DCC for community use. The boundary condition between the LRV stop and adjacent properties has been designed to permit visual connection, while also being cognisant of the

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		<ul style="list-style-type: none"> Boundary design between LRV stop and adjacent properties Planting and contouring scheme between LRV stop and properties to East of stop Durability of self-binding gravel use in play/stage area." 	requirements of the adjacent property occupants. TII agrees to continued engagement with DCC in relation to materials as noted at item 12 above. Please also refer to response provided to Item No. 2 above.
39	23	<p>The City Architects Division:</p> <p>"Ravens Court: The scheme consists of LUAS tracks and greening only south of Ravens Court, with no footpath or cycle path proposal on Cardiff Castle Road between Cappagh Road and Ravens Court. Further detail is required on the relationship between the public realm including the boundary to Garda Station and LUAS tracks and new junctions on Finglaswood Road.</p> <ul style="list-style-type: none"> Absence of path for pedestrians on the East side of Cardiff Castle Road Dead-end path to access LUAS technical cabinet, facing south on the new boundary wall to Ravens Court. The photomontage image suggests this as a pedestrian path for locals, but it ends abruptly at a grassed area DI-AL 32 D-O/1 labels the boundary to Garda Station as a 2m wall topped with a 2m high steel fence. The photomontage does not appear to illustrate this. The junction of both Cardiff Castle Road and the vehicular entrance to the garda station from Finglaswood Road, illustrated on landscaping plans, look similar to what appears to be a continuous footpath along Finglaswood Road." 	A cycle track is not being provided through Cardiff Castle Road which is consistent with the Greater Dublin Area Cycling Network Plan (2022). The low speed / low traffic volume nature and narrow road width of Cardiff Castle Road renders it acceptable for bicycle use. No footpath is proposed on the east side of Cardiff Castle Road as per the existing arrangement. The dead-end path will permit residents of Ravens Court access to the green area without having to cross the Luas line.
40	23	<p>The City Architects Division:</p> <p>"Finglas LRV stop Insufficient detail was provided in relation to layout and permeability, i.e. access to bicycle shelter.</p> <ul style="list-style-type: none"> High-quality granite paving restricted to LUAS stop The finish on the plaza between the childcare development and recreational centre is unclear from legend. Access to the new bicycle shelter appears to be restricted by a fence and gate LUAS substation location and orientation needs vandalism, anti-social behaviour assessment." 	TII agrees to continued engagement with DCC in relation to the detailed design of Finglas LRV stop and in particular the layout, permeability and material finishes. TII is in favour of removal of the fence/gate referred to and note this is part of DCC infrastructure. TII agrees to continued engagement with City Architects at detail design stage in relation to the detail design of the Finglas substation and surrounding environment in order to mitigate any perceived security concerns. Please also refer to response provided to Item No. 2 above.
41	23	<p>The City Architects Division:</p> <p>"St Margaret's LRV stop. The existing pedestrian bridge was replaced by an at-grade signalised crossing.</p> <ul style="list-style-type: none"> Use of remaining land south of stop not identified. Vehicular access is maintained. Cannot assess if an anti-social behaviour risk from continued use without use identification. Traffic calming at the junction north of the stop has very small upstands and the bus stop is restricted" 	<p>Vehicular access is required to private property east of St. Margaret's Stop, that is not being acquired as part of the proposed Scheme.</p> <p>The signalised junction layout for St. Margaret's Road / McKee Avenue will be in accordance with the Cycle Design Manual (2022).</p> <p>For the proposed bus stop north of St. Margaret's Stop, although the shape of the bus stop area appears restrictive, there will be 3.0m width footpath at the boarding/alighting area. Opportunities however to increase the space available for passengers can be explored at the detailed design stage. Please also refer to response provided to Item No. 2 above.</p>
42	23	<p>The City Architects Division:</p> <p>"Charlestown LRV stop and its environs Opportunity to introduce high quality public realm at shopping centre interface not taken. The proposed works outlined are unbalanced and cycle paths provision is unusual.</p> <ul style="list-style-type: none"> High-quality granite paving restricted to LUAS stop, remainder is exposed aggregate concrete or other coloured cycle path finish Doubling up of cycle paths on the West side of the junction to north and south of Charlestown Place, preventing better use of the widened public realm outside the shopping centre corner and new development on site opposite the LRV stop. Footpath and cycle path narrow considerably as they travel westwards on the south side of Charlestown Place. <p>The information provided is insufficient to facilitate a proper assessment of the proposals and additional information is required including, visualisations of the proposals."</p>	<p>The apparent doubling up of cycle track on left turns is to permit cyclists to bypass the traffic signal control at the junction and retains the current cycle track facility catering for this demand. Removal of these left turn slips may encourage cyclists to divert onto footpaths to bypass the traffic lights, which would be undesirable. The more compact layout of the proposed junction results in more space available for active travel measures such as this.</p> <p>The proposed scheme cycle track and footpath tie back into the existing cycle track and footpath at the limit of works on the south side of Charlestown Place and TII accepts that the existing cycle track and footpath widths are quite narrow at this point.</p>
43	23	<p>The City Architects Division:</p> <p>"Land Acquisition by TII & taking in charge: Where it is proposed to CPO or acquire lands as part of the Proposed Scheme, confirmation is sought as to whether ownership of these lands will be transferred to the</p>	TII intends that the areas within the boundary of the swept path of the LRV will be permanently acquired in order to secure the alignment and ensure operational continuity. In certain other locations it is envisaged that the acquired lands will be transferred or revert back to the local authority ownership. This includes areas of new or existing road, footway or cycle paths. Areas identified for temporary acquisition will revert back to the relevant owners.

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		relevant local authority or will these lands be retained by the TII but taken in charge by the relevant local authority for maintenance purposes." Conditions Applying 1; 2; 3; 4; 8; 10; 11	
44	24	The City Architects Division: "Car Parking: The roll-out of electric charging points for electric vehicles is required if national carbon emissions plans are to be met." Conditions Applying 1; 2; 5;	TII intends to provide electric charging at the proposed park and ride facility on North Road and also at the redesigned car park on Mellowes Road. Please refer to the landscape drawing showing the chargers at Finglas (D1-AI 32 3-4) and the structures drawings (D1-ST 33 B-C/4 and D1-ST 33 B-C/5) and the references in the EIAR to electric vehicle chargers at the Park and Ride and elsewhere Luas Finglas EIAR 2024 Chapter 5 – Description of the proposed Scheme.
45	24	"Car Parking: There are opportunities to provide the infrastructure where works are being carried out to or adjacent to parking, e.g. Broombridge Station, Ravens Court, Finglas Village and Garda Station, and St. Margaret' s Court." Conditions Applying 1; 2; 5;	Noted.
46	24	"Car Parking: It should also be noted that Dublin City Council intends to introduce mobility hubs. Coordination with the DCC team is advised to identify if mobility hub proposals are being considered along this scheme." Conditions Applying 1; 2; 5;	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the provision of mobility hubs during the detailed design stage. Please also refer to response provided to Item No.2 above.
47	24	"Car Parking: Insufficient detail in the submission, to fully assess if the required essential parking is being reinstated at the Childcare Development Centre, although the need to provide is referenced in Chapter 8 - Population of the EIAR." Conditions Applying 1; 2; 5;	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. TII will continue to engage in dialogue with DCC on this matter during the detailed design development. Please also refer to response provided to Item No.2 above.
48	24	The City Architects Division: "The palette of materials: There is a legend for the paving types identified in the landscape drawings and chapter 2.1. "Landscape and Visual Amenity" looks at the potential impacts on landscape character and visual amenities during construction and operational phases. Further clarification is needed to fully assess, including for example, material build-up and finish intended for buff cycle track, surface finish, design life and construction detail to paving and kerbs, in the interests of the health and safety of users of the public realm and durability of landscape to be maintained by Dublin City Council." Conditions Applying 1; 2; 3; 5; 9; 10; 11; 12	TII agrees to continued engagement with DCC in relation to the detail design and specification of landscape materials for cycle track infrastructure. Please also refer to response provided to Item No.2 above.
49	24	The City Architects Division: "The palette of street furniture: A full palette of street furniture to include street lighting, bins, benches, bollards, cycle stands, wayfinding poles, digi-panels, bus-shelter, etc and confirmation on their proposed locations is required." Conditions Applying 1; 2; 4; 5; 9; 11; 12; 14	The RO submission indicates locations for street furniture including street lighting, bins, benches, bollards, cycle stands, wayfinding poles, bus-shelter, etc. TII agrees to continued engagement with DCC in relation to the design and specification for all of these items at detail design stage. Please also refer to response provided to Item No.2 above.
50	24	"The palette of street furniture: Confirmation is sought as to whether an identical palette is to be used for the Proposed Scheme across all the local authority administrative areas or whether each local authority (and perhaps specific urban villages) will have its palette." Conditions Applying 1; 2; 4; 5; 9; 11; 12; 14	TII confirms that the proposed palette of materials creates a linewide identity, and that the same palette of materials will be used throughout Luas Finglas including both DCC and FCC administrative areas. The Urban Integration Report, Volume 5 - Appendix A21.2, illustrates the design palettes and design elements of the LRT landscape. The continuing theme of Luas Finglas is demonstrated through the use of the same iconographic materials to create a linewide identity.
51	24	"The palette of street furniture: Confirmation is sought as to whether there will be uniformity in the palette of street furniture across the LUAS Scheme." Conditions Applying 1; 2; 4; 5; 9; 11; 12; 14	Please refer to response to item 50 above.
52	24	"The palette of street furniture: To ensure Dublin City Council City Architect's Division and Environment & Transport Department, Road Design and Maintenance representatives can fully assess the palette of materials, - we recommend a specific condition covering this." Conditions Applying 1; 2; 4; 5; 9; 11; 12; 14	Please refer to response to item 50 above.
53	24-25	The City Architects Division: "Conservation: <ul style="list-style-type: none"> Broombridge Bridge over railway line and Royal Canal 	The competency wording, as outlined in Chapter 20 Volume 3 of the EIAR, is in accordance with Chapter 11 of the DCC Development Plan 2022-2028. TII confirms that any Contractor appointed for works, which have a direct or indirect impact on a Protected Structure or built heritage constraint, will require the appointment of a qualified professional with conservation expertise and accreditation to advise on all relevant works.

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		<ul style="list-style-type: none"> Tolka River Bridge over Tolka River <p>The application, EIAR chapter 20: cultural heritage, does reference a suitably qualified person: "A pre-works condition survey will be carried out will be carried out by a suitably qualified person with expertise in architectural conservation." But there does not appear to be any reference to a Conservation Architect nor RIAi Grade 1 or Grade 2 qualified."</p> <p>Conditions Applying 1; 2; 5; 6; 7; 9</p>	
54	25	<p>"Conservation: Canal. While Chapter 20: Cultural Heritage, including Table 20-9: Impact Assessment and Mitigation table, has been submitted as part of the EIAR, this document is quite general and we would request more detail of the Works, immediately surrounding or impacting the bridge, including protective measures."</p> <p>Conditions Applying 1; 2; 5; 6; 7; 9</p>	TII confirms that the design will be further developed during detailed design stage. At the bridge interface, TII is committed to continued engagement with both the relevant DCC departments and Waterways Ireland, in relation to the layout and design of any works on the canal at the appropriate design and construction phase.
55	25	<p>The City Architects Division:</p> <p>"Visual Impact: Bridge over railway line and Royal Canal Drawings of the bridge are provided including a longitudinal section with the proposed bridge in the foreground in the Landscape dwgs Plan no. D1-AL-31_O-A nor the Structural dwgs D1-ST 310-A & D1-ST 31 O-B/1. However, there are no cross-sections illustrating the relative bridge levels as they pass across the railway and canal. While 'EIAR Appendix A21.3 page 6 & 7 Viewpoint 1' has been submitted as part of the application, showing the view from the towpath with a new bridge in the foreground, it is a photomontage from one aspect only. Reference is made to height allowance for future electrification of the railway in the documentation, but the required height/level is not referenced in the drawings."</p> <p>Conditions Applying 1; 2; 5; 6; 7; 9; 10; 11</p>	Please refer to response provided to Items No. 2, 14 and 54 above.
56	25	<p>"Visual Impact: Tolka River Bridge over Tolka River: The photo montage is limited to a view from north of the existing stone bridge. A view from the West to illustrate the new bridge and/or a view from a road junction along the new bridge would complement more detailed plans of the proposed bridge which includes a cycle path parallel to tracks to allow a more considered assessment."</p> <p>Conditions Applying 1; 2; 5; 6; 7; 9; 10; 11</p>	The view locations included in the application were issued to DCC prior to submission and additional views were added as a result. TII confirms that a 3D BIM model with virtual reality capabilities is available to assist in the detailed design of the proposed bridge and that dialogue with DCC and the relevant departments will continue. Please also refer to response provided to Items No. 2, 14 and 54 above.
57	25	<p>The City Architects Division:</p> <p>"Landscaping/public realm: Broombridge Bridge over the railway line and Royal Canal: Further detail is requested to illustrate proposals for landscaping including treatment of access points to towpaths on either side of the north side of the canal and transition from new segregated paths to existing towpath condition."</p> <p>Conditions Applying: All conditions may apply 1; 2; 3; 4; 5; 6; 7; 8; 9; 10; 11; 12; 13; 14</p>	Noted. TII confirms that the design will be further developed during detailed design stage. Liaison with both DCC and Waterways Ireland will continue during the detailed design phase and into construction stage. Please also refer to response to Item No. 2 above.
58	25	<p>The City Architects Division:</p> <p>"Landscaping/public realm: Broombridge Bridge over the railway line and Royal Canal: Consideration of mitigation of anti-social behaviour risk, e.g. under the new bridge: "Further detail is requested to illustrate proposals for landscaping including, treatment of access points to towpaths on either side of the north side of the canal, and transition from new segregated paths to existing towpath condition. Consideration of mitigation of anti-social behaviour risk, e.g. under the new bridge at the south and north side of the bridge. Landscape dwgs and photomontage do not indicate any gates/controls to the canal towpath. Tolka Valley Bridge/entrance 'EIAR Appendix A21.3 page 8 & 9 Viewpoint 2' taken from the north side of the existing bridge around which there is no proposed landscaping. Cycle stands shown in pedestrian area potentially encourage cyclists to cross tracks on pedestrian paths. Landscape drawings do not indicate any gates/controls to the park from Ballyboggan Road."</p> <p>Conditions Applying: All conditions may apply 1; 2; 3; 4; 5; 6; 7; 8; 9; 10; 11; 12; 13; 14</p>	<p>Noted. TII confirms that the design will be further developed during detailed design stage. Liaison with both DCC and Waterways Ireland will continue during the detailed design phase and into construction stage. Please also refer to response to Item No. 2 above.</p> <p>It should be noted that the provision of gates to the parks is not possible as the access on the alignment of the tracks must remain open for the LRVs at all times.</p>
59	26	<p>The City Architects Division:</p> <p>"Landscaping/public realm: Tolka Valley Bridge/entrance: EIAR A21.3 pg. 8 & 9 viewpoint 2 taken from the northside of the existing bridge around which there is no proposed landscaping. Cycle stands shown in pedestrian area potentially encourage cyclists to cross tracks on pedestrian paths. Landscape drawings do not indicate any gates/ controls to the park from Ballyboggan Road."</p> <p>Conditions Applying: All conditions may apply 1; 2; 3; 4; 5; 6; 7; 8; 9; 10; 11; 12; 13; 14</p>	Please refer to response provided to Item No.58 above.

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60	26	<p>The City Architects Division:</p> <p>"General: Bridge design materials: Weathering Steel is proposed for the structure and balustrades of proposed bridges. The success of this material is dependent on its environment, specification and detailing to ensure a good visual quality of steelwork is maintained and to avoid any visual impact on surrounding materials and landscaping. Particular observations, include run-off into watercourses, salt impact, and approach to graffiti management."</p> <p>Conditions Applying: 1; 3; 5; 9; 10; 11</p>	Noted. TII confirms that the design will be further developed during detailed design stage. Liaison with DCC will continue during the detailed design phase and into construction stage. Please also refer to response to Item No. 2 above.
61	26	<p>The City Architects Division:</p> <p>"Other Structures and Features in the Proposed Scheme: Bike storage at Broombridge stop, Finglas Village stop and St Margaret's stop: Glazing, weathering steel and painted concrete indicated with sliding doors."</p> <p>Conditions Applying 1; 2; 3; 5; 9; 10; 11</p>	Please refer to response provided to Item No.60 above.
62	26	<p>"Other Structures and Features in the Proposed Scheme: Bike storage at Broombridge stop, Finglas Village stop and St Margaret's stop: Clarification is needed on the extent of and relationship between materials to assess the visual impact of bike shelters."</p> <p>Conditions Applying 1; 2; 3; 5; 9; 10; 11</p>	Please refer to response provided to Item No.60 above.
63	26	<p>"Other Structures and Features in the Proposed Scheme: Bike storage at Broombridge stop, Finglas Village stop and St Margaret's stop: Clarification on whether planes of weathering steel or glazing with some weathering steel detail is proposed and whether the assessment of particular risks to material posed by graffiti has been considered."</p> <p>Conditions Applying 1; 2; 3; 5; 9; 10; 11</p>	Please refer to response provided to Item No.60 above.
64	26	<p>"Other Structures and Features in the Proposed Scheme: Bike storage at Broombridge stop, Finglas Village stop and St Margaret's stop: The level of input on the materiality and durability of this structure may be subject to who is responsible for the maintenance of the shelter - of interest to DCC in relation to visual quality and public safety."</p> <p>Conditions Applying 1; 2; 3; 5; 9; 10; 11</p>	Please refer to response provided to Item No.60 above.
65	26	<p>The City Architects Division:</p> <p>"Traction Sub-stations/ Luas Technical Rooms: Simple brick/brick slip-clad substations are described in drawings DI-ST 33 O-A (Finglas Stop) and D1-ST 33 B-C/9 (St Margaret's Stop). In the case of St Margaret's stop, the proposal is to install a railing on the wall and gated boundary and use greening to obscure the visual impact of the station."</p> <p>Conditions Applying 1; 2; 3; 5; 10; 11</p>	This is correct.
66	26	<p>"Traction Sub-stations/ Luas Technical Rooms: At Finglas stop the substation is open to the public realm, with doors on side elevation pointing away from the stop and with very limited passive surveillance during daytime only."</p> <p>Conditions Applying 1; 2; 3; 5; 10; 11</p>	This location shares curtilage with the Uisce Éireann pumping station. Appropriate security including CCTV coverage of the structure will be considered in the detail design stage. TII confirms that the design will be further developed during the detailed design stage. Liaison with DCC will continue during this phase and into construction stage. Please also refer to response provided to Item No. 2 above.
67	26	<p>"Traction Sub-stations/ Luas Technical Rooms: With the exception of showing an exposed aggregate concrete urban footpath with sufficient width for vehicles to the substation, there is no description or visualisation of this space."</p> <p>Conditions Applying 1; 2; 3; 5; 10; 11</p>	TII confirms that a 3D BIM model with virtual reality capabilities is available to assist in the detailed design of the proposed structure and that dialogue with DCC and the relevant departments will continue. Please also refer to response provided to Items No. 2, 14 and 54 above.
68	26	<p>"Traction Sub-stations/ Luas Technical Rooms: The approach appears to be very different in each location."</p> <p>Conditions Applying 1; 2; 3; 5; 10; 11</p>	This is correct. The immediate environment at both locations is very different. TII confirms that a 3D BIM model with virtual reality capabilities is available to assist in the detailed design of the proposed structure and that dialogue with DCC and the relevant departments will continue. Please also refer to response provided to Items No. 2, 14 and 54 above.
69	26	<p>"Traction Sub-stations/ Luas Technical Rooms: Concern about security, anti-social behaviour and quality of public realm at Finglas stop location."</p> <p>Conditions Applying 1; 2; 3; 5; 10; 11</p>	Noted. TII confirms that a 3D BIM model with virtual reality capabilities is available to assist in the detailed design of the proposed structure and that dialogue with DCC and the relevant departments will continue. Please also refer to response provided to Items No. 2, 14 and 54 above.

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70	26	<p>The City Architects Division:</p> <p>Park Structures: "Weathering steel is proposed for a number of parks and public realm structures including, for example at and adjacent to St Helena's stop. Stage structure in area with little passive surveillance, north of stop: risk of graffiti on weathering steel; risk of rust runoff. Viewing/changing pavilion and store at football pitches east of LRV stop: risk of graffiti on weathering steel; risk of rust run-off; 3 steps up to the podium - accessibility challenge for spectators using the shelter."</p> <p>Conditions Applying 1; 2; 3; 5; 10; 11; 12</p>	Noted. TII confirms that a 3D BIM model with virtual reality capabilities is available to assist in the detailed design of the proposed structure and that dialogue with DCC and the relevant departments will continue. Please also refer to response provided to Items No. 2, 14 and 54 above.
71	27	<p>The City Architects Division:</p> <p>Park and Public Realm Features: "At St Helena's Stop, steel archways are proposed within the public realm north of the LRV stop. The introduction of play/decorative features shall be considered by those who will take on responsibility and liability for the operational phase of the project."</p> <p>Conditions Applying 1; 2; 3; 5; 10; 11</p>	Noted.
72	27	<p>The City Architects Division:</p> <p>Per cent for Art Strategy: "It is not clear where the Percent for Art Strategy is to be incorporated into this project. Should the % for Art result in a physical intervention within the public realm, City Architects would recommend consultation with all relevant Dublin City Council depts., depending on the proposed location/s, i.e. with a park or within the public realm in conjunction with the Arts Office."</p> <p>Conditions Applying 1; 2; 5; 13;</p>	Noted and agreed. The location and proposals for public art under the percent for Art scheme to be provided as part of Luas Finglas will be agreed with DCC and other stakeholders. A Luas Finglas public art advisory group, to include representation from TII, DCC and other stakeholders will be set up for this purpose. Please also refer to response provided to Item No. 2 above.
73	27	<p>The City Architects Division:</p> <p>"To reduce plastic waste and promote sustainability, a strategy for the roll-out of water drinking fountains, such as the recently installed model on Clarendon Row, should be incorporated into the Proposed Scheme at suitable locations and in consultation with Dublin City Council, in response to: Objective CCUVO20 Civic Amenities in chapter 7 of the Dublin City Development Plan 2022-2028: (ii) To provide civic amenities such as accessible public toilet facilities and drinking water at suitable locations in new or redeveloped public realm..."</p> <p>Conditions Applying 1; 2; 4; 5; 14</p>	The provision of such features is beyond the scope of the Railway scheme and are currently not included however TII has no objection to accommodating such works and will continue to engage in dialogue with DCC on this matter in relation to the provision, location and maintenance of drinking water fountains. Please also refer to response provided to Item No. 2 above.
74	30	"Integrated transport network; the Luas Finglas project is not a standalone project and requires full coordination with other major transport project s in the city including BusConnects, DART+, Metrolink and City Centre Cycle Network. This is to ensure that all projects in combination will deliver high quality transport infrastructure without conflicting with each other while also minimising disruption during construction."	Noted and agreed. the proposed Scheme design has taken into account interfaces with all other adjacent transport projects. Further dialogue will continue during the detailed design and construction stages as referred to in response to Item No.2 above.
75	30	<p>"Detailed information; please provide clear documentation in order to facilitate meaningful commentary. It is understood that the project is at early stages but as the design progresses more detailed drawings will be required so that the proposals can be properly assessed. This information should be made available to DCC in advance of any workshops and include the following:</p> <ul style="list-style-type: none"> Site Analysis, Heritage Analysis, Concept Design Proposal Existing Condition Site Plan and Proposed Site Plan at same scale." 	Comment from 2020 - TII confirms that the design has been developed with input from DCC and will be further developed during detailed design stage. Liaison with DCC and the relevant departments will continue during the detailed design phase and into construction stage. Please also refer to response provided to Item No. 2 above.
76	30	<p>Original 2020 Comment: "Detailed Site Plans; please provide Existing Condition Site Plan and Proposed Site Plan at same scale. These drawings should include all utilities, street lighting, traffic control boxes, bollards, bins benches etc. drawn to scale. Protected structures in the vicinity should also be identified."</p> <p>Further Comment 2025: "Landscape drawing required showing clearly the entirety of services for each area of scheme. To be demonstrated through further consultation with DCC City Architects at the detail design stage."</p>	Comment from 2020 - TII confirms that the design has been developed with input from DCC and will be further developed during detailed design stage. Liaison with DCC and the relevant departments will continue during the detailed design phase and into construction stage. Please also refer to response provided to Item No. 2 above.
77	30	<p>Original 2020 Comment: "High Quality Public Realm; the delivery of a high-quality public realm needs to be a central focus of the scheme, particularly in the vicinity of the new stops."</p> <p>Further Comment 2025: "Limited information focusing on the Public Realm design. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."</p>	Comment from 2020 with 20025 update - TII confirms that the design has been developed with input from DD and will be further developed during detailed design stage. Liaison with DCC and the relevant departments will continue during the detailed design phase and into construction stage. Please also refer to response provided to Item No. 2 above.

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78	31	Original 2020 Comment: "Cycle path infrastructure; details are required of the parallel cycle path along the line and how it will integrate into the existing cycle network. Where cycle routes intersect the proposed Luas tracks, details are required to demonstrate how these crossings will be safely managed, for example, to prevent bicycle tyres becoming stuck in tracks." Further 2025 Comment: "Safety Assessment not provided. Resolution to be demonstrated through further consultation with DCC at the detail design stage. "	The cycle track infrastructure for the proposed Scheme has been developed in consultation with the NTA, DCC and FCC, and to align with the Greater Dublin Area Cycling Network Plan (2022). All cycle track crossings of the Luas line will be provided as close to a right angle as possible to limit the risk of wheel trap. Where angles of approach are more acute, there are rubber insert products available to reduce the risk of falls. DCC will be consulted on these matters during the detailed design stage. Please also refer to response provided to Item No. 2 above.
79	31	"Cycle parking provision at stops; please identify any new cycle parking provisions included in the proposals including justification of the quantities provided and of how the Development Plan Requirements are met (e.g. combination of bicycle parking and bicycle sharing facilities)." "To be demonstrated through further consultation with DCC at the detail design stage."	Each of the 4 new Luas stops will include cycle parking facilities which are indicated on the landscape and structures drawings included with the application, making it even easier to undertake Cycle-LRV trips supporting multimodal travel. The cycle parking numbers, types and locations are indicated on the RO Drawings. TII will continue to engage with DCC during the detailed design stage to further develop the design. Please also refer to response provided to Item No. 2 above.
80	31	Original 2020 Comment: "Luas Stop context analysis; a study of the broader area around each of the 4no. new stops including movement routes and volumes of pedestrians and cyclists accessing each station is required. Prepare a report on the Social and Commercial impacts of proposals. Studies may identify requirements to modify the proposals at a high level or by changes to existing junctions, footpaths etc. in the vicinity." Further 2025 Comment: "Social and Commercial Impact Report not provided. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	Social and commercial impacts are referenced in Luas Finglas EIAR 2024, Chapter 8: Population. Further dialogue will continue during the detailed design and construction stages as referred to in the response provided to Item No.2 above.
81	31	2020 Comment: "Junction design; the line crosses a no. of significant roads along the route, details of these intersections are required to demonstrate how pedestrian, cyclist and public transport prioritisation will be delivered. " Further 2025 Comment: "Further information required demonstrating transport prioritisation. To be demonstrated through further consultation with DCC at the detail design stage."	Luas Finglas will generally have priority at all road crossings. For the Finglas Road / North Road junction, the most significant junction on the proposed Scheme, Luas priority may not always be possible, however TII envisages any delays to Luas to be short in nature. The adoption of compact signalised junctions and rationalisation of queuing lanes will be more favourable to active travel. Additionally, the use of straight and single stage pedestrian crossings will facilitate negotiating a signalised junction for pedestrians. Further consultation with DCC will be carried out at the detail design stage. Please also refer to response provided to Item No. 2 above.
82	32	"Conservation architect; a full-time conservation architect, to RIAI Grade 1 or 2 or equivalent, should be employed to advise on the proposals at all stages of the project and for the preparation of a Heritage Impact Assessment Report. A no. of protected structures including buildings, bridges etc. exist adjacent to the emerging preferred route. This should also include in relation to temporary works that may impact on protected structures and historic fabric." "To be demonstrated through further consultation with DCC City Architects at the detail design stage."	Please refer to response provided to Item No. 53 above.
83	32	"Materials; please provide an indication of finishes and materials proposed for surface treatments taking account of the Dublin City palette of materials. To be demonstrated through further consultation with DCC City Architects at the detail design stage. "	Please refer to response provided to Item No. 48 above.
84	32	"Sustainability; details of measures included to contribute to a more sustainable environment along the new route, for example, SUDS measures. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	The proposed Scheme design has taken sustainability and sustainable design into account and in fact is a pilot circular economy project for TII. Further dialogue with DCC will continue during the detailed design and construction stages as referred to in the response to Item No.2 above.
85	32	"Greening strategy; the emerging preferred route passes through a variety of environments including parks, suburban streets and local centres. It is noted that a grass track is proposed for extensive sections of the line, please clarify if any further proposals for additional trees and planting along the route and adjacent to stops are included. Any trees proposed to be removed for either permanent or temporary works need to be clearly identified and need to be replaced. To be demonstrated through further consultation with DCC at the detail design stage."	The alignment drawings and landscape drawings included in the RO Drawings as part of the RO application include details of tree removal and replacement. The Luas Finglas EIAR 2024 Chapter 21 - Landscape and Visual Amenity and Appendix A21.2: Urban Integration Report include details of planting strategies, and a full arborist report is included in Appendix A21.1. Further dialogue with DCC will continue during the detailed design and construction stages as referred to in the response to Item No.2 above.
86	32	Original 2020 Comment: "Universal Access; access for all passengers should be treated with equal importance in accordance with universal design principles. Please prepare a Universal Access Audit on the design demonstrating how equal access for all users is being delivered." Further 2025 Comment: "Universal Access Audit not provided. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII support the inclusion of universal design principles, and an accessibility audit has been carried out. TII will continue to engage with DCC and will address pertinent items raised in the accessibility audit in addition to integration of public art, at detail design stage. Please also refer to response provided to Item No. 2 above.

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87	33	Original 2020 Comment: "OHLE; details of overhead line equipment need to be provided and visual impact assessments carried out to demonstrate integration into the local context." Further 2025 Comment: "Not shown clearly on the photomontages provided. To be resolved through further consultation with DCC City Architects at the detail design stage."	TII welcomes DCC's willingness to further engage at the detailed design stage.
88	33	2020 Comment "Utility cabinets; proposed locations of utility and services cabinets need to be shown on drawings as early as possible. If locations are not integrated from the outset, cabinets can constitute obstructions and contribute to clutter in the public realm - this needs to be avoided." 2025 Comment "Detailed design of the scheme must include fully designed detailed layouts of all above ground infrastructure impacting spatially and visually on the public realm. To be demonstrated through further consultation with DCC City Architects at the detail design stage"	Utility cabinet type size and locations are indicated on the landscape drawing submitted with the RO application. TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the location and design of proposed utility cabinets during the detailed design stage.
89	33	"Reference Documents; in addition to the requirements of the Development Plan, LAPs and SDZs, the line should be designed with consideration given to the following documents: a. Your City Your Space - Dublin City Public Realm Strategy, 2012, b. 2016-2020 Dublin City Tree Strategy, c. 2016 Construction Standards for Road and Street Works in Dublin City Council"	TII confirms that consideration will be given to Your City Your Space - Dublin City Public Realm Strategy (2012), 2016-2020 Dublin City Tree Strategy, and Construction Standards for Road and Street Works in Dublin City Council (2016) during detailed design.
90	33	Programme for Design Development Workshops for Proposals; when options have been selected and design proposals have been developed, please arrange for a programme of workshops to take place for DCC to review each station in more detail before proposals are finalised for Railway Order application.	Noted that this is a historical comment and that the workshops did take place as requested.
91	33	2020 Comment: "Percent for Art; please provide clarification of how the Percent for Art scheme requirements for will be met across the Luas Finglas scheme and how artworks will be integrated into the public realm." 2025 Comment: "Not clear where the Percent for Art Strategy is to be incorporated. Further consultation with DCC City Architects at the detail design stage to confirm selection and locations of artworks."	Please refer to response provided to item No.22 above.
92	34	2020 Comment: "Access Route; Further information on the access route beside the Luas requested, including access to the Housing Site, the Pumping Station and the park, including widths, segregation distances, pedestrian v traffic routes etc." 2025 Comment: "Further information required as outlined in the specific locations below. Resolution to be demonstrated through further consultation with DCC at the detail design stage."	The proposed access will be 4.8m wide and will operate as a shared pavement, in compliance with DMURS 4.3.4 "local street with a shared surface carriageway". DCC shall be consulted on these matters during the detailed design stage. Please also refer to response provided to Item No. 2 above.
93	34	"Aerial images; or maps showing the existing vs the proposed are very useful for discussion purposes."	Noted.
94	34	"Red Line; extent of LUAS works red line would be useful to see on drawings to understand where public realm upgrades start / finish. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	The Red Line extent of works is shown on the alignment drawings included with the drawing pack submitted as part of the RO application. A further boundary map has been prepared post submission showing maintenance responsibilities within this Red Line and will be shared with DCC as part of the ongoing dialogue on the detailed design and construction as referred to in the response provided to Item No.2 above.
95	34	"Presentation; Request for presentation from TII at meeting from 21/07/21 to be issued as Draft to City Architects for review."	Noted - historical comment.
96	34	"Housing Meetings; to be arranged with representatives from Housing Dept. (familiar with development proposals) to assess proposed Luas alignments and impacts on development potential on the following sites: <ul style="list-style-type: none"> St Margaret's Road and the DCC Finglas 2020 Strategy Mellowes Road (incl. access requirements to pumping station) St. Helena's Road To be demonstrated through further consultation with DCC City Architects at the detail design stage."	Noted - historical comment. Meetings as described did take place. Further dialogue with DCC will continue during the detailed design and construction stages as referred to in the response provided to Item No.2 above.
97	34	2022 Comment: "Services Infrastructure; prelim landscaping drawings do not appear to show all services including utility cabinets, poles, rain gardens etc. All services infrastructure elements need to be shown on the landscaping drawings so that they can be fully integrated into landscaping and public realm design." 2025 Comment: "Further information required as outlined as specified above. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. TII will continue to engage in dialogue with DCC on this matter during the detailed design development and construction stages. Please also refer to response provided to Item No. 2 above.

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98	35	"Hard Landscape Treatments; further details of proposed materials and finishes required to ensure high quality public realm is delivered. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the provision of hard landscape treatments during the detailed design stage. Please also refer to response provided to Item No. 2 above.
99	35	"Street Furniture; further details of proposed street furniture materials and finishes required to ensure high quality public realm is delivered. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the provision of street furniture during the detailed design stage. Please also refer to response provided to Item No. 2 above.
100	35	"Edge Details; further details of proposed edge details, level differences required to clarify interfaces between soft and hard landscaping materials and finishes. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. TII will continue to engage in dialogue with DCC on this matter during the detailed design development. Please also refer to response provided to Item No. 2 above.
101	35	"Bus Stops; pedestrians and cyclists appear to come into conflict at bus stops. Cycle paths stop for a short distance where pedestrians would cross over cycle route to get to or from bus stops. Careful design solution required to ensure cyclists slow down, yield to pedestrians and avoid conflicts. See comments below in specific locations - Safety Assessment not provided. Resolution to be demonstrated through further consultation with DCC at the detail design stage."	It is the intention of TII at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and in particular for bus stop locations. A Stage 2 Road Safety Audit will be carried out as part of the detailed design process.
102	35	"Junction Layouts; junction layouts need to be considered in the context of the final public realm and landscape design. In some locations, it appears as though they could be better resolved. To be demonstrated through further consultation with DCC at the detail design stage."	TII is committed to continued engagement with DCC and welcomes further discussion regarding junction layouts in the context of the final public realm and landscape design, during the detailed design stage. Please also refer to response provided to Item No. 2 above.
103	35	"Cycle paths; the proposed cycle paths lack consistency, varying along the route from segregated, shared with pedestrians and stop/starting either side of bus stops. The design approach needs clarity, and a full safety assessment needs to be carried out to ensure the changes in condition are designed to be as safe as possible and minimise conflicts. Safety Assessment not provided. Resolution to be demonstrated through further consultation with DCC at the detail design stage."	It is the intention of TII at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual. The provision of shared areas will for example be reassessed with a view to providing more segregation. A Stage 2 Road Safety Audit will be carried out as part of the detailed design process.
104	35	"Project extents; a number of Landscaping preliminary design drawings, for example Area 32 Sheet 2 of 5 and Area 33 Sheet 3 of 5 show two separate red lines around the works. Absolute clarity is required in terms of the extent of works that will be delivered as part of the Luas Finglas project."	The red lines in question represent "Boundary remove and reuse (circular economy)" as specified in the legend of the respective drawings. These lines do not indicate the extents of the project - this is indicated on the alignment drawings. As noted above a further boundary map has been developed indicating maintenance responsibilities within the project boundary.
105	35	2020 Comment: "Soakaways & Infiltration Trenches; further details of proposed soakaways and infiltration trenches, for example, edge details are required. These elements need to be fully integrated into the public realm and landscaping design." 2025 Comment: "Soakaways Infiltration previously and Trenches proposed are no longer shown. Further Details and specific locations required. To be demonstrated through further consultation with DCC at the detail design stage."	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. TII will continue to engage in dialogue with DCC on this matter during the detailed design development. Please also refer to response provided to Item No. 2 above.
106	36	"Rain Gardens; Rain Gardens shown on drawings Area 32 Sheet 2, Area 33 Sheet 10 - 12; could be consolidated with slivers of green between footpath and cycle path in the interest of visual consistency. Very narrow slivers of planting may not be successful. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the design of proposed rain gardens during the detailed design stage. Please also refer to response provided to Item No. 2 above.
107	36	"Rain Gardens; Further details of proposed planting and maintenance arrangements for rain gardens are required to ensure the planting thrives over time. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the planting and maintenance arrangements of proposed rain gardens during the detailed design stage. Please also refer to response provided to Item No. 2 above.
108	36	"Permeable Green Track; the proposed permeable green track will provide additional greening and contribute towards SuDS and therefore is a welcome solution."	It is proposed to provide grass track to limit the visual and physical impact on the parkland public open space. A SuDS-based approach has been applied to drainage with a view to creating a more sustainable low maintenance scheme.
109	36	"Public Lighting; the public lighting design and OHLE need to be fully coordinated to deliver an integrated solution with OHLE poles accommodating lighting. A proliferation of separate poles for OHLE and public lighting must be avoided."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the coordination of lighting and OHLE poles during the detailed design stage. Please also refer to response provided to Item No. 2 above.

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		Please refer to previous comments- not shown clearly on the photo montages provided. To be resolved through further consultation with DCC City Architects at the detail design stage."	
110	36	2020 Comment: "BROOMBRIDGE LRV STOP to Tolka Valley Road: Broombridge Stop; detailed study of stop required (including sections) showing relationship and connectivity with existing Irish Rail infrastructure, noting that Irish Rail are planning the electrification of the Maynooth Line." 2025 Comment: "Drawings do not include cross section of proposed bridge within its context of existing Broombridge. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	The drawing of the bridge structure (D1-St 31 OB 1/1) includes a cross section and long elevation showing the relative position of the Irish Rail track and bridge structure and clearance envelope required for the Dart + project respectively. TII has undertaken several coordination meetings with Irish Rail regarding the interfaces between both projects. TII is committed to continued engagement with DCC and welcomes further discussion on the coordination of the bridge designs during the detailed design stage. Refer also to responses to items 1 and 3 above.
111	37	"Broombridge Bridge; new bridge will be immediately adjacent to existing protected structure bridge, so a detailed heritage impact assessment is required. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	The RO application design included consideration of the various options and their impact on the nearby heritage structure (reference Luas Finglas EIAR 2024 Chapter 4: Alternatives Considered). TII is committed to continued engagement with DCC Architects and Conservation Section, and welcome further discussion in relation Broome Bridge at the detailed design stage.
112	37	"Broombridge Stop: Pedestrian link to canal; the pedestrian connection from Broombridge down to the greenway on the north side of the Royal Canal is an important link and needs to be retained (It is unclear on the drawings whether this connection is being retained or being severed by new bridge structure.)"	This link is proposed to be retained. Further details can be provided at the detailed design stage.
113	37	"Tolka River Bridge; new bridge will be immediately adjacent to existing protected structure wood bridge therefore a detailed heritage impact assessment is required. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC Architects and Conservation Section, and welcome further discussion in relation to Tolka River Bridge (Finglaswood Bridge) at the detailed design stage. Please also refer to response provided to Items No. 2 and 15 above.
114	37	"Broombridge Bridge; areas underneath new bridge, including cycle parking and landscaped areas require careful design consideration with lighting and passive supervision in mind to anti-social behaviour. Issue to be resolved through further consultation with DCC City Architects at the detail design stage with specific reference to materials and design to both sides of the bridge."	TII is committed to continued engagement with both DCC City Architects and Waterways Ireland, and welcomes further discussion on specific materials and design to both sides of the bridge at detailed design stage
115	37	"Broombridge Bridge; bridge supports should be developed into a more sculptural form to compliment the design of the bridge itself and integrate the structure into the context as an element of the landscaping design. Additional drawings required of proposed bridge within its context. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on Broombridge Bridge during the detailed design stage.
116	37	"Broombridge Stop; Note on drawing states Access to Irish Rail platform to be developed at detail design stage and that the pedestrian ramp is to be demolished. At this stage it is important to demonstrate the feasibility of providing access without negatively impacting the heritage structures of the Royal Canal or Broombridge bridge. See comments above. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC Architects and Conservation Section, and welcome further discussion in relation to removal of pedestrian ramp at detailed design stage.
117	38	2020 Comment: "Broombridge Stop; Trees; proposed line of five new trees adjacent to the bus stop could be better aligned with existing trees to provide a more integrated and coherent design solution." 2025 Comment: "Position of trees appears to impact the clear width of footpath adjacent to bus stops. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the trees at Broombridge Stop during the detailed design stage.
118	38	"Key Public Realm Design Location; the area around Broombridge Stop is an area of critical concern in terms of public realm design. A detailed design for a high-quality public realm for this area needs to be developed and submitted to DCC for review. Limited information focusing on the Public Realm design at this location. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC City Architects and welcomes further discussion on the public realm at Broombridge Stop during the detailed design stage.
119	38	"Pedestrian priority; the 1.8m footpath appears relatively narrow compared to cycle lane and includes a line of new trees in pits creating pinch points. Pedestrian movements need to be prioritised as part of a universal design solution. Surface details of tree grilles need to be flush and accessible. Resolution to be demonstrated through further consultation with DCC at the detail design stage."	The corridor along Broombridge is constrained by the existing businesses on the west side of the road. The 1.8m width footpath on the east side of the road is the desirable minimum under DMURS. The 2.5m width cycle track on the west side of the road is less than the desirable minimum (3.0m) required for 2-way cycle tracks under the Cycle Design Manual. DCC will be consulted further on these matters during the detailed design stage.

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120	38	"Tolka Valley Park: Pedestrian crossings; in a number of locations, the pedestrian crossings do not appear to follow desire lines, for example, on the southern side of the junction of Ballyboggan Road and Broombridge Road. Ensure safe crossing points are provided and designed in consideration of desire lines to reduce risk of pedestrians taking short cuts across LRV tracks. Resolution to be demonstrated through further consultation with DCC at the detail design stage."	TII is committed to continued engagement with DCC and welcomes further discussion on pedestrian crossings at Tolka Valley Park during the detailed design stage to ensure safe crossing points are provided.
121	38	"Tolka Valley Park: Shared pedestrian cycle path; the Park design approach for the cycle path through Tolka Valley Park is inconsistent and changes from segregated to combined with pedestrian footpath over bridge. A safety assessment should be carried out to ensure a safe route for all that minimises conflicts is delivered. Safety Assessment not provided. Resolution to be demonstrated through further consultation with DCC at the detail design stage."	It is the intention of TII at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and consider increasing the level of segregation between cyclists and pedestrians, and limit in so far as possible the provision of shared surfaces. A Stage 2 Road Safety Audit will be carried out as part of the detailed design process. DCC will be consulted on these matters during the detailed design stage.
122	39	Tolka Valley Park: Pedestrian routes; it is understood that the existing gradients make it difficult to provide walkways at universally accessible grades through the park. The design should be assessment to ensure points to rest are provided at appropriate spacing along route.	TII is committed to continued engagement with DCC and welcomes further discussion on the provision of rest stops at appropriate locations within Tolka Valley Park during the detailed design stage.
123		"Tolka Valley Park: Key Public Realm Design Location Park 2; the area around the entrance to Tolka Valley Park from Ballyboggan Road is an area of critical concern in terms of public realm design. A detailed design for a high-quality public realm for this area needs to be developed and submitted to DCC for review. Limited information focusing on the Public Realm design at this intersection. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC and welcomes further discussion on public realm at Tolka Valley Park entrance from Ballyboggan Road during the detailed design stage to ensure a high-quality design is provided.
124	39	"Tolka Valley Road to ST HELENA'S LRV STOP: St Helena's junction with Tolka Valley Road: Pedestrian and Cyclist interaction; there appears to be an area where pedestrians and cyclists will share a space north of the junction with Tolka Valley Road. This needs to be carefully designed to ensure cyclists slow down on approach to this area. Limited information focusing on the Public Realm design at this intersection. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	It is the intention of TII at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and consider increasing the level of segregation between cyclists and pedestrians, and limit in so far as possible the provision of shared surfaces. A Stage 2 Road Safety Audit will be carried out as part of the detailed design process. DCC will be consulted on these matters during the detailed design stage.
125	39	"St Helena's Landscape Design and Planting; there are high levels of anti-social behaviour in this area including scrambler bikes. The landscaping and planting design requires careful consideration to ensure passive supervision is achieved and anti-social behaviour is deterred. Landscaping to ensure passive surveillance is encouraged to prevent anti-social behaviour. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC and welcomes further discussion on landscape and planting design in St Helena's with DCC City Architect during the detailed design stage.
126	40	"St Helena 's Key Public Realm Design Location Stop 3; the area surrounding St. Helena's Stop is an area of critical concern in terms of public realm design. A detailed design for a high-quality public realm for this area needs to be developed and submitted to DCC for review. Limited information focusing on the Public Realm design at this intersection. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC and welcomes further discussion on landscape and planting design of St Helena's stop with DCC City Architects during the detailed design stage.
127	40	"St Helena's Infiltration Trench; the proposed Stop infiltration trench opposite the junction with Dunsink Road is on a future DCC housing site. Consult with DCC Housing to determine optimum solution in this location to avoid unnecessary impacts on housing site and to agree site access. Soakaways and Infiltration Trenches previously proposed are no longer shown. Further Details and specific locations required. To be demonstrated through further consultation with DCC at the detail design stage."	TII is committed to ongoing engagement with DCC and welcomes further discussions on the SuDS measures during the detailed design stage.
128	40	"Farnham Pitches Cycle track; the cycle track appears 19/05/2022 to stop south of Farnham pitches. Cyclists tend to take the shortest route so if they are proposed to use the carriageway in this area, the design needs to be configured to discourage cyclists from taking a shortcut along the pedestrian footpath through the park. To be demonstrated through further consultation with DCC at the detail design stage."	In the absence of cycle tracks through Farnham pitches, it would be difficult to discourage cyclists from using the footpaths through the park, while still retaining universal access. Implementation of the Greater Dublin Area Cycling Network Plan to provide cycle tracks on Farnham Drive may encourage some cyclists not to use the park. DCC will be consulted on these matters during the detailed design stage.
129	40	"St Helena's to FINGLAS VILLAGE LRV STOP: Finglas Stop Finglas Village Stop; it would be important to see the LUAS swept path overlaid on a drawing which also shows the red line of the housing site boundary. Any restrictions on development on the site should be clearly indicated, as well as impact of the Luas on the site."	The Luas swept path will be overlaid on a drawing which also shows the red line of the housing site boundary during the detailed design stage as requested. TII is committed to ongoing engagement with DCC and welcomes further discussions on the housing proposals during the detailed design stage.

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		Overlay not provided. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	
130	40	Finglas: Housing Development; Study required in conjunction with City Architects to examine the potential to integrate the substation into the housing building in order to maximise buildable site footprint. TII to provide information re. substation (size, construction type, orientation, access etc.). To be demonstrated through further consultation with DCC City Architects at the detail design stage.	During the examination of alternatives for the substation site several options to integrate the substation with a potential future development were examined. At the request of DCC the substation was designed as a stand-alone structure, but it does not preclude future integration into a development. Reference Luas Finglas EIAR 2024 Chapter 4: Alternatives Considered
131	41	Finglas: Cycle parking; location must consider access for cyclists and interactions of cyclists with public space. Limited information focusing on the Public Realm design at this intersection. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage.	TII is committed to ongoing engagement with DCC and is open to further discussions on cycle parking during the detailed design stage.
132	41	"Finglas: Sections Required; Further information required regarding the track level, materials etc. along the edge of the Mellows Rd housing site and also surrounding the stop. Sections will be required. Further details required for levels, dimensions & materials not included on sections. To be demonstrated the rough further consultation with DCC City Architects at the detail design stage."	TII is committed to ongoing engagement with DCC and is open to providing further information regarding the track level, materials etc. along the edge of the Mellows Rd housing site and also surrounding the stop during the detailed design stage.
133	41	"Finglas: Site Walk; Request to review proposals on site"	TII is committed to ongoing engagement with DCC and is open to partaking in a Finglas site visit to review proposals during the detailed design stage.
134	41	"Finglas: Parking Provision; CA support Transport Planning comments re. parking. Priority should be given to public open space, greening, pedestrians and cyclists. Study required to assess quantum of essential parking for creche. No clear evidence provided of quantum of essential parking required for creche. To be demonstrated through further consultation with DCC at the detail design stage."	TII is committed to ongoing engagement with DCC and is open to providing further information regarding quantum of essential parking required for the creche during the detailed design stage.
135	41	"Project Integration; At site meeting on 28/07/2021, the importance of integrating the Luas into the surrounding areas was discussed. It was suggested that TII prepare designs including public realm improvements for the broader surrounding area of the Finglas Luas Stop for inclusion in the Railway Order, with DCC to agree a delivery strategy for the areas falling outside the red line. Limited information focusing on the Public Realm design at this location. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to ongoing engagement with DCC and is open to further discussions on the Finglas Stop public realm during the detailed design stage.
136	41	"Key Public Realm Design Location 4; this is a critical point on the line and a comprehensive, high-quality public realm design is to be and submitted to DCC for review. The public realm design needs to extend northwest to Cardiff Castle Road (to include the area north of the childcare centre and connect to Mellows Park), Refer APPENDIX A attached. The extent to be delivered as part of Luas Finglas project is to be agreed with DCC. Limited information focusing on the Public Realm design at this location. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	Note that the extents of work are indicated by the Red line drawing included with the alignment drawing submitted as part of the RO application and the environmental impacts have been assessed on the basis of those works that are considered essential for the construction and operation of the railway. The suggested expansion of the red line in this case is outside scope. TII is committed to ongoing engagement with DCC and is open to further discussions on the public realm during the detailed design stage.
137	42	"Finglas Village to St Margaret's LRV stop: Mellows Park; track alignment through Mellows park appears to impact on the existing sports pitch. If this is the case, a detailed investigation is required to determine if the tracks could be moved closer to the Finglas Road to preserve the sports pitch."	Noted historical comment from 2022. The location of the tracks were examined and due to civil engineering constraints of the adjacent embankment is located accordingly. The interference with the sports pitch is very minor and involves a slight realignment of markings and goal posts.
138	42	"St. Margaret's St. Margaret's Stop; existing LRV Stop pedestrian overbridge on Finglas Road is proposed to be removed as part of proposal. Detailed design study of stop required to demonstrate how important pedestrian link across busy Finglas Road can be retained safely and satisfactorily with an at-grade crossing as proposed. Further details of design of route to safe crossing point required. Resolution to be demonstrated through further consultation with DCC at the detail design stage."	The adoption of a compact signalised junction will be favourable to active travel. Additionally, the use of straight and single stage pedestrian crossings will facilitate negotiating a signalised junction for pedestrians. Further consultation with DCC will be carried out at the detail design stage.
139	42	"St. Margaret's Key Public Realm Design Location LRV Stop 5; the area around St. Margaret's LRV Stop is an area of critical concern in terms of public realm design. A detailed design for a high-quality public realm for this area needs to be developed and submitted to DCC for review. Limited information focusing on the Public Realm design at this Location. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC and welcomes further discussion on public realm design of St Margaret's stop with DCC City Architects during the detailed design stage.

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140	42	"St. Margaret's Future Site for Sheltered Housing; I LRV Stop treatment of this site as part of Luas Finglas project to be agreed. Concern that layout currently shown will give rise to anti-social behaviour. Boundary now secured and gated but nature of vehicular access unclear. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to ongoing engagement with DCC and is open to consulting with DCC regarding St. Margaret's future site for sheltered housing during the detailed design stage.
141	43	"St. Margaret's to CHARLESTOWN LRV STOP: Charlestown Stop/Terminus; the end of line stop at Charlestown Shopping Centre will likely cater for large volumes of passengers and provides an opportunity for a high-quality public realm space. A high-level study of transport infrastructure in the vicinity should be undertaken to establish how the pedestrian traffic will be managed to maximise connectivity to the shopping centre. (The existing conditions and current emerging preferred route proposal appears to be strongly weighted towards vehicular traffic at the expense of pedestrians and sustainable transport modes and should be revisited in the context of the arrival of Luas.) Noted the reduction of vehicular lanes. Further information required in relation to the Public Realm design at this junction. To be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to ongoing engagement with both DCC and FCC and is open to carrying out a study of alternative options for the public realm design at the Charlestown junction to provide a more pedestrian-focused link between the shopping centre and the Luas terminus during the detailed design stage.
142	43	"Key Public Realm Design Location 6; the area around Charlestown LRV Stop is an area of critical concern in terms of public realm design. A detailed design for a high-quality public realm for this area needs to be developed and submitted to DCC for review. Limited information focusing on the Public Realm design at this Location. Resolution to be demonstrated through further consultation with DCC City Architects at the detail design stage."	TII is committed to continued engagement with DCC and welcomes further discussion on public realm design of Charlestown stop with DCC City Architects during the detailed design stage.
143	43	"Pedestrian and Cyclist Interface; the proposal shows a space where the cycle path is discontinued where pedestrians can move between the LRV and bus stops. This requires careful design and may involve narrowing of the cycle path and other measures to ensure cyclists slow down, yield to pedestrians and avoid conflicts. Additional safety assessment of this junction required. Issue to be resolved through further consultation with DCC City Architects at the detail design stage."	It is the intention of TII at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and in particular to consider interactions between cyclists and pedestrians at bus stops. A Stage 2 Road Safety Audit will be carried out as part of the detailed design process.
144	43	"Cycle Paths; on the western side of 19/05/2022 Stop St. Margaret's Road at the junction with Charlestown Place, there appears to be a doubling up of cycle lanes meaning pedestrians would need to cross 2 cycle paths on each side of the road. This requires further review as it does not appear to provide pedestrian priority and could give rise to unnecessary conflicts. Issue to be resolved through further consultation with DCC at the detail design stage."	The apparent doubling up of cycle track on left turns is to permit cyclists to bypass the traffic signal control at the junction, to confer an advantage to cycling and retains the current cycle track facility catering for this demand. Removal of these left turn slips may encourage cyclists to divert onto footpaths to bypass the traffic lights, which would be undesirable. The more compact layout of the proposed junction results in more space available for active travel measures such as this. The left-turn slips proposed will require cyclists to cross a footpath and to yield to pedestrians. These crossings will have zebra markings as per the Cycle Design Manual (2022). DCC will be further consulted on these matters during the detailed design stage.
145	43	"Charlestown Bus Stops; shelters for bus stops: Stop should be provided where possible"	At the Charlestown terminus, double bay bus stops will be provided on St. Margaret's Road with a single bus shelter on the southbound side and two bus shelters on the northbound side to cater for the anticipated increased demand for Luas passengers to continue their journey by bus.
146	43	"Charlestown Set-down bay; as this is the last Stop on the line, it is likely that there will be demand for a location for dropping off and collection of passengers from Luas. This should be considered as part of the design as it will likely occur whether provided for or not. Issue to be resolved through further consultation with DCC at the detail design stage."	TII confirms our commitment to ongoing dialogue with DCC and the relevant agencies, ensuring their comments are taken account of and incorporated during the detailed design stage as much as possible.
147	43	"EIA Scoping Report: Description of Proposed Works; Report Under 2.2 Description of the Proposed Works, please include the following in the list of works: Public Realm Improvements, landscaping and integration of scheme into the surrounding areas."	EIA Scoping Report is published. Amending the list of works at this stage is not possible.
148	44	"EIA Scoping Report: Operational Phase; It is critical that the design of the public realm areas adjacent to the proposed route are considered in detail to ensure the delivery of high-quality public spaces that are not conducive to anti-social behaviour. The extent of public realm improvements to be included as part of this project should be clarified. City Architects expect that TII will present for consideration and comment detailed design drawings showing public realm design proposals for all areas impacted by the new route."	TII welcomes the opportunity of presenting detailed design drawings and 3D model/Animation/VR to DCC showing public realm design proposals for all areas impacted by the new route for consideration at detailed design stage.
149	45	"EIA Scoping Report: Material Assets: Infrastructure and Utilities; This section should include reference to the potential impacts, of increased visual clutter in the form of new service infrastructure such as poles and	EIA Scoping Report is published. Amending the list of works at this stage is not possible.

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		utility cabinets. While consideration should be given to appropriately locating such elements within the public realm, consideration must be given to the undergrounding and coordination of services infrastructure where possible in order to reduce the number of above ground elements and minimise this impact."	
150	45	"EIA Scoping Report: Land Take; It is critical to engage with DCC Housing Department regarding the potential impacts of Luas Finglas on future DCC Housing projects on adjacent sites."	TII is committed to continued engagement with DCC, and welcomes further discussion with DCC City Architects during the detailed design stage
151	45	"EIA Scoping Report: Stabling Yard at Bannow Road is reducing the size of a housing site which will be going to a Housing Association (AHB). There is as yet no design for the development. It seems some Councillors have complained about the loss of housing numbers to allow for parking LRVs."	The layout of the LRV stabling has been discussed and agreed previously with DCC for the design that was included with the RO application and as indicated on the associated drawings. Subsequent discussions have taken place in February 2025 between TII and DCC representatives to exchange latest design information (the final published RO Application designs) and progress the DCC housing scheme design.
152	45	"EIA Scoping Report: St Helena's Park (south end); There is an opportunity to improve passive surveillance of LUAS track by adding to cul-de-sacs at Garrigallen and Gortmore. These however are not economical to develop as housing."	TII is committed to continued engagement with DCC, and welcomes further discussion with DCC City Architects during the detailed design stage.
153	45	"EIA Scoping Report: St Helena's stop; Development is needed to provide activity and surveillance at this stop. Part of the site would be suitable for social housing. Another part needs to be residential over shops, this is difficult for Housing to develop."	TII is committed to continued engagement with DCC, and welcomes further discussion with DCC City Architects during the detailed design stage
154	45	"EIA Scoping Report: St Margaret's stop, opposite Lidl; LUAS are having to buy a site here (Pizza Hut and North Road Motors?) The site will not be included in their works, they show open space and community uses, it is not suitable for this, but would be a good site for older people housing."	The remaining residual site has not been referenced for acquisition and does not form part of the proposed Scheme and will remain in the current owner's wherewithal to dispose of or to develop.
155	45	"EIA Scoping Report: Mellows Road at Fire Station; LUAS need to build electrical plant here, but there will be a residual site. It should not be left vacant because it is an important part of the street frontage here (which is not particularly active as it is). The residual site is best developed as an active use at ground level (shop or cafe adjacent to new LUAS stop) with potentially multiple residential floors over. For the reason that Housing have difficulty developing commercial uses, this site may not be suitable for DCC to develop directly."	TII is committed to continued engagement with DCC and welcomes further discussion with DCC City Architects during the detailed design stage on the redevelopment of the site in question.
156	46	<p>The City Archaeology Section:</p> <p>"The proposed scheme is the next phase of the development of Dublin's integrated light rail network. It is 3.9km in length and will extend the Luas Green Line northwards from its current terminus at Broom bridge to a new proposed terminus at Charlestown. This office has reviewed the EIAR submitted to An B6rd Pleanála as part of the Railway Order application. The potential archaeological impact of the scheme as outlined in Chapter 20 of the document (Cultural Heritage) is noted. The following cultural heritage constraints were identified:</p> <ul style="list-style-type: none"> Fourteen cultural heritage constraints of High importance including town defences, a historic town, a monastic enclosure, houses, wells, bridges, canal, etc.;" "Ten cultural heritage constraints of Very Low importance have been identified in disturbed/modified areas within the study area. These include seven sites of buildings, one site of a well, and four Areas of Archaeological Potential; and "Fourteen cultural heritage constraints of Low importance including railway structures, LRT poles reused as light poles, one quarry with no surface remains, and one levelled townland boundary in a potentially undisturbed area; "Ten cultural heritage constraints of Very Low importance #have been identified in disturbed/modified areas within the study area. These include seven sites of buildings, one site of a well, and four Areas of Archaeological Potential; and "Fifteen levelled cultural heritage constraints of Neutral importance have been identified in very disturbed/ modified areas within the study area. These include townland boundaries, a quarry, two sites of buildings, and one demesne feature. This office notes the potential archaeological impacts associated with the Construction and Operational Phases of the proposed scheme and concurs with the proposed archaeological mitigation and monitoring measures as outlined in Section 20.5 of the EIAR." 	<p>Noted and agreed.</p> <p>TII will ensure full compliance with the mitigation measures and monitoring procedures outlined in Chapter 20 of the EIAR</p>
157	47	<p>Forward Planning/ Development Management Section:</p> <p>"TII reports that an access to the rear of St Margaret's Station has been provided to facilitate access to land severed by the proposed scheme. It is stated that a small public open space is proposed behind the southern</p>	The land at the rear of St. Margarets Stop is not required for construction or operation of the LRT and therefore is outside the scope of this application. TII has therefore not referenced this residual land and it remains the wherewithal of the current owner to dispose of or redevelop (subject to planning permission). A service road has been preserved to allow

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		platform with informal native tree and shrub planting integrating both cycling parking facilities, public seating and an access road to residual lands. The boundary treatment and planting will provide both visual and acoustic screening for the neighbouring residential area. This Section notes that the proposed acquisition of land and the location of the St. Margaret's Station removes the existing access to serviced and zoned land (a motor company and valeting service) situated to the rear of Nos. 168-174 North Road and 223-234 McKee Avenue. Whilst the landscaping drawings depict a grasscrete path running alongside No. 234 McKee Avenue, it is unclear if a new wayleave is to be created here to service this land. The applicant is requested to clarify the access arrangements at this location and to provide details of boundary treatment between the proposed station plaza and the privately owned lands to the rear. The positioning and details of cabinets next to No. 234 McKee Avenue should also be agreed with the planning authority."	access to the site which would otherwise be landlocked. TII is committed to continued engagement with DCC and welcomes further discussion with DCC City Architects during the detailed design stage on the site in question. Details of materials and treatment are included in the landscape plans and Urban integration report reference Chapter 21 - Landscape and Visual Amenity: Appendix A21.2 - Urban Integration Report. Longer term uses of this land will depend on the current owner's intention.
158	48	"The following conditions are recommended; Details of alternative access arrangements to lands to the rear (south) of the St. Margaret's Station plaza to be agreed with the Planning Authority prior to commencement of development."	The access to the residual property at the rear of St. Margarets Stop is included in the RO application and is illustrated on the alignment, property and landscape drawings.
159	48	"Details of boundary treatment to the south of the St. Margaret's Station Plaza, along with details of proposed cabinets to be agreed with the Planning Authority."	TII is committed to continued engagement with DCC and welcomes further discussion on the area south of the St. Margaret's Station Plaza with DCC planners during the detailed design stage.
160	48	Forward Planning/ Development Management Section: "Jamestown Masterplan and infrastructural future proofing: The Jamestown Masterplan was developed based on the principles of water sensitive urban design. The plan's green infrastructure strategy provides for: <ul style="list-style-type: none"> The de-culverting of the Finglas Stream and the retention of existing open watercourses, with an appropriate riparian zone. The de-culverting of the east-west link into an open channel and its integration into landscaping proposals. Nature-based solutions and Sustainable Urban Drainage Systems (SuDS) in the management of surface water and integrated fully with the landscaping proposals. The incorporation of open swales, retention basins/ponds and other major SuDS features throughout the public realm. Site controls to ensure that water quality will be improved. An attenuation network with clear parameters on the attenuation responsibilities within the public open space network and within individual sites."	The proposed Scheme is not considered to compromise the integrity of the green infrastructure strategy outlined in the Jamestown masterplan. The masterplan includes specific considerations for instances where Luas Finglas operations prevent the continued use of existing access points to St. Margarets Road. For example, access to the Manhattan Peanuts and Murdock's site will be provided from a new access street off McKee Avenue to the property boundary. Similarly, access to Polonez and Finglas Auto Parts will be provided from the north. The submitted design is aligned with the urban structure set out in the masterplan. The proposed Scheme is aligned with the Jamestown Masterplan and includes extensive nature-based SuDS measures for the management of surface water. Specifically, in St. Margarets Court where works are proposed to amend access arrangements and parking, the proposed Scheme includes bioretention areas and petrol interceptors, which will assist the Jamestown Masterplan in achieving improved water quality in the locality. The Surface Water Management Strategy also intends to de-culvert the eastern drainage connection. The proposed Scheme does not transect the east-west link at any point and is not considered to affect the proposals to transform this culvert into an open channel or to integrate it with landscaping proposals. Should the proposed RO be approved, TII is committed to engaging further with Dublin City Council during the detailed design phase. This collaboration will ensure that the proposed Scheme does not prejudice the realisation of the Jamestown masterplan's green infrastructure strategy.
161	48	"Should the proposed Railway Order be approved, further engagement with DCC during the detailed design phase would be beneficial to ensure that the scheme does not prejudice the realisation of the masterplan's green infrastructure strategy with respect to de-culverting of watercourses in the area including the Finglas Stream, or to their possible later expansion and further integration into wider landscaping proposals."	TII is committed to continued engagement with DCC, and welcomes further discussion with DCC planners to ensure that the proposed Scheme does not prejudice the realisation of the masterplan's green infrastructure strategy with respect to de-culverting of watercourses in the area including the Finglas Stream, or to their possible later expansion and further integration into wider landscaping proposals during the detailed design stage.
162		Forward Planning/ Development Management Section: "Royal Canal Greenway Proposals: As part of the Royal Canal Greenway Phase 4 (between Cross Guns Bridge, Phibsborough, Dublin 7 and Ashtown, Dublin 15), Dublin City Council has submitted an Amending Part 8 application (3513/21) to approved Part 8 (Ref.2870/15), under Part 8 of the Planning and Development Regulations 2001, as amended, to undertake development in this area. Dublin City Council proposes to widen the existing towpath by realigning the northern bank of the canal at the following three locations to overcome the need for third party land acquisition, along with associated works and associated ancillary services: West of Lock 6 for approximately 600 metres, realigning by up to 2.15 metres; West of Broombridge for approximately 345 metres, realigning by up to 1.4 metres; and West of Lock 8 for approximately 85 metres, realigning by up to 1.75 metres. Due to a referral made by a 3rd Party on 18th October 2023 regarding the Determination received on the Environment Impact Assessment Screening and the Appropriate Assessment Screening, the Draft Chief Executive's report cannot be concluded within the expected timeframe. A decision from An Bord Pleanála on the Appropriate Assessment Screening was received on 1st May 2024, which recommended that the preparation of a Natura Impact Statement (NIS) is required for the scheme. The An Bord Pleanála decision on the Environment Impact Assessment Screening	TII is committed to continued engagement with DCC and welcomes further discussion with DCC planners and Active Travel Office to ensure that the most up to date information on the Royal Canal Greenway scheme is available during the detailed design stage.

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		is still pending. It is recommended that the applicant contact Dublin City Council's Active Travel Office at detailed design stage to obtain the most current update with regard to the Royal Canal Greenway proposals."	
163	49	"Parks, Biodiversity & Landscape Services note that the provided drawings do not provide sufficient information at 1:500 to accurately comment on all aspects of the proposals, however the following conditions should be considered should the Railway Order be approved. A Landscape Architect, Ecologist and Arborist Consultant be retained to ensure that project liaison is completed to DCC satisfaction"	The requirement for a landscape architect, ecologist, and an arborist is noted and agreed.
164	50	"A Tree Bond be agreed with DCC Parks Landscape and Biodiversity Section for each proposed retained tree within the permission grant."	Tree bonds to be agreed and all trees to be protected as to current BS standard
165	50	"A design guide be developed and agreed with DCC Parks, Biodiversity & Landscape Services, which details the proposed finishes, fixtures, and fittings including a soft landscape/ planting strategy."	TII will agree landscape design guide with DCC Parks, Biodiversity and Landscape Services.
166	50	"Consideration should be given to a tree strategy, which provides a lasting landscape character and consistency along the route."	TII will agree to further develop the Luas Finglas Tree Strategy with DCC Parks, Biodiversity and Landscape Services. and DCC Tree officer.
167	50	"An agreed maintenance and management plan between DCC and TII needs to be agreed for all soft landscape elements prior to construction. This should be in the form of a taking in charge map and document which clearly states who is responsible for which area and procedures for access and future works."	TII confirms that a boundaries map has been developed post RO application and will be discussed further with DCC to ensure clarity with regard to the proposed maintenance boundaries.
168	50	Parks, Biodiversity & Landscape Services Division: "It is difficult to consider the impact on the landscape at 1:500 drawings and it is therefore requested that all detail landscape drawings be issued not less than 1:200 clearly showing existing and proposed for approval"	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process and is in keeping with previous Luas RO application. TII will continue to engage in dialogue with DCC on this matter during the detailed design development. See also responses to items 1 and 3 above.
169	50	"All landscape construction details and specifications be agreed with DCC Parks, Biodiversity & Landscape Services"	TII will agree landscape construction details and specifications will DCC Parks, Biodiversity and Landscape Services.
170	50	Parks, Biodiversity & Landscape Services Division: "A stop in Tolka Valley park should be considered to act as a catalyst for tourism and Amenity Value"	A comprehensive two-stage assessment process was undertaken to determine the Emerging Preferred Route (EPR) for Luas Finglas, including the selection of appropriate stop locations. This assessment was conducted in accordance with the Department of Transport, Tourism and Sport (DTTAS) procedures, namely the Common Appraisal Framework (CAF) for Transport Projects and Programmes (March 2016) and best standard practices. As detailed in Section 4.8 of Chapter 4 of the EIAR, the identification of the EPR involved a thorough evaluation of multiple route and stop location options, following a two stages process. The Option Selection Report Stage 1 is included in Volume 5 - Appendix A4.1 of this EIAR. Table 4-8 provides an overall summary of the MCA1 route option assessment results. These options were refined at a later stage, but the location of each stop was established at this first stage. The assessment demonstrated that a stop at Tolka Valley Park was not justified from a catchment perspective, as it did not provide sufficient demand or accessibility advantages when compared to other selected stop locations. Additionally, the primary stop locations were determined at the initial stage based on their ability to maximise ridership, connectivity, and network integration. There is currently no evidence supporting the inclusion of a Luas stop at Tolka Valley Park, based in the findings of the comprehensive selection process.
171	50	"All Attenuation / SUDS areas need to be a detailed designed to be agreed with the relevant DCC Departments as these areas will need to be maintained by TII. It is unclear on the plans what these are in terms of impact on the amenity space or visual appearance."	TII is committed to continued engagement with DCC and welcomes further discussion regarding all attenuation / SUDS areas during the detailed design stage. In discussions to date. it has been agreed in principle for DCC to maintain some SUDS features, which have been designed in line with DCC standards and best practice. A boundaries map has been developed post RO application, in line with discussions held throughout the project between TII and DCC, and this can and will be discussed further with DCC to ensure clarity with regard to the proposed maintenance boundaries.
172	50	Drawings DI-AI-31 0-A "Details of all tree pits and planting needs to be agreed with Parks."	Noted and agreed. TII is committed to engaging with DCC Parks department during the detailed design stages of the proposed Scheme regarding all tree pits and planting.
173	50	"Potential for anti-social behaviour under the bridge on canal needs to be considered."	Noted and agreed. TII is committed to engaging with DCC Parks department during the detailed design stages of the proposed Scheme regarding anti-social behaviour under the bridge on the canal.
174	50	Drawings DI-AI-31 A-B "Details of all tree pits and planting needs to be agreed with Parks."	Noted and agreed. TII is committed to engaging with DCC Parks department regarding tree pits and planting during the detailed design stages of the proposed Scheme.
175	51	"Potential for anti-social behaviour under the bridge on the canal needs to be considered."	Noted and agreed. TII is committed to engaging with DCC Parks department during the detailed design stages of the proposed Scheme regarding anti-social behaviour under the bridge on the canal.

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176	51	"The use of green tracks would seem appropriate within the park."	Noted and agreed, the design of the proposed Scheme includes the use of grass track to integrate with the surrounding areas and improve the visual impact.
177	51	"There should be no barriers on the edge of the tracks, but views maintained for safety so those using the park and those driving the Luas can easily see each other."	Noted and agreed. Intervisibility is a key component of Luas landscape design. As such the trackside planting is typically kept to a maximum of 300mm high and will be designed and specified to ensure required intervisibility.
178	51	"The OLE poles and wires will have a significant physical and visual impact within the park, and where possible these impacts should be minimised."	Noted and agreed. Where possible OLE poles and wires impacts will be minimised.
179	51	"Opportunities to combine CCTV and Lighting on the OLE should be considered subject to allow its use for cyclists, being cognitive of any lighting restrictions relating to wildlife (Bats)."	Noted. Where possible public lighting and OHLE poles have been combined. The lighting design takes account of wildlife considerations. A CCTV system outside of the at stop locations is not proposed.
180	51	"A stop in the park should be considered to act as a catalyst for tourism and amenity value."	Please refer to response provided to Item No.170 above.
181	51	"Some of the tree planting along Broombridge Road appears optimistic."	Noted. TII is committed to engaging with DCC Parks department regarding trees and planting during the detailed design stages of the proposed Scheme.
182	51	Drawings DI-AI-32 B - 0/1 "It is assumed that all planting and paths inside the cycleway/footway and including the swept paths is under TII management."	This is correct. Maps and a maintenance agreement between DCC and TII is under discussion.
183	51	"The provision of the green track is supported."	Noted
184	51	"A stop in the park should be considered to act as a catalyst for tourism and amenity value."	Please refer to response provided to Item No.170 above.
185	51	Drawings DI-AI-32 A-B "It is assumed that all planting and paths inside the cycleway/footway and including the swept paths is under TII management."	Please refer to response provided to Item No.182 above.
186	51	"The park area at St Helena Stop will need to be detailed designed with DCC Parks. More seating, active recreation offer and bicycle stands needed."	TII is committed to engaging with DCC Parks department regarding the area around St. Helena's Stop during the detailed design stages of the proposed Scheme
187	51	Drawings DI-AL 32 B-C/1Fa "The final layout, materials and boundary treatment for Farnham Park needs to be agreed with DCC Parks."	TII is committed to engaging with DCC Parks department regarding the final layout, materials and boundary treatment for Farnham Park during the detailed design stages of the proposed Scheme
188	51	Drawings DI-AL 32 C-D "A path along the park side of Casement Road would be beneficial for pedestrian circulation."	An additional footpath can be considered along the park side of Casement Road at detailed design stage. TII is committed to engaging with DCC Parks department regarding the detailed design of the proposed Scheme
189	51	Drawings DI-AL 32 D-O/1 "It is unclear how pedestrian movement will take place in the green area adjacent Cardiff Castle Road, especially for pedestrians moving from school area on the south to the north. It is likely pedestrians would want to cross the tracks, yet there are no paths, with an attenuation area in the middle."	North-south pedestrian movements will be via the existing footpath on Cardiff Castle Road.
190	51	Drawings D1- AL 33 O-A "The attenuation area within Mellows Park further impacts the open space use for active recreation and should be relocated."	TII will continue to liaise with DCC. It is possible to amend this detail at the detailed design stage to have a narrower SUDS feature and amend the above ground planting.
191	51	"The loss of amenity space should be offset with, and improved recreation offer such as play equipment or similar."	TII will continue to liaise with DCC and agree in advance of construction.
192	51	Drawings D1- AL 33 B-C to End of Project "Tree planting and SUDS interventions need to be further developed along St Margaret's Road including agreement on maintenance."	Noted and agreed. TII will continue to engage with DCC in relation to the tree planting and SUDS interventions at St Margaret's Road during detail design phase.
193	51	"A consistent boundary treatment and tree planning strategy is needed for this area."	Noted and agreed. TII will continue to engage with DCC in relation to a consistent boundary treatment and planting strategy at St Margaret's Road during detail design phase.
194	51	Air Quality Monitoring & Noise Control Unit: Noise sensitive receptor at St Helena's Childcare Centre: "According to the study the only noise sensitive receptor is St. Helena's Childcare Centre which is located immediately adjacent to the works site and Luas line. This is being mitigated by 2.25m high solid boundary. The council would recommend that TII consult	Noted and agreed.

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		with the centre to confirm the noise control measures within the building and co-ordinate activities particularly during the construction phase. No other sound barriers are being proposed."																													
195	53	<p>Air Quality Monitoring & Noise Control Unit:</p> <p>"Questionable whether noise monitoring for a period of 24 hours or less is sufficient to establish a baseline: "Section 15.3.1 sets out details of the data collected to establish the baseline for comparison with the existing scheme. This includes noise surveys at 23 locations. This included 8 unattended locations where measurements were conducted for a period of 24 hours and 15 locations where attended surveys were completed in daytime only (assumed 16 hrs). These baseline survey results are used in Table 15-34 to justify the rating of noise changes at Impacted Locations. However, it is questionable whether noise monitoring for a period of 24 hrs or less is sufficient to establish a baseline against which significant ratings could reasonably be applied. It is suggested that monitoring for a period of at least two weeks would be needed to provide a more reliable baseline. The EIAR suggests that the baseline results align well with the Strategic Noise Maps from Round 4, however, this comparison appears to be limited to 4 of the 23 survey locations only and covers sites very close to existing traffic sources."</p>			<p>"The submission queries if the duration of baseline noise monitoring is sufficient, noting that monitoring was carried out over a 24hr duration. The duration of baseline noise monitoring for the proposed Scheme has been taken from guidance contained in the Transport Infrastructure Ireland (TII) document Guidelines for the Treatment of Noise and Vibration on National Roads (2004). While that document is specific to road projects it was considered reasonable to apply the same approach to the Luas Finglas project which is a similar linear transportation development.</p> <p>Furthermore, making reference to Appendix 15.1 of Volume 4 of the EIAR the unattended noise monitoring carried out for the proposed Scheme was over a longer duration at several locations. For example,</p> <ul style="list-style-type: none">UT1 – 96hrsUT4 – 48hrsUT8 – 48hrs <p>The submission suggests that 2 weeks of unattended monitoring would be required, however, that is not best practice for infrastructure projects and the only applicable national guidance on the topic, TII guidelines referred to above, require 24hrs minimum which has been complied with.</p> <p>With regard to the comparison of the measured baseline at each unattended location and the EPA noise maps Section 15.3.1 of Volume 3 of the EIAR presents a comparison for locations UT1, UT6, UT7 and UT8. To expand this comparison, TII has added in all other unattended locations to as follows:</p> <ul style="list-style-type: none">UT1 – mapped road traffic noise levels are in the 60 to 64dB Lden noise contour which align with the measured level of 61dB Lden;UT2 – is not mapped by the EPA maps;UT3 – mapped road traffic noise levels are in the 55 to 59dB Lden noise contour which align with the measured level of 56dB Lden;UT4 – mapped road traffic noise levels are in the 55 to 59dB Lden noise contour which align with the measured level of 52dB Lden;UT5 – mapped road traffic noise levels are in the 55 to 59dB Lden noise contour which align with the measured level of 61dB Lden;UT6 – mapped road traffic noise levels are in the 55 to 59dB Lden noise contour which align with the measured level of 58dB Lden;UT7 – mapped road traffic noise levels are in the 60 to 64dB Lden noise contour which align with the measured level of 62dB Lden;UT8 – mapped road traffic noise levels are in the 65 to 69dB Lden noise contour which align with the measured level of 71dB Lden; <p>At all locations where a comparison is possible there is good agreement between the measured results and the mapped results. "</p>																										
196	53	<p>Air Quality Monitoring & Noise Control Unit:</p> <p>“Inconsistencies in information presented in Tables 15-15 15-16 15-33 15-34: "Noise impacts are considered for high sensitivity receptors that experience noise levels above the thresholds of 55dBLAeq, 16hr (daytime) and 45dBLAeq, Bhr (night-time) as set out in Table 15-15. Table 15-8 of the EIAR shows a number of Noise Sensitive Locations, which are high sensitivity. These are mainly residential areas. However, it is not clear why Patrickswell Place, which appears to have residential buildings on both sides, is considered only as medium sensitivity. The noise impact magnitude and significance rating of any change is presented in Table 15-16 and considers the change against the thresholds set in Table 15-15 or the baseline levels and also the type of receptor. Noise levels 5 dB above threshold values or baseline are considered to be Significant for residential development. A 3dB increase represents a doubling of sound intensity and it is suggested that increases above this magnitude, are likely to begin to have a negative impact on residential areas. Table 15-32 shows the calculated rail noise levels for the Opening Year 2035 at 168 receptor sites (111 residential, 11 amenity, 4 education, 1 Garcia Station, 41 Commercial). 15 of the receptors show Daytime LAeq 16hr above the criteria outlined in Table 15-15 of the report. However, of these 2 are Amenity, 2 are Education and only 1 is residential. The rest are Commercial for which, it is suggested, a higher threshold of 60 dB is applicable. However, for the residential receptors it is noted that</p>			<p>This has been reviewed and there is an error in this Table. For the purpose of responding to this submission a revised version of the Table is presented below. The changes have been highlighted in red. The updated version of the Table has not changed the conclusions set out in Chapter 15 of Volume 3 of the EIAR.</p> <p>Table 5-3 Rail Noise significance ratings at Impacted Locations – Daytime 2057</p> <table><tr><th colspan="2">Receptor</th><th>Rail Noise Threshold</th><th>Calculated Rail Noise Level</th><th>Measured Baseline Noise Level (Reference location)</th><th>Cumulative Noise Level</th><th>Increase above Baseline</th><th>Significance rating of noise change from baseline</th></tr><tr><th>ID</th><th>Description</th><th colspan="4">Daytime, dB LAeq,16hr</th><th></th><th></th></tr><tr><td>R015</td><td>Commercial</td><td>60</td><td>62</td><td>70 (AT10)</td><td>71</td><td>+0.6</td><td>Not Significant</td></tr></table>			Receptor		Rail Noise Threshold	Calculated Rail Noise Level	Measured Baseline Noise Level (Reference location)	Cumulative Noise Level	Increase above Baseline	Significance rating of noise change from baseline	ID	Description	Daytime, dB LAeq,16hr						R015	Commercial	60	62	70 (AT10)	71	+0.6	Not Significant
Receptor		Rail Noise Threshold	Calculated Rail Noise Level	Measured Baseline Noise Level (Reference location)	Cumulative Noise Level	Increase above Baseline	Significance rating of noise change from baseline																								
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R015	Commercial	60	62	70 (AT10)	71	+0.6	Not Significant																								

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		12 exceed the threshold for Lnight. Table 15-33 shows the results for the future Operational Year 2057. For this scenario 21 of the receptors show Daytime LAeq 16hr above the criteria outlined in Table 15-15 of the report. However, of these 2 are Amenity, 2 are Education and 3 are residential. The rest are Commercial for which, it is suggested, a higher threshold of 60 dB is applicable. However, for the residential receptors it is noted that 16 exceed the threshold for Lnight. Table 15-34 presents the impact assessment for locations where the calculated rail noise levels were above the significant threshold daytime levels for the year 2057 and suggests this is a conservative case. The criteria to be applied is set out after Table 15-33 and adds the predicted rail noise level to the measured baseline to determine a cumulative noise level which is then compared to the baseline level to determine the increase. Notwithstanding the comments made earlier about the duration of the noise monitoring to establish the baseline being considered to be inadequate, the following comments are made in respect of Table 15-34."	R042	Education	55	58	54 (UT3)	59	+5.6 +5.3	Significant
			R044	Education	55	57	54 (UT3)	58-59	+4.9 +4.5	Significant
			R135	Residential	55	56	58 (UT7)	64-60	+1.9 +2.1	Slight
			R136	Residential	55	57	58 (UT7)	69 61	+2.5 +2.7	Slight
			R137	Commercial	60	64	58 (UT7)	71-65	+6.4 +6.7	Moderate
			R142	Commercial	60	62	58 (UT7)	59	+5.1 +5.4	Moderate
			R151	Residential	55	60	69 (UT8)	65-70	+0.5	Not Significant
TII confirms that the errors corrected in the table below do not alter the assessment and have no consequential interactions with other assessments.										
197	53-54	Air Quality Monitoring & Noise Control Unit: "While it is acknowledged that this Luas project is not responsible for existing noise levels and in particular has no obligation to reduce them through the project, it is questioned whether the assessment should be based on an assessment of calculated rail noise against the threshold rather than cumulative noise levels against the baseline. This would ensure that receptors are not exposed to any increases due to the introduction of this new noise source, even if those increases are considered insignificant against an existing possibly already high baseline."	"The submission queries whether it is appropriate to screen out mitigation in locations where the prevailing baseline noise level is already high and therefore the addition of Luas noise is not significant. The submission makes reference to the Noise Action Plan for Dublin, the Environmental Noise Directive (END) reporting thresholds and the World Health Organisation (WHO) 2018 Guidelines. The assessment criteria adopted for the proposed Scheme are discussed in detail in Section 15.2.4.8 of Volume 3 of the EIAR. As outlined, there are no applicable national guidelines or standards for the assessment of rail noise impacts. Therefore, reference has been made to other projects both within Ireland and in the UK to determine an appropriate approach. Importantly to ensure consistency the thresholds for the proposed Scheme are identical to those adopted by DART+ West and Metrolink. "							
198	55	Air Quality Monitoring & Noise Control Unit: "Receptors that are exposed to nighttime rail noise levels above the threshold values in Table 15-15: "When considering the location of the receptors that are seen to be exposed to nighttime rail noise levels above the threshold values in Table 15-15, it can be seen that these fall into three distinct locations; Cardiff Castle Road and two along St Margaret's Road. Excessive night-time noise can result in sleep disturbance, and it is suggested that further consideration should be given to this parameter in confirming the final mitigation measures applicable for the scheme. Furthermore, given the limited duration of measurements to establish the baseline case, combined with the high baseline values used, it is suggested that consideration should also be given to providing suitable mitigation at any locations where the rail noise threshold level (day-time or night-time) in Table 15-15 are exceeded." "However, the strategic noise maps for Round 4 do indicate that, for the Dublin City Council administrative area, as many as 48,000 and 33,300 people could be exposed to railway noise levels above SSdB Lden and 50 dB Lnight, respectively (END reporting requirements). Of these, it suggests that as many as 12,406 and 6,630 could be highly annoyed and highly sleep disturbed, respectively. It should be noted that these numbers include existing heavy rail and existing light rail (Luas). It is clear from the strategic noise mapping work and identification of these MIAs, that the best way to mitigate noise impacts is to deal with them at the planning and design stage rather than leaving mitigation to subsequent Rounds of the Environmental Noise Regulations [The Regulations] where clarity on responsibility may be unclear. Indeed the Noise Policy Statement of the Round 4 Noise Action Plan places Prevention ahead of Mitigation in respect of managing exposure to environmental noise."	Table 15-15 of Volume 3 of the EIAR sets the absolute noise thresholds adopted for the proposed Scheme. As outlined in the EIAR where operational rail noise is calculated to be below the threshold values in Table 15-15, the impact is determined to be not significant. Where operational rail noise levels are above these threshold levels, the impact rating is dependent on the magnitude above the threshold value and the increase above the baseline noise environment. Where pre-existing noise levels are already very high (well above the threshold value), a small change in noise levels may be unnoticeable. However, a larger change may cause disturbance and be significant. The scale of the impact will depend on the degree of noise change. If the ambient noise level is currently low (below the threshold), then the scale of impact is dependent on the extent to which the predicted noise levels exceed the thresholds. The change criteria and associated impact ratings are summarised in Table 15-16 of Volume 3 of the EIAR. This approach is consistent with other rail projects in Dublin and previous Luas projects. It is also reasonable to adopt this approach as often the pre-existing baseline noise environment is elevated in urban areas and therefore mitigating noise from the proposed Scheme would not offer any noticeable benefit.							
199	55	Drainage Planning, Policy & Development Control: "The submission did not include drainage drawings showing clearly the lines of demarcation between the rail drainage agency and other parties: "In the context of future responsibility and maintenance of the proposed surface water systems, the submitted documents acknowledge that maintenance of the drainage systems will be undertaken by different agencies and state that the design has incorporated delineation between the different drainage elements (EIAR Chapter 10: Water) and state that "prior to construction commencing detailed maintenance plans and responsibilities for the different agencies will be prepared". However, it is disappointing that the submission did not also include drainage drawings showing clearly the lines of demarcation between the rail drainage agency and other parties. It is very important to DCC	Drainage drawings have not formed part of previous RO submissions and were not included for that reason. However, TII recognises the importance of developing and agreeing these details with DCC. Nature based drainage solutions have been shown on the landscaping drawings in the RO application, which are fully integrated with the drainage design. A line wide set of Operation and Maintenance drawings are being prepared, based on principles previously discussed with DCC and TII Operations. These drawings will clearly define Local Authority and TII maintenance responsibilities and facilitate discussions and agreements.							

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		Environmental Protection Division that immediate and risk-free access is maintained at all times to all public surface water systems/infrastructure."	
200	56	<p>Drainage Planning, Policy & Development Control:</p> <p>"That a number of existing manholes are in close proximity/ adjacent to the proposed rail track: "DCC Environmental Protection Division operate a 24/7/365 day a year drainage maintenance service to tackle any blockages/flooding (and subsequent risks to public health) and it appears that a number of existing manholes are in close proximity/adjacent to the proposed rail track. While such concerns may be addressed in the detailed design the applicant should note that additional drainage works may be necessary to ensure arrangements for future maintenance, to the satisfaction of DCC Environmental Protection Division. These details shall be agreed prior to commencement of construction."</p>	<p>The submission seeks clarity in relation to future responsibility and maintenance of the proposed surface water systems. Dublin City Council (DCC) will be responsible for the drainage infrastructure, gullies, pipes, and attenuation within the DCC catchment area. Fingal County Council (FCC) will handle the drainage infrastructure, gullies, pipes, and attenuation within the FCC catchment area. The Dublin City Parks Department will oversee the drainage features incorporating Sustainable Drainage Systems (SuDS) elements, such as tree pits, bioretention areas, and rain gardens. Where combined sewers are present, responsibility will fall to Uisce Éireann and the Luas Operator (currently Transdev) will be responsible for the maintenance of the Luas track drainage system (extending as far as the closest downstream manhole to the track).</p> <p>During detailed design stage, drawings will be prepared that clearly convey the lines of demarcation between responsible parties.</p> <p>Concerns were also raised with regard to a number of existing manholes being located in close proximity / adjacent to the proposed railway line. It is noted on the Drainage Drawings that locations of proposed and existing drainage infrastructure are indicative. Final locations are to be determined during the detailed design phase. Access arrangements for future maintenance will be agreed with DCC EPD prior to the commencement of construction.</p>
201	56	<p>Drainage Planning, Policy & Development Control:</p> <p>"The proposed mitigation measure are not entirely clear and the approach to the ICW mitigation measures seems to contain contradictory statements: "The proposed mitigation measures are not entirely clear and the approach to the ICW mitigation measures seems to contain contradictory statements. Appendix A10.4: Integrated Constructed Wetland Mitigation and Works Proposal notes that "there is limited scope to expand the existing treatment area to offset the loss from the proposed LUAS project" however the mitigation measures include for expansion of Cell 1 to the north and south. It is not clear that this proposed expansion compensates adequately for the area of lost habitat. The same appendix also observes that the existing embankments provide the required area for safe access and maintenance; and the embankments also serve as flood protection for the ICW during storm events. It is unclear how the proposed Cell 1 expansion works would retain these functions when moved closer to the River Tolka. Increasing the area of Cell 1 to the south may also reduce the width of the existing riparian zone."</p>	<p>Integrated Constructed Wetland</p> <p>The proposed Scheme will directly impact the Integrated Constructed Wetland (ICW) due to the loss of treatment area within Cell 1 as a result of overshadowing from the proposed bridge. To compensate for this loss, Cell 1 will be slightly extended to both the north and south. The report confirms that the implementation of the ICW approach ensures that there would be no net loss in habitat within the ICW footprint.</p> <p>Inconsistencies in the drainage drawings are acknowledged. Specifically, the surface water pipe from the Finglaswood Stream is absent from Drainage Drawing LDD101-BEV-GA-GZ31-XX-DR-CD-00101, however, its location is correctly depicted in Figure 10-5 of EIAR Chapter 10 (Water). This surface water pipe will direct surface water flow from the Finglaswood Stream, join another surface water pipe conveying flows from the proposed attenuation pond, before outfalling to Cell 1. These inconsistencies in the Drainage Drawings will be remedied during the detailed design stage.</p> <p>The location of the existing surface water connection has also been queried. To clarify, the 'Finglaswood Stream Connection Point' labelled in Drainage Drawing LDD101-BEV-GA-GZ31-XX-DR-CD-00101 refers to the proposed location of the outfall as part of the proposed Scheme. Under the current scenario, a surface water pipe connects the Finglaswood Stream, connecting to the existing culvert at a manhole approximately 50m from the northern corner of the Council Depot (visible on Google Maps Satellite Imagery). This pipe is routed along the path to the northeast of the Council depot before entering Cell 1 in the northeastern corner of the treatment area.</p> <p>An outline of the proposed works to facilitate the proposed Scheme is provided below for clarity:</p> <ul style="list-style-type: none"> Before commencing works on the ICW, the condition of the connecting pipe between the Finglaswood Stream and the ICW will be inspected for cracks or damage. It must be confirmed that the pipe is functioning adequately and that the mechanism transferring DWF to the ICW is in working order. The ICW should receive all DWF from the Finglaswood Stream and resume using the primary culvert where flows exceed 35l/s, or a maximum flow rate based on the maximum treatment area. During construction, feed waters from the ICW inlet will be overpumped to the open water section of the pond downstream of ICW Cell 2B. Cell 1 of the ICW will be expanded to the north and south, along with the associated extension of the clay liner. The surface water connection between the Finglaswood Stream and the ICW will be repositioned. The inlet pipe, currently in line with the proposed Luas extension in the north-eastern extents of Cell 1, will be relocated along the northern boundary of Cell 1, adjacent to the new compensatory storage area. Flows from the drainage system of the proposed Scheme will be passed through a new attenuation pond before entering the ICW. These flows will be limited to the greenfield runoff rate and discharged to the ICW via the new surface water connection. Unsuitable plant species within the ICW, such as Common Reed and terrestrial vegetation, will be removed. Accumulated solids should be removed and disposed. The treatment cell shall be levelled, and fresh topsoil applied and fully replanted with appropriate species for biodiversity.

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			<ul style="list-style-type: none"> After removing Phragmites and other terrestrial plant species, the same areas will be replanted with <i>Glyceria maxima</i> and <i>Carex riparia</i> to optimise treatment efficiency. Additional planting, such as <i>Typha latifolia</i>, can be used to break up sightlines, but <i>Typha</i> should not be planted in areas overshadowed by the proposed Luas line. Willow trees along the inside of the southern boundary will be removed, and the stumps/stems appropriately treated to avoid damage to the cell embankment integrity. Minimal flows will be reinstated to ensure vegetation success, with the majority of flows from the Finglaswood Stream continuing to be overpumped, allowing only minimal flow through the ICW until such time that the newly planted vegetation is sustained. Once the newly planted vegetation is established, the ICW will return to a gravity-fed system, receiving flows from the Finglaswood Stream and the newly installed attenuation pond. Monitoring of ICW establishment. <p>The inclusion of the new attenuation pond, widening of Cell 1, and the relocation of the surface water connection are considered modifications to the existing ICW arrangement and have been included within the red line boundary of the proposed Scheme accordingly.</p> <p>The ICW has received limited maintenance over the past 25 years. With the proposed Scheme necessitating works on the ICW, there is an opportunity to carry out refurbishment works on other elements of the ICW (including those outside the red line boundary for the proposed Scheme) to ensure sustained performance into the future. The proposed remediation measures on the existing ICW elements are outlined below:</p> <ul style="list-style-type: none"> Removal of accumulated silt from three cells of the ICW. Clearing of pipes connecting Cells 1 to 2A and 2A to 2B, and 2B to open water pond. Trees and root networks within Cell 2B will be removed, and the clay liner will be repaired. The embankment and pipe connection between Cell 2B and the open water pond will be reconstructed. Cell 2b requires remediation works to correct issues with the embankments between the ICW and the open water pond. There are fallen trees within the cell, resulting in obstructed flow pathways and reduced treatment area. The interconnecting pipework between the cell and pond is also blocked, forcing through-flowing waters to spill over the embankment into the pond, rather than its designed method. Fallen trees within Cell 2B will be cut and removed off-site. Additional trees within the cell will be removed while ensuring the integrity of the cell base liner is not damaged. The dividing embankment between Cell 2 and the open water pond will be rebuilt and widened to provide an access path along the top of the embankment. Pipework between Cell 2B and the open water pond will be extended to accommodate the additional width of the embankment, cleared of debris, and fitted with an elbow bend for water level and flow control. <p>These measures are intended to be carried out ahead of works on the proposed Scheme, forming part of an advance works contract which will be completed prior to the commencement of the main works contract for the proposed Scheme.</p> <p>For clarity and completeness, the measures outlined in Figure 10-6 of EIAR Chapter 10 (Water) will also be employed during the construction period to minimise impacts to the ICW as a result of the proposed Scheme.</p> <p>The width of the resultant embankment separating the Cell 1 from the River Tolka is considered sufficient to retain the existing functions of the embankment. Retaining adequate space to allow for the safe access of machinery for maintenance and providing flood protection was a key consideration in developing the proposals.</p> <p>The report (Volume 5 - Appendix A10.4) also notes that the elevated embankments serve as flood protection during flood events. The annotation illustrates the area of the embankment that will be regraded as part of the excavations for the additional storage areas, confirming that the height of the embankment that bounds to the River Tolka will not be modified and will retain its current level of protection during heavy flood events.</p> <p>As outlined above, the interconnecting pipework between Cell 2 and the open water pond is blocked and forcing through-flowing waters to spill over the embankment between Cell 2 and the open water pond in its current state. As part of the proposed improvements to the existing ICW elements, this embankment will be reconstructed to include a pedestrian pathway at the top and will include sloped access to the inlet/outlet pipes. This width will allow for safe pedestrian access around the ICW for future inspections or maintenance.</p> <p>The proposed works will offset the lost treatment area, ensuring that the ICW is capable of providing improved passive treatment of through-flowing waters. These works will also improve access across the ICW for operations, maintenance and sampling works.</p>

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			The Luas Team welcomes further engagement with DCC during the detailed design phase to ensure that the proposed works on the ICW and long-term maintenance will be agreed to the satisfaction of DCC EPD prior to the commencement of construction
202	57	<p>Drainage Planning, Policy & Development Control:</p> <p>"Inconsistencies between the Drainage design Drawings A10.5, Figure 10.5 (A10.4) and the written descriptions of the proposed mitigation measures. The submitted drawings do not fully demonstrate the ICW proposals: " It was not possible to locate a definitive detailed drawing within the submission of the proposed works.</p> <p>in the ICW and Tolka Valley Park area. There also seem to be inconsistencies between the Drainage Design Drawings (EIAR Appendix A10.5), Figure 10.5 (EIAR Appendix A10.4) and the written descriptions of the proposed mitigation measures. The submitted drawings do not fully demonstrate the ICW proposals."</p>	Please refer to response in item 219 above.
203	57	<p>Drainage Planning, Policy & Development Control:</p> <p>"It is not clear where the surface water connections is to be relocated to it is not shown on the drainage Design Drawings: "It is not clear where the surface water connection is to be relocated to; it is not shown on the Drainage Design Drawings."</p>	Please refer to response in item 219 above.
204	58	<p>Drainage Planning, Policy & Development Control:</p> <p>"ICW Pumping and discharging: "Where the existing ICW system works by gravity, without the need for electricity and little maintenance, it appears the mitigation measures propose pumping as a permanent solution. No further detail is provided. The proposal also seems to suggest that flow from the Finglaswood Stream will now bypass the ICW altogether by being pumped downstream and discharging into the open pond. In the absence of drainage layout drawings, it is difficult to comprehend the proposed measure. The basic principles must be clarified in relation to the ICW works. "</p>	<p>The proposed Scheme will directly impact the Integrated Constructed Wetland (ICW) due to the loss of treatment area within Cell 1 as a result of overshadowing from the proposed bridge. To compensate for this loss, Cell 1 will be slightly extended to both the north and south. The report confirms that the implementation of the ICW approach ensures that there would be no net loss in habitat within the ICW footprint.</p> <p>Inconsistencies in the drainage drawings are acknowledged. Specifically, the surface water pipe from the Finglaswood Stream is absent from Drainage Drawing LDD101-BEV-GA-GZ31-XX-DR-CD-00101, however, its location is correctly depicted in Figure 10-5 of EIAR Chapter 10 (Water). This surface water pipe will direct surface water flow from the Finglaswood Stream, join another surface water pipe conveying flows from the proposed attenuation pond, before outfalling to Cell 1. These inconsistencies in the Drainage Drawings will be remedied during the detailed design stage.</p> <p>The location of the existing surface water connection has also been queried. To clarify, the 'Finglaswood Stream Connection Point' labelled in Drainage Drawing LDD101-BEV-GA-GZ31-XX-DR-CD-00101 refers to the proposed location of the outfall as part of the proposed Scheme. Under the current scenario, a surface water pipe connects the Finglaswood Stream, connecting to the existing culvert at a manhole approximately 50m from the northern corner of the Council Depot (visible on Google Maps Satellite Imagery). This pipe is routed along the path to the northeast of the Council depot before entering Cell 1 in the northeastern corner of the treatment area.</p> <p>An outline of the methodology to modify the ICW and facilitate the proposed Scheme is provided below for clarity, and as noted below the proposal was provided by the original schme providers (VESI) and agreed in principle with DCC:</p> <ul style="list-style-type: none"> Before commencing works on the ICW, the condition of the connecting pipe between the Finglaswood Stream and the ICW will be inspected for cracks or damage. It must be confirmed that the pipe is functioning adequately and that the mechanism transferring DWF to the ICW is in working order. The ICW should receive all DWF from the Finglaswood Stream and resume using the primary culvert where flows exceed 35l/s, or a maximum flow rate based on the maximum treatment area. During construction, feed waters from the ICW inlet will be over-pumped to the open water section of the pond downstream of ICW Cell 2B. Cell 1 of the ICW will be expanded to the north and south, along with the associated extension of the clay liner. The surface water connection between the Finglaswood Stream and the ICW will be repositioned. The inlet pipe, currently in line with the proposed Luas extension in the north-eastern extents of Cell 1, will be relocated along the northern boundary of Cell 1, adjacent to the new compensatory storage area. Flows from the drainage system of the proposed Scheme will be passed through a new attenuation pond before entering the ICW. These flows will be limited to the greenfield runoff rate and discharged to the ICW via the new surface water connection. Unsuitable plant species within the ICW, such as Common Reed and terrestrial vegetation, will be removed. Accumulated solids should be removed and disposed. The treatment cell shall be levelled, and fresh topsoil applied and fully replanted with appropriate species for biodiversity.

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			<ul style="list-style-type: none"> After removing Phragmites and other terrestrial plant species, the same areas will be replanted with <i>Glyceria maxima</i> and <i>Carex riparia</i> to optimise treatment efficiency. Additional planting, such as <i>Typha latifolia</i>, can be used to break up sightlines, but <i>Typha</i> should not be planted in areas overshadowed by the proposed Luas line. Willow trees along the inside of the southern boundary will be removed, and the stumps/stems appropriately treated to avoid damage to the cell embankment integrity. Minimal flows will be reinstated to ensure vegetation success, with the majority of flows from the Finglaswood Stream continuing to be overpumped, allowing only minimal flow through the ICW until such time that the newly planted vegetation is sustained. Once the newly planted vegetation is established, the ICW will return to a gravity-fed system, receiving flows from the Finglaswood Stream and the newly installed attenuation pond. Monitoring of ICW establishment. The inclusion of the new attenuation pond, widening of Cell 1, and the relocation of the surface water connection are considered modifications to the existing ICW arrangement and have been included within the red line boundary of the proposed Scheme accordingly. The ICW has received limited maintenance over the past 25 years. With the proposed Scheme necessitating works on the ICW, there is an opportunity to carry out refurbishment works on other elements of the ICW (including those outside the red line boundary for the proposed Scheme) to ensure sustained performance into the future. The proposed remediation measures on the existing ICW elements are outlined below: <ul style="list-style-type: none"> Removal of accumulated silt from three cells of the ICW. Clearing of pipes connecting Cells 1 to 2A and 2A to 2B, and 2B to open water pond. Trees and root networks within Cell 2B will be removed, and the clay liner will be repaired. The embankment and pipe connection between Cell 2B and the open water pond will be reconstructed. Cell 2b requires remediation works to correct issues with the embankments between the ICW and the open water pond. There are fallen trees within the cell, resulting in obstructed flow pathways and reduced treatment area. The interconnecting pipework between the cell and pond is also blocked, forcing through-flowing waters to spill over the embankment into the pond, rather than its designed method. Fallen trees within Cell 2B will be cut and removed off-site. Additional trees within the cell will be removed while ensuring the integrity of the cell base liner is not damaged. The dividing embankment between Cell 2 and the open water pond will be rebuilt and widened to provide an access path along the top of the embankment. Pipework between Cell 2B and the open water pond will be extended to accommodate the additional width of the embankment, cleared of debris, and fitted with an elbow bend for water level and flow control. <p>These measures are intended to be carried out ahead of works on the proposed Scheme, forming part of an advance works contract which will be completed prior to the commencement of the main works contract for the proposed Scheme.</p> <p>For clarity and completeness, the measures outlined in Figure 10-6 of EIAR Chapter 10 (Water) will also be employed during the construction period to minimise impacts to the ICW as a result of the proposed Scheme.</p> <p>The width of the resultant embankment separating the Cell 1 from the River Tolka is considered sufficient to retain the existing functions of the embankment. Retaining adequate space to allow for the safe access of machinery for maintenance and providing flood protection was a key consideration in developing the proposals.</p> <p>The report (Volume 5 - Appendix A10.4) also notes that the elevated embankments serve as flood protection during flood events. The annotation illustrates the area of the embankment that will be regraded as part of the excavations for the additional storage areas, confirming that the height of the embankment that bounds to the River Tolka will not be modified and will retain its current level of protection during heavy flood events.</p> <p>As outlined above, the interconnecting pipework between Cell 2 and the open water pond is blocked and forcing through-flowing waters to spill over the embankment between Cell 2 and the open water pond in its current state. As part of the proposed improvements to the existing ICW elements, this embankment will be reconstructed to include a pedestrian pathway at the top and will include sloped access to the inlet/outlet pipes. This width will allow for safe pedestrian access around the ICW for future inspections or maintenance.</p> <p>The proposed works will offset the lost treatment area, ensuring that the ICW is capable of providing improved passive treatment of through-flowing waters. These works will also improve access across the ICW for operations, maintenance and sampling works.</p>

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			The Luas Team welcomes further engagement with DCC during the detailed design phase to ensure that the proposed works on the ICW and long-term maintenance will be agreed to the satisfaction of DCC EPD prior to the commencement of construction.
205	58	<p>Drainage Planning, Policy & Development Control:</p> <p>“DCC EPD were led to believe that key issues such as the ICW and long-term maintenance of infrastructure near the tracks would be agreed/resolved before a RO was submitted but this was not done. As such this application would be regarded as premature: “It is acknowledged that DCC Environmental Protection Division (EPD) participated in discussions for this project and there was a long period of consultation with TII. However, DCC EPD were led to believe that key issues such as the ICW and long-term maintenance of infrastructure near the tracks would be agreed/ resolved before a RO was submitted but this was not done. As such, this application would be regarded as premature. While DCC EPD are supportive of strategic infrastructure proposals, issues are evident in the submitted documentation, and it is preferable that these items are resolved and clarity sought prior to a grant being considered. The ICW performs an important environmental function, and the level of detail provided to support the application from a surface water perspective is unsatisfactory. DCC EPD would not be in a position at this point to recommend the application based on the submitted documentation, however, should consideration be given to granting approval then the following conditions set out below.”</p>	<p>TII welcomes the DCC drainage department's expression of support for development of strategic infrastructure proposals, which ultimately will help the state deliver its climate and environmental ambition. TII confirms that discussions are ongoing with DCC regarding the ICW and long-term maintenance boundaries and responsibilities. In fact, the methodology proposed was developed by VESI, the original ICW designers and suppliers. TII presented a report to DCC on this methodology and it was approved in principle at that point.</p> <p>TII notes the current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. TII will continue to engage in dialogue with DCC on this matter during the detailed design development and construction stages. Please also refer to response in Item No.204 above.</p>
206	58	<p>Active Travel Programme Office:</p> <p>“The proposed cross section widths are in the order of 1.85m for the cycle track with a 0.25m to 0.30m buffer. These facilities are slightly below the desirable minimum widths in the Cycle Design Manual: “The proposed cross section widths are in the order of 1.85m for the cycle track with a 0.25m to 0.3m buffer. These facilities are slightly below the desirable minimum widths in the Cycle Design Manual (CDM). Given that the existing parallel parking along the street appears to have been removed in these proposals, it is felt that the desirable minimum widths in the CDM of 2.0m cycle track with an associated 0.5m buffer should be achievable. Notwithstanding this, the proposals for Finglas to Killester Cycle Scheme should be able to tie-in safely with these active travel proposals.”</p>	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023. The proposals for Finglas to Killester Cycle Scheme will be reviewed at detailed design stage to tie-in safely with these active travel proposals.
207	58	<p>Active Travel Programme Office</p> <p>“The bus stop facilities on Mellowes road appear to be sub-standard: “More generally, the bus stop facilities on Mellowes Road appear to be sub-standard. The westbound bus stop outside the Garda Station proposes an arrangement whereby cyclists and pedestrians are forced to intersect at a shared use area (although this appears to called a footpath in the legend) which appears unsafe.”</p>	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to bus stop facilities on Mellowes Road.
208	59	<p>Active Travel Programme Office:</p> <p>“There is no warning tactile paving in the footpath to warn visually impaired pedestrians that they are entering an area where they may come into conflict with cyclists: “There is no warning tactile paving in the footpath to warn visually impaired pedestrians that they are entering an area where they may come into conflict with cyclists. Exacerbating this potential issue is the location of the bus shelter at the back of the footpath, forcing bus patrons to potentially have to cross the cyclists' direction of travel. Pedestrians are likely to have to make this movement quickly when a bus is arriving increasing the likelihood of a collision between pedestrians and cyclists still further.”</p>	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to bus stop facilities.
209	59	<p>Active Travel Programme Office:</p> <p>“The location of the bus shelter at the back of the footpath, forcing bus patrons to potentially have to cross the cyclist's direction of travel. Pedestrians are likely to have to make this movement quickly when a bus is arriving increasing the likelihood of a collision between pedestrians and cyclists: “The same arrangement exists on the eastbound bus stop with cyclists and pedestrians being forced to cross each other's path. In this location the bus shelter is on the carriageway side of the cycle track which is preferable however the arrangement still appears unsafe. At both bus stops this shared area / footpath occurs where cyclists are negotiating a horizontal bend meaning their attention may be divided between safely negotiating this bend and avoiding pedestrians (notwithstanding the fact cyclists are required to yield to pedestrians in these proposals). Furthermore, it appears the cycle lanes and footpaths/ bus stops are at grade which, if the case, means pedestrians could cross the cycle track at any location in the vicinity of the bus stop again increasing</p>	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to bus stop facilities and with regard to ensuring a level difference between cycle track and footpath.

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		the likelihood of collisions between these two sets of road users. The proposed bus stop facilities should be reviewed with a view to bringing these in line with TL114 of the COM."	
210	59	Active Travel Programme Office: "The same arrangement exists on the eastbound bus stop with cyclist and pedestrians being forced to cross each other's paths: "Furthermore it appears the cycle lanes and footpaths/ bus stops are at grade which, if the case, means pedestrians could cross the cycle track at any location in the vicinity of the bus stop again increasing the likelihood of collisions between these two sets of road users. The proposed bus stop facilities should be reviewed with a view to bringing these in line with TL114 of the COM."	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to bus stop facilities and with regard to ensuring a level difference between cycle track and footpath.
211	59	Active Travel Programme Office: "Crossing facilities at either side of the junction with the LRVs tracks on Mellowes Road are only 2.8m wide: "It is noted that crossing facilities are provided either side of the junction with the LRV tracks on Mellowes Road. These crossings are only 2.8 wide. At a minimum these should be toucan crossings at 4m in width (not preferred). Ideally these would be fully segregated parallel pedestrian and cyclist crossings in accordance with TL606 of the COM (preferred)."	TII confirms that at the detailed design stage the improvement of the design and operation of these crossings can be further considered.
212	59	Active Travel Programme Office: "The junction of McKee Ave and St Margaret's Road are missing stop lines in some locations on the circulatory cycle lanes and additional road markings are needed to make it clear how to circumnavigate the junction: "The tie-in on McKee Avenue at the junction of McKee Avenue and St Margaret's Road proposes 2m wide cycle tracks uni-directional cycle tracks with 0.3m buffers. This is a good level of provision and we do not foresee there being issues to tie-in in with the Finglas to Killester Cycle Scheme."	TII confirms that it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to road markings.
213	59	Active Travel Programme Office: "Mid-block Toucan crossing proposed approximately midway between McKee Avenue and McKelvey Road: "The junction of McKee Avenue and St Margaret's Road provides for cyclist movements in all directions however it is noted that stop lines are missing in some locations on the circulatory cycle lanes and additional road markings are needed (primarily arrows) to make it clear to cyclists how to circumnavigate the junction. The locations of these missing stop lines are highlighted under Figure 2 below." "There is a mid-block Toucan crossing proposed approximately midway between McKee Avenue and McKelvey Road which should be a fully segregated, parallel pedestrian and cyclist crossing (COM TL606)."	TII confirms that it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to road markings. The form of the proposed mid-block crossing can be reviewed at detailed design stage with a view to introducing full segregation.
214	60	Travel Advisory Group: "See Page 61-62 for all the conditions set out: "Below are some general comments from the Transport Advisory Group (TAG) and ITS (Traffic Signals) Section. More detailed site-specific commentary is provided in the attached appendix. Final detailed design for road layouts, signing and lining and traffic signals shall be agreed in writing with E& T Department prior to commencement of the works. A condition is recommended below in this regard. Tactile paving shall be provided at end of cycle lanes and footpaths crossing cycle lanes, as per Cycle Design Manual (CDM)."	TII confirms that it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual, in particular in relation to tactile paving.
215	61-62	"Tactile paving shall be provided for pedestrians crossing cycle lanes and LUAS track."	TII confirms that it is the intention of the proposed Scheme to provide tactile paving at pedestrian crossings as appropriate.
216	62	"All 'Stop' lines directly after turns to be Road Safety Audited or removed as these are not to the standard as set out in the Construction Standards for Road and Street Works in Dublin City Council."	TII confirms that it is the intention of the proposed Scheme for this to be addressed at detailed design stage.
217	62	"More details are needed at crossing points (especially at the uncontrolled ones) where pedestrians may conflict with cyclists."	TII confirms that it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023 and this will include footpath/cycle track crossings.
218	62	"A Vehicle Swept Path Analysis should be carried out for all junctions to ensure safe turning for large vehicles."	Vehicle Swept Path Analysis has been used to inform the preliminary design. This will be reviewed as part of the detailed design process.
219	62	"Road Safety Audits are required"	A Stage 2 Road Safety Audit will be carried out as part of the detailed design.
220	62	"Rescinding of old Statutory Orders (Stats) and creation of new Stats through Statutory Process"	Noted.

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221	62	"Adherence to all standards and guidance such as the Construction Standards for Road and Street Works in Dublin City Council, Traffic Signs Manual (Government of Ireland), Design Manual for Urban Road and Streets, Cycle Design Manual"	Detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council, Traffic Signs Manual (Government of Ireland), Design Manual for Urban Road and Streets, Cycle Design Manual. TII looks forward to continued engagement on these issues.
222	62	"Public Lighting columns are indicated in sections along the route. The lights are indicative only and no detailed lighting designs have been submitted for approval. The detailed designs should show lights, ducts & cable chambers, cables, circuits, supplies and so on."	TII confirms that it is the intention of the proposed Scheme for this to be addressed at Detailed Design stage. TII looks forward to continued engagement on these issues.
223	62	"There doesn't appear to be anything indicating how existing street lighting may be affected by the works and how that will be dealt with."	TII confirms that it is the intention of the proposed Scheme for this to be addressed at Detailed Design stage.
224	62	"Some of the drawings show trees right beside lights. This needs to be considered in the detailed design so that the trees don't have a blocking effect on the lights."	TII confirms that it is the intention of the proposed Scheme for this to be addressed at Detailed Design stage.
225	62	"It isn't clear whether or not all proposed lights can be maintained from a truck mounted hoist. A number of lights are shown in green areas so are they accessible using a hoist. If not raising and lowering columns will be required."	TII confirms that it is the intention of the proposed Scheme for this to be addressed at Detailed Design stage. The type of lighting columns used in green areas will be by agreement with DCC.
226	62	Luas Station Lights: "These will be maintained by the Luas operator and must be completely separate from the general public lighting. This means Luas Station lights must be on separate electrical supplies, cables and so on with no connection to the general public lighting. This needs to be made clear on the drawings."	TII confirms that it is the intention of the proposed Scheme for this to be addressed at Detailed Design stage.
227	62	"Lighting designs to be carried out by a competent lighting designer and electrical designer and need to comply with our general specification for Public Lighting."	The preliminary design has been undertaken by a suitably qualified lighting engineer. TII confirms that it is the intention of the proposed Scheme for this to be addressed at Detailed Design stage.
228	62	"The installation must be carried out by a specialist public lighting contractor."	TII confirms that it is the intention of the proposed Scheme for this to be addressed at construction stage.
229	62	Liaison between Transport Infrastructure Ireland and Dublin City Council: "1. Transport Infrastructure Ireland shall proactively liaise with Dublin City Council at all stages of the Project including from detailed design through construction to handover phases. Prior to commencement of development, an agreed programme for liaison including a schedule of regular meetings shall be agreed in writing with Dublin City Council."	TII is committed to facilitating ongoing engagement with DCC throughout the duration of the project.
230	62	Handover: "2. Prior to commencement of any works, a formal Handover Procedure Agreement shall be agreed with Dublin City Council and put in place for all works to be undertaken on public lands. This procedure shall be carried out on any section of work as soon as it is completed. A global handover of all works at the end of the construction period shall not be permitted. As built drawings of each section of the finished works shall be provided in A1 sized hard copy to an appropriate scale and also in electronic format compatible with DCC's current version of Microstation. These as built drawings shall include details of any new services and alterations to existing services. Drawings shall also be provided showing exactly what areas are to be in DCC's charge."	TII is committed to facilitating ongoing engagement with DCC throughout the duration of the project.
231	62	Existing Condition Record: "3. A photographic record of all areas in Dublin City Council's control to be affected by the scheme works shall be provided to Dublin City Council prior to the commencement of any work."	TII is committed to facilitating ongoing engagement with DCC throughout the duration of the project.
232	62	"4. Drawings distinguishing between antique granite footways and kerbs and new granite footways and kerbs shall be submitted as part of detailed design development of approved scheme."	No antique granite footways or kerbs were identified within the proposed Scheme boundary. TII agrees to continued engagement with DCC in relation to the detailed design including material finishes
233	62	Roads Design & Construction: "5. Final details (including materials, finishes, sizes, gradients, levels and drainage) of all junctions, carriageways, islands, buildouts and footways as well as all signal/traffic light infrastructure shall be agreed with Dublin City Council prior to construction."	TII will continue to engage with DCC in relation to the detail design and specification of hard landscape materials. Please refer to engineer for carriageway specification.
234	62	"6. New roads and alterations to existing roads shall comply with "Technical Acceptance of Road Structures on Motorways and Other National Roads DN-STR-03001 April 2019"."	Detailed design will be based on appropriate national and local authority standards including but not limited to Technical Acceptance of Road Structures on Motorways and Other National Roads DN-STR-03001 April 2019.

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235	62	“7. The new access road through Jamestown Industrial Estate to serve existing businesses along St. Margaret's Road shall be designed to include pedestrian and cyclist priority including crossings, in line with the requirements of the Jamestown Masterplan.”	TII is committed to continued engagement with DCC and proposes further discussions on the design of the proposed new access road through Jamestown Industrial Estate, during the detailed design stage.
236	62	“8. Road Safety Audits shall be carried out for any new roads and each existing public road that is to be modified as part of the scheme works at appropriate stages throughout the design of each individual scheme.”	Road Safety Audits will be carried out at appropriate stages throughout the design of each individual scheme.
237	63	“9. The alignment of any new or altered roads included as part of the Project shall be designed so as ensure that all longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways are in accordance with those specified in "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.”	The detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council in relation to longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways.
238	63	“10. Pedestrian and cyclist connectivity to and within stations shall be improved as part of the scheme including as part of bridge works. Details to be agreed with Dublin City Council at detailed design stage. The Project shall ensure that principles of universal design are adhered to and accessibility requirements are met throughout the Project.”	TII is committed to continued engagement with DCC and is agreeable to engaging in further discussion on the design of proposed pedestrian and cyclist connectivity to and within stations, during the detailed design stage.
239	63	“11. Any alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage poles shall be agreed with E& T Department at detailed design stage.”	TII is committed to continued engagement with DCC E&T Department and is agreeable to engaging in further discussion on any alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage poles, during the detailed design stage.
240	63	12. All signage and road markings to comply with the Traffic Signs Manual.”	Noted and agreed. The Traffic Signs Manual will be complied with.
241	63	“13. Prior to commencement of works, TII shall consult with the Roads Design and Construction Division of Dublin City Council regarding all works that impact on bridges within Dublin City's jurisdiction. All works to bridges shall align with best practice as set out in TII Publications (Standards and Technical).”	TII is committed to continued engagement with DCC Roads Design and Construction Division and is agreeable to engaging in further discussion on all works that impact on bridges within Dublin City's jurisdiction during the detailed design stage and works to bridges shall be to TII Publications (Standards and Technical).
242	63	Reinstatement & Maintenance: “14. All reinstatement work in areas to be taken in charge shall be carried out in accordance with "Construction Standards for Road and Street Works in Dublin City Council" unless otherwise agreed with DCC.”	Noted and agreed.
243	63	“15. The extent and type of the reinstatement required shall be agreed with DCC prior to commencement of any work on site. This shall be shown on drawings and signed off on by both parties.”	Noted and agreed.
244	63	“16. Detailed drawings should be prepared and forwarded to Dublin City Council, setting out proposed construction details for any works to the public realm to include proposed materials and construction details.”	Noted and agreed.
245	63	“17. All proposed upgrade works that involve changes or additions to the existing public realm, including alterations to the carriageway, footpaths, drainage systems, traffic infrastructure, public lighting etc. shall be completed in accordance with "Construction Standards for Road and Street Works in Dublin City Council" and in accordance with the 'Guidelines for Managing Openings in Public Roads', published by the Department of Transport”	Noted and agreed.
246	63	“18. Where applicable samples of all new natural stone kerbs, flags and setts to be used in reinstatement and/or upgrade works shall be supplied to DCC for agreement prior to use.”	Noted and agreed.
247	63	“19. Regarding bridge structures along the route, prior to commencement of works TII and Dublin City Council shall agree in writing details regarding ownership and maintenance of bridges.”	Noted and agreed.
248	64	Construction Period: “20. Prior to commencement of works, TII shall engage with Dublin City Council to agree an overall Traffic Plan for all project works including phasing of works, road closures and diversions etc. and which addresses the cumulative impact on traffic for the whole city. TII shall continually liaise with Dublin City Council during construction through an agreed schedule of regular meetings.”	Please refer to Luas Finglas EIAR 2024 Chapter 6 – Construction Activities and Appendix A6.2 - CTMP.
249	64	“21. All roadworks shall be carried out in accordance with the current edition of Dublin City Council' s Directive for the Control and Management of Roadworks in Dublin City unless otherwise agreed with DCC.”	Please refer to Luas Finglas EIAR 2024 Chapter 6 – Construction Activities and Appendix A6.2 - CTMP.

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250	64	“22. In cases of reinstatement of areas where the roadway or footway is not being reconstructed in full (e.g. trench for utility alongside street) TII or their Contractor shall pay DCC long term impact charges as set out in the 'Guidelines for Managing Openings in Public Roads', published by the Department of Transport.2	Please refer to Luas Finglas EIAR 2024 Chapter 6 – Construction Activities and Appendix A6.2 - CTMP.
251	64	“23. All antique setts if removed as part of the works shall be cleaned, stored on pallets by the contractor and reinstated in the carriageway to DCC's specification if required by DCC unless otherwise agreed with Dublin City Council.”	Noted and agreed.
252	64	“24. All existing and antique natural stone kerbs and flags, if removed without damage as part of the works, shall be cleaned, stored on pallets by the contractor and reinstated in the footway to DCC's specification.”	Noted and agreed.
253	64	“25. Specific areas and infrastructure to be taken in charge shall be agreed in writing with Dublin City Council.”	Noted and agreed. Please also refer to response provided to Item No.43 above.
254	64	“26. Where relevant works should comply with Dublin City Council's procedure for 'Ground Anchors Installations' shall be adhered to as contained at https://www.dublincity.ie/residential/transportation/apply-licence-or-permit/groundanchor-i installation.”	Noted and agreed.
255	64	Air Quality: “27. The assessment methodology, mitigation measures and monitoring procedures detailed in Chapter 13: (Air Quality) of the Environmental Impact Assessment shall be adhered to. The cumulative effects of all activities on site shall be considered at all times.”	TII will ensure full compliance with the assessment methodology, mitigation measures, and monitoring procedures set out in Chapter 13 of the Environmental Impact Assessment. TII will also continuously assess the cumulative effects of all site activities to maintain best practices and meet regulatory requirements.
256	64	“28. The commitment to carry out Dust Deposition, Particulate Monitoring (PM10, PM2.5) and NO2 monitoring indicated in Chapter 13 (Air Quality) of the Environmental Impact Assessment shall be adhered to. The type, location and number of monitors must be agreed with Dublin City Council prior to installation. The results of the monitoring shall be made available to Dublin City Council on request in an agreed format. Should exceedances be recorded (as outlined in the assessment methodology), mitigation measures shall be adapted to ensure limits are complied with.”	Noted and agreed.
257	64	Noise and Vibration: “29. The assessment methodology, mitigation and monitoring procedures detailed in Chapter 15: (Noise & Vibration) of the Environmental Impact Assessment shall be adhered to. The cumulative effects of all activities on site shall be considered at all times. Should exceedances be recorded, (as outlined in the assessment methodology), mitigation measures shall be adapted to ensure limits are complied with.”	TII will ensure full compliance with the assessment methodology, mitigation measures, and monitoring procedures set out in Chapter 15 of the Environmental Impact Assessment. TII will also continuously assess the cumulative effects of all site activities to maintain best practices and meet regulatory requirements.
258	65	“30. The commitment to carry out noise and vibration monitoring indicated in Chapter 15: (Noise & Vibration) the Environmental Impact Assessment shall be adhered to. The type, location and number of monitors must be agreed with Dublin City Council prior to installation. The results of the monitoring shall be made available to Dublin City Council on request in an agreed format. Should exceedances be recorded (as outlined in the assessment methodology), mitigation measures shall be adapted to ensure limits are complied with.”	Noted and agreed.
259	65	Community Engagement and Notification Procedures “31. The community engagement procedures detailed in the Environmental Impact Assessment shall be adhered to.”	Noted and agreed. It will be a condition of the Works Requirements that the successful contractor effectively implements all the applicable measures identified in this EIAR and any additional measures required pursuant to conditions imposed by the Board to a grant of approval.
260	65	“32. A Community Liaison Officer shall be nominated to engage with the local residents/businesses, and relevant authorities. Contact details including an out of hours contact shall be provided to the local residents and businesses. The Community Liaison Officer shall manage complaints and the communication of site information. Regular updates via email/newsletter at appropriate intervals shall be provided to all neighbours/businesses likely to be impacted.”	Noted and agreed.
261	65	Out of Hours Work Notification “33. Out of hours work shall require prior notification. At least 4 days' notice shall be given to the Dublin City Council when applying for extensions to normal working hours. Out of hours work shall not be undertaken unless prior approval has been granted. The applicant shall demonstrate in writing that the out of hours work required cannot be carried out during normal working hours. A Work Method Statement must be submitted with the application. The Statement must address the following; <ul style="list-style-type: none"> The dates and times of the proposed work. 	Noted and agreed.

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		<ul style="list-style-type: none"> The nature of the work detailing all of the noisy equipment that will be used. An estimation of the noise levels that will be generated. What sensitive receptors will be impacted based on the estimated noise level and details of the notification to residents that will take place. The mitigation measures proposed to minimise noise/disturbance." 	
262	65	"The advance notification to residents impacted by out of hours works shall detail the nature of the works, why the works are necessary, the duration, date and times. Only works associated with the out of hour's permission shall take place during the extended permission period."	Noted and agreed.
263	65	Operational Phase "34. For the control of noise and vibration associated with the use the mitigation measures detailed in the Environmental Impact Assessment shall be adhered to in full."	TII will ensure full compliance with the assessment methodology, mitigation measures, and monitoring procedures set out in Chapter 15 of the Environmental Impact Assessment. TII will also continuously assess the cumulative effects of all site activities to maintain best practices and meet regulatory requirements.
264	66	" 35. Further detailed operational noise assessment should be conducted as part of the detailed design process and consideration should be given to providing mitigation at all locations exposed to noise levels exceeding those set out in Table 15-15 of the EIAR, this should include both daytime and night-time thresholds for future operational scenarios."	TII will ensure full compliance with the assessment methodology, mitigation measures, and monitoring procedures set out in Chapter 15 of the Environmental Impact Assessment. TII will also continuously assess the cumulative effects of all site activities to maintain best practices and meet regulatory requirements.
265	66	" 36. Transport Infrastructure Ireland (TII) and the design team for the scheme shall work collaboratively with the Noise Mapping Bodies (NMBs) and Action Planning Authorities (APAs), as defined by The Regulations, to minimise the effect that the introduction of this new Luas route will have on the rail exposure statistics determined for Round 4 and future Rounds of The Regulations and to ensure no new Most Important Areas are created as a result of the scheme."	TII and the design team for the proposed Scheme shall work collaboratively with the Noise Mapping Bodies (NMBs) and Action Planning Authorities (APAs), as defined by The Regulations, to allow the introduction of this new Luas route to be included in future Rounds of The Regulations.
266	66	" 37. Post construction monitoring of the noise levels along the route shall be undertaken and any exceedances of the modelling results shall be mitigated through the development of suitable noise mitigation measures as part of any future Noise Action Plan in joint collaboration with the relevant NMBs and APAs. All such measures to be implemented by the authority [TII] responsible for the infrastructure."	Post construction monitoring of the noise levels along the route shall be undertaken and any exceedances of the Luas Finglas EIAR criteria shall be mitigated through the development of suitable noise mitigation measures as part of any future Noise Action Plan in collaboration with the relevant NMBs and APAs. All such measures to be implemented by the authority [TII] responsible for the infrastructure.
267	66	" 38. A post construction Noise Monitoring Survey must be carried out along the route on completion of the project. The monitoring must fully establish if the predicted noise levels (at all locations referenced in the Environmental Impact Assessment) are consistent with the noise levels for the Operational Phase. A report detailing the findings must be submitted to Dublin City Council for review. The methodology and timelines for completion of the survey must be agreed with Dublin City Council within one month after the project is completed. Where the results show that the noise levels are higher than the predicted levels additional attenuation measures must be agreed with Dublin City Council for inclusion and implementation as part the current or future Noise Action Plan."	Noted and agreed.
268	66	Drainage & Water Protection "39. TII/NTA shall comply with the Greater Dublin Regional Code of Practice for Development Works - version 6.0.	Noted and agreed. The drainage design for Luas Finglas has been developed in conjunction with DCC Drainage Department, Fingal County Council and all other stakeholders. The design is in keeping with TII design standards and guidance documents, and the document 'Sustainable Drainage design and Evaluation Guide 2021, the Greater Dublin Regional Code of Practice for Drainage Works and the Greater Dublin Strategic Drainage Study as published by Dublin City Council. Further engagement is planned through the detailed design stage.
269	66	" 40. The Project shall incorporate Sustainable Drainage Systems in the management of surface water, soft landscaping will be preferred where practicable and the SuDS design will refer to the new Dublin City Council Sustainable Drainage Design and Evaluation Guide published in 2021."	Please refer to response to Item No. 286 above.
270	66	" 41. The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement."	Noted and agreed. The detailed drainage design shall be agreed in writing with DCC Drainage Planning, Policy and Development Control prior to commencement.
271	66	" 42. Records of public surface water sewers are indicative and must be verified on site. The developer must carry out a comprehensive site survey to establish all public surface water sewers that may be on the site. If surface water infrastructure is found that is not on public records the developer must immediately contact the DPPDC section to ascertain their requirements. Any damage to existing public surface water sewers shall be rectified at the developer's expense."	Noted and agreed. The Contractor shall carry out a comprehensive site survey to establish all public surface water sewers that may be on site.
272	67	" 43. TII/NTA shall provide details of the foundations of all that is being constructed by the Luas Scheme, together with details of all affected SW sewers. Any potential changes to SW sewers will be subject to written	Noted and agreed.

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		agreement of DCC's Drainage Planning, Policy and Development Control prior to commencement of construction."	
273	67	"44. TII/NTA shall undertake pre- and post-construction surveys of the surface water infrastructure. In the event that surface water sewers are impacted by the works, TII/NTA will carry out necessary remedial measures. Sewers to which access may be restricted post the construction of the Luas will be identified and upgraded."	Noted and agreed.
274	67	"45. As constructed drawings and a CCTV survey of all new public pipelines and pipelines to be taken in charge must be submitted to DCC Drainage Planning, Policy and Development Control after the completion of each phase of the development on site. This submission should include drawings indicating clearly the proposed demarcation between public and private SW drainage infrastructure. Future maintenance responsibility for all new and altered surface water drainage elements of the project and all existing drainage in proximity to the Luas route is to be agreed in writing with the Environmental Protection Division prior to commencement of construction."	Noted and agreed.
275	67	"46. Each SW sewer diversion and any new connection to the SW network shall be carried out under separate licence from DCC Drainage Planning, Policy and Development Control. TII/NTA, their agents or contractor shall comply with the licensing and connection procedure of DCC Drainage Planning, Policy and Development Control. No application for a licence will be accepted until the drainage design details are agreed in writing."	Noted and agreed.
276	67	"47. Permanent discharge of groundwater to the drainage network is not permitted."	Noted and agreed.
277	67	"48. There shall be no pumping or discharge of groundwater or any other trade effluent to Dublin City Council sewers or waters except under and in accordance with a licence granted by Dublin City Council as required by the Local Government (Water Pollution) Acts, 1977 and 1990."	Noted and agreed.
278	67	"49. All internal basement drainage must be designed in accordance with the City Council's policy on basements as set out in the Greater Dublin Strategic Drainage Study - Regional Drainage Policy - Volume 6, Basements. In particular, all internal drainage shall be pumped so as to discharge by gravity from the site to the public sewer and all openings to such structures shall be higher than the prevailing flood level in the area. All underground structures must be constructed to be watertight and therefore eliminate any permanent requirement to discharge groundwater. The design should address any potential risk of flotation or structural failure arising from making the structure watertight and should take steps to eliminate such risks."	Noted and agreed.
279	67	"50. Basement Impact Assessment (BIA), in accordance with the DCC Basement Development Guidance included in Appendix 9 of the Dublin City Development Plan 2022-2028, shall be provided for any new basement as part of detailed design development."	Noted and agreed. A Basement Impact Assessment (BIA) shall be provided for any new basement as part of detailed design development, in accordance with the DCC Basement Development Guidance included in Appendix 9 of the Dublin City Development Plan 2022-2028.
280	68	"51. Mitigation measures proposed to protect the ICW shall be fully implemented in consultation and agreement with Dublin City Council."	TII welcomes further engagement with DCC during the detailed design phase to ensure that the proposed mitigation measures for the ICW will be agreed to the satisfaction of DCC EPD prior to the commencement of construction.
281	68	"52. TII/NTA shall ensure that there is no deterioration in riparian margins or river substrate/bed of the Tolka River during construction or operation phases due to physical modifications or increased sediment loads."	Measures to protect the riparian margins and riverbed of the River Tolka are detailed within EIAR Chapter 9 (Biodiversity), Chapter 10 (Water) and Chapter 6 (Construction Activities) Appendix A6.1 (CEMP).
282	68	Public Lighting: "53. Careful consideration needs to be given to the Lighting around station areas to ensure they are adequately lit. Areas to be taken in charge around stations need to be agreed, i.e. DCC areas and TII is as."	It is TII's intention to continue to engage in dialogue with DCC public lighting section to incorporate their comments in accordance with our stated procedures as referenced in the EIAR.
283	68	"54. On many of the bridges a new lighting scheme will be required to replace the existing old lighting infrastructure. The new lighting infrastructure will need to include lighting columns/LED lights, PL ducts & chambers, PL cables, new electrical supplies etc."	There are no proposals to replace existing bridge lighting as part of the proposed Scheme.
284	68	"55. In general, if bridges are closed during construction, then temporary lighting may not be required. However, if bridges remain open to the public, then lighting, whether it be temporary or existing, will need to be provided or maintained."	There are no proposals to close existing bridge lighting as part of the proposed Scheme.
285	68	"56. Briefings to be provided on the general layouts when they are available in order to fully understand and assess public lighting requirements. Ongoing consultation is required at all stages from design, to	Noted and agreed.

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		construction, to testing, commissioning and handover/taking in charge. A formal documented approvals process is required to be put in place with sign off at each stage."	
286	68	" 57. New and/or altered public lighting schemes shall comply and be designed to IS EN13021. They shall also comply with DCCs General Specification for Public Lighting. Light Level Classes will be dependent upon Daily Traffic Flows and levels of usage (both vehicular and pedestrian) and need to be formally agreed and signed off for each area of the project. May require reassessment and possible re-classification of Light Level Classes to meet IS EN13021. Particular attention needs to be paid to light levels at entrances to stations and the areas around them where higher levels may be required (and different standards apply). Lighting needs to be treated holistically. If half a junction is being reconstructed the whole junction needs to be looked at and assessed holistically from a lighting standpoint to comply with standards. All public lighting works should be carried out a competent public lighting contractor or operator (such as DCC Public Lighting Services)."	Noted and agreed.
287	68	" 58. In areas where construction activities are taking place and there will continue to be some public access these areas must remain lighted at all times. Maintaining lighting can be achieved by maintaining the existing public lighting infrastructure during construction or removing the existing public lighting infrastructure and providing agreed temporary lighting or providing the new public lighting infrastructure in advance of decommissioning the existing infrastructure."	Noted and agreed.
288	69	" 59. Condition Assessment of lighting infrastructure will be required in advance. Replacement of existing Lighting Infrastructure with new infrastructure is likely. Some Lighting Infrastructure will at end of life and the upgrading of luminaires may require the upgrade the entire PL asset, including the column, cabling, and ducting for electrical and lighting compliance. Upgrade of luminaires to high efficiency LED luminaires is a minimum requirement for each area. LEDs must comply with DCC General Specification."	Noted and agreed.
289	69	" 60. Need to establish lighting circuits and electrical supply locations at design stage. Need to establish if any third-party infrastructure, e.g. Traffic Lights, are supplied from the public lighting infrastructure and plan to relocate accordingly."	Noted and agreed.
290	69	" 61. There is a limitation on where lights can be re-located. Careful consideration is needed in this regard. Need to minimise street clutter to avoid plethora of supply pillars and other street furniture."	Noted and agreed.
291	69	" 62. Lighting Works may require alterations to other Utility Services. Permits may be required to work on lights, e.g. close to lights on ESB Network Infrastructure or Luas LRV Network Infrastructure."	Noted and agreed.
292	69	" 63. Careful consideration needs to be given to all proposed tree locations with respect to light locations to reduce potential blocking that could result in carriageways and footways being in darkness. Lighting Designers also need to carefully consider existing tree locations in their designs."	Noted and agreed.
293	69	" 64. GPPR surveys may be needed in advance of construction in certain areas. Locate all underground services and identify possible underground congestion. Locate any cellars under footpaths/roads. Facilitates detailed design of new lighting infrastructure and identifies possible location for lighting columns and duct routes etc."	Noted and agreed.
294	69	" 65. DCC Public Lighting (PL) is the only ESB authorised body that is responsible for managing street lights mounted on ESB Networks Infrastructure in Dublin City Council. Those involved in Projects such as DART Expansion cannot alter, remove or relocate lighting infrastructure mounted on ESB Infrastructure without DCC PL and ESNB approval."	Noted and agreed.
295	69	Area 31 at Lagan Road "All tactile paving to be in accordance with the Construction Standards for Road and Street Works in Dublin City Council. Concern regarding safety at "crossing" point for cyclists. Possible conflict with general traffic and/or LUAS."	Detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council in relation to tactile paving. TII is committed to continued engagement with DCC and is agreeable to engaging in further discussion on any concerns regarding safety at crossing points for cyclists and possible conflict with general traffic and/or LUAS, during the detailed design stage.
296	70	Area 31 at Pier 6 - Pier 7 "Road markings are not consistent with the Traffic Signs Manual. This layout could lead to safety issues if vehicles are larger than stop zone provided (note: HGVs regularly use this junction)."	Compliance with the Traffic Signs Manual will be addressed during detailed design stage. TII is committed to continued engagement with DCC and is agreeable to engaging in further discussion on any concerns regarding safety issues, during the detailed design stage.

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297	70	Area 31 at Existing Broombridge “All tactile paving to be in accordance with the Construction Standards for Road and Street Works in Dublin City Council.”	Detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council in relation to tactile paving.
298	70	Area 31 at existing Broombridge “Uncontrolled pedestrian crossing near the Bus Stops on Broombridge Road - concern regarding visibility.”	Visibility can be reviewed at the uncontrolled pedestrian crossing near the Bus Stops on Broombridge Road during detailed design.
299	70	Area 31 at east of North Abutment Ch. 580.800 “Signage required for cyclists at junction between cycle-lane and LUAS track. Stop directly after turn in to Glenn Industrial Estate is not in accordance with the Construction Standards for Road and Street Works in Dublin City Council. There should only be 'Stop' line at a given junction. Tactile paving for pedestrians crossing the cycle lane on the west side of the Lagan Road junction. In Tolka Valley Park, could a pedestrian path be provided to link the pedestrian footway north and south of the pond parallel to the LUAS track rather than forcing pedestrians to cross the LUAS tracks twice? Between Lagan Road and Ballyboggan Road, could a path be provided east of the LUAS track for pedestrians to walk north/south without having to cross the LUAS track twice? The close proximity of the two stop lines creates a risk of vehicles unintentionally blocking the cycle-lane which could force cyclists into the path of moving vehicles.”	Detailed design will be based on appropriate national and local authority standards including but not limited to the Traffic Signs Manual and Construction Standards for Road and Street Works in Dublin City Council in relation to tactile paving. TII is committed to continued engagement with DCC and is agreeable to engaging in further discussion on any concerns regarding sign, markings or tactile paving, during the detailed design stage. For Tolka Valley Park, the existing park paths will form the basis for the proposed scheme. Incorporating a footpath on the proposed Tolka Valley Bridge is considered unnecessary. A footpath east of the track between Lagan Road and Ballyboggan Road is not considered necessary as there will be a footpath provided west of the track. Provision of such a footpath would require additional land take and building acquisition from Westrock. In relation to the proximity of junctions and potential for blocking, both junctions will be on the DCC SCATS signalling system which will allow for queue management.
300	70	Area 32 at St Helena's Road opposite Montessori School “Uncontrolled pedestrian crossing near the Bus Stops -concern regarding visibility.”	The uncontrolled crossings on St. Helena's Road will have at least the minimum required stopping sight distance to the back of tactile paving as per Table 4.2 of DMURS.
301	71	Area 32 at west of Wellmount Parade “Safety concern regarding uncontrolled pedestrian crossing on a S0km/h road (Wellmount Road).”	The proposed design includes a raised table for the Wellmount Road / Patrickswell Place junction with the objective of augmenting the existing traffic calming measures on Wellmount Road and creating the conditions whereby an uncontrolled crossing is suitable. TII would welcome further discussion with DCC on how safety at this pedestrian crossing could be improved, during the detailed design stage.
302	71	Area 32 at Cardiff Castle Road/Ravens Court junction “It is unclear whether it is proposed to signalise this junction. Potential conflict point with stopped vehicles on LUAS lines. Uncontrolled pedestrian crossing at the bend - possible issue with visibility (trees, ESB poles, etc.) Road markings not consistent with the Traffic Signs Manual. Concern regarding large vehicles stopping in the middle of the junction.”	Cardiff Castle Road/Ravens Court junction will remain as a priority junction. The junction will not be signalised. Drivers exiting Ravens Court, including drivers of large vehicles, are not being encouraged to stop across the LRV tracks: they are expected to stop at the Stop line for the LRT and check for both LRV traffic and Cardiff Castle Road traffic before progressing. The referred to uncontrolled crossing on the bend could be removed by not providing tactile paving / dished kerbs so as not to indicate to pedestrians that this is a safe place to cross. The road markings can be reviewed at detailed design stage for compliance with the Traffic Signs Manual.
303	71	Area 33 at St Margaret's Road/McKee Avenue “No dimension on drawings -Bus Stop to be checked in conjunction with Road Traffic Act: (2) A vehicle shall not be parked (h) within 15 metres (on the approach side) or 5 metres (on the side other than the approach side) of a section of roadway where any of the following Traffic Signs have been provided.”	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. TII is committed to continued engagement with DCC, and if they have specific concerns in relation to the positioning of bus stops TII would be happy to engage in further discussion on any concerns they may have during the detailed design stage.
304	72	Area 33 at St Margaret's Road/McKelvey Road junction “Concern regarding how cyclists can cross this junction safely. Possible conflict with pedestrians.”	The proposed scheme includes a Toucan crossing to permit cyclists to use the mid-block crossing. The Toucan crossing by its nature mixes pedestrians and cyclists but only over a short distance and can be an ideal solution where pedestrian and cycling usage of the crossing is not anticipated to be high, as with this crossing. TII is committed to continued engagement with DCC and would be happy to engage in further discussion regarding the form of this crossing during the detailed design stage.
305	72	Area 33 at St Margaret's Road/Mc Kelvey Avenue “No dimension on drawings -Bus Stop to be checked in conjunction with Road Traffic Act: (2) A vehicle shall not be parked (h) within 15 metres (on approach side) or 5 metres (on the side other than the approach side) of a section of roadway where any of the following traffic signs have been provided.”	Please refer to response provided to Item No.304 above.
306	72	Area 33 at St Margaret's Road/ESBN private road junction “Bus Stop 'over-hanging' junction on opposite side of road. Uncontrolled pedestrian crossing on a 50km/h road and proximity of a Bus Stop -concern regarding visibility. Safety concerns regarding junction design - some details appear to be missing.”	Buses stopped at the bus stop may conflict with accessing vehicles at this location, however it would be a momentary obstruction. The uncontrolled pedestrian crossing is provided to cater for a strong anticipated pedestrian desire line. Buses stopped at the bus stop may block visibility, however it would be a momentary blockage. A controlled crossing is not possible here due to the presence of private accesses on the west side of St. Margaret's Road. There are no feasible alternative locations for the crossing. Removal of the crossing and the path leading to it across the Luas tracks could lead to pedestrians walking on the access road for ESBN which would be even more hazardous. TII is committed to

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			continued engagement with DCC and would be happy to engage in further discussion regarding the ESBN junction during the detailed design stage.
307	72	<p>Drawing</p> <p>“Removal of Footbridge Can the footbridge be maintained, rebuilt or resituated so as to preserve the access to the Liam Mellows memorial? Continuous pedestrian access to Finglas West (Casement Road ,Barry Ave, St Kevin's Boys National school , Finglas West Family Resource Centre Landscape Pg. 25 TAG General Comments: will be broken and pedestrians will be forced to use a new staggered pedestrian crossing where they had a footbridge. That, or could the technical room be relocated so as to keep the footbridge in-situ?</p> <p>Space between the Yellow Box on Finglas Bypass northbound and the pedestrian crossing on the eastern-most lane is not wide enough for vehicles to stop safely without blocking either the pedestrian crossing of the LUAS track.</p> <ul style="list-style-type: none"> Confirm Bus Connects plans for Finglas By-pass Uncontrolled crossings to be provided to allow crossing. Bus Stop Relocation: Position the Bus Stop at least 15 - 20 metres before or beyond the stop line to provide enough space for vehicles to stop safely without obstructing traffic. The tactile paving at the uncontrolled pedestrian crossing is not in accordance with Construction Standards for Road and Street Works in Dublin City Council. Continuous Centre Line at access to ESBN to be dashed to allow for right turn from premises. <p>Dashed line to allow vehicles egressing from St. Margaret's Court to turn right.”</p>	<p>The existing footbridge removal is required due to a physical clash with the infrastructure for the Luas OHLE and the vehicle pantograph. The ramped sections leading to the footbridge are to be preserved in place and will be augmented by a new ramp providing access to the N2 at grade road crossing - For details see Landscape Drawing D1 AL 33 B-C. The staggered crossing is provided for safety reasons. Sequencing of the crossing time will be developed during the detailed design stage with an aim to provide a single continuous crossing for pedestrians and cyclists as much as possible.</p> <p>For the proposed yellow box marking, the priority in this case is to ensure that the drivers do not sit on the Luas tracks. If the length of the yellow box is excessive, there is a greater risk of non-compliance by drivers. As this is a SCATS operated junction, the junction can be controlled to flush out any traffic lingering beyond the Stop line by extending the intergreen period.</p> <p>The Bus Connects scheme will end before the Finglas Road / North Road junction. The Luas Finglas scheme is compatible with the Bus Connects scheme.</p> <p>TII can comply with the 15-20m bus stop location requirement.</p> <p>Detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council in relation to tactile paving. Road markings on the proposed Scheme to be as per the Traffic Sign Manual.</p>
308	72	“Tactile paving to be provided for at end of cycle lanes and footpaths crossing cycle lanes, as per Cycle Design Manual.”	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation to tactile paving.
309	73	“Tactile paving for pedestrians crossing cycle lane and LUAS track.”	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023, in particular in relation tactile paving.
310	73	“All 'Stop' lines directly after turns to be Road Safety Audited or removed as these are not to the standard as set out in the Construction Standards for Road and Street Works in Dublin City Council.”	Detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council.
311	73	“More details are needed at crossing points (especially at the uncontrolled ones) where pedestrians may conflict with cyclists.”	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. It is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual.
312	74	“A Vehicle Swept Path Analysis should be carried out for all junctions to ensure safe turning for large vehicles.”	Vehicle Swept Path Analysis has been used to inform the preliminary design. This will be reviewed as part of the detailed design process.
313	74	“A Road Safety Audit is required.”	A Stage 2 Road Safety Audit will be carried out as part of the detailed design.
314	74	“Rescinding of old Statutory Orders (Stats) and creation of new Stats through Statutory Process.”	Noted.
315	74	“Adherence to all standards and guidance such as the Construction Standards for Road and Street Works in Dublin City Council, Traffic Signs Manual (Government of Ireland), Design Manual for Urban Road and Streets, Cycle Design Manual.”	Detailed design will be based on appropriate national and local authority standards including but not limited to Construction Standards for Road and Street Works in Dublin City Council, Traffic Signs Manual (Government of Ireland), Design Manual for Urban Road and Streets, Cycle Design Manual.
316	74	<p>Traffic Signals (ITS Section)</p> <p>“Full signalised drawing were not provided as part of this submission.”</p>	The current level of detail provided is appropriate for use in the assessments and at this stage of the planning process. It is the intention of TII at detailed design stage to continue dialogue with DCC and relevant department.
317	74	“All new and modifications of traffic signal arrangement must be discussed with DCC for all DCC controlled traffic signal locations and must be in accordance with the latest version of the Traffic Signs Manual.”	TII is committed to continued engagement with DCC and will engage in further discussion on the design of proposed traffic signals in accordance with the latest version of the Traffic Signs Manual, during the detailed design stage.
318	74	“Please confirm if all Luas standalone crossing are un-signalised.”	All pedestrian/cycle crossings of the Luas line will be non-signalised. Two vehicular crossings of the Luas line will be non-signalised: Ravens Court and the ESBN access.
319	74	“Please ensure that the locations of trees along the route does not block traffic signals.”	Locations of all trees will be reviewed to prevent blocking of signals, during the detailed design stage.
320	74	<p>Broombridge station</p> <p>“Will there be a replacement for the removed pedestrian access ramp?”</p>	The removed metal pedestrian ramp will not be replaced due to insufficient headroom beneath the new overbridge. This is further exasperated due to a requirement to raise the bridge deck of the existing bridge for the Dart + project. Access to the Irish Rail inbound platform will be via the existing bridge and Broombridge interchange using the current pedestrian

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			overbridge and lifts at the east end of the platforms. A full explanation of the alternatives considered can be found in Luas Finglas EIAR Chapter 4 – Alternatives Considered, Section 4.10.2 Pedestrian Bridge over the Royal Canal.
321	74	Langan Road - New Signalised Junction “Why is there no pedestrian crossing on the third arm?”	There is no frontage activity on the west side of Broombridge Road between the Ballyboggan Road junction and Lagan Road junction that will generate pedestrian demand for such a crossing. Pedestrians coming from Ballyboggan Road and going to Lagan Road will cross at Ballyboggan Road junction. Allowance will be made in the design for future inclusion of a pedestrian crossing should it be required.
322	74	“Stop line on the arm without a pedestrian is very far back and will result in longer intergreens.”	Stop lines are required to be set back to accommodate swept-path requirements for articulated HGVs and in conjunction with implementation of DMURS road geometry standards.
323	74	Keep Clear marking is located where our SCATS inductive loop would be - how will this work.	Two induction loops to be installed.
324	74	Ballyboggan Road “The junction layout is quite large which will lead to long intergreens for traffic phases which may result in delays.”	Installation of a signalised junction here with prioritisation given to the Luas will result delays for drivers that they may not currently be experiencing. The junction has been made as compact as possible and the 3-arm nature of the junction combined with moderate traffic volumes will ensure that congestion is kept to acceptable levels.
325	74	“Cycle Design Manual does not recommend use of ASLs for cyclists. What is the purpose of the ASL here?”	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023.
326	74	“Southbound stop line for cyclists will need to be tweaked to allow a minimum distance from a cycle signal head.”	This is a detail that can be addressed at detailed design stage.
327	74	“Eastbound cyclists have a stop line in the centre of the T junction. Is there any protection or kerbing being provided here to protect cyclists from right turning traffic if they are waiting here?”	No kerbing is proposed however it is anticipated that cyclists will be given a pre-signal to allow them to clear the junction ahead of traffic from Broombridge Road.
328	75	Tolka Valley Junction “What is the purpose of the ASL for cyclists? NTA COM does not recommend their use.”	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023.
329	75	St Helena's Road “The junction layout is quite large which will lead to long intergreens for traffic phases which may result in delays.”	From a traffic signalling point of view, it is a very simple junction that can operate with three Stages. Furthermore, the pedestrian crossing stage will be only proceed if called. Excessive delays for motorists are not anticipated.
330	75	Wellmount Road “The new arrangement at the entrance to Patrickwell Place adds a single pedestrian crossing on the Northeast side of the Luas line but does not provide a pedestrian or signal control for the entrance into the Patrickwell Place.”	Traffic modelling did not indicate that this junction required signalisation. However, TII is committed to continued engagement with DCC, and is agreeable to engaging in further discussion on whether or not this junction should be signalised.
331	75	“The pedestrian facilities should be improved at this location.”	TII is committed to continued engagement with DCC and is agreeable to engaging in further discussion during the detailed design stage on how TII can improve pedestrian facilities at this location.
332	75	“Consider extending the cycling provision through the junction towards the school.”	TII is committed to continued engagement with DCC and is agreeable to engaging in further discussion during the detailed design stage on how TII can improve cycle track facilities at this location.
333	75	“Fully signalising this junction may assist in traffic calming and control of rat running through the estate.”	Traffic modelling did not indicate that this junction required signalisation. However, TII is committed to continued engagement with DCC and is agreeable to engaging in further discussion on whether or not this junction should be signalised.
334	75	Mellows Road area “Is the line of site sufficient from the exit of Ravens Court?”	Proposed estate boundaries have been positioned to provide at least the minimum sight distance requirements of DMURS and the LRSSB.
335	75	“Confirm if there is tactile paving at all signalised pedestrian crossings - it's not entirely clear on the drawing.”	TII confirms that all signalised junctions will have tactile paving as per standards.
336	75	R135 - St Margaret's Road “The introduction of cycle and pedestrian movement is welcome but the reduction in capacity could lead to congestions which cannot be mitigated by the traffic signals.”	Traffic modelling indicated that congestion on St. Margaret's Road would be within acceptable thresholds.
337	75	“This junction is only partially protected no changes made to the RBS.”	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual.
338	75	St Margaret's Road- McKee Avenue	Traffic modelling indicated that congestion on St. Margaret's Road would be within acceptable thresholds.

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		"The introduction of cycle and pedestrian movement is welcome but the reduction in capacity could lead to congestions which cannot be mitigated by the traffic signals."	
339	75	"The arrangement of the protected junction needs to be developed further to ensure the protected islands are of sufficient size to allow for signals to be installed and the locations of the stop lines and the signals are compliant with the Traffic Signs Manual."	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual 2023.
340	76	McKelvey Road Junction "The junction layout is quite large which will lead to long intergreens for traffic phases which may result in delays."	Stop lines are required to be set back to accommodate swept-path requirements for articulated HGVs and in conjunction with implementation of DMURS road geometry standards. Traffic modelling indicated that congestion on St. Margaret's Road would be within acceptable thresholds.
341	76	St Margaret's Road McKelvey Avenue "The location of the bus stop near the pedestrian crossing may lead to block back of the pedestrian crossing."	Both the bus stop and pedestrian crossing are ideally placed to serve the residents of McKelvey Avenue.
342	76	Charlestown Place - St Margaret's Road "The introduction of cycle and pedestrian movement is welcome but the reduction in capacity could lead to congestions which cannot be mitigated by the traffic signals."	Traffic modelling indicated that congestion at this junction would be within acceptable limits.
343	76	"The arrangement of the protected junction needs to be developed further to ensure the protected islands are of sufficient size to allow for signals to be installed and the locations of the stop lines and the signals are compliant with the Traffic Signs Manual."	TII confirms it is the intention at detailed design stage to revisit the design of cycling infrastructure to align it closer to the Cycle Design Manual.
344	76	"The Conservation Section acknowledge the need to expand the Luas system to the Greater Dublin Area and are supportive of this objective in principle. However, it is recommended that the proposed works should, where possible, avoid any direct material losses of historic fabric and take into account the setting of Protected Structures and other historic buildings, structures and settlements that are within the context of the proposed route."	TII is committed to further engagement with DCC Conservation Section, and welcome further discussion in relation to cultural heritage constraints within the environs of the route.
345	77	"The Conservation Section have considered the potential impact of the proposed development on the architectural heritage along the proposed route on the following categories in particular: <ul style="list-style-type: none"> Protected Structures and Proposed Protected Structures and their setting Buildings and other structures included in the National Inventory of Architectural Heritage (NIAH) Structures included in the Dublin City Industrial Heritage Record Survey (DCIHR) The impacts of the proposed development on Protected Structures and buildings within Architectural Conservation Areas, Conservation Areas, have been considered in the context of the provisions of the Dublin City Council Development Plan 2022 - 2028, including the policies and objectives of Chapter 11- Built Heritage and Culture, Chapter 15 - Development Standards and all relevant appendices."	Noted.
346	77	"A number of important historic buildings and structures will be impacted by the proposed works. Record of Protected Structures (RPS) Six Protected Structures are located within the vicinity of the proposed route, and include Broombridge (RPS 909), Finglaswood Bridge (RPS 906), St. Helena's House (RPS 7575), King William's Ramparts, Southern Section (RPS 8733), St. Patrick's Well (RPS 8735) and King William's Ramparts, Northern Section (RPS 8734)."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.
347	77	"I also note other Protected Structures located within Finglas Village which could be considered as being within the wider vicinity of the proposed route, including St. Canice's Church of Ireland (RPS 1554), The Elms: boundary wall, stone entrance porch and front of the house (RPS 1553), ruined church, graveyard and stone cross (RPS 1552), House at No. 4 Barrack Lane (RPS 8729), House at No. 5 Barrack Lane (RPS 8730), Red Brick Cottage, Woodlands Lodge -Towson's Cottage (RPS 4849), Rose Hill House (RPS 4850)."	Please note that these items were descoped once the Preferred Route was chosen, as they have no direct or indirect impact. Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.
348	77	"Also located in the vicinity of the proposed works are Red Hatch Conservation Areas identified within the Dublin City Council Development Plan 2022 - 2029 for the Royal Canal, the Tolka Valley and three areas within Finglas Village (located at St. Canice's Church, St. Canice's (ruins) Cross and Graveyard, and Rose Hill House)."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.
349	78	"Three NIAH entries within the vicinity of the proposed route, which relate to all of the Protected Structures previously noted - these include Broombridge (Reg. No. 50069126), Finglaswood Bridge (Reg. No. 50130015) and St. Helena's House (Reg. No. 50130011)."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.

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350	78	"I also note other NIAH entries located within Finglas Village which could be considered as being within the wider vicinity of the proposed route, including Rectory/glebe/vicarage/curate's house (Reg. No. 5013007), St. Canice's Church of Ireland (Reg. No. 50130008), The Elms Reg. No. 50130010), St. Canice's Church - Roman Catholic (Reg. No. 50130028) and Rosehill House (Reg. No. 50130031)."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.
351	78	"Archaeological entries include the site of 16th/17th manor house (DU014-066005), 17th century house (DU014-066003), Ritual Site - holy well (DU014-066002), North Section of King William's Ramparts (DU014-066008), Church, Graveyard and High Cross on the site of an earlier monastery associated with St. Canice (DU014-066009, DU014-066017, DU014-066010)."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.
352	78	Dublin City Industrial Heritage Record (DCIHR): Royal Canal "The subject Luas extension crosses a part of the Royal Canal that was constructed between 1790 and 1796 and is considered by the DCIHR to be of National Importance. DCIHR 18_02_001, 18_03_001. Appraisal: The Royal Canal was part of the dawning of a new era in transportation in Ireland in the latter part of the eighteenth century. It commenced construction in 1790, in competition to the Grand Canal which commenced construction in 1789 and reached the River Shannon at Tarmonbarry in 1817. The construction of the canal constitutes one of the major civil engineering achievements of the eighteenth-century facilitating transport links between Dublin and the interior of the country."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage
353	78	Broom Bridge "DCIHR 18_02_010 (Railway Bridge) Appraisal: Built as part of the Midland and Great Western Railway project, which commenced construction in 1846, this bridge is a testament to the engineering and technological skills of the nineteenth-century builders of Ireland's railways. Its sitting beside a canal bridge highlights the number of facets of Ireland's infrastructural expansion during this period, further enhancing the significance of the site within Dublin's industrial heritage. DCIHR 18_02_005 (Canal Bridge) Appraisal: Broombridge is one of a number of bridges constructed in association with the Royal Canal, whose building commenced in 1790. The bridge follows the style apparent throughout all Irish canal bridges with the simple humpbacked design enhanced by finely executed stonework. The bridge also has a historical connotation through its being the location where Sir William Rowan Hamilton first wrote down the fundamental formula for quaternion on the 16th October 1843, making the site of historical importance with respect to mathematics."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage. Please also refer to Luas Finglas EIAR 2024 Chapter 21 - Landscape and Visual Amenity Appendix A21.2: Urban Integration Report.
354	78	Finglaswood Bridge DCIHR 18_02_028 (Tolka River) Appraisal: Double-arch stone road bridge, built c.1800, carrying road over the Tolka river. Random-rubble walling with cut limestone voussoirs; arch on south side taller and wider than arch on north side. North-west side of parapet damaged. Deck now covered with tarmacadam. Cast-iron utility pipe on east elevation running just above keystone on north arch and just below keystone on south arch. A number of other DCIHR sites are noted on the Heritage Maps website in the general vicinity of but not affected by the proposed route, but no remains survive of these various sites which included former quarries, a telephone box and a smithy/forge.	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.
355	79	"Broombridge (RPS 909, NIAH Reg. No. 50060126) This two-arch limestone canal bridge of c.1790 and railway bridge of c.1845, carrying Broombridge Road on the north-south axis over the Royal Canal (north) and Dublin-Sligo railway line (south) is given a National rating by the NIAH, identifying categories of special interest as Architectural, Historical, Social and Technical. The NIAH Appraisal notes "Named after William Broome, a director of the Royal Canal Company. The canal section of the bridge is no doubt the older structure. It is of considerable significance for its associations with William Rowan Hamilton who. on the 16th October 1843, inscribed his mathematical formula for quaternions on to the bridge when out walking with his wife. The plaque under the bridge was unveiled by the Taoiseach Eamon de Valera, himself a mathematician and student of quaternions, on 13th November 1958. The railway bridge probably dates from the 1840s, while the two crossings now form a most appealing historic structure in the landscape at a junction of public transport and public amenity". Although the proposed new bridge and elevated track to carry the Luas Extension is somewhat removed from the subject structure, it is sufficiently close to have a significant and adverse visual impact on the setting of Broome Bridge, a Protected Structure."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage.

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356	79	"The reconstruction of the masonry where the existing pedestrian ramp is removed shall be specified by a conservation expert and executed by an experienced heritage stone mason using stones to match the existing historic coursing in accordance with best conservation practice. EIAR Chapter 20 Cultural Heritage 20.3.1.6 Field Survey refers to a number of serious defects noted in inspections and an archaeological underwater/ wade condition survey of Broome Bridge, noting there is evidence of a poor quality finish to the east terminal, poorly executed stonework in previous repairs including inappropriate cement pointing, poorly reconstructed parapet masonry, mortar loss, erosion and cracked stones, delaminated stones due to fire damage. The EIAR also notes that significant defects were also noted within the canal walls at Broom Bridge, including several areas of displacement, voids and partial collapse to parts of the top of the wall, including the replacement of coping stones with concrete and loss of stonework due to a tree root."	Please refer to Luas Finglas EIAR 2024 Chapter 20: Cultural Heritage
357	79	Conservation Section: "Owners of the historic bridges and other structures engage in a structural engineer/conservation architect: "It is important that all existing fabric defects within the historic bridges and canal walls are inspected at close quarters and recorded in detailed survey drawings at an appropriate scale and photographs (as noted in the mitigation in Table 20-9: Impact Assessment and Mitigation, Chapter 20 - Cultural Heritage). I also recommend that the owners of the historic bridges and other structures engage a structural engineer/conservation architect with proven conservation expertise in the specifying and design of remedial structural works for significant historic structures, and that the works are repaired by experienced heritage stone masons in accordance with best conservation practice in advance of the LUAS works commencing. It is important that all such defects are stabilised prior to the construction of the new bridge, to avoid any further deterioration. All repaired defects shall be monitored during the construction process to ensure that any recurrences are addressed appropriately."	As detailed Table 20.9 of the EIAR (Chapter 20: Cultural Heritage) a written, drawn and photographic record of the setting of the historic bridges and canal walls will be prepared by a suitably qualified person with expertise in architectural conservation prior to construction. DCC, as owners of the bridge structures, will be provided with a detailed method statement, which is prepared by a suitably qualified person with expertise in architectural conservation, for the removal of the existing steel pedestrian bridge from the east parapet wall of Broome Bridge and reinstatement of the parapet wall at the breach. Table 20.9 also details construction phase mitigation measures for the historic bridges and the canal and these including protective hoardings, signage, vibration monitoring and archaeological monitoring. A suitably qualified person with expertise in architectural conservation will also compile a written and photographic record of the removal of the existing steel pedestrian bridge from Broome Bridge and the reinstatement of the parapet wall at the breach during the construction phase. In relation to other structures, all works within the environs of the Royal Canal will be carried out in agreement with and under permit from Waterways Ireland and will be carried out in accordance with Waterways Ireland Guidelines for the Conservation of Built Heritage.
358	80 - 81	Conservation Section: "Lack of photomontages of the new bridge from the west of the historic bridge: "Comparative views: Viewpoint 1 indicates the view of the new bridge and guardings. The historic arches are visible beneath the bridge. This new bridge appears to float above the concrete column beneath. The visual impact of the new bridge and guarding on the architectural character and setting of the historic bridge is determined by the relative proximity of the structures. Figure 5-39 Visualisation of the proposed bridge of the proposed bridge over the railway and Royal Canal in EIAR Chapter 5 description of Proposed Scheme illustrates the relationship between the new and historic bridges. I recommend that an additional photomontage is provided of the new bridge from the opposite site (west) of the historic bridge to indicate what the visual impact of the new bridge on the character of the historic bridge when viewed from the west. The only way to remove the visual impact on the setting of the historic bridge would be to locate the new bridge more remotely from the historic bridge." "It is clear that the Finglaswood Bridge has a number of prominent defects visible in the existing photographs and photomontages provided. EIAR Chapter 20 Cultural Heritage 20.3.1.6 Field Survey notes that sections of the upper portions of the bridge were rebuilt in recent years and the overall structure has been somewhat compromised."	The Photomontages (Appendix A21.3 Volume 5 of the EIAR), are intended to assist Cultural Heritage and LVIA specialists in assessing the proposed Scheme's potential impacts. Their location was agreed between LVIA and Cultural Heritage specialists in consultation with Dublin City Council. Initially, 12 locations were identified, and following DCC's feedback at the Scoping stage (see Appendix A1.3), three additional locations were included, bringing the total to 15. The assessment team has followed the recommended best practice methodology and proportionate approach, which have led to the selection of these locations in order to provide a robust basis and evidence for assessment. In addition, as it can be seen from the flythrough prepared https://www.luasfinglas.ie/#flyover that the preliminary design has been prepared to a BIM Level 2, allowing new bridges views from different angles. The Landscape / Cultural Heritage specialists are satisfied that TII has adequate photomontages for the Landscape and Visual Impact Assessment (& Cultural Heritage Assessment) within the EIAR. TII envisages that the BIM model, and associated flythrough animations, will play a more important role in capturing these visualisations from a range of perspectives and also when presenting to DCC as the design for each bridge develops. The Finglaswood Bridge is not impacted by the proposed scheme and all work in this area will be in line with the CEMP and the Cultural Heritage Strategy and Conservation best practice.
359	80 - 81	Conservation Section: "The utilitarian and perfunctory galvanised steel security railing near St Helena's house is entirely inappropriate: "The setting of St. Helena's House has already been greatly diminished by residential and other development in its environs, when a comparison is made between its historic curtilage as illustrated on the 25 inch OS Map and a current Google Maps aerial view. The utilitarian and perfunctory galvanised steel security railing indicated in a photograph provided in the presentation documents on the 20th March is entirely inappropriate and detracts significantly from the setting of the Protected Structure, particularly its principal elevation."	TII is committed to further engagement with DCC and will liaise with the Conservation Section in relation to the existing security railing near St Helena's House during the detailed design and construction stage. Landscape drawings D1 AL 32 B-C/1, and D1 AL 32 1-2 show works to either side of the wall in question, and alignment drawings D1 GA 32 B-C/1, and D1 GA 32 1-2 show that the wall is inside the red line extent of works boundary thus it falls within the impact zone. Please note that there is an error of the landscape drawing, which indicates a noise barrier at this location. The barrier only extends around the school premises adjacent to St Helena's House, as advised by the noise specialist see Chapter 15 – Noise and Vibration Figure 15-10: Extent of proposed Noise Barrier at St Helena's Childcare Centre.
360	82	"To safeguard the special interest of affected Architectural Heritage in the vicinity of the Luas Finglas Works, including Protected Structures, Architectural Conservation Areas, Conservation Areas, historic stone kerbing and margins to the Royal Canal, and to ensure that any repair works required to historic fabric will be carried out in accordance with best conservation practice with no unauthorised or unnecessary damage or loss of historic fabric, the Conservation Section submit that all works shall be designed and supervised with the	Please refer to response provided to Item No.2 and 15 above.

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		input of an expert in architectural conservation in accordance with the provisions (outlined above) of the Dublin City Development Plan 2022-2028, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and relevant documents of the DEHLG."	
361	83	"The conservation expert shall ensure adequate protection of the retained and historic fabric during the proposed works and across all preparatory and construction phases. In this regard, all works shall be designed to cause minimum interference to historic fabric."	Noted and agreed.
362	83	"The conservation officers raise concern regarding the potential for known significant defects (referred to in EIAR Chapter 20 Cultural Heritage 20.3.1.6 Field Survey pertaining to Broombridge, the adjacent canal walls and Finglaswood Bridge) to deteriorate during the proposed works, if these defects are not addressed by those responsible for their care and maintenance in advance of the works proceeding."	TII is continuing liaising closely with Irish Rail, DCC and Waterways Ireland regarding the impacts to the existing bridges. TII does not agree to the proposal that the LRT works should not proceed in advance of or be dependent on works by others. Suitable mitigation measures are described in Table 20-9: Impact Assessment and Mitigation of Luas Finglas EIAR Chapter 20 – Cultural Heritage and in Chapter 6 – Construction Activities, section 6.4.2 Broombridge to Tolka Valley Park (S31.1).
363	83	"The conservation officers recommend that significant defects are inspected and stabilised at least temporarily prior to the works if comprehensive repairs are not possible, to avoid further deterioration of this significant architectural heritage."	Please refer to response provided to Item No.362 above.
364	83	"In accordance with best conservation practice, detailed specifications and method statements for any lifting/temporary removal, storage and reinstatement or any other conservation repairs required, shall be submitted by the conservation expert to the Planning Authority for its written approval."	Noted and agreed.
365	83	"The conservation expert shall advise the Conservation Section on any architectural and conservation matters that may have further impacts on the project throughout the construction phases."	Noted and agreed.
366	83	"If during the course of the construction work across the Luas Finglas routes, hitherto unknown and concealed architectural heritage fabric is found, the conservation professional shall contact the Conservation Section to advise them of the discovery, as the presence of historic fabric may inform an alternative strategy for a design proposal that would enhance the setting of a Protected Structure, Architectural Conservation Area or Conservation Area."	Noted and agreed.
367	83	"All works shall be executed in accordance with best conservation practice and the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series."	Noted and agreed.
368	83	"Any repair works required shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded prior to removal, catalogued and numbered for authentic reinstatement, All existing original architectural heritage features in the vicinity of the works shall be protected during the course of all phases of construction works, and all repair of historic fabric shall be scheduled and executed by appropriately experienced conservators of historic fabric."	Noted and agreed.

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1	3	"The access plans to Broombridge station will mean that the distance to the southbound Irish Rail platform will be quadrupled for pedestrians, from 70m to 270m. The removal of the ramp from the canal bridge down to the station will require everyone accessing the southbound platform to go around and continue all the way to the end of the station to get to the other side of the tracks."	<p>As outlined in section 4.10.2 of Chapter 4, the current access to Iarnród Éireann's inbound platform is incompatible with the proposed new Luas alignment and bridge structure over the railway and canal at Broombridge. Due to spatial and track parameters there is insufficient headroom for the current ramped access to remain. In addition, Iarnród Éireann plan to modify (planning approval obtained) the old canal bridge to facilitate electrification of the line which will require the road level and thus the access point of the ramp to be raised, further reducing the available headroom.</p> <p>As result a number of alternatives were considered as part of the design development and assessed against a number of criteria including environmental topics. The alternatives considered included: do nothing, new infrastructure off Hamilton Bridge, extension of the existing bridge at Broombridge Station and a new canal bridge.</p> <p>Conclusions: Option One (Do Minimum - use of existing lifts is), on balance, the most practical solution, with smaller and simpler interventions. This proposed option to access inbound Iarnród Éireann services is to direct all users through the interchange plaza and using the existing lift and stair structure, installed as part of Luas Green Line. This option is entirely contingent on the full operational use of the lifts, to a high standard of service. TII and the Luas Operator will continue to maintain these lifts to a high standard of service to ensure the lifts provide the linkage needed.</p> <p>Notwithstanding the potential inconvenience to a small number of users, it does provide a viable alternative for those with a mobility impairment and provided mitigation measures are put in place, will allow for an interchange environment which is safe and intuitive to use. In terms of future transport demand, all the intermodal transfers and desired transport patterns can be achieved either at Broombridge Interchange. It is anticipated that the number of users wishing to make the transfer from Broombridge to the city centre, via Irish rail, will decrease once Luas Finglas is in place, since passengers who currently walk to or get dropped to Broombridge will board the Luas sooner, stay on board to the city centre and transfer, if necessary, at Abbey Street for services to the Docklands or to Connolly.</p> <p>Adequate set-down and disabled parking spaces will be provided at the interchange, as part of the Luas Finglas scheme, to accommodate those with mobility issues who may struggle with a longer walk. A new drop-off/access point within the interchange for those with mobility issues has the added benefit of the interchange plaza being the recognisable, go-to location for all modes of transport for Broombridge.</p> <p>The visual and environmental impacts of the alternative options assessed are significant, in an environmentally sensitive area. This is a very sensitive location due to the two historic and protected bridges and the association with Hamilton. It is difficult to reconcile competing requirements, but on balance, given that the IE inbound platform is fully accessible albeit via a slightly longer route, and that passengers using the Luas will have alternative interchange options available nearer the city, it was considered that an additional overbridge structure at this location is best avoided.</p>
2	3	"The current design is a missed opportunity to enhance access to the Irish rail platforms particularly with redevelopment planned for the industrial estate."	<p>Please refer to response to Item 1 above. The Luas Team evaluated four options to provide accessible access to Iarnród Éireann's inbound platform at Broom Bridge as part of the proposed Scheme. The selected option directs all users through the interchange plaza, utilising the existing lift and stair structure installed as part of the Luas Green Line to access inbound Iarnród Éireann services. This option was chosen for being the least environmentally intrusive. Alternative options, detailed in Section 4.10.2 of EIAR Chapter 4 (Alternatives), were found to have adverse consequences at this environmentally sensitive location, affecting ecological, cultural heritage, and visual sensitivities at this location.</p>
3	3	"The southbound platform will have its accessibility reduced, as people with mobility issues, such as wheelchair users will be forced to rely on an elevator to get across to the platform. We have consistently seen issues with the proper functionality of elevators in recent years, often becoming out of service with little to no notice for wheelchair users, which is simply unacceptable."	<p>It is recognised that the success of the proposals relies entirely on the full operational use of the lifts, maintained to a high standard of service. TII and the Luas Operator are committed to ensuring these lifts are consistently well-maintained to provide the necessary linkage.</p>
4	3	"It is imperative that any upgrade works to public transport infrastructure at its most basic function; retains accessibility to platforms by all users, regardless of their level of physical mobility. We would request that the inspector insist an access ramp from Broombridge road be retained in some form within the final approved plans. "	<p>Please refer to response provided to Item No. 1 above.</p>
5	5	"The proposed cycle track is to begin and end on the Northern side of the Royal Canal Bridge. This design creates a large risk of conflict between users across the steep humpbacked bridge due to its limited visibility.	<p>As there is a separate Irish Rail scheme, the DART+ West Project, in progress that will modify Broome Bridge, the Luas Finglas scheme is excluding this area from its scope of works. The DART+ West Project aims to</p>

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		A cyclist may have begun crossing the bridge with a light sequence but may not have completed it before vehicles coming in the opposite direction come through on the single lane road over the bridge."	provide two-way access across Broome Bridge for buses as well as for cyclists with one-way access northbound only for all other vehicles as per existing.
6	6	"Firstly, the entrance / exit point on the northern side of the bridge ends after the safety box for cyclists. This will leave cyclists entering traffic to cross the humpback bridge immediately in a conflict zone with oncoming one-way traffic as it exits the bridge. Cyclists who are using the cycleway and continuing their journey will be forced to turn back on themselves, in order to get to the cycle waiting point on the road."	Please refer to response provided to Item No. 5.
7	6	"Make the Luas bridge over Canal / railway line wider to cater for cyclists"	Catering for cyclists on the proposed Luas bridge over the canal / railway line would add unwarranted cost and complexity to the proposed Scheme. A dedicated cycle track on the Luas bridge would only have a single function in catering for cyclists travelling between anywhere north of Lagan Road and the station. The proposed upgrade of Broome Bridge as part of Dart+ will accommodate cyclists accessing the station and the wider road / cycle track network.
8	6	"It's quite clear from this design that cyclist safety is not being catered for, which is in strict violation of article 2.2.2 of DMURS, which lays out the priority list of road users. The needs of cyclists must be catered for ahead of those in private motor vehicles, so we would request that the inspector require this junction be made safe for cyclists as part of the conditions of approval."	Please refer to response provided to Item No. 5.
9	6	"There is an opportunity to provide segregated cycle access on the side of the Luas bridge which would have enhanced access to the station considerably and reduced risks for cyclists accessing the station. This might be a viable alternative; however, this would involve a widening of the new Luas bridge as can be seen on the Tolka Valley bridge."	Please refer to response provided to Item No.7.
10	6	"A cycle track is added to the northern side of the Ballyboggan road but there is none added to the southern side. The connection from the 2-way cycle track to the eastbound cycle lane is also unclear. The connection from the 2- way cycle track to the eastbound cycle lane is also unclear. Both sides of the Ballyboggan road should have a cycle lane added to protect vulnerable road users at this junction and support uptake of active travel. There is space within the road width to support this. This would also reduce speeds approaching the junction."	Ballyboggan Road does not form part of the 2022 Greater Dublin Area Cycle Network Plan. The proposed design at Ballyboggan Road therefore ties into the existing road layout: on-road eastbound cycle track and no westbound cycle track. At detailed design stage, consideration will be given to improving the junction layout for cyclists and bringing the proposal more in line with the Cycle Design Manual.
11	8	"A 3.0m cycle track has been provided on the new bridge across the Tolka river. This is premised on the assumption that pedestrians will use the old bridge across the Tolka river to access Broombridge highlighted in red on the image below. A more direct route for pedestrians could be provided by extending the width of the bridge by another 2m to provide a pedestrian space alongside the 2-way cycle track or to achieve the desirable minimum width for a shared active travel facility. A more direct route for pedestrians could be provided by extending the width of the bridge by another 2m to provide a pedestrian space alongside the 2- way cycle track or to achieve the desirable minimum width for a shared active travel facility."	It is the intent of the proposed Scheme to offer the route across the bridge to cyclists only and for pedestrians to use the slightly less direct existing pathways through Tolka Valley Park. Further widening of the bridge would lead to additional loss of treatment area within Cell 1 of the ICW. Under the current proposals, the new bridge already reduces the treatment area within Cell 1. To compensate for this loss, Cell 1 will be expanded to the north and south. However, there is limited capacity to offset any further loss of treatment area as constraints such as the topography to the north and the need to retain the function of the embankments separating the ICW and the River Tolka limit the expansion of the treatment area beyond what is already proposed in the proposed Scheme.
12	8	"When designing any new infrastructure, care must be given to peoples natural desire lines, it's almost inevitable that some pedestrians will begin to use the dedicated cycle lane on the Tolka Valley bridge, therefore we would recommend that the bridge be widened to include a safe pedestrian footpath as well."	Please refer to response to Item No.11 above.
13	9	"The cycle track width through the park is below the desirable minimum outlined in the national cycle design manual of 3.0m. There is more than adequate space within the park to provide a wider cycle track. There is also expected to be development in the area in the future so a wider cycle track of 4.0m should be provided to enable higher usage."	TII will consult with Dublin Commuter Coalition and other stakeholders and consider the cycle track widths in this area, subject to complying with the planning consents. A Stage 2 Road Safety Audit will also be carried out as part of the detailed design process. TII will continue to engage in dialogue with DCC, FCC and relevant stakeholders, including Dublin Commuter Coalition, as the design is refined and implemented during detailed design and construction phases.
14	10	"The cycle track provided from Broombridge to St. Helena's abruptly ends after the St. Helena's stop. This is a missed opportunity. The cycle track should have been continued alongside the LRV route through the park as a 2- way cycle track."	Farnham Drive roadway will be reduced in width and traffic-calmed for pedestrian safety and to facilitate proposed future cycle tracks, which are to be provided as part of the NTA network plan but will be for Dublin City Council to progress. Following feedback received during the Non-Statutory Public Consultation, the Luas scheme design was modified to minimise consequences for the GAA club, which had previously lost pitches due to other transport projects and feared further losses with the Luas Finglas project. Furthermore, to mitigate adverse environmental effects, additional land take in the vicinity of Erin's Isle playing pitches has been avoided. This area is particularly sensitive, hosting several wintering bird species that rely on it for commuting and foraging. Clearing vegetation

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			here would reduce available refuge, potentially affecting nesting success and survival rates. Retaining trees in this area was also a key consideration that influenced the design. "
15	10	"Farnham Drive is listed as a secondary cycle route in the Greater Dublin Cycle Network 2022 but there is no cycling provision included in this design. The presence of schools to the east on St. Helena's Road should also require cycle provision to support Safe Routes to Schools on this section of the route. "	Please refer to response to Item No.14 above.
16	13	"There are a number of issues with how the junction has been designed at the St, Margaret's Road and Finglas road junction. Firstly, the positioning of the yellow box and stop line on the northbound section of the Finglas road invites cars to advance to the stop line and squeezing into the space between the LRV and pedestrian crossings. This will inevitably result in cars blocking the LRV lanes. The entire area between the first stop line and the pedestrian crossing would be designated in yellow to prevent blockage of the LRV line."	For the proposed yellow box marking, the priority in this case is to ensure that the drivers do not sit on the Luas tracks. If the length of the yellow box is excessive, there is a greater risk of non-compliance by drivers. As this is a SCATS operated junction, the junction can be controlled to flush out any traffic lingering beyond the Stop line by extending the intergreen period.
17	13	"Secondly the staggering of the pedestrian crossing across the Finglas Road is not aligned to the Design Manual for Urban Roads and Streets (DMURS). These crossings should allow crossing in a single movement and should not be staggered as proposed. ". Extract from DMURS: Allow pedestrians to cross the street in a single, direct movement (see Figure 4.39). Staggered/staged crossings should not be used where pedestrians are active, such as in Centres, Neighbourhoods and Suburbs (except where stated below). Not only do two-stage pedestrian crossings leave vulnerable pedestrians isolated on traffic islands, they also encourage pedestrians to cross whilst there may be a break in traffic due to how many stages it takes to get across the junction."	In this particular case, staggered crossings are warranted. The skewed nature of the junction would result in straight crossings not being aligned with the desire line and could result in pedestrians choosing not to use the crossing provided. Secondly in consideration of the likely traffic signal staging, the use of skewed crossings will allow pedestrians to progress through this junction quicker compared to single movement straight crossings and limit risk-taking that can occur due to longer wait times associated with single movement straight crossings.
18	14	"Finally cycle parking has been provided in the Park and Ride building on the ground floor which is to be welcomed, but there is no cycle lane provision on the North Road. This is not in accordance with the Greater Dublin Area Cycle Network Plan which lists the North Road as a primary cycle network."	Casement Road was identified as a more desirable possible future offline north-south cycle track routing for connection of Casement Road to the south and the existing M50 cycle track crossing facility to the north, especially considering there are no plans to construct cycle tracks on Finglas Road to the south. This would avoid feeding cyclists directly into a very busy junction (Finglas Road / North Road junction). This proposal is subject agreement with the NTA and Dublin City Council.
19	14	"Cycle lanes should be provided on the North Road and an updated junction design added to improve safety for cyclists on this section. A TL502 Protected Junction - CYCLOPS Layout would significantly improve cyclist and pedestrian utility at this junction and at the Lidl car park entrance."	Please refer to response in Item No18. It is the intention at detailed design stage to develop the design of cycling infrastructure to align it closer to the Cycle Design Manual, in particular for the Finglas Road / North Road junction. A Cyclops junction can be considered as part of that process. This development of design will not impact on the environmental assessments or land acquisition.
20	16	"The junction design chosen for McKelvy road and St. Margarets Road doesn't appear in the National cycle design manual. The TL504 Protected T-Junction design would provide shorter crossing distances and better cycle visibility and therefore protection for cyclists passing the entrance to Jamestown Business Park."	At detailed design stage, the design will be updated to align with the updated Cycle Design Manual 2023, in particular for the Jamestown Business Park junction. This development of design will not impact on the environmental assessments or land acquisition.
21	16	"The TL504 Protected T-Junction design would provide shorter crossing distances and better cycle visibility and therefore protection for cyclists passing the entrance to Jamestown Business Park."	Please refer to response provided to Item No.20.
22	17	"The junction at the Charlestown stop could be significantly improved if a CYCLOPS junction was utilised instead of the current proposed design. This would reduce the risk cyclists going straight through the junction have by increasing their visibility to left turning cars and shorten pedestrian crossing distances."	The use of a Cyclops junction for the Charlestown junction can be considered at Detailed Design stage. This development of design will not impact on the environmental assessments or land acquisition.
23	18	"With all infrastructure projects, it is essential for both public buy-in, and general safety, that an appropriate amount of public lighting be put in alongside the new cycleways and footpaths. This will be of particular importance in the new green areas in the previously unused park-lands after the Tolka Valley Road. If the new cycle tracks do not come with a perceived level of safety, then ultimately, they will not be used to their maximum potential, especially in the winter months when it can already be dark when people are leaving work."	The "previously unused park-lands after the Tolka Valley Road" within the submission refers to St Helena's green area. Regarding the lighting of this parkland, only the eastern section of this linear green area will be preserved as a dark corridor to support nocturnal fauna, particularly the local bat species. The pedestrian and cyclist thoroughfare will be located in the western section of this green area and will feature appropriate lighting to ensure the security and safety of park users. Furthermore, during the winter months, the lighting timings will not be restricted for ecological safeguarding purposes, as the local bat populations, along with other nocturnal mammals such as hedgehogs, will be in hibernation.
24	18	"There is a distinct lack of secure cycle lockers at our transport hubs in Dublin, currently only seven Dart stations have secure lockers, and on the Luas; just Dundrum station has ten lockers available. We would request that each of the new stations on the Finglas Luas line incorporate an initial provision of secure lockers, in addition to an appropriate amount of Sheffield stands for safe storage of bicycles by commuters."	A combination of secure cycle storage facilities (Broombridge Terminus, Finglas Village Stop and St Margaret's Road Stop and within the Park & Ride facility) and "Sheffield" type cycle stands are proposed at Luas stops. TII will engage further with DCC, FCC and NTA at detailed design stage in relation to the provision of cycle lockers.

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1	3	<p>"Our Client is the owner of lands referenced in the CPO/Railway Order documentation which are shown:</p> <p>1) in the second schedule (land to be acquired): Ref D 1-31 A-A6 - Plan D 1-P 31 AB. RefDI-31A-A9-Plan DI-P31 A-B. Ref DI-31A-A10-PlanDI -P31 AB. Ref D1-31A-A13- Plan D1-P 31 A-B. Ref DI-31A-A15. Plan D1-P 31 AB.</p> <p>2) In the fourth schedule (temporary acquisition): Ref. D 1-3 I A-T4 Plan D 1-P 31 AB. RefDI-31A-T5PlanDI-P31 A-B.Ref.DI-31A-T6 PlanDI-P31 A-8 . Ref DI-31 A-T8 Plan 1-P 3 I A-B</p> <p>3) In the tenth schedule (private rights of way which may be extinguished): Ref D 1-3 IA-A I 2 Plan DI-P3I A-B."</p>	<p>Plots tagged D1-31A-A6 and D1-31A-T4 on plan D1-P 31A-B have two owners or occupiers named in the Books of References and include Fashionflo Limited. The rest of tags are limited to one owner/occupier which is Fashionflo Limited.</p>
2	3	<p>"As set out in the attached report (at Appendix 1) by Transport Insights the effect of the development on our Client's business and lands is quite serious/profound."</p>	<p>TII does not accept that the effect of the proposed Scheme on Fashionflo's business and lands to be serious or profound. Please refer to response to Item No. 3 below.</p> <p>The phasing of works during construction will allow access to be maintained to this business during construction. Although the construction works will require some delay to traffic, this will not be significant enough to impact on business performance. Temporary vehicle parking will be provided where existing parking is impacted by the footprint of the construction works.</p>
3	3	<p>"The development will impact all vehicle movement on the site and will greatly reduce parking."</p>	<p>The existing main access to Fashionflo off Broombridge Road for vehicles and pedestrians will be permanently closed off and replaced with direct access off Lagan Road. Further to consultations with Fashionflo, general access will be provided 45m from the Broombridge Road junction and off Lagan Road which will cater for all car and mid-sized commercial vehicle access. Access for large HGVs will be via an HGV-only gated access at the corner to the site adjacent to an existing property access at Lagan Road but closer to the junction. Further to consultations with Fashionflo, they have indicated that the need for this gate to be used would be infrequent, i.e. up to once a month.</p> <p>TII does not accept that the proposed Scheme will greatly reduce parking. The current Fashionflo marked-out car parking capacity consists of 14 no. perpendicular spaces in front of their building; 13 no. perpendicular spaces along their front boundary; and 7 no. parallel spaces along the side of their building. The 14 no. existing spaces are unaffected by the proposed works. The 13 no. existing spaces are affected by the proposed Scheme: there would be insufficient space for perpendicular parking however provision of 4 no. parallel parking spaces is possible here. Provision of a new access off Lagan Road would necessitate removal of 4 no. parallel parking spaces along the side of the building. The net loss of parking is 13 no. spaces, representing 38% of the existing total of 34 no. the proposed Scheme does not provide for mitigation for the car parking spaces lost. The location of the proposed Broombridge Luas station nearby, together with proposed active travel infrastructure on Broombridge Road and beyond, will offer people travelling to the Broombridge Road area alternative ways to travel and encourage a modal shift away from car dependency. This should translate to a lower requirement for parking at the Fashionflo site.</p>
4	3	<p>"It will result in a smaller retained landholding, all road frontage onto Broom bridge Road - about 60% of the site's entire road frontage - will be lost."</p>	<p>Our calculation is that approximately 50% of the site's entire road frontage bounds Broombridge Road. The frontage to Broombridge Road is replaced with frontage to the Luas line. The existing frontage to Broombridge Road is bounded by a wall / fence with one access location. This access is being relocated to Lagan Road. The boundary wall / fence will be replaced with a new boundary wall / fence. By point of clarification approximately 13% of the paved area in front of the Fashionflo building is being acquired.</p>
5	3	<p>"With the Luas tracks/ramp/bridge running right up to the boundary of the site, it appears that pedestrian access will also not be possible from Broombridge Road."</p>	<p>Please refer to response to Item No. 3.</p>
6	4	<p>"Modifications to the proposed scheme LUAS scheme in this case effected either through the presentation of a modified scheme at an Oral Hearing or alternatively by way of conditions to any grant, if possible, including, for example, the extension of the proposed flyover bridge further along Broom bridge Road (if this would allow for vehicular access to be maintained from Broom bridge Road), would be of particular interest to our Client."</p>	<p>The Luas vertical alignment is elevated to clear the Royal Canal and railway line only and then drops down to existing ground level north of this crossing. Retaining the Luas vertical alignment elevated to facilitate an underpass access at Fashionflo would also require grade separation at Lagan Road and at Ballyboggan Road. This would result in a continuous elevated structure from Broombridge station to north of the River Tolka, which would be circa 550m long and therefor unjustified based on excessive cost, impact on programme and environmental grounds. It is not deemed feasible for the proposed Scheme to provide grade separation at every access or road crossing encountered. The full length of the Luas Finglas scheme north of the Royal Canal is therefore characterised by being fully at-grade.</p>
7	6	<p>"It should be noted that both site access gates will be affected by the land take, with the main access along Broombridge Road being permanently removed/severed."</p>	<p>Please refer to response to Item No. 3.</p>

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8	7	“It is noted that an issues paper was published by Dublin City Council in 2024 which is to form the basis of a local area plan (the Ballyboggan Local Area Plan 2024-2030). No draft plan has been prepared at the time of writing and so until such time as the emerging LAP is enacted, any development proposals within the subject area should comply with the current land use zoning objective as per Dublin City Development Plan 2022-2028, and the impacts of proposed transport schemes such as Luas Finglas be assessed in the context of the lands' existing zoning designation.”	<p>The zoning map contained in the Dublin City Development Plan 2022 - 2028 includes a note “1. Map to be read in conjunction with the written statement” and in the written statement itself there is specific policy (Policy SMT22) which provides as follows:</p> <p>“To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained (...) Delivery of Luas to Finglas”</p> <p>Therefore, the zoning map cannot be read in isolation but must clearly be read in conjunction with the written statement, and within that written statement there is a specific policy which supports the delivery of Luas Finglas.”</p>
9	8 & 42	“Proposed revised access arrangements will result in increased complexity and traffic hazards for motorists and vulnerable road users (pedestrians and cyclists) associated with vehicular movements into and out of the site in a challenging junction environment with HGV movements being particularly problematic.”	<p>The proposed access arrangement to Fashionflo aims to minimise conflict for all road users. TII disagrees with the contention that the new access arrangement will be complex: the proposal is to move the property access from in front of the main building to the side of that building and should not present difficulties for staff or visitors. The current business operates with a low frequency of HGV movements into and out of the site. TII does not agree that the proposed scheme would give rise to traffic hazards within the property. It is expected that the business will continue to operate with due care and adherence to workplace safety regulation. Based on the amount of car parking at the site and the number of likely resulting accessing movements, the likelihood of a conflict occurring with another vehicle is considered low. As this is an enclosed car park with limited opportunity for drivers to gain speed, this also reduces the chance of a conflict occurring and the severity of a conflict should one occur. On that basis, the car park is considered a low-risk environment.</p>
10	8 & 42	“The currently proposed land take , compounded by revised access arrangements, will create highly complex HGV turning manoeuvres required for accessing the on-site loading docks and egressing the site in forward gear. Indeed, it is apparent from TI I-provided swept path analysis outputs that articulated vehicle movements will likely become impossible on a permanent basis following the commencement of construction works within the site's vicinity and on an ongoing basis thereafter (including the operational phase of Luas Finglas). “	<p>TII acknowledges that there will be less space available for HGV movements. The changes required are referred to in Chapter 5 – Description of the proposed Scheme and Chapter 8 – Population. Over the course of the project solutions were explored with Fashionflo to minimise these impacts. On the southern corner of the site a disused loading dock is proposed to be infilled. At the north of the site alternative entrance and gate configurations were also explored. The proposed solution is considered to be the least impactful arrangement. TII will continue to engage with Fashionflo at all stages of the process to ensure disruption is minimised to the fullest extent possible.</p>
11	8 & 42	“Proposed temporary land take will likely completely prevent HGV circulation within the site by severing the northern and southern portions of the site for indefinite period of time, with no mitigation measures being proposed by TII.”	<p>The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments. Additionally, a strip is required for a short period for a utility connection. The duration for these areas will be limited to the duration required in completing these specific works and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP.</p>
12	8 & 42	“Proposed temporary land take will likely completely prevent HGV circulation within the site by severing the northern and southern portions of the site for indefinite period of time, with no mitigation measures being proposed by TII.”	<p>Please refer to response to Items No. 10 and 11 above.</p>
13	9 & 42	“Proposed routing of all commercial vehicle movements through a car parking aisle and the publicly accessible part of the site will give rise to traffic hazards within the site, which do not currently occur.”	<p>TII does not accept the assertion that the proposed scheme would give rise to traffic hazards within the property. Based on the amount of car parking at the site and the number of likely resulting accessing movements, the likelihood of a conflict occurring with another vehicle is considered low. As this is an enclosed car park with limited opportunity for drivers to gain speed, this also reduces the chance of a conflict occurring and the severity of a conflict should one occur. On that basis, the car park is considered a low-risk environment.</p>
14	9 & 42	“Proposed permanent land take and revised vehicular circulation arrangements appears likely to result in a loss of a 70% of existing on-site car parking capacity, affecting business operations and potentially resulting in informal or overspill car parking.”	<p>TII does not agree with the assertion that the proposed scheme would likely result in a loss of a 70% of existing on-site car parking capacity. Please refer to response to Item No. 3.</p>
15	9 & 42	<p>“Proposed land take will affect the site's long-term viability for zoned employment land use, with unconstrained goods vehicle access being essential for such use.</p> <p>Irrespective of whether current zoning should be retained or changed in the future, the land take will permanently affect the site's form factor and create a physical and visual barrier between the site and Broombridge Road, increasing complexity of redevelopment and reducing the site 's valuation.”</p>	<p>The visual impacts of the proposed Scheme have been assessed in Chapter 21: Landscape and Visual Amenity and the proposed improvements are described in the landscape drawings and Appendix A21.2 - Urban Integration Report. TII does not accept the assertion that the tracks will reduce visibility of the site. The current landscape sensitivity in this area is determined as Low. The removal of the existing low quality boundary treatment and poor-quality footpaths and replacement with quality surfaces for footpath and cycleway and new property boundary treatment represents a significant positive aspect of the proposed Scheme in this area. The removal of the poor-quality boundary treatment and the changes that will restore a degraded landscape</p>

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			<p>represents a significant positive aspect of the proposed Scheme in this area. The magnitude of Landscape change during the Operational Phase is Medium and the quality is Positive. The frequent movement of LRVs along the track and across the Canal bridge may create slight periodic disruption but may also create aspects of interest in the visually poor environment that do not currently exist. Overall, the potential effects on receptors R006-R016 during the Operational Phase will be Slight, Permanent and Positive.</p> <p>TII does not agree with the assertion that the Proposed land take will affect the site's long-term viability for zoned employment land use, with unconstrained goods vehicle access being essential for such use. The proposed land acquisition will involve taking lands to the front of Fashionflo, along its western boundary to Broombridge Road and currently being used for car parking. The proposed scheme will remove the existing Broombridge Road access and provide an alternative access to Lagan Road. Please refer to response to Item no. 3 for details of access.</p> <p>Any future development on these lands is subject to the preparation of a statutory plan for the Z6 Zoned Lands at Glasnevin as per the Dublin City Development Plan 2022-2028. The Council and ABP have also confirmed any future development of the site is premature pending this also. In relation to planning policy, any future redevelopment is contingent on (1) finalisation of the design of Luas Finglas having regard to Policy SMT22 and (2) preparation of Feasibility Study and Local Statutory Plan for the Z6 Lands at Glasnevin (Objective CSO1). These are policy prerequisites for any re-development of the site.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the Luas Finglas EIAR 2024, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p> <p>Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p>
16	9 & 42	"The cumulative impact of the proposed Luas Finglas scheme as summarised above would fundamentally undermine Fashionflo 's commercial operations on a permanent basis, with the currently proposed mitigation measures being deeply inadequate in addressing such impacts."	<p>While issues have been raised regarding impacts on the daily operation of the business, which are addressed above, these do not amount to an impact that may result in fundamentally undermining Fashionflo's operations on a permanent basis or result in a "loss of employment". On the contrary, the proposed scheme will provide much improved accessibility for prospective employees from the catchment to the north and interconnections with other public transport. The availability of a new public transport option will also reduce pressure on the</p>

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			demand for on-site car parking. Access issues, parking and HGV access have been addressed in Item 3. Access safety, traffic and HGV movements are addressed in Items No. 9, 10, 13 and 22.
17	9 & 42	"Retention of site access off Broombridge Road: It is Fashionflo's preference that the existing access arrangements be retained insofar as possible. In this context, the proposed Luas Finglas tracks are noted to run above ground along Broombridge road immediately to the south of the Fashionflo site, with the Colorman site bounding the Fashionflo site to the south retaining direct access off Broombridge Road via an underpass of the Luas tracks."	Please refer to response to Item No. 6 in relation to extending the above ground section of the Luas Finglas track to the north.
18	9 & 42	"It is requested that the above ground section of the Luas Finglas track be extended to the north, so that a similar access to the Fashionflo site can be provided. Alternatively, a modification of the proposed Luas track elevation to retain the existing access gate off Broombridge Road could be considered, with traffic signals being provided to prevent collisions between the Luas and accessing/ egressing vehicles."	Please refer to response to Item no. 6 in relation to extending the above ground section of the Luas Finglas track to the north. The second proposal of retaining the Luas track at-grade in front of Fashionflo to permit continued access at the existing access gate is not feasible due to vertical geometry constraints for the track alignment and a signal-controlled access is not practical as it would cause issues with Luas operations being close to the Lagan Road Luas crossing.
19	9 & 42	"Amended revised access arrangements: Should the above request not be accommodated, it is requested that alternative revised access options be identified and considered, so that excessively complex turning manoeuvres in accessing manoeuvring within and egressing the site (particularly by HGVs) be avoided. In doing so, access from or egress to the south (via the Colorman site and the proposed underpass) should be considered."	TII does not accept the contention that accessing manoeuvres will be excessively complex. Please refer to response to Item No. 9. Providing access through a third party's property is not feasible.
20	9 & 42	"Reduction of temporary land take extent, mitigation and clarification of its duration: Proposed temporary land take has been recognised to involve temporary severance of the loading/ unloading area within the Fashionflo site from the remainder of the site and a public road access, while also preventing HGV turning movements within the site for unclear duration."	Please refer to response provided to Item No. 11 above.
21	9 & 42	"It is requested that the extent of temporary land take be revised and minimised, with the required duration being clarified and mitigation measures being identified."	Please refer to response provided to Item No. 11 above.
22	10	"Without prejudice to the issues raised in that report the development of the LUAS as proposed will have a broader impact on traffic congestion arising from vehicles accessing and exiting the Dublin Industrial Estate where traffic which would otherwise use the access to the site from Broombridge Road will instead have to use the junction at Broombridge and Lagan Road, which junction is one of the main access points to the Dublin Industrial Estate."	Section 18.4.3.8 of Chapter 18 of the EIAR outlines the General Traffic Impact Assessment during the operational phase of the proposed Scheme. To determine the impact that the proposed Scheme has in terms of general traffic redistribution on the study area, the Local Area Traffic Model has been used to identify the difference in general traffic flows between the Do Minimum and Do Something scenarios. Figure 18-31 and 18-32 of the EIAR illustrate the flow differences on road links within the study area as a result of the proposed scheme in the opening year (2035) AM and PM peak hours. The results indicate a change in traffic volume along Broombridge Road and Lagan Road of less than 100 vehicles (combined 2-directions) as a result of the proposed scheme. As outlined in Chapter 18 Traffic and Transport of the EIAR, TII's Traffic and Transport Assessment Guidelines (May 2014) define a threshold for assessment of 100 vehicles (combined 2-way flow) in the peak hours (Figure 18-30 of the EIAR). This threshold aligns with an approximate 1 vehicle per minute increase per direction on any given road. Where changes in traffic volumes as a result of the proposed Scheme are less than the 100 vehicle threshold (as is the case here), then the impacts are deemed to be "Not Significant".
23	10	"The Board will be aware of the relevant case law concerning the exercise of its power of compulsory purchase of land. The relevant acquiring authority must also demonstrate that the compulsory purchase order is "clearly justified by the existence of the common good" (see Clinton v An Bord Pleanála) There is however a concern, given the profound impact of the Railway Order on our Client's business as set out in detail in the report of Transport Insights, and by reason of the severance of access from Broom bridge Road, that the development is not consistent with the site 's zoning and arguably materially contravene the site's zoning in that: The lands which are to be permanently acquired are zoned as Z6 the purpose of which is to " ... provide for the creation and protection of enterprise and facilitate opportunities for employment creation". Instead of protecting the existing enterprise (which supports 50 employees) the development will in fact seriously undermine its viability and the future use of the land for a similar type of enterprise that is reliant on good vehicular access and egress."	In their submission on behalf of FashionFlo Limited in respect of Luas Finglas, Sheehan Planning refer to "relevant case law" concerning the exercise of the Board's powers of compulsory acquisition, and in particular refer to the decision in Clinton v the Board (No. 2) [2007] 4 IR 701 to suggest that the relevant acquiring authority must demonstrate that the compulsory purchase order 'is clearly justified by the exigencies of the common good'. Luas Finglas clearly meets this test and the acquisition of lands from FashionFlo is justified by the exigencies of the common good. The Clinton Case was primarily a challenge to a CPO on the basis that the stated purpose in that CPO namely to facilitate development was not a sufficiently specific purpose and that there was no material before the Board to justify the confirmation of the CPO. The Supreme Court found that "the precise nature of the development was not required to be proved" because the property was required for the legitimate purpose of regeneration of the O'Connell Street area. The situation here is that TII has clearly set out in the draft RO and all of the other application documentation that is before the Board that the lands as identified in that draft RO including the lands from FashionFlo are required for the purpose of the construction and implementation of Luas Finglas, and TII under the Transport (Railway Infrastructure) Act 2001 (as amended) has the power to compulsorily acquire these lands.


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			<p>Further, the potential impacts on FashionFlo of Luas Finglas including the acquisition of certain lands from FashionFlo were carefully considered and assessed in the EIAR ("EIAR") for Luas Finglas.</p> <p>TII notes and welcomes that FashionFlo accepts that there is a general community need for the Luas and also that there are various policies in the development plan promoting the delivery of the Luas extension to Finglas and the submission references policy/objective SMT22 in this regard.</p> <p>The FashionFlo submission however does contend that "the development is not consistent with the site's zoning and arguably materially contravene the site's zoning". There is no such material contravention. The zoning map contained in the Dublin City Development Plan 2022 - 2028 includes a note "1. Map to be read in conjunction with the written statement" and in the written statement, as outlined in the Fashionflo submission itself there is specific policy (Policy SMT22) which provides as follows:</p> <p>"To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained (...) - Delivery of Luas to Finglas"</p> <p>Therefore, the zoning map cannot be read in isolation but must clearly be read in conjunction with the written statement, and within that written statement there is a specific policy which supports the delivery of Luas Finglas."</p>
24	11	<p>"Text at 14.7.6 of the Development Plan (already set out at section 2.0 above) underlines the importance of Z6 zoned sites having "good vehicular and public transport access. " Whereas the LUAS will increase public transport access it is also a requirement of the development plan that good vehicular access is provided. The development in this case will sever access from the site to Broombridge Road and further, as explained in the technical report by Transport Insights the proposed revised access arrangements "will create highly complex HGV turning manoeuvres required for accessing the on-site loading docks and egressing the site in forward gear. Indeed, it is apparent from TII-provided swept path analysis outputs that articulated vehicle movements will likely become impossible on a permanent basis following the commencement of construction works within the site's vicinity and on an ongoing basis thereafter (including the operational phase of Luas Finglas)."</p>	<p>The submission raises questions about the feasibility of the proposed alternative access for HGV in terms of restrictions in manoeuvrability. This is a material matter impacting the on-going operation of an existing business and appropriate access arrangements have been provided to allow the business to continue to operate. Access issues, parking and HGV access have been addressed in Item 3. Access safety, traffic and HGV movements are addressed in Items 9, 10, 13 and 22.</p>
25	11	<p>"The acquisition of the land will further prevent and/or severely impact the viability of our Client's business as set out above and insofar as it will sever vehicular access to the site from Broombridge Road this will reduce the development potential (noting that a minimum of 3-4 storeys height is promoted on such lands in the Development Plan) and value of the site to our Client and to prospective purchasers."</p>	<p>TII understands the concerns regarding the acquisition of land, TII believes that the overall impact on the viability of the business and the development potential of the site may not be as severe as suggested.</p> <p>Firstly, the enhanced connectivity and accessibility provided by the Luas extension could increase the attractiveness of the area, potentially offsetting any initial inconvenience caused by the loss of vehicular access from Broombridge Road.</p> <p>Furthermore, the promotion of 3-4 storey developments indicates a positive outlook for future growth and investment in the area, which could ultimately enhance the value of the site for our Client and prospective purchasers.</p> <p>In addition, while there will be no access directly to Broombridge Road, an alternative access is being provided to Lagan Road.</p>
26	11	<p>"For these reasons it is considered that the acquisition would disproportionately interfere with our Client's property rights, would diminish the value of their property and the development on the lands to be acquired is contrary to proper planning and sustainable development as it arguably materially contravenes the zoning of the lands and/or will give rise to traffic hazards."</p>	<p>The extent of Land Take has been minimised as far as possible while allowing sufficient space for cycle / pedestrian paths, the Luas tracks and the continued two-way function of Broombridge Road. The presence of the Proposed Scheme will also have a positive effect on the business by increasing people familiarity with its location.</p> <p>The issue of zoning of lands has been dealt with under Item No. 23.</p> <p>Traffic impacts have been dealt with under Items No. 9, 10, 13 and 22</p>
27	11	<p>"For the reasons outlined in Transport Insights Report it is considered that the mitigation measures for access to the site are inadequate."</p>	<p>TII disagree that mitigation measures are inadequate. Access issues, parking and HGV access have been addressed in Item 3. Access safety, traffic and HGV movements are addressed in Items No.9, 10, 13 and 22.</p>
28	11	<p>"Our Client requests that the Board engage with the 'Requested Alterations' as set out at section 5.3 of Transport Insights Report (quoted earlier) and in particular consider requiring the extension of the proposed flyover bridge further along Broombridge Road (if this would allow for vehicular access to be maintained from Broombridge Road). In this regard, if an elevated section could be continued all the way through to Tolka Valley Park it would greatly simplify the Lagan Road and Ballyboggan Road junctions and would allow appear to allow our Client to retain its current access from Broombridge Road. It may also potentially avoid the need for any</p>	<p>Please refer to response to Item No. 6 in relation to extending the above ground section of the Luas Finglas track to the north.</p>


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		land take on our Client's site as the elevated track might oversail the road to some degree, allowing the track be moved further to the west."	
29	12	"For the reasons set out above it is considered that the Railway Order Application, if confined/granted, would have a disproportionate impact on our Client's property rights, would diminish the value of their lands, and, in its current form, would be contrary to proper planning and sustainable development of the area."	TII disagrees with the contention that the currently proposed mitigation measures are deeply inadequate in addressing impacts on Fashionflo's business and consider them to be overstated. Please refer to response to Item No. 3 regarding impacts on access and parking. Please refer to response to Item No. 55 and 56 regarding accessing complexity and safety. Please refer to response to Item No. 10 and 63 regarding impacts on HGV manoeuvring.
30	12	"Without prejudice to this position in the event that the Board is minded to confirm/grant the Railway Order our Client requests that the Board amend the scheme through the attachment of conditions and/or by otherwise seeking modifications (noting in particular that a revised alignment was presented at the recent Metro North Oral Hearing by the TII which satisfied several objectors to that development)."	The EIAR (Chapter 4) has assessed alternatives considered including alternatives along Broombridge Road. Refer also to response to Item no. 6 in relation to extending the above ground section of the Luas Finglas track to the north. TII is of the opinion that the optimum solution for the Luas line and realignment of Broombridge Road has been brought to RO.
31	17	"While our Client is supportive in principle of the proposed Luas Finglas scheme, which is expected to improve sustainable accessibility within its catchment area, they are concerned that the proposed temporary and permanent land take encompassing a portion of its site at Lagan Road will have a severely negative impact on its business operations."	TII notes Fashionflo's support in principle of the proposed Scheme. TII has dealt with the permanent land take issues above in detail including the loss of car parking (Item 3), the relocation of the entrance to Lagan Road from Broombridge Road (Items 3), Traffic impacts / safety (items 9, 13 and 22), HGV movements (Items 3 and 10). Refer also to response to Item no. 26 in relation to the permanent impact on business operations. Refer also to Item 15 for how compensation is dealt with. Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP. It will be a requirement of the construction contract to maintain continuity of access and address any traffic conflicts, including for HGVs, throughout construction. As noted in Section 1.3.1 of the CTMP "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." No impact is envisaged to traffic and delivery movements in the permanent scheme, and this is to be maintained through construction. Traffic control measures to be maintained for Broombridge road are outlined in the CTMP, Volume 5 Appendix A6.2 Table 6-2 of the EIAR. Phased lane closures will be required for the works. Some limited road closures will be required for works also. The intention is these will be undertaken as night works to reduce disruption.
32	17	"Such impacts result from the current proposals limiting vehicular access, circulation and turning movements within the site, thus affecting the site's commercial viability."	TII has dealt with vehicular access issues above in detail including the relocation of the entrance to Lagan Road from Broombridge Road (Items 3), Traffic impacts / safety (items 9, 13 and 22), HCV movements (Items 3 and 10). Refer also to Item 15 for how compensation is dealt with.
33	18	"While Fashionflo notes the mitigation measures proposed by Transport Infrastructure Ireland (TII) which seek to maintain accessibility of the site for a variety of vehicle types, they consider the effect of those measures to be deeply inadequate."	TII disagree that the measures proposed are inadequate. TII has dealt with vehicular access issues above in detail including the relocation of the entrance to Lagan Road from Broombridge Road (Items 3), Traffic impacts / safety (Items No. 9, 13 and 22), HCV movements (Items No. 3 and 10). Refer also to Item 15 for how compensation is dealt with.
34	21	"The figure also shows that the proposed permanent Compulsory Purchase Order (land take) shall include a portion of land (ca. 175 sqm in total) at the site's west boundary along Broombridge Road, with further portion (ca. 252 sqm in total) in the west and north of the site to be acquired temporarily. It should be noted that both site access gates will be affected by the land take, with the main access being permanently removed. Details of extent and impact of the proposed land acquisition are presented in Section 3. "	Noted.
35	21	"Fashionflo wishes to highlight that while all meetings with TII were amicable, they did not provide clear, definitive answers to key questions relating to land take, timelines and, especially, site access."	As detailed in Chapter 1 - Introduction, Table 1-10: Key stakeholders and number of meetings held between 2020 and 2024, TII held meetings/site visits with Fashionflo on 6 occasions and in addition 2 site visits by technical staff took place. During these meetings TII discussed in-depth the impacts of Luas Finglas on these premises. Land takes, both temporary and permanent, timelines and site access and circulation were issues that were comprehensively covered. Drawings and 3D models were presented to provide further clarity and understanding. TII welcomes the opportunity to provide further clarification of the Luas Finglas project with all stakeholders.
36	21	"The land take and swept path analysis drawings, which underpin this Submission and have been partially reproduced in Section 3.4, are noted to have been provided by TII to Fashionflo in Autumn 2024."	Fashionflo were made aware of all drawings concerning their premises in good time. TII drew particular focus to drawing LDD101-BEV-TM-ROUT-XX-DR-CH-00003-A01 which covers the entrance solution for their premises. For their meetings with Fashionflo, TII had tailored presentations that clearly pointed to the pinch points concerning Fashionflo and the comprehensive and collaborative, efforts made by TII to mitigate them.

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			TII would welcome further engagement with Fashionflo to further explore any residual concerns presented in this submission.
37	22	"It is further noted by our Client that the information provided by TII has been piecemeal in nature, with the furnished swept path analysis files not superimposed on either the completed topographical survey of the site and the temporary and permanent land take. As such, prior to Fashionflo engaging Transport Insights in late-October 2024, the severity of impacts of TII's current proposals on on-site operations within the Fashionflo site was unclear."	TII held online and on-site meetings with Fashionflo (please refer to response to item 35 above), created bespoke presentations, models and forwarded site-specific drawings. TII does not accept the notion of conducting piecemeal approach to our stakeholders' concerns. During meetings with Fashionflo, TII directed Fashionflo's attention to the consideration given to mitigate all on-site operations, both oral and visual solutions were presented. Photomontages are a non-statutory courtesy, that help illustrate Luas Finglas in-situ, when complete, at various sites along the route. These images were made available to all Luas Finglas stakeholders. TII is committed to continue to engage with Fashionflo.
38	23	"To enable consideration of the swept path outputs and extents of temporary and permanent land take in the context of the proposed new roads layout and topographical survey, the above files have been combined, with the combined drawing utilised for producing illustrations presented herein. It should be noted that the extent of the topographical survey issued by TII does not cover the entirety of the Fashionflo site, missing key features located in the southern part of the site, as shown in Figure 1.3 (overleaf)."	The scope of the topographic survey includes the Fashionflo frontage and north side of the site along Lagan Road.
39	23	"The requested measures have been elaborated on in Section 4.3 and can be summarised as follows: Retention of site access off Broombridge Road: It is Fashionflo's preference that the existing access arrangements be retained, with the proposed above-ground section of Luas Finglas being extended to the north and an underpass to the Fashionflo site being provided."	Please refer to response to Item No. 6 in relation to extending the above ground section of the Luas Finglas track to the north.
40	23	"Amended revised access arrangements: Should a direct Broombridge Road access via an underpass not be provided, it is requested that alternative access options be identified and pursued, so that excessively complex turning manoeuvres in accessing and egressing the site (particularly by HGVs) be avoided."	Please refer to response to Item No. 6 in relation to extending the above ground section of the Luas Finglas track to the north. TII does not agree that turning manoeuvres will be excessively complex. Please refer to response to Item No. 9.
41	30 & 31	"Reduction of temporary land take extent, mitigation and clarification of its duration: It is requested that the extent of temporary land take be revised and minimised, with the required duration being clarified and effective mitigation measures being identified."	The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments. Additionally, a strip is required for a short period for a utility connection. The duration for these areas will be limited to the duration required in completing these specific works and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP.
42	31	"As can be seen in the preceding figure (3.2), due to the currently proposed construction of LRV tracks along Broom bridge Road, the permanent acquisition of a strip of land along the Fashionflo site's west boundary is envisaged, with the extents of same extending ca. 3.2 metres into the site. This will result in the yard area in the west part of the site being substantially narrowed. Moreover, the current proposed scheme will result in closing of the main access to the site from Broom bridge Road, as no access across the Luas line is to be provided at this location."	The permanent land take strip along Broombridge Road varies in width along its length up to circa 3.2m at the southern end. Refer also to response to Item No. 4 with regard to the amount of land being acquired. A new access is being provided to Lagan Road as detailed in Item No. 3 above.
43	31	"The impact of temporary land take will be even more extensive, with the strip of land along the site's west boundary being sanitised widened by further ca. 2.0 metres to more than 5.0 metres in total. The temporary land take will also involve a time-limited severance of the northern and southern parts of the yard, with what is understood to be an air duct to be installed across the yard."	The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments. Additionally, a strip is required for a short period for a utility connection. The duration for these areas will be limited to the duration required in completing these specific works and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP.
44	31	"Expected impacts of the proposed land take on Fashionflo operations and long-term viability of the site for industrial uses are described in detail in Section 4, with the mitigation measures currently proposed as part of the Luas Finglas scheme (as per subsequent Section 3.4) accounted for. However, the preceding Figure 3.2 clearly presents the impact at a high-level, including reduced manoeuvrability within the significantly narrowed yard (from ca. 14.5-21.5 metres wide at present to ca. 12.0-18.5 metres with the proposed permanent land take, and ca. 10.0-16.5 metres with the temporary land take), presenting significant access challenges for larger vehicles, and a loss of a much of the site's current on-site car parking facilities."	Please refer to response to Item no. 16 and 25 in relation to long-term viability of the site for industrial use and concerns about restrictions in manoeuvrability.
45	32	"Furthermore, significant loss of usable road frontage should be noted, with the Luas tracks preventing vehicular or pedestrian access to the site at any location along its western boundary."	Please refer to response to Item No. 3 in relation to the proposed access arrangement for pedestrians and vehicles.
46	33	"The proposed new main access gate off Lagan Road has been described on the TII drawing as being "sufficiently distant from traffic signals so as not to present a hazard". While the existing main gate off Broom bridge Road is opened on demand, the new gate has been proposed to remain open throughout the day, presumably to avoid vehicles waiting for the gate to be opened on Lagan Road. As this would compromise the	Noted.

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		site's security, it has been proposed to install an inner sliding security gate within the site, so that its southern part (including the goods in/ out area) can be secured while the northern part of the site remains open to the public."	
47	35	"As shown in the preceding Figure 3.4, a vehicle entering the site via the main gate would need to immediately take a sharp 90 degree turn to the right, pass by the building's Lagan Road frontage, and then take another 90 degree turn to the left to enter the circulation, loading and parking area located in the western part of the site, along the Broom bridge Road frontage. Egress would be accommodated in the same way, with inverse manoeuvres being necessary. With the above-described tight turning manoeuvres required in accessing and egressing the site via proposed new main gate, the gate would not be suitable for accommodating larger trucks such as articulated HGVs."	Noted. HGV's will access via the gate closer to Lagan Road
48	35	"In the case of egressing HGVs, it has been proposed that equivalent hazards be resolved by introducing a left-turn egressing restriction at the HGV gate. The TII drawing annotation states that the hazards involved in left-turn movements would include "drivers not seeing the primary signal heads, drivers not seeing north-bound LRVs and potential for overrun of kerbs and putting pedestrians at risk and potential for impacts with traffic signal equipment on the south side of Lagan Road".	Noted.
49	35	"The proposed arrangements would involve all egressing HGVs to travel east (as shown in Figure 3.6) into the Dublin Industrial Estate interior and circulate within the Estate so that they can approach the Broombridge Road/ Lagan Road Junction travelling westbound before progressing north via Broombridge Road. While a yellow box is proposed on the westbound lane of Lagan Road in front of the HGV entrance to facilitate goods vehicles' movements, the extent of the proposed box is clearly insufficient to ensure safe eastbound turning, as highlighted in Figure 3.6. The figure shows that an egressing eastbound HGV would encroach on the opposite lane up to ca. 18 metres upstream from the yellow box, with any westbound queuing preventing completion of such turning movement."	A yellow box has been provided on Lagan Road to ensure that HGV's entering the property are not blocked. Detailed design can consider extending the length of the yellow box to facilitate HGVs.
50	36	"Given the significance of Lagan Road as one of only two Dublin Industrial Estate access/ egress roads, queuing at this location is likely to be present for extended time periods throughout the day, creating difficulties and hazards in HGV egressing the site."	TII does not accept the assertion that queuing at Lagan Road is likely to be present for extended time periods throughout the day, creating difficulties and hazards in HGV egressing the site. Traffic at the junction will be regulated by traffic lights which will put order on what is currently an uncontrolled junction thereby facilitating traffic on Lagan Road. Furthermore, the SCATS traffic signalling system that will be used at this junction, is adaptive and can respond to any imbalances in demand from the approach links. Pedestrians will be able to navigate the junction at controlled crossings. The proposed road infrastructure, its interface with the Luas and accommodation of direct accesses is not untypical of what is found on the existing Luas network elsewhere in the city where there is on-street running of the Luas. The public road layout as designed has gone through a preliminary design process involving consultation with Dublin City Council Traffic Section, the NTA, traffic modelling experts, traffic safety experts and Luas safety experts. The detailed design process will require more detailed involvement from the above parties to ensure that the proposed infrastructure operates effectively and safely. Refer also to Item 22 above which details the traffic impacts assessed for the EIAR.
51	36	"Proposed revised access arrangements, as described in Section 3.4, are considered unsuitable and are deemed to give rise to traffic hazards, particularly in the case of HGV access and egress."	Access issues, parking and HGV access have been addressed in Item 3. Access safety, traffic and HGV movements are addressed in Items 9, 10, 13 and 22.
52	36	"The swept path drawing for a panel van (shown in Figure 3.4) demonstrates that due to the turning movements required, egressing vehicles will cross the footpath along the site's northern boundary at an acute angle rather than at the right angle. Northbound movements via Broombridge Road (ie. the majority of traffic leaving the site) will require a 180 degree turn from the inside of the site via the gate onto the westbound lane of Lagan Road, with turning vehicles substantially encroaching onto the opposite (i.e. eastbound) lane of Lagan Road. As no yellow box is proposed at the main site access, it is deemed likely that the gate will often be blocked by vehicles queuing on Lagan Road upon approach to the Broom bridge Road/ Lagan Road Junction."	Van drivers exiting the site can utilise the opposing lane to manoeuvre as per the Design Manual for Urban Roads and Streets and therefore cross the footpath on Lagan Road at right angles. Detailed design can consider providing an additional yellow box on Lagan Road to facilitate access at the proposed main entrance location.
53	36	"Such conditions are deemed to create a complex and unsafe environment for driving, and to contribute to increased hazard particularly to pedestrians - both those in the publicly accessible northern part of the Fashionflo site and the ones using the footpath along the southern edge of Lagan Road (who would have priority over accessing or egressing vehicles, however may be poorly visible due to acute approach angles)."	TII does not accept the contention that the proposed road infrastructure at the Lagan Road junction area will be a complex and unsafe environment for driving. TII disagrees that the contention that the proposed road infrastructure will contribute to increased hazard particularly to pedestrians. Traffic at the junction will be regulated by traffic lights which will put order on what is currently an uncontrolled junction thereby facilitating traffic on Lagan Road. Furthermore, the SCATS traffic signalling system that will be used at this junction, is adaptive and can respond to any imbalances in demand from the approach links.

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			<p>Pedestrians will be able to navigate the junction at controlled crossings. The proposed road infrastructure, its interface with the Luas and accommodation of direct accesses is not untypical of what is found on the existing Luas network elsewhere in the city where the G58e is on-street running of the Luas. The public road layout as designed has gone through a preliminary design process involving consultation with Dublin City Council Traffic Section, the NTA, traffic modelling experts, traffic safety experts and Luas safety experts. The detailed design process will require more detailed involvement from the above parties to ensure that the proposed infrastructure operates effectively and safely.</p> <p>TII does not agree with the contention that there will be a complex and unsafe environment in the publicly accessible northern part of the Fashionflo site. Please refer to response to Item no. 9, 10 and 13. TII does not accept the contention that there will be increased hazard to pedestrians using the footpath on Lagan Road in part due to poor visibility on account of acute approach angles. The existing site boundary consists of a steel palisade fence which facilitates good intervisibility between users of the footpath and drivers accessing the property. Furthermore, for drivers exiting the property they will drive alongside and parallel to the Lagan Road footpath before crossing the same footpath thus providing ample opportunity for drivers to observe any pedestrians using the footpath and approaching the access from the west side.</p>
54	36	“In the case of HGVs, Figure 3.5 shows that the movements involved in accessing the site will be complex, with trucks travelling from the north required to perform a complex S-shaped movement at the proposed Broombridge Road/ Lagan Road Junction, including across the proposed Luas tracks and the pedestrian crossing at the eastern junction approach. Should queuing be present at the eastern junction approach, it may prevent an HGV from completing the manoeuvre at once, potentially requiring reversing movements, thereby generating an elevated in traffic hazard.”	TII does not accept the contention that the proposed HGV access arrangement will be complex. HGV drivers will have a good view of the access in question: they turn left at the junction and then swing right to get into the Fashionflo site. It is expected that HGV drivers intending to enter the property and finding that their way is blocked, will not enter the yellow box area across the Luas line. It would be expected that professional HGV drivers do not reverse their vehicle in live traffic.
55	37	“While the HGV movement involved in accessing from the east is simpler, the tight tolerance between the turning vehicle's swept path and the access gate (as shown in Figure 3.5) should be noted. In practice, such turning manoeuvres may require the truck to encroach on the opposing (i.e. eastbound) Lagan Road traffic lane, potentially resulting in temporary blocking back across the pedestrian crossing and Luas tracks.”	Consideration can be given to providing a wider gate opening, at detail design stage, to increase the tolerance between the turning vehicle's swept path and the access gate.
56	37	“Similar concerns arise with respect to proposed HGV egress arrangements (shown in Figure 3.6), wherein the proposed extents of the yellow box on Lagan Road will be insufficient to prevent blocking of egressing HGVs by a westbound traffic on the road. The complexity of HGV movements and interaction with general traffic is compounded by the proposed HGV gate being located at the corner of the Fashionflo site, with acute angles to be expected between approaching and egressing trucks and pedestrians using the footpaths at the southeast corner of the Broombridge Road/ Lagan Road Junction. As in the case of the LGV movements described above, the overall road environment created by the currently proposed access arrangements is deemed overly complex, giving rise to traffic hazards which the TII proposal does not adequately address.”	<p>Please refer to response to Item no. 50 in relation to the extents of the yellow box.</p> <p>TII disagree with the contention that the proposed HGV access arrangement will be complex. Please refer to response to Item no. 55 on this matter.</p> <p>TII disagree with the contention that the overall road environment created by the currently proposed access arrangements is deemed overly complex, giving rise to traffic hazards which the TII proposal does not adequately address. Please refer to response to Item No. 54.</p>
57	37	“As in the case of the LGV movements described above, the overall road environment created by the currently proposed access arrangements is deemed overly complex, giving rise to traffic hazards which the TII proposal does not adequately address.”	TII does not agree with the contention that the overall road environment created by the currently proposed access arrangements is deemed overly complex, giving rise to traffic hazards which the TII proposal does not adequately address. Please refer to response to Item No. 54.
58	37	“The above considerations are compounded by the likely reduction in the Broom bride Road/ Lagan Road Junction capacity due to the introduction of the Luas. With the junction forming one of only two accesses to an extensive industrial estate, it carries high volumes of traffic with a significant proportion of HGVs. It is expected that queuing along the Lagan Road arm past both proposed Fashionflo site accesses may frequently occur, thereby further hindering site access and egress movements.”	TII does not accept the contention that there will be a reduction in capacity at the Lagan Road junction. Traffic at the junction will be regulated by traffic lights which will put order on what is currently an uncontrolled junction thereby facilitating traffic on Lagan Road. Furthermore, the SCATS traffic signalling system that will be used at this junction, is adaptive and can respond to any imbalances in demand from the approach links. Refer also to response to Item No.22 in relation to traffic modelling.
59	37	“The proposed access arrangements result in all goods vehicle traffic, including HGVs to pass by the car parking area and the northernmost section of the site, which is due to be open to the public at all times. This is compounded by the complexity of turning movements involved in accessing and egressing the site.”	TII does not agree with the contention that there will be complexity of turning movements involved in accessing and egressing the site. Please refer to response to Item No. 54.
60	38	“Overall, the proposed arrangements are considered to be significantly detrimental to traffic safety within the site and in the vicinity of the site accesses, with safety hazards affecting both vehicles and vulnerable road users.”	TII does not accept the contention that the proposed arrangements are considered to be significantly detrimental to traffic safety within the site and in the vicinity of the site accesses, with safety hazards affecting both vehicles and vulnerable road users. "Within the site": please refer to response to Item No. 13. "Vicinity of the site access": please refer to response to Item No. 54.
61	38	“Figure 4.1 (overleaf) presents the swept path drawing produced by TII and issued to Fashionflo with the purpose of demonstrating feasibility of accommodating HGV movements within its yard in spite of its narrowing	The illustrations below indicate that it is possible to manoeuvre an articulated vehicle with due care within the site. These illustrations are extracts from one of the iterative phases of design that leads to the proposed Scheme set of drawings. In this case, a 16.48m length articulated heavy goods vehicle turning will be possible

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		<p>due to the temporary and permanent land take. Transport Insights has produced annotation on the drawing to highlight the deficiencies of the proposed HGV accommodation arrangements."</p>	<p>within the boundary constraints of the reduced size Fashionflo yard assuming a 5-point turn and assuming that the existing ramp at the gable end of the building be moved circa 10m length east to create a level paved area from edge of building to boundary wall.</p>  <p>Note that for a 10m long rigid HGV, a 3-point turn is possible within the boundary constraints of the reduced size Fashionflo yard and without the need to use the paved area at the gable end of the building, as illustrated in Figure below.</p>

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62	37	<p>"As can be seen within the preceding Figure 4.1, accommodating articulated heavy goods vehicles within the narrowed marshalling yard will require complex and atypical turning manoeuvres, including 3-point turning within a heavily constrained (and reduced) space between the building and the site boundary. Analysis of the presented swept path drawing (produced on behalf of TII and issued to Fashionflo) indicates that the HGV may need to encroach upon the new site boundary to the west (i.e. the permanent land take boundary) while reversing, and there is extremely tight tolerance (ca. 10 centimetres at the minimum) in the forward movement between the HGV and the Fashionflo building to the east."</p>	Please refer to response to Item No. 61.
63	37	<p>"In addition to the above, it is noted that the proposed HGV movement sequence appears to ignore the existing elevation difference and retaining wall in the southern part of the site (which, as noted in Section 1.6, have not been reflected in the TII-issued topographical survey outputs)."</p>	Please refer to response to Item No. 61.
64	39	<p>"It should be noted that Figure 4.1 presents only the movements necessary to enable egress of an HGV from the Fashionflo site in forward gear after it has turned (which is a therefore theoretical exercise as HGVs only enter the site to accommodate Fashionflo's ongoing operations). As a result, additional reversing and turning movements would be needed to align the trailer with a shutter gate or a dock leveller to enable loading/unloading operations. The feasibility of such movements has not been demonstrated by TII."</p>	As set out above, during the design of the proposed Scheme, which is an iterative process, the turning circle options at Fashionflo were examined using standard design tools. Please refer to the illustration below which describes how a 16.48m length articulated HGV can be managed on the site. This example has the HGV reversing to the existing shutter gate will be possible within the boundary constraints of the reduced size Fashionflo yard. This detail is not typically shown on design drawings for simplicity purposes.

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65	39	<p>"The presented Figure 4.1 also shows that the proposed temporary land take, extending beyond the proposed permanent land take area, would have an even more profound impact of manoeuvrability within the yard. As highlighted in the figure, the HGV turning manoeuvres would encroach on the temporary sanitised area in multiple locations, and as such could not be accommodated for the duration of the temporary land take. As per the permanent land take proposals outlined above, such proposals would render Fashionflo's business operations unviable."</p>	<p>For use of temporary areas please refer to response to item No. 11.</p>
66	39	<p>"It should also be noted that an area within the site's southern extents, which would be needed to complete the presented turning movements, is currently utilised for storage. This includes several shipping containers used for that purpose, which are located directly at the site's boundary. The relevant areas would need to be kept clear at all times to enable turning movements, resulting in a loss of a significant portion of existing onsite storage capacity."</p>	<p>TII accept that certain areas of the site currently being used for storage would need to be cleared to facilitate articulated HGVs.</p>
67	39	<p>"Following the commencement of construction works, and on an ongoing basis thereafter (including the operational phase of Luas Finglas), there would also be no space for HGV trailer parking within the site, preventing extended loading and unloading, which is essential to Fashionflo's business operations (see: Section 2.4)."</p>	<p>Whilst Fashionflo are best placed to decide how and where vehicles park for the reduced extents of the site, there is potential for HGV trailer parking along the western boundary of the site at and north of the existing access location. It is noted that the land take is along the western boundary currently used for car parking and the entrance to the property.</p>
68	40	<p>"With the constraints on manoeuvrability within the Fashionflo yard imposed by the currently proposed temporary land take in the medium term and the permanent land take in perpetuity, it is likely that HGV deliveries to and collections from the Fashionflo site will become impractical or impossible, thereby rendering Fashionflo's operations commercially unviable from the commencement of the Luas Finglas' construction works. "</p>	<p>Please refer to response to Item No. 10 regarding HGV deliveries for the permanent situation. For use of temporary areas please refer to response to item no. 12.</p>
69	40	<p>"The Fashionflo site currently includes 34 no. marked car parking spaces, including 7 no. parallel spaces in the northern part of the site (along the Fashionflo building's north wall) and 27 no. perpendicular spaces in the northwest part of the site (13 no. along the Broombridge Road boundary and 14 no. along the Fashionflo</p>	<p>Please refer to response to Item No. 3 in relation to loss of parking.</p>

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		building's west wall). The proposed land take and access rearrangement will result in a significant reduction in the availability of space within the site that could be used for car parking."	
70	40	"As can be seen in Figure 3.2, all spaces along the Broombridge Road boundary will be affected by permanent land take, resulting in their loss. The spaces along the north wall of the Fashionflo building will need to be partially or completely removed to provide sufficient space for vehicular access and egress manoeuvres. Finally, accommodating a new internal division (a security fence/ gate) as shown in Figure 3.3) and providing space for goods vehicle movements throughout the site will require rearranging of all remaining spaces located along the Fashionflo building's western wall."	Please refer to response to Item No. 3 in relation to loss of parking.
71	40	"It is likely that all parking spaces that can be provided in the rearranged site will be parallel to either a site boundary or building wall, with fewer than 10 no. spaces estimated to remain."	Please refer to response to Item No. 3 in relation to loss of parking.
72	40	"While the current on-site parking provision is noted to exceed the relevant standards set out in the current Dublin City Development Plan, this in itself does not justify a substantial (by ca. 70%) reduction in on-site car parking capacity provided without the site being redeveloped."	Please refer to response to Item No. 3 in relation to loss of parking.
73	40	"In light of current parking demand within the site as noted in Section 2.4, it is deemed likely that the loss of car parking may result in overspill car parking externally and/ or informal car parking internally within the site may occur, both likely to have a detrimental impact on traffic safety within the site and the wider area."	Please refer to response to Item No. 3 in relation to loss of parking.
74	40	"As shown in Figure 4.1, the temporary landtake associated with Luas Finglas construction (indicated in blue) will extend further into the site than the permanent land take. The temporary land take includes complete severance of the southern part of the site, which includes both loading/ unloading gates."	The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments. Additionally, a strip is required for a short period for a utility connection. The duration for these areas will be limited to the duration required in completing these specific works and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP.
75	40	"While this section of temporary land take is understood to be required for a short period only to install an air vent, the precise length of time this may entail has not been stated, with no mitigation measures for this period being set out. Unless the works in this area are completed overnight or over a weekend, they would severely affect Fashionflo operations, preventing deliveries and collections by all vehicle types until such time as the works in question are completed."	The utility works will be discussed in advance with the business so as to limit disruption. As per 1.3.20 of the CTMP Not less than 7 days prior to commencement of the works the Licensee/Contractor shall advise all local property owners/occupiers likely to be adversely affected by the works and shall enter into discussions as necessary regarding the avoidance/mitigation of impacts arising from the works. The Licensee/Contractor shall use its best endeavours to minimise the impact of the works on property owners/occupiers. Access to all houses and premises to be maintained save with the prior approval of the property owner. Any such agreement shall ensure that adequate provision is maintained for Emergency Service access to the affected properties during the works.
76	41	"The remaining portion of the temporary land take, including a ca. 2.0 metres wide strip along the proposed new (i.e. accounting for proposed permanent land acquisition) west site boundary, is understood to be required for an extended period of time. As shown in Figure 4.1 and elaborated upon in Section 4.3, sanitisation of that area will prevent HGV turning movements from being completed internally within the site, affecting company logistics and increasing complexity and cost of goods movements."	The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP.
77	41	"Furthermore, it is unclear whether the proposed temporary land take would also affect internal turning movements of smaller goods vehicles, or whether it would permit any goods vehicle to reverse to the sliding gate or the loading dock at the right angle, as needed for loading or unloading."	The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP. This will ensure turning movements can be made through the construction stage within the site.
78	41	"Overall, there is a lack of clarity in relation to the duration and impact of proposed temporary land take locally, with the associated uncertainty affecting Fashionflo's business e.g. by hindering decision making regarding its participation in long-term projects that may require regular HGV movements."	As set out in Section 1.3.1 of the CTMP - When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area. As per 1.3.20 of the CTMP Not less than 7 days prior to commencement of the works the Licensee/Contractor shall advise all local property owners/occupiers likely to be adversely affected by the works and shall enter into discussions as necessary regarding the avoidance/mitigation of impacts arising from the works. The Licensee/Contractor shall use its best endeavours to minimise the impact of the works on property owners/occupiers. Access to all houses and premises to be maintained save with the prior approval of the

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			property owner. Any such agreement shall ensure that adequate provision is maintained for Emergency Service access to the affected properties during the works.
79	41	"With the Fashionflo site being an industrial/ warehousing site, both in terms of its current land use and applicable zoning (see: Section 1.4), unconstrained goods vehicle access, including HGV access, is paramount to the site's viability and a key driver of the site's valuation. Given that the proposed revised access and internal circulation arrangements are problematic (as elaborated upon respectively in Sections 4.2 and 4.3), the site's long-term viability in accommodating its current land use will be undermined."	Please refer to response to Items No.3, 9 and 10 in relation to access.
80	41	"While Luas Finglas' impact on Fashionflo's operations have been articulated above, the proposed permanent land take is also noted to affect the site's form factor, giving it an elongated shape and making any potential future redevelopment more challenging irrespective of whether current land use zoning will be retained or revised by the upcoming Ballyboggan LAP (see Section 1.4)."	Please refer to response to Item No.15 above.
81	41	"Furthermore, significant loss of usable road frontage should be noted, with the Luas tracks preventing vehicular or pedestrian access to the site at any location along its western boundary."	An urban pathway is indicated on Landscape Drawing D1 AL 31 A-B and D1 AL 31 O-B/1 that allows direct access to the property frontage along the western boundary. It is anticipated that any future development would include appropriate setbacks which would enable this footpath to be widened. Vehicular access is not permitted for operational reasons along the frontage.
82	41	"The tracks will also substantially reduce visibility of the site from Broom bridge Road and likely result in increased noise, thereby further compromising the site's long-term redevelopment potential."	<p>The visual impacts of the proposed Scheme have been assessed in Chapter 21: Landscape and Visual Amenity and the proposed improvements are described in the landscape drawings and Appendix A21.2 - Urban Integration Report. TT do not accept the assertion that the tracks will reduce visibility of the site. The current landscape sensitivity in this area is determined as Low. The removal of the existing low quality boundary treatment and poor-quality footpaths and replacement with quality surfaces for footpath and cycleway and new property boundary treatment represents a significant positive aspect of the proposed Scheme in this area. The removal of the poor-quality boundary treatment and the changes that will restore a degraded landscape represents a significant positive aspect of the proposed Scheme in this area. The magnitude of Landscape change during the Operational Phase is Medium and the quality is Positive. The frequent movement of LRVs along the track and across the Canal bridge may create slight periodic disruption but may also create aspects of interest in the visually poor environment that do not currently exist. Overall, the potential effects on receptors R006-R016 during the Operational Phase will be Slight, Permanent and Positive.</p> <p>Noise impacts have been assessed in Chapter 15 - Noise and Vibration. The calculated unmitigated noise level during operation of the proposed Scheme at R010 is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. In the case of receptor R010 only the daytime noise level is relevant as the building is not operated at night. The daytime noise levels due to operation of the Luas is of the order of 55 dB LAeq,16hr. This absolute noise level is lower than the threshold of 60dB for daytime noise to generate a potentially significant effect on commercial buildings as described in Section 15.4.1.5 of Volume 3 of the EIAR. Furthermore, to put the calculated noise level in context reference is made to the noise monitoring described in Section 15.3.1 of Volume 3 of the EIAR. The closest monitoring location to the Fashionflo building was UT1, as illustrated in Figure 15.1 of Volume 4 of the EIAR, which is at an adjacent commercial premises along Broombridge Road. Noise levels measured at this location were of the order of 59dB during the daytime. Therefore, the new noise from Luas operation will be lower than the existing baseline noise environment due to road traffic.</p> <p>In conclusion the noise impact at the Fashionflo facility has been robustly assessed in the EIAR submitted with the RO and the noise impact at this location is concluded to be not significant.</p>
83	41	"Considering that the proposed scheme will have a limited positive impact on the site's accessibility (with none of the new Luas stops being located closer to the site than the existing Broombridge terminus), it is unlikely that such positive accessibility impacts would outweigh the above-described negative impacts on the site's access and circulation characteristic."	TII does not agree with the assertion and note that the site is located in proximity to the existing Broombridge stop. the proposed Scheme proposes to connect an additional 4 stops north of this location offering a significant increase in catchment and as such will have a significant positive impact on the site's accessibility.
84	42	"Overall, the currently proposed Luas Finglas scheme is noted to give rise to the negative impacts which the upcoming Ballyboggan LAP has sought to avoid, namely to create "severance or physical and visual barriers in the future urban form of the area".	TII does not agree with this assertion. Please refer to response to Items No. 8 and 15 above.
85	42	"Proposed revised access arrangements will result in increased complexity and traffic hazards for motorists and vulnerable road users (pedestrians and cyclists) associated with vehicular movements into and out of the site in a challenging junction environment, with HGV movements being particularly problematic."	<p>Please refer to response to Item No. 3 in relation to access.</p> <p>Traffic impacts have been dealt with under Items No. 9, 10, 13 and 22</p>

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86	42	"The currently proposed land take, compounded by revised access arrangements, will create highly complex HGV turning manoeuvres required for accessing the on-site loading docks and egressing the site in forward gear. Indeed, it is apparent from TI I-provided swept path analysis outputs that articulated vehicle movements will likely become impossible on a permanent basis following the commencement of construction works within the site's vicinity and on an ongoing basis thereafter (including the operational phase of Luas Finglas)."	Traffic impacts have been dealt with under Items No. 9, 10, 13 and 22
87	42	"Proposed temporary land take will likely completely prevent HGV circulation within the site by severing the northern and southern portions of the site for indefinite period of time, with no mitigation measures being proposed by TII."	The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments. Additionally, a strip is required for a short period for a utility connection. The duration for these areas will be limited to the duration required in completing these specific works and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP.
88	42	"Proposed routing of all commercial vehicle movements through a car parking aisle and the publicly accessible part of the site will give rise to traffic hazards within the site, which do not currently occur."	Traffic impacts/safety have been dealt with under Items 9, 10, 13 and 22. Refer also to response to Item no. 54 in relation to safety.
89	42	"Proposed permanent land take and revised vehicular circulation arrangements appears likely to result in a loss of a. 70% of existing on-site car parking capacity, affecting business operations and potentially resulting in informal or overspill car parking."	Please refer to response to Item No.3 in relation to loss of parking.
90	42	"Proposed land take will affect the site's long-term viability for zoned employment land use, with unconstrained goods vehicle access being essential for such use. Irrespective of whether current zoning should be retained or changed in the future, the land take will permanently affect the site' s form factor and create a physical and visual barrier between the site and Brombridge Road, increasing complexity of redevelopment and reducing the site's valuation."	Please refer to response to Item No. 15 above
91	43	"The cumulative impact of the proposed Luas Finglas scheme as summarised above would fundamentally undermine Fashionflo's commercial operations on a permanent basis, with the currently proposed mitigation measures being deeply inadequate in addressing such impacts."	TII disagree with the contention that the currently proposed mitigation measures are deeply inadequate in addressing impacts on Fashionflo's business and consider them to be overstated. Please refer to response to Item No. 3 regarding impacts on access and parking. Please refer to response to Item no. 54 and 55 regarding accessing complexity and safety. Please refer to response to Items No.9, 10, 13 and 61 regarding impacts on HGV manoeuvring and safety.
92	43	"Retention of site access off Broombridge Road: It is Fashionflo's preference that the existing access arrangements be retained insofar as possible. In this context, the proposed Luas Finglas tracks are noted to run above ground along Broom bridge road immediately to the south of the Fashionflo site, with the Colorman site bounding the Fashionflo site to the south retaining direct access off Broombridge Road via an underpass of the Luas tracks. It is requested that the aboveground section of the Luas Finglas track be extended to the north, so that a similar access to the Fashionflo site can be provided. Alternatively, a modification of the proposed Luas track elevation to retain the existing access gate off Broombridge Road could be considered, with traffic being provided to prevent collisions between the Luas and accessing/ egressing vehicles."	Please refer to response to Item No. 6 in relation to extending the above ground section of the Luas Finglas track to the north.
93	43	"Amended revised access arrangements: Should the above request not be accommodated, it is requested that alternative revised access options be identified and considered, so that excessively complex turning manoeuvres in accessing manoeuvring within and egressing the site (particularly by HGVs) be avoided. In doing so, access from or egress to the south (via the Colorman site and the proposed underpass) should be considered."	TII does not accept the contention that accessing manoeuvres will be excessively complex. TII has delivered a comprehensive EIAR which ensures access is maintained for Fashionflo and recognise that due care and attention will be required for the new circulation arrangements within the site. Please refer to response to Item No. 9. Providing access through the third party's property was previously suggested by Fashionflo during an onsite stakeholder meeting. This was considered and is not necessary as the current proposals and assessment demonstrate that it is not required. In addition, the complexities of providing access through an operational third-party premises and topographical and geometric issues means this proposal is not within the gift of TII. TII confirms their commitment to continuing dialogue with the stakeholders during the detailed design and construction stages, and with regard to the masterplan for Ballyboggan and access
94	43	"Reduction of temporary land take extent, mitigation and clarification of its duration: Proposed temporary land take has been recognised to involve temporary severance of the loading/ unloading area within the Fashionflo site from the remainder of the site and a public road access, while also preventing HGV turning movements within the site for unclear duration. It is requested that the extent of temporary land take be revised and minimised, with the required duration being clarified and mitigation measures being identified."	The area required at this location entails a strip of land to the back of the permanent works and is required for the construction of the boundary treatments and will be coordinated with the stakeholder in advance and throughout the construction stage: Reference Chapter 6 Construction Activities and CTMP. This will ensure turning movements can be made through the construction stage within the site. As set out in Section 1.3.1 of the CTMP When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details

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			<p>regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.</p> <p>As per 1.3.20 of the CTMP "Not less than 7 days prior to commencement of the works the Licensee/Contractor shall advise all local property owners/occupiers likely to be adversely affected by the works and shall enter into discussions as necessary regarding the avoidance/mitigation of impacts arising from the works. The Licensee/Contractor shall use its best endeavours to minimise the impact of the works on property owners/occupiers. Access to all houses and premises to be maintained save with the prior approval of the property owner. Any such agreement shall ensure that adequate provision is maintained for Emergency Service access to the affected properties during the works."</p>

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1	1	"Fingal County Council acknowledges the contribution of the Luas-Finglas - Broombridge to Charlestown scheme will make towards supporting compact urban growth, promoting modal shift, reducing congestion and emissions in the locality. We welcome engagement with the TII on a continual basis to ensure a positive impact to the locality and as a long-term solution for sustainable transport in the local region"	<p>TII welcomes the general submission of Fingal County Council in respect of the RO which confirms its full support for the Luas Finglas project noting that it will provide high-capacity, high frequency sustainable transport infrastructure linking Charlestown to Dublin City Centre enhancing integration with the wider public transport network and will bring about a "transformative change for residents, commuters, and visitors within the area from a social, economic and environmental perspective".</p> <p>The submission by Fingal County Council highlights Objective DMSO123 and the potential of the Council to utilise Section 48 and 49 of the Planning and Development Act 2000 (as amended) to generate financial contributions towards the capital costs of providing strategic infrastructure services which benefit a specific area. This is welcomed. The Finglas Luas project will contribute significantly to the future redevelopment of areas along its corridor. Further to any approval of the RO, Transport Infrastructure Ireland will engage with Fingal County Council and Dublin City Council in respect of the establishment of a potential supplementary contributions scheme.</p>
2	8 and 9	"The proposed new junction layout at Charlestown Place St. Margarets Road Is significant FCC recognises that a change to public transport involves challenges in redistributing space from private vehicles to public and active travel. While it will bring improvements to cycle safety, we ask that consideration be given that buses linking to the area will not be adversely impacted on. This is in relation to queuing at the nearby junction and adequate waiting area for future interchange buses near the terminus."	Existing and proposed bus services at Charlestown and St. Margaret's Road are included as part of the proposed Scheme development, please see Luas Finglas EIAR 2024 Chapter 18: Material Assets: Traffic and Transport for details. TII confirms their commitment to continued engagement with Fingal County Council and other stakeholders (including DCC and BusConnects).
3	9	"FCC is available to meet with TII and its project team to consider how the transport scheme can be delivered while improving quality for buses, pedestrians and cycles and maintain movement for other vehicles."	Noted. TII is committed to continued engagement with FCC and is agreeable to engaging in further discussion during the detailed design stage on the proposed Scheme delivered while improving quality for buses, pedestrians and cycles and maintain movement for other vehicles. at this location.
4	9	"There will be a need for adequate secure bike parking near the terminus at Charlestown during the operation stage."	Luas Finglas proposes Sheffield stands at two locations adjacent to Charlestown stop. There is good cycling connectivity to St Margaret's stop where there is secure internal bicycle parking at the stop and also in the multi storey Park & Ride.
5	9	"Fingal County Council considers it appropriate that conditions giving effect to community gain are included in any forthcoming decision to award permission for this development, such as those which would support sport, recreation, leisure, and community development Initiatives."	<p>TII welcomes the general submission of Fingal County Council in respect of the RO which confirms their full support for the Luas Finglas project noting that it will provide high-capacity, high frequency sustainable transport infrastructure linking Charlestown to Dublin City Centre enhancing integration with the wider public transport network and will bring about a "transformative change for residents, commuters, and visitors within the area from a social, economic and environmental perspective".</p> <p>The submission by Fingal County Council highlights Objective DMSO123 and the potential of the Council to utilise Section 48 and 49 of the Planning and Development Act 2000 (as amended) to generate financial contributions towards the capital costs of providing strategic infrastructure services which benefit a specific area. This is welcomed. The Finglas Luas project will contribute significantly to the future redevelopment of areas along its corridor. Further to any approval of the RO, Transport Infrastructure Ireland will engage with Fingal County Council and Dublin City Council in respect of the establishment of a potential supplementary contributions scheme.</p>
6	10	"Conditions should be in the form of direct provision of specific projects and an annual levy towards on-going maintenance or, alternatively, a once-off direct capital contribution towards the provision of specific projects and annual levy towards on-going maintenance. It is suggested that a committee comprised of members of the local community, Fingal County Council and the applicant decide on the nature and extent of appropriate community gain projects arising."	<p>Fingal County Council refer to the levying of general development contributions in respect of the public infrastructure and facilities benefiting development in the area of the planning authority. TII respectfully submit that this text may have been included in error. Section 48 of the Planning and Development Act 2000, as amended ("the Act") defines "public infrastructure and facilities" to include, inter alia, "the provision of bus corridors and lanes, bus interchange facilities (including car parks for these facilities (infrastructure to facilitate public transport, cycle and pedestrian facilities, and traffic calming measures. It is clear from this definition that the subject scheme is in itself a form of public infrastructure and facilities that will benefit the area and can be funded under development contributions as opposed to a form of development on which contributions are levied. TII notes the terms of the Fingal County Council Development Contributions Scheme 2021-2025 (under Section 48, Planning and Development Act 2000, as amended), which confirms that contributions will be levied on a per square metre basis for residential, industrial and commercial classes of development. The proposed scheme does not fall into any of these class categories.</p> <p>See also responses to Items No. 17 and 18 below.</p>
7	11	"Relevant Planning History relating to the Subject Site and the surrounding Area: A planning Application search has been completed along the eastern and western boundaries of the proposed route (c. 200 metre buffer) This is included in Appendix 1."	TII notes the relevant planning history relating to the subject site and the surrounding areas included in Appendix 1 of the submission made to the Board. The following application, FW24A/0116, was granted planning permission following the completion of the cumulative impact assessment for the RO application. However,

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			<p>upon submission to the Board, TII continued to engage with both the local authority and the Boardplanning lists from June 2024 to February 2025 to ensure a comprehensive assessment of projects with potential cumulative impacts, in accordance with the methodology outlined in Chapter 24 of the EIAR. The updated list identified 13 projects requiring further review by environmental specialists due to their potential cumulative impacts. However, FW24A/0116 was excluded from consideration, as it pertains to a Change of Use application and is therefore considered part of the existing baseline.</p> <p>The new applications and projects listed below were reviewed together with Luas Finglas, considering their overall impact from an EIA and AA perspective. This review also includes application 3278/22 (Aldi site redevelopment), which was mistakenly left out of the cumulative impact assessment and has now been added to the post-RO project list. The assessment concluded that there are no overall or combined cumulative impacts with Luas Finglas.</p> <table><tr><td>3278/22</td><td>F23A/0636</td><td>WEB1256/25</td></tr><tr><td>320953</td><td>F25A/0011E</td><td>DSDZ4146/24</td></tr><tr><td>4034/24</td><td>LRD6057/24-S3A</td><td>F24A/0965E</td></tr><tr><td>4160/24</td><td>4410/24</td><td>F25A/0112E</td></tr><tr><td>F23A/0781</td><td></td><td></td></tr></table>	3278/22	F23A/0636	WEB1256/25	320953	F25A/0011E	DSDZ4146/24	4034/24	LRD6057/24-S3A	F24A/0965E	4160/24	4410/24	F25A/0112E	F23A/0781		
3278/22	F23A/0636	WEB1256/25																
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8	18	Condition 1 – “Standard Condition In order to achieve a satisfactory standard of development."	Noted															
9	18	Condition 2 -"Ensure satisfactory completion of all hard and soft landscaping measures in order to ensure a high standard of all development and in the interest of visual amenity."	Noted															
10	18	Condition 3 -"Details of Construction Management Plan and a Construction Traffic Management Plan in the interest of orderly development."	<p>As noted in section 6.12.2 of Chapter 6 of the EIAR "A CEMP is prepared for the proposed Scheme and is included in Volume 5 – Appendix A6.1. The CEMP will be updated by each appointed contractor prior to the commencement of the Construction Phase, so as to include any additional measures required pursuant to conditions attached to any decision to grant approval. " As noted in Section 6.12.3 "A CTMP has been prepared to demonstrate.... " As per Section 6.12.6: "A plan has been developed which details the requirement for the construction contractor to develop a Construction and Demolition Resource and Waste Management Plan (C&D RWMP)."</p>															
11	18	Condition 4 – “Details of a Construction and Demolition Resource Waste Management Plan in the interest of orderly development.”	<p>Section 6.12.6 of EIAR Chapter 6 states that "a plan has been developed which details the requirement for the construction contractor to develop a Construction and Demolition Resource and Waste Management Plan (C&D RWMP), which incorporates all of the measures outlined in this Chapter, Chapter 11 (Land and Soils) and Chapter 19 (Material Assets: Resource & Waste Management). The C&D RWMP will identify how waste arisings are to be controlled and managed during the lifetime of the proposed Scheme, in particular how waste prevention principles will be applied and how on-site waste will be minimised.</p> <p>The Plan shall be produced by the construction contractor in accordance with the 'Best Practice Guidelines on the Preparation of Resource and Waste Management Plans for Construction and Demolition Projects' (EPA, 2021) which clearly sets out the Contractor’s proposals regarding the treatment, storage and disposal of waste. Any Class U2 material will be disposed of at a suitably licensed waste facility."</p>															
12	18	Condition 5 – “Details of connections agreement with Uisce Éireann and construction details (where applicable). In the interest of proper planning and the sustainable development of the area.”	Noted															
13	18	Condition 6 – “Condition with respect to hours of construction and measures to control noise intrusion, in the interest of public health and to safeguard residential amenity.”	<p>Standard working hours, as set out in Table 6-10 of EIAR Chapter 6, are from 07:00hrs to 19:00hrs on weekdays (excluding Bank and Public Holidays) and from 07:00hrs to 13:00hrs on Saturdays. This includes standard delivery hours to the construction sites. Standard working times will be included in the Works Requirements and construction will take consideration of sensitive receptors, in particular, any nearby residential areas. Working hours on roads requiring lane closures will be restricted so as to minimise impact on traffic during peak traffic hours. These traffic management restrictions will be included in the Works Requirements. Most construction activities will be undertaken during the proposed standard working hours, as outlined above, however there will be some activities that require working outside of these standard hours.</p> <p>A Noise and Vibration Management Plan within the CEMP (Volume 5 - Appendix A6.1) has been prepared as part of the EIAR which provides the strategy to be adopted in order to manage noise and vibration during construction. This will be incorporated by each contractor into their Plans and implemented as part of their works.</p>															

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14	18	Condition 7 – “Condition to prevent the spillage or deposit of and materials on adjoining roads during the course of development to protect the amenities in the area.”	<p>Section 1.3.15 of the CTMP outlines measures to reduce the impact on road condition, including the covering of HGV loads or the utilisation of enclosed units to prevent loss. The appointed contractor will also provide wheel washing facilities, and any other necessary measures to remove mud and organic material from vehicles, at the Construction Compound and egress from haul roads, where necessary.</p> <p>As outlined in Section 1.3.14 of the CTMP, "roads being used for dedicated construction vehicle access routes shall be regularly inspected for cleanliness. The appointed contractor will monitor for mud and debris on the roads as a result of the Construction Phase works and use a road sweeping vehicle for cleanliness if needed. The use of road cleaning sweepers should be considered as a last resort with prevention being the main objective."</p>
15	18	Condition 8 – “Undergrounding of services in the interest of visual amenity”	TII is committed to working closely with the various utilities stakeholders to reduce the overall visual clutter of cables and poles by providing appropriate ductwork and diversions as detailed in RO Drawings, Utilities book and referenced in Chapter 17 Infrastructure and Utilities. TII confirms their commitment to continued engagement with stakeholder regarding this matter.
16	18	Condition 9 - "Condition with regard to surface water management in the interest of public health."	<p>The impact to surface water has been robustly assessed in Volume 3 - Chapter 10 of the EIAR submitted with the RO. The proposed Scheme includes comprehensive mitigation measures to manage surface water effectively, ensuring public health and environmental protection.</p> <p>A Surface Water Management Plan (SWMP) (Volume 5 - Appendix A6.4) and a Construction Environmental Management Plan (CEMP) (Volume 5 - Appendix A6.1) have been prepared, detailing the control measures that will be conditioned within the construction contract Works Requirements. The successful contractor(s), immediately following appointment, must detail how they intend to effectively implement all the applicable measures identified in this EIAR and any additional measures required pursuant to conditions imposed by the Board on any grant of approval. The CEMP and SWMP have taken into consideration the risks and the work area and will reduce the risk to the surface water bodies within the region.</p> <p>Pre-emptive mitigation measures are also to be implemented for the sustained performance of the ICW. Additionally, operational mitigation measures have been integrated into the design of the proposed Scheme, primarily through drainage design, bridge designs, and landscaping. The proposed SuDS measures have been designed to mimic natural drainage and will provide a range of environmental benefits, encouraging infiltration, attenuation, and passive treatment.</p> <p>Volume 3 - Chapter 25 of the EIAR provides full details of the extensive list of the proposed mitigation measures.</p>
17	18	Condition 10 – “Condition with respect to financial contribution towards expenditure that was and/or that is proposed to be incurred by the planning authority in respect of public infrastructure and facilities benefiting development in the area of the authority, as provided for in the contribution Scheme for Fingal County made by the council. The phasing of payments shall be agreed in writing with the planning authority prior to the commencement of the development.”	It is implied that Fingal County Council may consider the levying of general development contributions in respect of the public infrastructure and facilities benefiting development in the area of the planning authority. TII respectfully submits that this text may have been included in error. Section 48 of the Planning and Development Act 2000, as amended (“the Act”) defines “public infrastructure and facilities” to include, inter alia, “the provision of bus corridors and lanes, bus interchange facilities (including car parks for these facilities (infrastructure to facilitate public transport, cycle and pedestrian facilities, and traffic calming measures. It is clear from this definition that the subject scheme is in itself a form of public infrastructure and facilities that will benefit the area and can be funded under development contributions as opposed to a form of development on which contributions are levied. TII notes the terms of the Fingal County Council Development Contributions Scheme 2021-2025 (under Section 48, Planning and Development Act 2000, as amended), which confirms that contributions will be levied on a per square metre basis for residential, industrial and commercial classes of development. The proposed scheme does not fall into any of these class categories.
18	18	“Financial contribution: It is considered reasonable that the payment of a contribution be required in respect of the public infrastructure and facilities benefiting development in the area of the planning authority and which is provided, or which is intended to be provided by, or on behalf of the Local Authority”	It is implied that Fingal County Council may consider the levying of general development contributions in respect of the public infrastructure and facilities benefiting development in the area of the planning authority. TII respectfully submit that this text may have been included in error. Section 48 of the Planning and Development Act 2000, as amended (“the Act”) defines “public infrastructure and facilities” to include, inter alia, “the provision of bus corridors and lanes, bus interchange facilities (including car parks for these facilities (infrastructure to facilitate public transport, cycle and pedestrian facilities, and traffic calming measures. It is clear from this definition that the subject scheme is in itself a form of public infrastructure and facilities that will benefit the area and can be funded under development contributions as opposed to a form of development on which contributions are levied. TII notes the terms of the Fingal County Council Development Contributions Scheme 2021-2025 (under Section 48, Planning and Development Act 2000, as amended), which confirms that

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			contributions will be levied on a per square metre basis for residential, industrial and commercial classes of development. The proposed scheme does not fall into any of these class categories.

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Submitted by	Finglas Counselling Service Board of Management		
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1	2	<p>"We are delighted to see the Luas Service coming to our community and welcome its arrival. Our concerns are that the drawings we have viewed (fig1) do not consider our service and any disruption to our services. We appreciate these drawings were developed before we moved into the premises however, we ask Luas to now consider our service and how important it is to our community.</p> <p>We have service level agreements with the HSE and Tusla and any disruption in our service will result in us not being able to deliver our SLA's this in turn may impact our funding and the future of our service."</p>	<p>The proposed main construction works will not require the relocation of the counselling service.</p> <p>It is worth noting that the entire site was originally included in the land take based on the assumption that the then-vacant building could be used temporarily for construction accommodation. However, with its new use by the counselling service, TII is satisfied that only the only the area designated as permanent acquisition will be required, along with a smaller temporary working space for fence construction.</p> <p>Access will be maintained during construction, including maintaining safe entry points and minimising noise and construction-related disturbances. It is not anticipated that there will be any disruption to Fingal Counselling Services.</p> <p>TII is satisfied to consult with Finglas Counselling Service with regard to the proposed construction and operation of Luas Finglas.</p>
2	2	<p>"Access - we suggest the entrance and front door be relocated to the opposite side at the fire brigade station including wheelchair ramp."</p>	<p>TII acknowledges the suggestion to relocate the door to the other side of the building. It is worth noting that the entire site was originally included in the land take based on the assumption that the then-vacant building could be used temporarily for construction accommodation. However, with its new use by the counselling service, TII is satisfied that only the only the area designated as permanent acquisition will be required, along with a smaller temporary working space for fence construction.</p> <p>In the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006. The entrance and access paths will be subject to compensation agreements with the landowner. Where necessary, feasible, and proportionate, TII will engage with stakeholders to reach agreements, and in principle, TII sees no reason why an agreement could not be reached in this regard. Any implications for the entrance and ramp can be discussed and agreed upon during this stage.</p>
3	2	<p>"Noise - Building to be sound proofed and insulated including windows."</p>	<p>In the case of receptor R088 only the daytime noise levels are relevant as the building is not operated at night. The daytime noise levels due to operation of the Luas range from 48 – 49 dB LAeq,16hr. This absolute noise level is lower than the threshold of 55dB for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR. Daytime peak hour noise levels will be 1dB higher in terms of LAeq,1hr for the daytime peak hour of operation.</p> <p>Furthermore, to put the calculated noise level in context reference is made to the noise monitoring described in Section 15.3.1 of Volume 3 of the EIAR. The closest monitoring location to the Finglas Counselling Service was AT6, as illustrated in Figure 15.1 of Volume 4 of the EIAR, which is on Mellowes Rd adjacent to the Finglas Counselling Service. Noise levels measured at this location were of the order of 68dB during the daytime. Therefore, the new noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic.</p> <p>Finally, in the vicinity of the Finglas Counselling Service the proposed track operates at low speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 3 of the EIAR.</p> <p>In conclusion the noise impact at the Finglas Counselling Service has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p>
4	3	<p>"Fence boundary lines – Privacy"</p>	<p>Table 12-11 of the EIAR Chapter 12 (Volume 3) outlines the need for a temporary acquisition of this site to facilitate the demolition of existing boundary walls. As part of the specific mitigation measures, new boundary walls and fences will be provided.</p> <p>The relocation of the boundary fence will be, where necessary, feasible and proportionate, agreed upon with the landowner as part of the compensation agreements. In principle, TII see no reason why an agreement could not be reached in this regard.</p>

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5	3	<p>Parking</p> <p>"Tar mac area at back of building for six car spaces beside new entrance."</p>	<p>While there is an existing vehicular access to the east of the building and some informal parking, there is currently no designated parking area within the site. The provision of new parking spaces falls outside the scope of this project.</p> <p>However, In the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006. The provision of formal parking will be subject to compensation agreements with the landowner. Where necessary, feasible, and proportionate, TII will engage with stakeholders to reach agreements.</p>

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Submitted by	Finglas Youth Resource Centre CLG		
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1	3	<p>2nd Schedule - Land Required</p> <p>"The land in question includes the car park outside the FYRC building. This car park is an essential resource for our staff, many of whom commute to work from outside Finglas by car. While unofficial, access to this parking area is a key factor in our recruitment and retention efforts. Could we discuss the possibility of creating alternative parking arrangements to support our staff during this time and going forward permanently?"</p>	<p>The proposed Scheme will provide a new public transport connection, together with connections to local bus services, making Finglas Sports and Leisure Centre more accessible to people within a larger catchment and enhancing its ability to serve as a public community facility. In addition, a new cycle lane is included in the design together with a covered bicycle parking facility. An ESB e-bike charging facility has already been installed outside the Leisure Centre. The combination of public transport and cycling infrastructure will be particularly beneficial to young people and others who are likely to have more limited access to private vehicles. The Finglas Village stop will be located within a new plaza in front of the Leisure Centre, providing an attractive and car-free environment. The negative effect of loss of car parking from outside of the Finglas Sports and Leisure Centre is acknowledged in Section 8.4.3. This loss will be partly compensated for by new parking to the rear of the building from where safer access can be provided from Cardiff Castle Road.</p> <p>A loss of public parking is needed to facilitate the Luas alignment and Finglas Village stop. In the longer term, once operational Luas will provide an alternative to car use. TII will continue to work with DCC and other stakeholders, including Finglas Youth Resource Centre to minimise impacts in the area during both the construction and operational phase.</p>
2	3	<p>4th Schedule - Temporary Possession</p> <p>"The land under the 4th Schedule runs the length of the building's facade and wraps around to the lefthand side of it. Could you provide a timeline for when this land will be under temporary possession? During this period, will access to the front of the building be restricted? If so, could an option for rear access be made available?"</p>	<p>TII aims to reassure FYRC that there is no requirement for the Centre to close, either temporarily or permanently. Access to the Centre will be maintained at all times throughout the construction process. As per RO Property Drawing D1-P32-DO, there will be a short-term need to cease use of the external area to adjust the boundary wall, but this will not affect the Centre's operation.</p> <p>The details of these adjustments, including the timing and any necessary access arrangements, will be further developed during the detailed design stage. At the construction phase, communication will be provided to FYRC regarding the timescale and any specific arrangements for access, safety, and other relevant factors, in line with the Construction Activities outlined in Table 6-2 of Chapter 6 and Section 1.3.1 of the CTMP (Appendix A6.2).</p> <p>The proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area. Access will be maintained throughout construction.</p> <p>Specific parking arrangements is addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12. "The appointed Contractor will provide temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare / Mellow Spring Childcare Centre to compensate for existing spaces lost during construction. Consideration will be given to the car parking needs of employees of the Finglas Resource Centre to avoid competition for remaining places." Continuity of access is to be maintained to FYRC as identified in the CTMP.</p>
3	3	<p>9th & 10th Schedules - Rights of Way</p> <p>"If public and private rights of way are extinguished, does this mean the FYRC would have to cease operations or relocate? Such a scenario would deeply impact our service users, many of whom have developed strong ties to the building and the staff. Relocating could present significant challenges, as our young people may be unwilling or unable to attend a service outside their immediate area. Staff contracts would also need to be addressed in the event of any relocation. Could you clarify whether temporary or permanent shutdowns are expected, and if so, how these disruptions will be notified?"</p>	<p>A public right of way will be maintained throughout construction to ensure safe access to FYRC, meaning the centre will not need to close at any stage. The Centre will not need to close, cease operations or relocate. However, the external area will need to be temporarily closed for a short period to facilitate adjustments to the boundary wall. This will be further developed during the detailed design phase, and during construction, clear communication will be provided regarding timelines, access, and safety arrangements, in accordance with Chapter 6 (Construction Activities) and the CTMP. Additionally, specific parking arrangements and implementation measures are addressed in A6.1 CEMP Table A6 1-5.</p>
4	3	<p>Health & Safety During Works</p> <p>"The FYRC is a safe space for young people, and construction activities associated with the Luas project could introduce significant risks. We propose that risk assessments be carried out and that health and safety meetings take place to identify and mitigate potential hazards for individuals using the building and its surrounding areas."</p>	<p>As identified in Chapter 6, Section 6.9 of the EIAR "The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated by the Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS) which will address health and safety issues from the design stages through to the completion of the Construction Phase. This plan will be reviewed as the proposed Scheme progresses. The contents of the Health and Safety Plan will follow the requirements of the Regulations. In accordance with the Regulations, a PSDP has been appointed and PSCS will be appointed as appropriate."</p> <p>TII will continue to engage with the stakeholders at all stages of the process to ensure concerns are considered to the fullest extent possible as per EIAR Chapter 6 Construction Activities and CTMP.</p>
5	4	<p>"Our building is a vital resource for the young people we serve, who refer to it as "Our Place, Our Space." We want to ensure that it continues to be a safe and supportive environment, even after the Luas is operational."</p>	<p>The high sensitivity of the Resource Centre is acknowledged in Section 8.2.5 (Population) of the EIAR. On operational, LRVs in the vicinity of the Finglas Stop will operate at low speed due to the curvature of the track at this location. The proximity of the Finglas Stop will greatly improve the Centre's accessibility and its ability to cater for the needs of young people. A new cycle lane will also be provided with a covered cycle storage facility.</p>

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			<p>The stop itself will be located within a safer car free environment of a new civic plaza. The environment will be open and the Resource Centre will be very visible from the stop and so easy to locate. It is likely that the stop will result in greater footfall, and this will have a mixture of implications for sensitive subsets of the population. The number of people alighting at the stop will, in itself, provide for natural surveillance with regard to anti-social behaviour, combined with the provision of good lighting, security cameras and emergency help buttons. The Centre will itself need to decide on how to adapt to this footfall with the support of the operators of the service. Overall, the Finglas Stop will greatly improve the Centre’s accessibility, making it easier to reach using public transport from a larger catchment than at present and so strengthening its ability to cater for the needs of young people. The stop at Finglas Village is incorporated into a new civic plaza which will improve public realm and enhance access to the nearby community facilities.</p>
6	4	<p>Noise concerns</p> <p>“During a recent meeting, potential noise from passing LRVs was discussed. While we appreciate the proposal to plant additional trees near the counselling and training rooms, we are concerned that this measure alone will not adequately mitigate noise. Could you provide assurances that the building's interior will remain unaffected by LRV noise?”</p>	<p>The Finglas Youth Resource Centre (FYRC) have raised concerns regarding noise impacts on their premises during the operation of the Luas. Section 15.4.1.5 of Volume 3 of the EIAR assesses the operational phase noise impacts of the proposed Scheme. Specifically, noise model receptors R086 and R087 are located at the external façades of the FYRC on the eastern and southern elevations respectively. Figure 15.2 of Volume 4 of the EIAR illustrates the location of this and all other noise model receptors.</p> <p>The calculated noise level during operation of the proposed Scheme at R086 and R087 is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none">Daytime Noise dB LAeq,16hrDaytime Peak Hour Noise dB LAeq,1hrNight-time Noise dB LnightNight-time Peak Hour Noise dB LAeq,1hr <p>In the case of receptors R086 and R087 only the daytime noise levels are relevant as the building is not operated at night. The daytime noise levels due to operation of the Luas range from 50 – 52dB LAeq,16hr at R087 on the southern facade and are of the order of 59 dB LAeq,16hr at R086 on the southern facade. This absolute noise level is lower than the threshold of 60dB for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for commercial properties.</p> <p>Furthermore, to put the calculated noise level in context reference is made to the noise monitoring described in Section 15.3.1 of Volume 3 of the EIAR. The closest monitoring location to the FYRC was AT6, as illustrated in Figure 15.1 of Volume 4 of the EIAR, which is on Mellowes Rd adjacent to the Finglas Counselling Service. Noise levels measured at this location were of the order of 68dB during the daytime. Therefore, the new noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic.</p> <p>Finally, in the vicinity of the FYRC the proposed track operates at low speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 3 of the EIAR.</p> <p>In conclusion the noise impact at the FYRC has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p>
7	4	<p>“We request the inclusion of proven soundproofing measures, such as cladding and/or soundproof windows, to minimise the impact. Given the proximity of the LRV path to the building, frequent LRV passes (approximately every seven minutes) could disrupt essential activities such as counselling, meditation, and training sessions.”</p>	<p>The assessment contained within Chapter 15 of Volume 3 of the EIAR submitted has demonstrated that the residual noise and vibration impact of both the operation and construction of the proposed Scheme is not significant and in many cases the impact is slight. Sound insulation measures to buildings along the proposed Scheme are therefore not required.</p>
8	4	<p>Safety</p> <p>“Front Door Security - The "Finglas Village Stop" is positioned at the heart of the new line, which will likely increase footfall outside the centre. While we have historically operated an "open door" policy, the increase in activity could result in additional risk factors to the centre. In light of this, and to align with child protection guidelines, we may need to transition to an "invitation-only" access policy. Our current front door is not fit for</p>	<p>Please refer to response to item No 5 above and No 9 below with regard to security during the operation of Luas Finglas. Irrespective, TII is satisfied to continue to consult with Finglas Youth Research Centre with regard to the proposed construction and operation of Luas Finglas.</p>

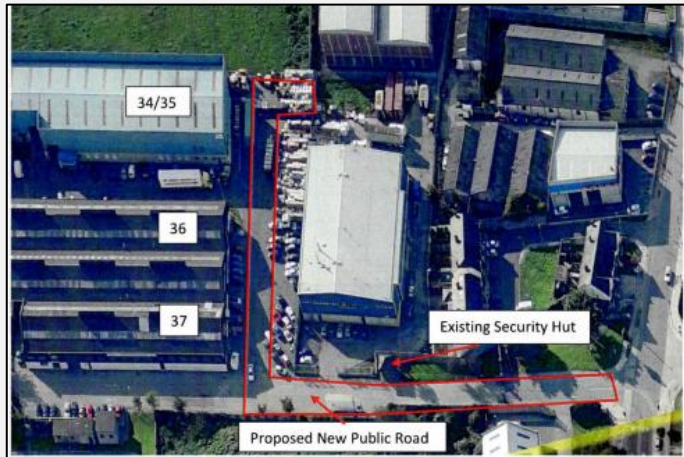
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		purpose under these circumstances. We request modifications to the door to incorporate enhanced security features that align with our revised policy. Risk of Injury: The stop may pose certain dangers in relation to accidents and/or incidents as the young people adapt to their new surroundings."	
9	4	Anti-social Behaviour and Gangs congregating at Finglas Village Stop "The stop may attract drug use, drug trafficking, and other forms of antisocial behaviour, potentially making young people hesitant to attend the centre. The stop may become a meeting point for gangs, deterring our service users from feeling safe or welcome at FYRC."	In terms of security, the increased activity in the vicinity of stops, and the provision of LRT services will provide a level of passive surveillance by drivers and passengers. The new activity will not on its own moderate the level of anti-social behaviour and crime but will make a contribution. To ensure people feel safe and welcome, adequate lighting will be provided in the vicinity of Luas Stops. Additionally, emergency help buttons will be installed to complement this effect, enhancing the sense of security for all users.
10	5	"Parking Solutions: Explore options for alternative parking arrangements for staff."	Please refer to response provided to Item No.1 above.
11	5	"Access During Temporary Possession: Provide clear timelines and discuss potential rear access to the building."	Please refer to response provided to Item No.2 above.
12	5	"Noise Mitigation: Implement soundproofing measures to ensure uninterrupted service delivery within FYRC."	Please refer to response provided to Item No. 6 and No. 7 above.
13	5	"Front Door Security: Modify the front door to meet enhanced security requirements."	Please refer to response provided to Item No.8 above.
14	5	"Health & Safety: Conduct regular risk assessments and meetings to mitigate construction related risks."	Please refer to response provided to Item No.4 above.
15	5	"Clarity on Rights of Way: Confirm whether operations will need to cease and provide relocation support if required."	Please refer to response provided to Item No.2 and No. 3 above.
16	5	"Safety of our Young People: Discuss potential ideas around security measures at the Finglas Village stop to mitigate against any threats towards our young people and their ability to attend the service."	Please refer to response provided to Item No 5, No.8 and No. 9 above.

Submission No.	20		
Submitted by	Firethorn Ltd. / Manhattan Peanuts Ltd. (Hughes Planning & Development Consultants on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
1	4	<p>"From the outset, this submission requests that An Bord Pleanála duly consider the negative implications arising on our client's lands. It is strongly contended that the proposed development has not had regard to the daily operations and development capacity of our client's lands at Manhattan Peanuts Ltd, McKee Avenue, Finglas, Dublin 011 F654."</p>	<p>TII, in the design, preparation, and assessment of proposed Scheme has had full regard to the daily operations and development capacity at Manhattan Peanuts Ltd. as discussed in more detail in the responses below.</p> <p>The proposed Scheme design and EIAR has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, , the Transport (Railway Infrastructure) Act 2001 (as amended) and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme and following an extended non-statutory public consultation process as evidenced in Luas Finglas EIAR Chapter 1 - Introduction and Luas Finglas EIAR 2024 Volume 1: Non-Technical Summary Section 6: Consultation. The proposed Scheme has been designed to minimise as far as possible impacts on existing occupied premises on either side of the alignment.</p> <p>The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the Luas Finglas EIAR 2024. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and the stakeholders will be kept informed and advised in accordance with the procedures set out in Luas Finglas EIAR 2024 Chapter 6 Construction activities and CTMP.</p> <p>Access from to the premises will be maintained throughout construction and alternative access will be provided prior to the existing access from St Margarets Road being removed. A key consideration is traffic management during the construction stage so as to minimise the impact on the local community and traffic network, the works will be carried out in accordance with Volume 5, Chapter 6 of the EIAR and Appendix A6.2 the CTMP. Specifically, continuity of access will be maintained throughout construction. As noted in Section 1.3.1 "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." No impact is envisaged to traffic and delivery movements during the operational phase of the proposed Scheme, and this will be maintained through construction.</p> <p>Chapter 2 of the submitted Luas Finglas EIAR 2024 establishes the overarching strategic approach to the Dublin City Council Development Plan 2022-2028 to 'to develop a low carbon, sustainable, climate resilient city'. The Plan identifies that key strategic transport projects, including Luas line extensions, will 'continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years'. The Chapter confirms that the extension of Luas to Finglas is supported directly under Policy SMT22 and that the design of Luas Finglas will inform the masterplanning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the Manhattan Peanuts lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network, providing a key link between proposed open spaces. It is further added that future development ratios, densities and height will be formed in this area to avail of this proposed public transport infrastructure and the development of a sustainable and compact urban form.</p> <p>As set out in Chapter 2 of the EIAR acknowledges that in February 2024, Dublin City Council adopted Variation No. 4 of the 2022 Dublin City Development Plan. This variation related to SDRA 3 Finglas Village Environs and Jamestown Lands and the incorporation of Jamestown Masterplan 2023 into the Development Plan by way of a new appendix. It is stated in the submission that the presence of the site within SDRA means it has significant development capacity but that the proposed scheme will have a negative impact on the lands. In policy terms, the Jamestown Masterplan 2023 is a detailed refinement of the SDRA framework – it is the policy instrument by which future development potential is identified and will be delivered. Part of the subject lands are identified for future 'residential led mixed use' having regard to their location along the Luas corridor, with the eastern component part of earmarked public open space.</p>
2	8	<p>"It is considered that the these works as part of the proposed development will significantly impact the ability of the subject lands to carry out their daily operations by impeding access to the site and resulting in complications for the future development of the site."</p>	<p>Please refer to response to Item No. 1 above.</p>
3	9	<p>"We would therefore request that the proposed works with regard to the subject lands should be revised to provide for an alternative solution to the route which is proposed within the boundary of the subject site, which would provide for a significant reduction of the impacts of the works on the subject lands."</p>	<p>The proposed alternative access via McKee Avenue as indicated on alignment drawing D1 32 GA 1-2 is in line with the master plan for Jamestown Business Park. TII has included land take within the subject lands to ensure a direct link to allow public access to the adjoining business premises. i</p>

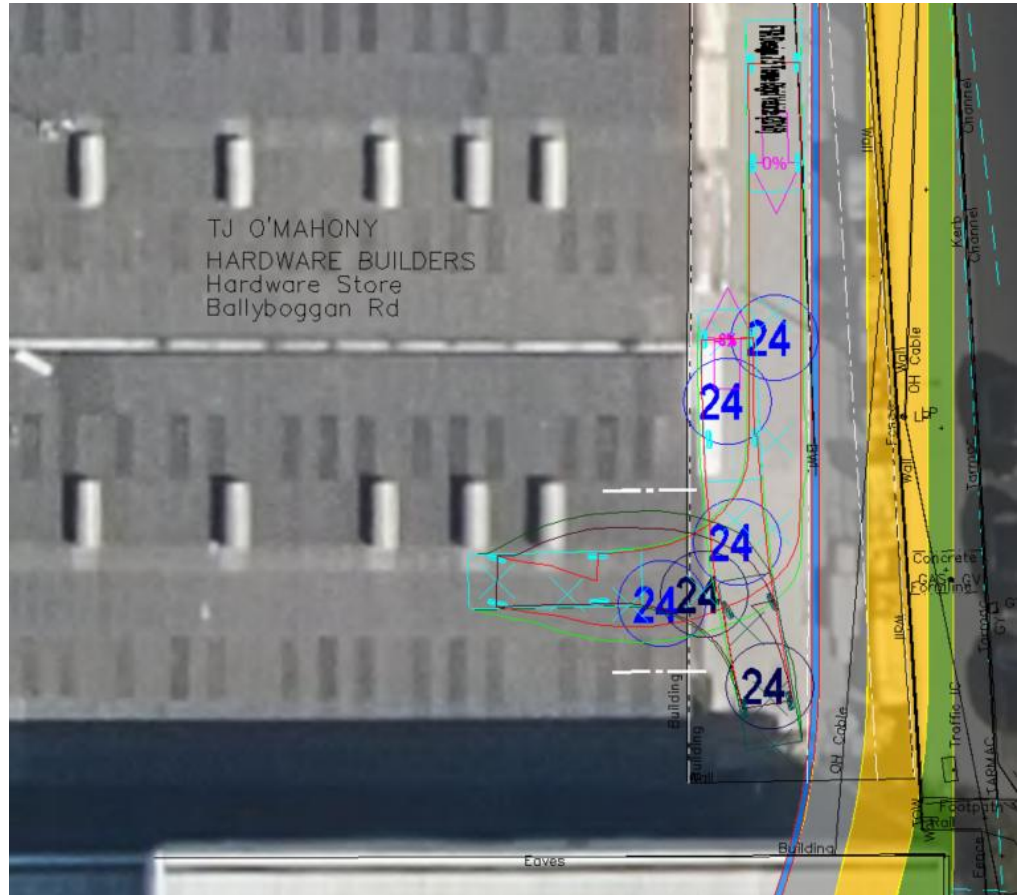
Submission No.	20		
Submitted by	Firethorn Ltd. / Manhattan Peanuts Ltd. (Hughes Planning & Development Consultants on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
4	9	"It is at the request of our clients that a site-specific solution is explored and implemented in order to ensure minimal interventions which have significant impacts on existing site conditions, with particular regard to the subject site situated at McKee Avenue and St. Margaret's Road, Finglas, Dublin 11."	Please refer to response to item No. 3 above
5	14	<p>"The subject site is located within SORA 3 - Finglas Village Environs and Jamestown Lands. These lands have been designated as an SORA due to the proposed new public transport network under the new Luas Green Line extension and BusConnects. The plan recognises that the Z14 lands constitute an important land bank for employment use in the city which it is considered strategically important to protect. The primary objective is to facilitate long-term economic development and regeneration in the city region. Relevant principles to achieving the objective of this zone are as follows:</p> <p>To support the economic revitalisation of Finglas Village.</p> <p>To provide for more varied and intense mix of uses within the Dublin Metropolitan Area.</p> <p>To maximise the potential of a well-connected but underutilised brownfield area located adjacent to the proposed Luas green line extension to Finglas, and proposed Finglas Core Bus Corridor.</p> <p>The lands situated to the north-east, along Jamestown Road, shall be developed at an approximate ratio of 70% employment commercial (gross) and 30% residential (gross), to support the continuation of a sustainable working community in the area.</p> <p>The subject lands are considered to have significant development capacity due to the site's locational context, availability of services and amenities and support within the Development Plan for development of vacant and underutilised sites in well-served areas. It is considered, however, that the proposed development will have negative impacts on our client's land, significantly reducing the development potential of the lands which have the capacity for development, as demonstrated by previously granted planning applications as outlined in Section 3.0 of this report."</p>	<p>As set out in Chapter 2 of the submitted EIAR establishes the overarching strategic approach to the Dublin City Council Development Plan 2022-2028 'to develop a low carbon, sustainable, climate resilient city'. The Plan identifies that key strategic transport projects, including Luas line extensions, will 'continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years'. The Chapter confirms that the extension of Luas to Finglas is supported directly under Policy SMT22 and that the design of Luas Finglas will inform the masterplanning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the Manhattan Peanuts lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network, providing a key link between proposed open spaces. It is further added that future development ratios, densities and height will be formed in this area to avail of this proposed public transport infrastructure and the development of a sustainable and compact urban form.</p> <p>As set out in Chapter 2 of the prepared EIAR. in February 2024, Dublin City Council adopted Variation No. 4 of the 2022 Dublin City Development Plan. This variation related to SORA 3 Finglas Village Environs and Jamestown Lands and the incorporation of Jamestown Masterplan 2023 into the Development Plan by way of a new appendix. The subject lands are identified for future 'residential led mixed use' having regard to their location along the Luas corridor.</p> <p>The submission states generally that the proposed Scheme design is not consistent with the Jamestown Masterplan, but it does not substantiate this. Chapter 2 of the Masterplan establishes the urban structure for the future development of the area. Figure 2.1 establishes the 'private vehicle access & movement strategy' for the area. As illustrated above, the proposed Scheme complies with the adopted movement strategy and will deliver a local street consistent with the Masterplan framework (refer to plan no. D1-GA 33 1-2). Further, while not mentioned in the submission, the Jamestown Masterplan includes another potential future local road north through the subject lands. The future delivery of this, independent of the Luas Finglas project, has land take implications for any redevelopment of the site.</p> <p>Chapter 6 of the Jamestown Masterplan identifies that western parts the subject lands are situated in the Phase 2 development area, with the following a key infrastructure requirement:</p> <p>"Luas Finglas either under construction or operational before the granting of planning permissions for residential developments".</p> <p>The eastern part of the site is in Phase 1 indicating that the site can be serviced earlier subject to delivery of key access streets in that phase.</p> <p>The Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. The subject lands are located in area A with the following measures identified:</p> <p>"Access to the Manhattan Peanuts and Murdock's site to be provided from a new access street off McKee Avenue to the property boundary, if Luas Finglas operations prevent the continuation of access from St Margaret's Road. Any proposed expansion of Manhattan Peanuts and Murdock's existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site".</p> <p>It follows that the adopted Jamestown Masterplan allows for alternative access arrangements to be developed to support the maintenance of the existing use on the site.</p> <p>[Note: it is recommended that the site-specific access solution from McKee Avenue be reviewed to minimise any potential impact. Delivery of this to be sequenced ahead of closure of St Margaret's Road access]</p>
6	14	"As stated throughout this submission, the principal concern of our client arising from the proposed railway order application relates to the negative impact of the works on the accessibility and development potential of the subject lands. Transport Infrastructure Ireland intends to develop Luas Finglas within the next 15 no. years and so the proposed development as included with the railway order application proposes significant impacts to the capacity of the lands to continue their daily operations, due to the works required to facilitate the route."	Please refer to response to Item No.1 above.
7	17	"While it is acknowledged that the proposed works are to provide the necessary infrastructure improvements to facilitate the expansion of the Luas network, it is at the request of our client that an alternative solution to the	Please refer to response to Item No.3 above.

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Submitted by	Firethorn Ltd. / Manhattan Peanuts Ltd. (Hughes Planning & Development Consultants on their behalf)		
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		proposed works is proposed in order to ensure the protection of the existing businesses and development capacity of the site, in line with the adopted Jamestown Masterplan."	
8	17	"The proposed road from McKee Avenue to the south involves a concerningly large portion of our client's lands. Losing this level of land would be detrimental to the existing and proposed plans for the site as a whole. We would request that this is substantially minimised in order to allow our client to continue to operate, along the lines of those proposed below."	Please refer to response to Item No.3 above.
9	17 and 18	"It is worth noting that the access road, as depicted within the Railway Order does not align with that contained within the Jamestown Masterplan. The documents submitted as part of the Railway Order refer to the Jamestown Masterplan as being "under development". This would seem to indicate that Transport Infrastructure Ireland have not updated the EIA since the Masterplan has been adopted, even though Transport Infrastructure Ireland were included in discussions surrounding the adoption of the Masterplan. Therefore, the submitted EIA is inaccurate."	<p>The submission states that the access road in the RO does not align with the Jamestown Masterplan and suggests that the EIAR does not reflect the adoption of the Jamestown Masterplan. For clarity, on 12 February 2024, pursuant to Section 13 of the Planning and Development Act 2000, as amended, the Members of Dublin City Council resolved to adopt Variation No. 4 of the Dublin City Development Plan 2022-2028, in respect of SDRA 3 – Finglas Village Environs and Jamestown Lands and the incorporation of the Jamestown Masterplan 2023 into the Development Plan by way of a new appendix and this is set out in Chapter 2 Section 2.2.5 (Local Policy Context) of the EIAR.</p> <p>Chapter 2 of the Masterplan establishes the urban structure for the future development of the area and is an important consideration for the proposed scheme.</p> <p>As set out in Chapter 2 Section 2.2.5 of the EIAR, the proposed scheme (referred to in the masterplan as Luas Finglas) is aligned with the Jamestown Masterplan and the vision set out in the masterplan i.e. "The Jamestown Masterplan will regenerate 43 hectares of strategically placed low intensity industrial lands and will deliver a sustainable, mixed-use neighbourhood with a focus on new homes, creating new and supporting existing jobs, complemented with high quality community amenities and open spaces. Capitalising on significant state investment in public transportation (Luas Finglas and BusConnects), Jamestown has the potential to become an exemplar in urban design-led planning, underpinned by sustainable mobility, green infrastructure and sustainable urban drainage, addressing climate change adaptation."</p> <p>The Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. In this regard, TII notes that Section 6 of the Jamestown Masterplan does not restrict the provision of such an access to service established businesses:</p> <p>"Any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site".</p> <p>Having regard to the above, the Luas Finglas scheme complies with the Jamestown Masterplan.</p> <p>TII notes the submission made by Dublin City Council, that confirms that regenerative mixed use development proposals along the proposed route at, inter alia, Jamestown, "have / are being developed to ensure compatibility with the project delivery and future operation" of the Luas.</p> <p>Therefore, there is no question but that the EIAR for Luas Finglas is accurate and fully reflects the adopted Jamestown Masterplan, and that the Board has sufficient information to enable it to carry out an environmental impact assessment of Luas Finglas.</p>
10	18	"In sum, we request that that the new access road from McKee Avenue only runs up to the boundary of our client's land. Therefore, it will be our client's prerogative what form the access route takes from there. This will also mean that there is less up-front cost to Transport Infrastructure Ireland."	Please refer to response to Item No.3 above.
11	18	"We would strongly request that a condition is attached to the railway order which instructs the developer that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access from being removed."	<p>TII confirms that access will be maintained at all times and that any disruptions will be discussed with the landowners in advance in accordance with EIAR Chapter 6 (Construction Activities) and Appendix A6.2 (CTMP). Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in EIAR Chapter 6 (Construction Activities). The sequencing of the programme is shown in Figure 6-2: Construction Programme, Section 6.3.3. Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP.</p> <p>Specific measures for St Margaret's Road are also included in the A6.1 CEMP Table A6 1-5 including Mitigation number PM-23 "TII will ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the Jamestown Masterplan, where existing access will be directed impacted by the proposed Scheme. Provide highly visible signage to direct customers and suppliers to this new access". There is therefore no requirement for any condition in this regard to be attached to the RO.</p>

Submission No.	20		
Submitted by	Firethorn Ltd. / Manhattan Peanuts Ltd. (Hughes Planning & Development Consultants on their behalf)		
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12	18	"There was not any phasing plans submitted as part of the Railway Order and therefore the sequencing of the construction of Luas Finglas is unknown. This is a significant oversight by the Applicant."	<p>The existing access will not be removed until the new road and access is available to use. Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in Chapter 6 of the Luas Finglas EIAR 2024. The sequencing of the Programme is laid out in Section 6.3.3 where works along St Margaret's Road are estimated to be undertaken in the initial 18 months of the programme.</p> <p>Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP as referred to in a previous response.</p> <p>Specific measures for St Margaret's Road are also included in the A6.1 CEMP Table A6 1-5 including Mitigation number PM-23 "TII will ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the Jamestown Masterplan, where existing access will be directed impacted by the proposed Scheme. Provide highly visible signage to direct customers and suppliers to this new access"</p>
13	18	"As it stands, there are no measures to ensure that our client can access their site continuously, as the Luas extension is being constructed."	This statement is incorrect. Please refer to response to item 12 above.
14	19	"Given the lack of a detailed design of the actual scheme and the lack of a detailed scheme of mitigation measure showing how the business is to operate."	The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the EIAR. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and the stakeholders will be kept informed and advised in accordance with the procedures set out in Luas Finglas EIAR 2024 Chapter 6 Construction activities and CTMP.
15	19	"We request, in the strongest possible terms, that a condition is attached to the Railway Order which instructs the developer that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access from being removed."	Please refer to response to Item No. 11 above.
16	19	"It appears that the proposed works represent the worst-case scenario, and due regard has not been had for the impact on our client's site and its development potential, as previously demonstrated by a grant of permission for development under Reg. Ref. 3364/23. The proposed works will significantly reduce accessibility and the potential for the developable lands, therefore impacting on the land value."	Please refer to response to item 1 and 5 above.
17	19	"It is considered that the proposed works, specifically those impacting existing retailers on St. Margaret's Road have been designed without due regard to the subject lands within our client's ownership. In sum, Manhattan Peanuts Ltd will be severely affected by the proposed Railway Order."	Please refer to response to Item No.1 above.
18	19	"The proposal, as per the submitted drawings show a significant loss of land to facilitate the provision of the route along St. Margaret's Road. This intervention will significantly impact on the accessibility and development potential of our client's lands."	Please refer to response to Item No.1 above.
19	19	"A generic solution is proposed by Transport Infrastructure Ireland as opposed to an engineered site-specific solution. It is requested that the new access route from McKee Avenue should be revised to mitigate the proposed impacts on the subject lands."	Please refer to response to Item No.14 above.
20	19	"The Environmental Impact Statement is and remains incomplete, due to the lack of proper information regarding how the proposed design correlates with the adopted Jamestown Masterplan."	Please refer to response to Item No. 5 above.
21	19	"If the Board is minded to approve the Order, then a condition must be attached to the Railway Order which instructs the developer that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access from being removed."	Please refer to response to Item No. 11 above.
22	19	"The scheme will have a severely detrimental effect on the Manhattan's business enterprise, the enjoyment of the property and the ability to sustain, develop and diversify the business practices when required in order to maintain the viability of the business."	Please refer to response to Item 1 and 5 above.

Submission No.	21		
Submitted by	Heetland Limited		
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1	3	<p>"Extending footpaths from the St, Margaret's Road entrance into the estate to make pedestrian access safe. At present the footpath stops short and doesn't connect with the existing footpaths in Jamestown Business Park (JBP)."</p> 	<p>The proposed footpath on the north side of the access road will connect to the existing Jamestown Business Park (JBP) footpath at the proposed Scheme tie-in. The proposed footpath on the south side of the access road will terminate at the proposed Scheme tie-in as there is no internal JBP southside footpath to connect to.</p>
2	4	<p>"Security Hut & Security Provision - Jamestown Business Park is currently a private estate with security barriers on both entrances to the estate. The St, Margaret's Road entrance has a full-time manned security hut. It is proposed to make the road where the security hut is located into a public road. However, no details have been proposed as to how we can maintain security or controlled access to the remainder of the estate. No discussions have taken place as to whether a new security hut can be built at an alternative location."</p>	<p>TII acknowledges the concerns about maintaining security and access control at Jamestown Business Park after the road becomes public. TII confirms their intention to engage in discussions with Heetland and all stakeholders, including DCC, during the detailed design stage to find a suitable long-term solution with regard to the location of the security hut and security provision within the Jamestown Business Park. The planned to the future redevelopment of Jamestown Business Park, and its changing requirements over time, Security and access will be a key consideration in these discussions. TII is committed to developing a solution in collaboration with all stakeholders, addressing both the Luas Finglas project needs and the security arrangements of the redeveloped Jamestown Business Park.</p>
3	4	<p>"Can new boundary fences be installed between Unit 34/35 and 36?"</p> 	<p>Provision of new boundary fences are not required for the proposed access road to function. TII confirms its intention to engage in discussions with Heetland and all stakeholders including DCC with regard to fencing and security provision within the Jamestown Business Park during the detailed design stage in the context of the proposed redevelopment of the Jamestown Business Park.</p> <p>Please also refer to response to Item No.2 above.</p>
4	4	<p>"As detailed Jamestown Business Park is a private estate and as such it operates a Service Charge which all occupants contribute to. The Service Charge pays for items such as security, CCTV, public lighting, landscaping, cleaning etc. The lands which are to be acquired are to facilitate a new public road which will provide access to units which were previously accessed from St, Margaret's Road and did not form part of JBP. In providing this new public road through part of the now Jamestown Business Park some of the units which are inside JBP will find themselves outside the estate. This will have implications for the ability to collect service charges from these units and the therefore the ability to pay for the services currently provided. No proposals have been discussed to address this."</p>	<p>Private estate management issues, including service charge collection and the financial implications for Jamestown Business Park, are not matters for the Board. The internal financial arrangements between the estate management and its occupants, including payments for security, CCTV, lighting, and maintenance, are private contractual matters and fall outside the scope of the planning process. While the planning authority considers the physical and operational impacts of development, the redistribution of service charges and the management of private services should be addressed separately by the relevant stakeholders.</p>
5	4	<p>"The provision of this new private road through JBP will cut off the loading bay to unit 34/35 along with making access to units 36 and 37 very difficult. "</p>	<p>TII acknowledges that access to existing units will be affected by the change in use of the existing road pavement and permanent removal of a loading bay to unit 34/35 as referred to in EIAR Chapter 8 – Population and Chapter 12 Land Take. At detailed design stage, solutions will be explored to minimise these impacts. TII</p>

Submission No.	21		
Submitted by	Heetland Limited		
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			confirms its commitment to continue to engage with all stakeholders to ensure that disruption is minimised to the fullest extent possible.

Submission No.	22		
Submitted by	HPC Sales Ltd (PCOT Architects on their behalf)		
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1	2	"The dimensions of the areas lost vary in size from approximately 2.5m at the Ballyboggan Road/Broombridge Road junction to approximately 7m on Broombridge Road. This sterilises approximately 56m of road frontage including 37m of the eastern elevation of the T J O Mahony building for, as yet, an unspecified period of time."	<p>The exact timeline of the works is dependent on a number of factors including approvals, and third-party developments and construction tendering. TII will continue to engage with stakeholders at all stages of the process to ensure disruption is fully minimised.</p> <p>As per Chapter 6 of the EIAR the total duration for works in Section S31.1 along Broombridge road is estimated to be up to 18 months in total. The temporary works area is necessary for the completion of the boundary treatment along here with Broombridge Road and will only be required for a limited period of time for this. Access along here will be maintained for the business during construction as is reasonably practicable in delivering the proposed Scheme. Details of constructing the boundary will be discussed with the business prior to construction starting in the area.</p>
2	3	"Both the Proposed and Temporary Acquisition areas occur within an area which is fundamental to the day-to-day operation of the premises These areas coincide with an existing door on this eastern elevation which is used on a daily basis for deliveries and access will no longer be feasible as trucks etc would not be able to achieve the appropriate turning circles etc required. and will affect the overall operational and commercial viability of the business in this location."	<p>Existing access space will be reduced by the proposed permanent scheme and circa 5m width space will be retained between the eastern gable end of building and edge of proposed property boundary along Broombridge Road. It is accepted that this will restrict vehicle accessibility to the eastern gable end of building, and paved areas at the gable end that are currently being used for storage may need to be cleared. TII has determined that 7.5 tonne 7.17m length HGVs will still be able to drive to the access at the eastern gable end of building, turn into the building and reverse out to perform a 3-point turn.</p>  <p>Please refer to Item No. 1 above for temporary land take works and timelines.</p>
3	3	"This will make the day-to-day operation untenable and trading from the premises will no longer be commercially viable. The business has been in operation for in excess of 10 years, relying on a loyal customer base which has been built up in the area in that time. It currently employs in the region of 20 people."	<p>TII contends that day to day operations will not become untenable and that trading from the premises will no longer be commercially viable. Access will become more restricted to the eastern gable end of building as outlined in response to Item No.2, however TII does not agree that the changes will require the business to cease trading. The reduced operational area may require changes to the existing loading and access arrangements to the premises. TII has demonstrated that a turning movement is possible. Also, please refer to response to Item No. 2.</p>

Submission No.	22		
Submitted by	HPC Sales Ltd (PCOT Architects on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
4	3	"Unless the proposed route is modified our client will have no option but to cease trading altogether from the site."	Please refer to response provided in Item No. 3 above.
5	3	"Based on the above we therefore request the Bord to take our submission into account, if in granting the Railway Order, to include a condition modifying the route to omit the CPO effecting our client's premises."	<p>The proposed land takes both Permanent and Temporary are proportionate and necessary for the road widening due to the insertion of the LRT alignment and the associated upgrades to the footpaths, cycleways, roads, utilities and landscaping. The temporary land take is required for construction of new boundary treatment. These works are detailed in the alignment, utilities and landscape drawings and Luas Finglas EIAR 2024. Chapter 12: Land Take Table 12-10: Land take Impact Assessment in Area 32 included in the application. The temporary land take will also accommodate protective fencing/hoarding and provide some safe working space for the construction to take place as detailed in Luas Finglas EIAR 2024 Chapter 6 Construction Activities.</p> <p>It is not possible to modify the route to omit the CPOI for this plot.</p>

Submission No.	23		
Submitted by	Jack and Lily O’Neill		
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1	4	“Our main concern is the safety of pedestrians, and especially children, living in Ravens Court and Cardiff Castle Rd. The increase in traffic to the area of passing LRVs every 3.5 minutes is an obvious increase in risk of a collision.”	<p>The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p> <p>TII understands the concerns about the safety of pedestrians, especially children, at the entrance to Ravens Court and along Cardiff Castle Road, with the introduction of the Luas. TII is dedicated to delivering a Luas system that is safe for all road users and will implement appropriate operational or design safeguards as necessary.</p> <p>The Luas Finglas project incorporates several key features to protect pedestrians in this particular area:</p> <ul style="list-style-type: none">▪ Slow LRV Speeds: LRVs will be travelling at a low speed near the entrance to Ravens Court. This is due to the nearby signalised junction at Mellowes Road, the layout of the track as approach and depart Luas Finglas LRV stop, and the proximity to the estate entrance. Slow speeds significantly reduce the risk of accidents.▪ Clear Visibility: The design ensures that both LRV drivers and pedestrians will have a clear, unobstructed view of each other.▪ Driver Training: Luas drivers are trained to operate the vehicle on the route. They will be aware of pedestrian crossing locations and desire lines along the route.▪ Designated Pedestrian Crossings: There will be clearly marked pedestrian crossings near the entrance to Ravens Court, providing safe and designated places for residents to cross the tracks. These crossing will comply to all relevant safety standards.▪ Separate Footpaths: Continuous footpaths run alongside the tracks, keeping pedestrians safely separated from both the LRVs and road traffic.▪ Safety Regulation: The safe operation of Luas is regulated in Ireland by the CRR and TII will continue to engage with CRR throughout the project, to ensure that any hazards are properly controlled and managed. <p>Luas has a strong safety record in Dublin, and this new extension is designed with the same required high safety standards. The design meets all relevant safety regulations and guidelines for pedestrian safety near light rail lines.</p> <p>Regarding the issue of access to Ravens Court by pedestrians, including children, older people and persons with disability, an uncontrolled intersection is proposed at the entrance to the estate. The LRT crossing outside of the boundary to the estate, together with passing LRVs, will introduce an element of social and physical severance which is assessed in Section 8.4.3.2 as being significant, negative and long-term. The effect of this severance will be mitigated as far as possible by a slight relocation of the entrance to maximise visibility for people entering or leaving the estate. A pathway will be provided from Ravens Court to the green space to the south and secure fencing will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature needed to join Mellowes Road. Some relief from severance is also provided by the new direct access that will be provided alongside the LRT to community facilities on Mellowes Road.</p> <p>Additionally, the distance from the LRV swept-path envelop to the wall at the point where pedestrians emerge from the northern footpath at Ravens Court is over 2.6m, providing a wide dwell area and allowing sufficient space for pedestrians to assess approaching LRVs before crossing.</p> <p>Pedestrians intending to cross the Luas tracks will be presented with the standard suite of traffic signs, pavement markings and surface treatments to alert them of the presence of the crossing.</p>
2	4	“The proposed plan introduces a new blind-spot where a child darting out from the cul-de-sac would potentially appear from behind a brick wall, directly stepping out onto Luas tracks with less than a meter between the two. Even at the proposed slower driving speed this would not give a driver enough time to stop before an impact.”	<p>Having regard to the response above at Item 1 regarding visibility for pedestrians, the proposed Scheme has been designed to ensure that pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards.</p> <p>While the presence of a boundary wall may create some level of obstruction at close range, the design has been developed to provide visibility distances above the required minimums. These measures are taken to ensure that both drivers and pedestrians can make safe and informed decisions before entering the Luas corridor.</p>

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3	4	"TII is confident that a low-speed limit will be sufficient mitigation for this risk. However, a 2021 study (1 Gaea, S. and Franek, L., 2021. Pedestrian fatality risk as a function of LRV impact speed. Open Engineering, 11(1), pp.1105-1113.) into the impact of LRV speed on pedestrian fatalities estimates the fatality rate to be as high as 10% at speeds lower than 10km/h and recognises increased risks for children."	<p>TII understand resident concerns in relation to pedestrian safety, particularly for children. The safety of all pedestrians is of paramount priority in the design of the Luas Finglas project. The Luas Finglas design incorporates multiple layers of safety measures to prevent collisions from happening in the first place.</p> <p>Please also refer to response to Item No.1</p> <p>TII has initiated its engagement with the CRR. Ultimately the contracted operator will be responsible for ensuring that safety performance is of the highest standard for urban light rail. LRVs tend to have higher visibility than cars and are more predictable in their movements, making interaction with normal pedestrians and users safer. It is anticipated that the residents and LRV users will quickly assimilate to the use of the LRV as has happened in other urban parts of Dublin. The Luas in Dublin already runs through populated and heavily pedestrianised areas. The statistics for rail safety in Ireland are published annually by the CRR and there are regular interactions between the railway operators and the CRR.</p>
4	4	"We propose that the design is revised to remove this hazard, for example by installing a gate to the entrance of the cul-de-sac."	<p>TII understands the concern about pedestrian safety and the suggestion to install a gate at the entrance of the cul-de-sac as a way to remove the perceived hazard. While TII appreciates the suggestion, a gate at this location is not feasible and would, in fact, create additional problems, as outlined below.</p> <p>A gate has not been proposed as a viable solution for several key reasons:</p> <ul style="list-style-type: none"> ▪ Pedestrian Access Obstruction: A gate would significantly hinder pedestrian movement and access to the wider area. This creates a barrier for residents, particularly those with mobility issues, prams, or bicycles. ▪ Space Constraints: There would be insufficient distance from the likely gate location to the Luas swept-path envelope. Any vehicle bigger than a car and waiting for the gate to open could therefore potentially cause an obstruction on the Luas track. ▪ Operational Impact: A gate would disrupt the smooth operation of the Luas, causing delays and potentially impacting service reliability. ▪ Emergency Access Concerns: While gates can be designed for emergency access, they introduce a potential point of failure that could delay emergency vehicles. <p>The Luas Finglas design prioritises pedestrian safety through a multi-layered approach, which is more effective than a single barrier like a gate, which would also introduce risks.</p> <p>Please also refer to response to Item No. 1.</p>
5	4	"One of the most charming aspects of the property when we bought it in 2020 was the curb appeal as we drove into the cul-de-sac. The beautiful silver tree, the grassy green area for children to play on, and the resident-planted flowers and shrubs are beloved by all of us. These are all planned to be removed, leaving us with a cramped grey carpark to look out on and no communal area for the children or neighbours, to socialise in."	<p>As part of the detail design stage, which follows the grant of permission, a comprehensive landscape plan will be prepared and agreed with residents. Additional landscape design mitigation measures could be proposed that are not currently shown on the landscape design drawings, these measures are listed below. They would not mitigate the loss of green space, but they would enhance the quality of the semi-private open space in terms of functional and aesthetics.</p> <ul style="list-style-type: none"> ▪ Feature tree planting along the western boundary of the courtyard to reduce visibility of the OCS and to further enclose the cul de sac and retain the intimate character of the area. ▪ Evergreen flowering climbing plants grown against the proposed wall which will enhance the western boundary and improve the view in that direction from the residential properties. ▪ Street furniture i.e. south and east facing seating adjacent to the boundary wall to increase outdoor use of the space for courtyard residents. ▪ Grasscrete paving within the parking spaces of the courtyard to reduce the amount of hard surface.
6	5	<p>"Section 4.10.1.1 of Chapter 4 of the EIAR (Alternatives Considered) evaluates the impact of the loss of public green space on residents as an imperceptible to slight negative effect, noting that the green space is little used. This has, in fact, been one of the leading concerns of residents and has been brought up at every consultation meeting with TII. The green space is extensively used as a safe and quiet play area for the children of Ravens' Court, Cardiff Castle Road and the surrounding area. The proposed changes will force children to cross the tracks when going outside to play.</p> <p>The communal area of the Ravens' Court estate has been maintained and managed by the Ravens' Court Residents' Association. Jay Neeson, in particular has done fantastic work in planting flowers and maintaining the space on behalf of and alongside the other residents of Ravens' Court."</p>	<p>Chapter 4 – Alternatives Considered section 4.10.1 Ravens Court Alternative Access outlines the assessment and selection process and those alternatives considered for accessing the Ravenscourt Estate.</p> <p>Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 12 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>The proposed Luas Finglas will require the relocation of the western boundary wall 2.25m high, to be rebuilt 4m closer to the residential properties and reducing the amount of grass in the semi-private open space. The construction works would also require the removal of two trees along this area. The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit smaller in size.</p>

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			See also the response in Item No. 7 below.
7	5	"The residents would consider the impact of the loss of this greenspace as major and have made this clear to TII repeatedly. We were not, however, consulted on the alternative options laid out in section 4.10.1 of Chapter 4 of the EIAR (Alternatives Considered)."	<p>This issue is raised by a number of concerned Ravens Court residents and so responds to the same issue raised by all of those observers.</p> <p>TII understands and acknowledges the concerns of Ravens Court residents regarding the loss of greenspace and the potential impact on the community.</p> <p>Ultimately, in a scheme like this in an urban setting, there may be some permanent impacts on residents who are closest to the proposed Scheme, and in such a case as this, TII has considered first how to mitigate the impacts but also has repeatedly consulted and continues to engage with those affected parties on relevant issues. In this case, the loss of green space is assessed in Chapter 21 of the EIAR on a professional basis to be Slight, Permanent and Negative and TII has engaged in a comprehensive consultation and engagement strategy with key stakeholders. However, the proposed Scheme has the potential to bring a greater amount of positive social, economic and environmental benefits to the residents of Finglas and its surrounds and contributes to national targets in terms of delivering decarbonised transport and meeting other objectives which flow down from national targets, the UN sustainable development goals and government policy.</p> <p>Section 4.10.1 of Chapter 4 of the EIAR details the various alternative route options and designs that were considered during the project's development. This was an iterative design process, where different options were assessed for their engineering feasibility, environmental impact, and impact on communities. These alternatives were not discussed with Ravens Court residents, as in this case the alternatives considered did not result in changes to the previously communicated proposal. Please refer to Section 4.10.1.2 where it is noted that the alternative design options considered were not deemed to offer benefits over the original design.</p> <p>However, in direct response to the specific feedback received from Ravens Court residents throughout TII's engagement, and recognising the importance of the green space to the residents, the design was changed (following the second NSPC), whereby the track alignment was moved further west to reduce the amount of land taken from the communal greenspace at Ravens Court.</p> <p>TII records indicate that there have been 81 communications between TII and Ravens Court residents to date. Prior to the submission of the RO application, a meeting was held in October 2024. At this meeting, TII presented the revised design, highlighting the changes made to the alignment to minimise the impact on the Ravens Court greenspace in direct response to previous feedback. Updates on the overall scheme were also presented, along with advice for residents on how to continue their engagement with the project, and details of the mitigation strategies.</p> <p>TII remains committed to ongoing engagement with the Ravens Court residents.</p>
8	5	"We suggest that additional green space is provided within the estate boundaries to mitigate against this loss."	<p>Please refer to response provided to Item No. 7 above.</p> <p>A loss of green space is acknowledged, but sufficient green space will remain to provide an amenity for children's play. A pathway will be provided from Ravens Court to the green space to the south. Secure fencing along this pathway will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature need to join Mellowes Road.</p>
9	5	"Noise - Ravens Court is a secluded estate situated off a quiet road with very little existing noise pollution. The proposed development will drastically change the character of the environs. We are not reassured by TII's promises that the new tracks will be very quiet."	<p>Section 15.4.1.5 of Volume 3 of the EIAR assesses the operational phase noise impacts of the proposed Scheme. Specifically, noise model receptors R076 to R080 are located at the external façades of the Ravens Court residences. Figure 15.2 of Volume 4 of the EIAR illustrates the location of these and all other noise model receptors.</p> <p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p>

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10	5	"In its EIAR for the Luas Line A1 , TI I estimates the noise levels of a Luas turning a corner (as is the case around Ravens Court) to be 77 - 80 decibels. The report likens this level of noise to the curbside of a busy street. (https://www.tii.ie/media/kqfdmdpn/luas-line-a1-eis-chpt-11-noiseandvibration.pdf)"	In the vicinity of Ravens Court, the proposed track operates at lower speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 3 of the EIAR.
11	5	"This level is considerably above the 45 decibel limit recommended by the WHO to prevent sleep disturbances at night. Given that a Luas will pass once every 4 - 5 minutes and will operate between 5.30am and midnight year-round (and as late as 3.30am during the holiday season), the impact on residents will be considerable."	In the first instance Sections 15.2.4.9 and 15.6.3.2 of Volume 3 of the EIAR discusses the WHO thresholds and their applicability to this Scheme. In addition, it is important to note that the WHO thresholds are presented in terms of long-term annual average noise exposure. The noise of a single passing Luas cannot be directly compared to the WHO thresholds. The assessment contained within Chapter 15 of the EIAR does, however, calculate the long-term average noise levels for comparison to the WHO thresholds. To do this the noise signature of a single passing LRV is taken and used to calculate the average. Section 15.2.4.2 of Volume 3 of the EIAR describes the methodology used. In conclusion, the EIAR demonstrates that the residual noise impact at all locations as a result of the proposed Scheme operation is not significant. The EIAR also demonstrates that the WHO thresholds are in fact achieved at many locations and where they are not achieved the assessment compares the rail noise level to the existing baseline to conclude residual impacts are slight.
12	5	"There is also the problem of the bell being sounded on turns, which TII say the drivers could be instructed not to do, however this is not an ideal solution as drivers in the habit of sounding the bell on turns are likely to forget, and even if they do opt to silence the bell this is then an additional safety risk as a Luas may surprise a pedestrian or driver coming out of the cul-de-sac"	In this particular location, with pedestrians set well back from the rail at controlled crossing points, which are also signalised together with LRV/road traffic, there is no need for drivers to activate bells during normal operation.
13	5	"We suggest that residents' houses be insulated with sound-proof materials and sound-proof windows be installed to help mitigate this harm."	The assessment contained within Chapter 15 of Volume 3 of the EIAR submitted has demonstrated that the residual noise and vibration impact of both the operation and construction of the proposed Scheme is not significant and in many cases the impact is slight. Sound insulation measures to buildings along the proposed Scheme are therefore not required.
14	5	"There are additional safety concerns around emergency services access to the cul-de-sac, along with access for services such as bin trucks, and oil lorries. Currently, the bin trucks and oil lorries are dependent on parking in the entrance area to deliver service, and bins are placed on the stretch of pavement in this entrance area, which is proposed to be taken. No suitable alternatives for how these services would be delivered have been proposed."	TII does not agree with the contention that there are safety issues regarding emergency services access to the cul-de-sac. According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required. Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.
15	5	"If a Luas broke down on this stretch of road vehicular access in and out of the cul-de-sac would be completely cut off."	TII understands the concern about the possibility of a LRV blocking the entrance to Ravens Court, particularly in an emergency. It is important to note that this type of scenario (a vehicle potentially obstructing access) isn't unique to this location, and this is a consideration throughout the Luas network. Maintaining both pedestrian and vehicular access, is a key design principle for the Luas system. The design allows for, even in the unlikely event of a LRV breakdown at the entrance, maintaining pedestrian access to and from the estate. Footpaths are also alongside the tracks, allowing emergency services personnel (paramedics, firefighters) to reach the estate on foot if needed. The section of track near Ravens Court is designed to be low speed and is also relatively flat. These characteristics further reduce the likelihood of a LRV breakdown. In the unlikely event of a LRV breakdown, the Luas Operator would urgently address this in order to restore normal service, involving measures to quickly clear the obstruction. This includes, where necessary, having the capability to tow an LRV.

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16	5	"In the case of emergency services access an ambulance or fire engine may be delayed or impeded completely, particularly in the case of a Luas blocking the entrance."	Please refer to response to item No.14 regarding access for emergency services. Please refer to response to Item No.15 in relation to the potential for the Luas to block the entrance.
17	6	"We suggest that a credible proposal, in consultation with Dublin Fire Brigade and the National Ambulance Service is developed to ensure access for emergency vehicles."	Please refer to response to Item No.14 above regarding access for emergency services.
18	6	"The parking within the cul-de-sac is already under pressure with many of the houses having 2 cars, and some residents owning larger vehicles such as vans and taxis. We are reliant on the parking provided on the curbs in the entrance area which we will lose if the plans go ahead."	According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking. It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and preventing and limiting illegal parking in this area] at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use. However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.
19	6	"Additionally, there will be less space to manoeuvre."	According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the estate but only affects a portion of the green space and entrance. As a result, the manoeuvring space remains unchanged.
20	6	"We suggest that additional parking within the estate boundaries is provided if the current space is re-purposed."	Please refer to response to Items No.18 and 19 above. In addition, provision of additional parking space within the estate boundaries will have a greater impact on the green areas. However, if the residents want part of the greenspace to be repurposed for parking, a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.
21	6	"TII has been indifferent to the needs of local residents in its approach to planning this route. Due to its being situated in a cul-de-sac Ravens Court was expressly excluded from the initial Options Selection Report as a prima facie unsuitable location. This has meant that much of the planning and assessment which was done on the rest of the route was not carried out in Ravens Court."	TII does not accept the contention that TII has been indifferent to the needs of local residents in its approach to planning this route. As described in Chapter 1 - Introduction, section 1.9 the consultation on the Preferred Route took place over an eight-week period from December 7, 2021, to January 31, 2022. As part of this process, an online meeting was held with Ravens Court residents on December 8, 2021, followed by an in-person meeting on January 8, 2022. Additionally, several meetings have taken place with TII and local residents to discuss alternative alignments at Ravens Court and gather further input. The Option Selection study was carried out in two stages. In Stage 1, an initial high-level assessment was conducted - sometimes called a "sifting" process - to evaluate different route options. This assessment considered how well each route could meet the project's goals and whether they could realistically be built. A total of 29 potential route options were explored at this stage. After this process, four options were selected for further review in Stage 2. In January 2020, the Emerging Preferred Route (EPR) was identified, and a Non-Statutory Public Consultation (NSPC) was held to gather feedback from the public and stakeholders. The input received during the consultation was carefully reviewed alongside additional proposed improvements to the route and its design. As a result of this feedback and analysis, several changes were made to the EPR, leading to the selection of the final Preferred Route (PR). Chapter 4 – Alternatives Considered provides details of the various alternatives considered during the preliminary design development stage. One of the key changes involved the area around Mellowes Crescent and Mellowes Court. Originally, the proposed route passed through the Mellowes Crescent and Court estates, forming a sharp "S" curve before crossing Mellowes Road about 40 metres west of Finglas Fire Station. During the public consultation held from July to September 2020, residents expressed concerns that this design could divide their community. To address these concerns, the Luas Team carried out further assessments, comparing the EPR to alternative route options between Cappagh Road and Mellowes Road. These alternatives underwent a full suite of environmental assessments to ensure they were thoroughly evaluated. Based on this review, adjustments were made to the alignment at Ravens Court/Mellowes, leading to the final selection of the Preferred Route (PR).

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22	6	"The environmental impact assessments published on the Ravens Court section of the track are significantly less detailed than those of the section which were included in the initial report."	The EIAR summarises findings of assessments carried out by TII and it is intended to be read as part of a suite of documents and submissions to the Board and where relevant cross-referenced with the Options Selection study referred to above that led to the Emerging Preferred Route (EPR) and finally the Preferred Route (PR) being selected.
23	6	"Residents have consistently been on the back foot throughout this process, from being informed of the plans after local newspapers, to not being informed of the alternative route options 1 and 2 (outlined in Section 4.10.1 of Chapter 4 of the EIAR). The main concerns raised by residents at consultation meetings were the lack of green space and the safety issues associated with the blind spot created at the entrance to the estate. The former has been deemed by TII to have a "negligible" impact, and the latter has been omitted from the Railway Planning Order entirely."	Please refer to response to Item No.7 in relation to previous consultations and loss of greenspace. Please refer to response in Item No.2 above regarding "blind spot".
24	6	"While it is perhaps unavoidable that the requirements of the many outweigh the needs of the few, the disregard which TII has shown towards mitigating the harm clearly and consistently articulated to them by residents is shocking. We only ask that reasonable steps are taken to mitigate the significant harm this project will cause to local residents."	TII understands and acknowledges the strong feelings expressed regarding the perceived lack of mitigation and the impact of the project on local residents. TII is committed to working constructively with all affected communities. Minimising the negative impacts of the Luas Finglas project has been, and continues to be, a central priority throughout the project's development. TII has engaged in extensive consultation with residents throughout the design process, and the evolution of the proposed Scheme design demonstrates the significant effort to minimise impacts and to balance the needs of the project with the concerns of local residents. TII remains fully committed to ongoing dialogue and engagement.

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1	2	<p>"Per maps provided and remote meetings with TII in October 2024, the distance between the walled access point to and from Ravens Court and planned Luas tracks, will be 2 metres (at a minimum). Before a vehicle or person enters into this 2-metre space in order to leave Ravens Court, TII have acknowledged there will be a "blind spot" for both the Luas drivers and those trying to leave Ravens Court, due to the position of a neighbour's walled back garden." This is a significant danger, which was not raised in TII's EIAR."</p>	<p>TII understands the concerns about the safety of pedestrians, especially children, at the entrance to Ravens Court and along Cardiff Castle Road, with the introduction of the Luas. TII is dedicated to delivering a Luas system that is safe for all road users and will implement appropriate operational or design safeguards as necessary.</p> <p>The Luas Finglas project incorporates several key features to protect pedestrians in this particular area:</p> <ul style="list-style-type: none"> Slow LRV Speeds: LRVs will be travelling at a low speed near the entrance to Ravens Court. This is due to the nearby signalised junction at Mellowes Road, the layout of the track as approach and depart Luas Finglas LRV stop, and the proximity to the estate entrance. Slow speeds significantly reduce the risk of accidents. Clear Visibility: The design ensures that both LRV drivers and pedestrians will have a clear, unobstructed view of each other. Driver Training: Luas drivers are trained to operate the vehicle on the route. They will be aware of pedestrian crossing locations and desire lines along the route. Designated Pedestrian Crossings: There will be clearly marked pedestrian crossings near the entrance to Ravens Court, providing safe and designated places for residents to cross the tracks. These crossing will comply to all relevant safety standards. Separate Footpaths: Continuous footpaths run alongside the tracks, keeping pedestrians safely separated from both the LRVs and road traffic. Safety Regulation: The safe operation of Luas is regulated in Ireland by the CRR and TII will continue to engage with CRR throughout the project, to ensure that any hazards are properly controlled and managed. <p>Luas has a strong safety record in Dublin, and this new extension is designed with the same required high safety standards. The design meets all relevant safety regulations and guidelines for pedestrian safety near light rail lines.</p> <p>Regarding the issue of access to Ravens Court by pedestrians, including children, older people and persons with disability, an uncontrolled intersection is proposed at the entrance to the estate. The LRT crossing outside of the boundary to the estate, together with passing LRVs, will introduce an element of social and physical severance which is assessed in Section 8.4.3.2 as being significant, negative and long-term. The effect of this severance will be mitigated as far as possible by a slight relocation of the entrance to maximise visibility for people entering or leaving the estate. A pathway will be provided from Ravens Court to the green space to the south and secure fencing will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature needed to join Mellowes Road. Some relief from severance is also provided by the new direct access that will be provided alongside the LRT to community facilities on Mellowes Road.</p> <p>Additionally, the distance from the LRV swept-path envelop to the wall at the point where pedestrians emerge from the northern footpath at Ravens Court is over 2.6m, providing a wide dwell area and allowing sufficient space for pedestrians to assess approaching LRVs before crossing.</p> <p>Pedestrians intending to cross the Luas tracks will be presented with the standard suite of traffic signs, pavement markings and surface treatments to alert them of the presence of the crossing.</p> <p>The proposed Scheme has been designed to ensure that drivers exiting Ravens Court and crossing the Luas line, have appropriate visibility in accordance with relevant design standards.</p> <p>While the presence of a boundary wall may create some level of obstruction at close range, the design has been developed to provide visibility distances above the required minimums. These measures are taken to ensure that both drivers and pedestrians can make safe and informed decisions before entering the Luas corridor.</p>
2	2	<p>"Risks of Major Accident and Disasters (page 59, point 10.16 of TII's EIAR 2024 (EIAR) under the Risk of Major Accident and Disasters, TII states "there were several risks that were deemed low and were not considered further. No high risks were identified." "Significant risks related to infectious disease such as Covid-19". This totally plays down the very real risk to life that Ravens Court residents raised..."</p>	<p>The EIAR for Luas Finglas has been prepared in full compliance with all legal requirements including for example, the EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended), and contains sufficient information to enable the competent authority, the Board to carry out an environmental impact assessment of Luas Finglas. The Risk of Major Accidents and Disasters chapter (Chapter 22) in the EIAR, as per EPA guidelines, assesses the likelihood and consequences of significant accidents or disasters arising from the proposed project. Its purpose is to evaluate risks related to hazardous materials, technological failures, environmental hazards (e.g., fires, explosions, chemical spills), and natural disasters (e.g., floods, earthquakes) that could cause serious harm to human health, the environment, and infrastructure. Design-related risks are</p>

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			<p>normally addressed separately under health and safety regulations, engineering standards, and project design reviews, rather than set out in environmental risk assessments or the EIAR.</p> <p>The Major Accidents chapter therefore focuses on low-probability, high-consequence events linked to hazardous materials, natural disasters, and large-scale failures that could impact the environment and human health. The safe operation of a light railway is regulated in Ireland by the CRR. Light rail systems in urban Dublin have been proven to have a relatively low incidence of accidents and these statistics are publicly available. This informed the determination of risk of a major accident and potential environmental impact associated with this scheme.</p> <p>The probabilistic evaluations of the worst-case scenario risks were set out in a Major Accidents and Disasters (MANDs) Risk Register for both the Construction Phase and Operational Phase of the proposed Scheme, and the risks evaluated using the criteria in Section 22.4 of the EIAR. The risk evaluation is provided in Table 22-6 (Construction Phase) and Table 22-7 (Operational Phase). The key objective of this risk register is to identify whether additional mitigation and/or management measures are required (above those mitigation measures that have already been embedded in the current design) to manage the identified risks to the environment to be "as low as reasonably practicable" (ALARP). It is important to reiterate that this assessment will typically focus on 'low likelihood but potentially high consequence events' as per professional guidance published by the Institute of Environmental Management and Assessment IEMA 2020.</p>
3	2	"...risks which were never addressed by TII, other than to incorrectly say that there are no known fatalities, due to Luas drivers not able to stop in time, to avoid colliding with a person, when quite a few deaths were caused by this, as reported in the media over the years."	<p>Regarding the issue of access to Ravens Court by pedestrians, including children, older people and persons with disability, an uncontrolled intersection is proposed at the entrance to the estate. Luas Finglas crossing outside of the boundary to the estate, together with passing LRVs, will introduce an element of social and physical severance, which is assessed in Section 8.4.3.2 as being significant, negative and long-term. The effect of this severance will be mitigated as far as possible by a slight relocation of the entrance to maximise visibility for people entering or leaving the estate. A pathway will be provided from Ravens Court to the green space to the south and secure fencing will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature need to join Mellowes Road. Some relief from severance is also provided by the new direct access that will be provided alongside the LRT to community facilities on Mellowes Road.</p> <p>The safe operation of a light railway is regulated in Ireland by the CRR and TII, or its contacted operator, is obliged to engage with them. Light rail systems in urban Dublin have been proven to have a relatively low incidence of accidents and these statistics are publicly available. This informed the determination of risk of a major accident and potential environmental impact associated with the proposed scheme. The benefits of the design of a light rail system is that it normally provides for a high degree of line of sight for those interacting with it thereby enhancing safety. Other measures such as LRV speed are determined according to the track layout and interactions with junctions. During operations, drivers are specifically trained to operate the vehicle on the route and to look out for key hazards associated with particular spatial elements of that route.</p>
4	2	"There are young children in our estate, having a blind spot so near rail tracks is far from ideal, and surely poses a risk of serious injury or death."	TII does not agree with the assertion that the proposed boundary wall poses a risk of serious injury or death. Please refer to Item No. 2 above regarding alleged "blind spot" and boundary wall. Please refer also to response to Item No.3 above.
5	2	<p>Emergency Services and other services access</p> <p>"Given there is only one way in and out of Ravens Court, and this will not change, residents did not receive a satisfactory answer as to how any needed emergency services - ambulance, fire brigade etc. would access the estate without delays - considering a Luas will be passing by, in both direction every 3.5 minutes at peak times, and 7.5 off-peak, likely up to 12.30pm (this is per TII at our remote meeting in October 2024). This is a significant risk to life that, again, was not outlined in TII's EIAR."</p>	<p>TII does not accept the assertion that the proposed impact of the proposed Scheme on emergency services access will result in a significant risk to life.</p> <p>The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p> <p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p>

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			Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.
6	3	"Due to the single access area, and closeness of the tracks to it, residents will be running a gauntlet, trying to go about usual activities, it is highly impractical and dangerous to place Luas tracks at Ravens Court's only point of access."	TII does not agree that the proposed access will be highly impractical and dangerous. Please refer to Responses A item 1 and F item 1 regarding pedestrian and vehicular access.
7	3	"Oil deliveries, bin collections, general deliveries to residents will be impacted also, and those providing these services will also be put at risk of injury."	TII does not accept the contention that oil deliveries, bin collections, general deliveries to residents will be impacted significantly, or that those providing these services will also be put at risk of injury. Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.
8	3	Landscape and Visual Amenity (page 57, point 10.15 of TII EIAR) "By taking planned 3-4 metres from Ravens Court estate frontage, residents will be further hemmed in, with green space previously used for leisure and child play being used to park resident and visitor vehicles. The area is already used to full capacity."	According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking. It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and preventing and limiting illegal parking in this area] at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use. However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents. Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR. The proposed Luas Finglas will require the relocation of the western boundary wall 2.25m high, to be rebuilt 4m closer to the residential properties and reducing the amount of grass in the semi-private open space. The construction works would also require the removal of 2 trees along this area. The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit it smaller in size. As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents. Additional landscape design mitigation measures could be proposed that are not currently shown on the landscape design drawings, these measures are listed below. They would not mitigate the loss of green space, but they would enhance the quality of the semi- private open space in terms of functional and aesthetics. <ul style="list-style-type: none"> Feature tree planting along the western boundary of the courtyard to reduce visibility of the OCS and to further enclose the cul de sac and retain the intimate character of the area. Evergreen flowering climbing plants grown against the proposed wall which will enhance the western boundary and improve the view in that direction from the residential properties. Steet furniture i.e. south and east facing seating adjacent to the boundary wall to increase outdoor use of the space for courtyard residents. Grasscrete paving within the parking spaces of the courtyard to reduce the amount of hard surface.
9	3	"We have been told that this land grab could increase by 2 metres, due to "limits of deviation", after construction begins."	Appendix A5.2 (Volume 5) deals with limits of deviation (LOD) wider effects. Section 1.4 of this report identifies a number of locations where it is not possible not apply LODs due to constraints in the immediate vicinity of the proposed Scheme. This restriction includes the alignment along Cardiff Castle and Ravens Court.

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10	3	"This greatly impacts negatively on the green space available and on mental health, due to the imprisoned feeling being imposed, because the little green space we did have is being taken. To note - Ravens Court won a Dublin City Council award in recent times, for our composting initiative and work on our green area, we have lost heart this year to continue our good work, because TII have made it clear our green area will be demolished to make way for the construction, necessary to facilitate the Luas."	<p>In relation to the potential effect on mental health this has been extensively discussed in the Human Health Chapter 7 of the EIAR. I would reference section 7.2.2.8 and the potential for psychological effects, the methodology section as well as the psychological impacts of both the construction and operational phases which is outlined in 7.4.2.1 and 7.4.2.2.</p> <p>While it is accepted that some loss of space and amenity is unavoidable particularly during the construction phase this will be minimised where possible.</p> <p>It should also be noted that during the operation phase, residents will experience benefits in terms of better accessibility via the new public transport service.</p>
11	3	<p>Noise and Vibration (page 49, point 10.9 of TII EIAR)</p> <p>"Vibrations during construction and after, are bound to affect Ravens Court homes - TII informed that a "utilities trench" needs to be dug and worked on "over a few days" within Ravens Court, the current large Electrical Box situated within our estate will need to be moved and reinstalled, Luas lines and overhead electrical cables need to be set in place."</p>	<p>With regards to vibration during construction Section 15.2.4.7 of Volume 3 of the EIAR sets vibration thresholds which the construction stage of the proposed Scheme must remain within. Section 15.5.1.1 of Volume 3 of the EIAR specifies that monitoring must be undertaken during construction to ensure the works remain within the thresholds specified. The vibration thresholds outlined within the EIAR are to ensure that there is no risk of damage including cosmetic damage.</p> <p>The sub-station in question currently within Ravens Court is proposed to be relocated outside of Ravens Court along with all associated cabling and ducting. The subsequently freed up space will be incorporated into the new proposed landscaping to the communal space.</p>
12	3	"TII say they can guarantee our houses are not close enough to the construction/tracks, to be affected by vibrations, they are more concerned about the impact vibration will have on the Garda Station (per remote TII meeting held in October 2024). The Garda Station is not closer than our houses to the tracks and construction sites, so this statement about the Garda Station being more affected, is a concern. Houses are already 40 or so years old, so could be vulnerable to long-term damage during construction, utility upgrading and on-going Luas operations once all is in place."	<p>The Garda station ground floor level building is located at 6.6m minimum distance from the nearest running rail. This figure is reduced to 5.7m minimum distance for the first floor rendered part of the building and is reduced to 4.7m distance to the first-floor glazed part of the building. The distance from No.1 Ravens Court to the nearest running rail is 14.07m and the distance from No.12 Ravens Court to the nearest running rail is 13.8m.</p> <p>With regards to vibration during construction Section 15.2.4.7 of Volume 3 of the EIAR sets vibration thresholds which the construction stage of the proposed Scheme must remain within. Section 15.5.1.1 of Volume 3 of the EIAR specifies that monitoring must be undertaken during construction to ensure the works remain within the thresholds specified. The vibration thresholds outlined within the EIAR are to ensure that there is no risk of damage not even cosmetic damage.</p> <p>Section 15.4.1.5 of Volume 3 of the EIAR discusses the potential vibration impacts during operation. This assessment has concluded that at distances of greater than 4.5m from the track perceptible vibration within buildings will not occur. In conclusion the vibration impacts at Ravens Court during operation will not cause any long-term damage and are expected to be imperceptible.</p>
13	3	"On top of structural damage being a concern, the noise levels will increase significantly. TII say, because the LRVs will be slowing on approach to Ravens Court, and there will be grass tracks, the noise will be minimal - the key word here is "slowing", which means applying the breaks - I think we all know what that will sound like, we hear it enough when in Dublin City Centre - it is not pleasant and will be persistent."	<p>With regards to vibration during construction Section 15.2.4.7 of Volume 3 of the EIAR sets vibration thresholds which the construction stage of the proposed Scheme must remain within. Section 15.5.1.1 of Volume 3 of the EIAR specifies that monitoring must be undertaken during construction to ensure the works remain within the thresholds specified. The vibration thresholds outlined within the EIAR are to ensure that there is no risk of damage not even cosmetic damage.</p> <p>Section 15.4.1.5 of Volume 3 of the EIAR discusses the potential vibration impacts during operation. This assessment has concluded that at distances of greater than 4.5m from the track perceptible vibration within buildings will not occur. In conclusion the vibration impacts at Ravens Court during operation will not cause any long-term damage and are expected to be imperceptible.</p> <p>In the vicinity of Ravens Court, the proposed track operates at low speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 4 of the EIAR.</p>
14	3	"I note on page 37 of TII's EIAR, under "Human Health, point 10.1" it states "While some residents near new LRT stops may experience new noise sources, there will be no perceptible change in environment noise for most people." I guess the 40 or so Ravens Court residents will not be most people, and this noise pollution will be constant. Not to mention for those residents on the other side of the tracks along Cardiff's Castle Road."	<p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3, Chapter 15 of the EIAR for the opening and design years respectively. These tables present the current measured noise levels.</p> <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight. This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the</p>

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			<p>EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p>
15	4	<p>Alternative route</p> <p>"I strongly believe that, had the Luas route come through Tolka Valley Park, taken a right along Tolka Valley Road, taking unused land to the front of the run down industrial estate there (opposite The Tolka, Prospect Hill Apartments), taken a left, to be adjacent Finglas Road (there is grass and large pathways all along here up to the Finglas Fly Over; this Flyover ends almost directly opposite Mellowes Park, where the current route is going to go towards Charlestown), disturbance to people's property and lives, could have been kept to a minimum. It is also a route with a lot of apartments along it, which would house a lot of Luas' customers. I asked why this route couldn't have been used, and was told, it was considered, but the gradient of the Flyover was too steep for a Luas line. I don't understand why the Fly Over could not have been levelled, to allow for the Luas to go this way, as it seems the most logical route to have used, lowering impact and going through a high population catchment area, who would benefit from a Luas nearby."</p>	<p>TII welcomes this observation and wants to assure the Board and the observing parties that an option similar to this proposal was assessed, Option 3K. This option was brought forward following the initial long list sifting exercise. A Multi Criteria Analysis (MCA) was then conducted on 14 Options including this Option 3K. This MCA assessed the options under Economy, Integration, Environment, Accessibility & Social Inclusion and Safety. The assessment concluded that this option (3K) scored significantly lower than other options on Social Inclusion, Safety, and Compatibility with Development Plans, lower than other options on Integration with Transport Policies and Impact on Material and Cultural Assets, but it delivered some or significant advantages over other options on Journey Time (very fast option), Catchment, and Key Trip Attractors. The result of this Stage 1 assessment was that Option 3K was not brought forward to the next stage. The Options brought forward were Options 2A, 3A and 3J. Option 3J which does follow part of Finglas Road was brought forward to Stage 2 Option Selection. Section 4.8.2 of the EIAR sets out the detailed assessments conducted including Benefit Cost Ratio and Multi Criteria Assessments which determined the Emerging Preferred Option, Route 2A.</p>
16	4	<p>"All along TI I's language, in the few meetings held with us, has been when this happens, not if, so it is very defeating to deal with that, and to have concerns brushed under the carpet, and not discussed properly. I feel this objection is the last chance for someone to challenge TII's plans, and highlight how dangerous they are, with risk factors needing to be acknowledged officially and addressed. I believe there was insufficient consideration of feedback from local communities, stakeholders, or experts and concerns that the planning process failed to provide transparency."</p>	<p>This issue is raised by a number of concerned Ravens Court residents and so responds to the same issue raised by all of those observers.</p> <p>TII understands and acknowledges the concerns of Ravens Court residents regarding the loss of greenspace and the potential impact on the community.</p> <p>Ultimately, in a scheme like this in an urban setting, there may be some permanent impacts on residents who are closest to the proposed Scheme, and in such a case as this, TII has considered first how to mitigate the impacts but also has repeatedly consulted and continues to engage with those affected parties on relevant issues. In this case, the loss of green space is assessed in Chapter 21 of the EIAR on a professional basis to be Slight, Permanent and Negative and TII has engaged in a comprehensive consultation and engagement strategy with key stakeholders. However, the proposed Scheme has the potential to bring a greater amount of positive social, economic and environmental benefits to the residents of Finglas and its surrounds and contributes to national targets in terms of delivering decarbonised transport and meeting other objectives which flow down from national targets, the UN sustainable development goals and government policy.</p> <p>Section 4.10.1 of Chapter 4 of the EIAR details the various alternative route options and designs that were considered during the project's development. This was an iterative design process, where different options were assessed for their engineering feasibility, environmental impact, and impact on communities. These alternatives were not discussed with Ravens Court residents, as in this case the alternatives considered did not result in changes to the previously communicated proposal. Please refer to Section 4.10.1.2 where it is noted that the alternative design options considered were not deemed to offer benefits over the original design.</p> <p>However, in direct response to the specific feedback received from Ravens Court residents throughout TII's engagement, and recognising the importance of the green space to the residents, the design was changed (following the second NSPC), whereby the track alignment was moved further west to reduce the amount of land taken from the communal greenspace at Ravens Court.</p> <p>TII records indicate that there have been 81 communications between TII and Ravens Court residents to date. Prior to the submission of the RO application, a meeting was held in October 2024. At this meeting, TII presented the revised design, highlighting the changes made to the alignment to minimise the impact on the Ravens Court greenspace in direct response to previous feedback. Updates on the overall scheme were also presented, along with advice for residents on how to continue their engagement with the project, and details of the mitigation strategies.</p> <p>TII remains committed to ongoing engagement with the Ravens Court residents.</p>
17	4	<p>"Reiterating Risk to Life - I truly believe there will be a serious injury or accident, given the closeness of the tracks to the only access point for Ravens Court - TII acknowledges the blind spot that will be present here"</p>	<p>TII does not agree with the assertion that there will be a risk to life and that there will be a serious injury or accident, given the closeness of the tracks to the only access point for Ravens Court.</p> <p>Please refer to response to Item No.1 above.</p>

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18	4	"How this is not a strong feature within their EIAR is very concerning to me and shows me that TII's EIAR is a ticking of the box exercise, not a real duty of care report."	Any suggestion that the EIAR is a ticking of the box exercise is unfounded as is evident from the extent and comprehensive nature of the data and information contained in the main volume and indeed in its extensive appendices. The EIAR for Luas Finglas has been prepared in full compliance with all legal requirements including for example, the EIA Directive and the Transport (Railway Infrastructure) Act 2001 (as amended), and contains sufficient information to carry out an environmental impact assessment of the proposed Scheme i.e. Luas Finglas.

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Submitted by	Joe Duffy Property Company Ltd.		
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1	2	<p>"Please be advised that Folio DN161215F, which includes a right-of-way along the rear of their property and which right-of-way forms part of the proposed scheme, is in the Freehold ownership of Joe Duffy Property Company Limited."</p>	<p>As set out in this submission, Folio DN161215F Plan A725K and Plan A725N are registered to Joe Duffy Property Company Limited. As illustrated on Luas Finglas RO Property Drawing D1-P 33 B-C indicates that, there are no land acquisition requirements that fall within the curtilage of the lands in the ownership of Joe Duffy Property Company Limited (i.e. on Folio DN161215F Plan A725K and Plan A725N). The Right of Way located to the rear of Joe Duffy Motor Company Limited is not impacted by Luas Finglas land acquisition requirements.</p>

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1	6	"It goes against any logical health and safety."	<p>TII understands the concerns about the safety of pedestrians, especially children, at the entrance to Ravens Court and along Cardiff Castle Road, with the introduction of the Luas. TII is dedicated to delivering a Luas system that is safe for all road users and will implement appropriate operational or design safeguards as necessary.</p> <p>The Luas Finglas project incorporates several key features to protect pedestrians in this particular area:</p> <ul style="list-style-type: none"> ▪ Slow LRV Speeds: LRVs will be travelling at a low speed near the entrance to Ravens Court. This is due to the nearby signalised junction at Mellowes Road, the layout of the track as approach and depart Luas Finglas LRV stop, and the proximity to the estate entrance. Slow speeds significantly reduce the risk of accidents. ▪ Clear Visibility: The design ensures that both LRV drivers and pedestrians will have a clear, unobstructed view of each other. ▪ Driver Training: Luas drivers are trained to operate the vehicle on the route. They will be aware of pedestrian crossing locations and desire lines along the route. ▪ Designated Pedestrian Crossings: There will be clearly marked pedestrian crossings near the entrance to Ravens Court, providing safe and designated places for residents to cross the tracks. These crossing will comply to all relevant safety standards. ▪ Separate Footpaths: Continuous footpaths run alongside the tracks, keeping pedestrians safely separated from both the LRVs and road traffic. ▪ Safety Regulation: The safe operation of Luas is regulated in Ireland by the CRR and TII will continue to engage with CRR throughout the project, to ensure that any hazards are properly controlled and managed. <p>Luas has a strong safety record in Dublin, and this new extension is designed with the same required high safety standards. The design meets all relevant safety regulations and guidelines for pedestrian safety near light rail lines.</p> <p>Regarding the issue of access to Ravens Court by pedestrians, including children, older people and persons with disability, an uncontrolled intersection is proposed at the entrance to the estate. The LRV line crossing outside of the boundary to the estate, together with passing LRVs, will introduce an element of social and physical severance which is assessed in Section 8.4.3.2 as being significant, negative and long-term. The effect of this severance will be mitigated as far as possible by a slight relocation of the entrance to maximise visibility for people entering or leaving the estate. A pathway will be provided from Ravens Court to the green space to the south and secure fencing will ensure safe segregation from the LRV line. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature needed to join Mellowes Road. Some relief from severance is also provided by the new direct access that will be provided alongside the LRV line to community facilities on Mellowes Road.</p> <p>Additionally, the distance from the LRV swept path envelope to the wall at the point where pedestrians emerge from the northern footpath at Ravens Court is over 2.6m, providing a wide dwell area and allowing sufficient space for pedestrians to assess approaching LRVs before crossing.</p> <p>Pedestrians intending to cross the Luas tracks will be presented with the standard suite of traffic signs, pavement markings and surface treatments to alert them of the presence of the crossing.</p> <p>The proposed Scheme has been designed to ensure that drivers exiting Ravens Court and crossing the Luas line, have appropriate visibility in accordance with relevant design standards.</p> <p>The visibility distances in the proposals significantly exceed the minimum requirements, ensuring that drivers have sufficient sightlines before entering the Luas corridor.</p>
2	6	"Pose safety risks to elderly/vulnerable and children coming to and from the estate."	<p>TII does not accept the contention that the proposed Scheme will pose safety risks to elderly/vulnerable and children coming to and from the estate. Please refer to Item No.1 above regarding pedestrian access.</p>
3	6	"Pose safety risks with possible access blockage."	<p>TII understands the concern about the possibility of a LRV blocking the entrance to Ravens Court, particularly in an emergency. It is important to note that this type of scenario (a vehicle potentially obstructing access) isn't unique to this location, and this is a consideration throughout the Luas network. Maintaining both pedestrian and vehicular access, is a key design principle for the Luas system.</p> <p>The design allows for, even in the unlikely event of a LRV breakdown at the entrance, maintaining pedestrian access to and from the estate. Footpaths are also alongside the tracks, allowing emergency services personnel (paramedics, firefighters) to reach the estate on foot if needed.</p>

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			<p>The section of track near Ravens Court is designed to be low speed and is also relatively flat. These characteristics further reduce the likelihood of a LRV breakdown.</p> <p>In the unlikely event of a LRV breakdown, the Luas Operator would urgently address this in order to restore normal service, involving measures to quickly clear the obstruction. This includes, where necessary, having the capability to tow an LRV.</p>
4	6	"Pose safety risk in relation to emergency service access."	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
5	6	"We will have no greenspace within walking distance that doesn't have a Luas track going through it."	<p>TII does not agree with the contention that there will be no greenspace within walking distance that does not have a Luas track going through it.</p> <p>The existing greenspace to the south of Ravens Court will still be accessible and usable by residents of Ravens Court. A footpath is proposed as part of the proposed Scheme running between the Luas line and the boundary to Ravens Court, specifically to facilitate residents of Ravens Court to access this green space and without needing to cross the LRV line.</p> <p>RO Landscape Drawing Plan No. D1-AL 32 3-4."</p>
6	6	"I feel having young children I could not let them go to any of these areas to kick a ball, fly a kite, play chasing etc. due to the risk of being struck by a Luas LRV especially as they pass so often."	Please refer to response provided to Item No. 5 above.
7	6	"It will negatively impact resident's mental health secondary to the continued stress, this goes for the construction phase and after."	<p>In relation to the potential effect on mental health this has been extensively discussed in the Human Health Chapter 7 of the EIAR. I would reference section 7.2.2.8 and the potential for psychological effects, the methodology section as well as the psychological impacts of both the construction and operational phases which is outlined in 7.4.2.1 and 7.4.2.2.</p> <p>While it is accepted that some loss of space and amenity is unavoidable particularly during the construction phase this will be minimised where possible.</p> <p>It should also be noted that there are benefits in terms of better accessibility via the new public transport service.</p>
8	7	"We currently live in a very quiet and secluded area, peace and quiet, at night time you could hear a pin drop around in Ravens Court what will be completely destroyed if this Luas route goes ahead with massively increased noise and vibration from the LRVs passing so frequently (every 7 minutes each way which could mean a LRV passing every 3.5 minutes)) from 5.30am to 12.30pm on weekdays and 6.30am to 12.30pm at the weekends these are the running hours at the moment according to TII representatives, who also told us that these LRVs will run even later during Christmas time possibly as late as 3am and also the disturbance of track maintenance being carried out after Luas service hours, this could mean the running of empty Luas LRVs or service vehicles on the tracks at any time in the very early hours of the morning."	<p>The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p> <p>Noise - Section 15.4.1.2 of Volume 3 of the EIAR assessed the potential for the construction stage to generate noise impacts. The conclusion of this section was that Ravens Court would experience a negative significant to very significant noise impact during construction, please refer to Table 15-28. As a result of this outcome mitigation measures have been specified within Section 15.5.1 of Volume 3 of the EIAR to reduce the noise impacts during construction.</p> <p>With the mitigation measures in place the residual noise impact at Ravens Court during construction reduces to a moderate to significant noise impact. The utility diversion works will generate the highest impact; however, the duration of that work will be short.</p> <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p> <p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that</p>

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			<p>slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p> <p>Notwithstanding this, the assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design which screens Ravens Court from the Luas tracks.</p> <p>In conclusion the noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p> <p>Vibration - With regards to vibration during construction Section 15.2.4.7 of Volume 3 of the EIAR sets vibration thresholds which the construction stage of the proposed Scheme must remain within. Section 15.5.1.1 of Volume 3 of the EIAR specifies that monitoring must be undertaken during construction to ensure the works remain within the thresholds specified. The vibration thresholds outlined within the EIAR are to ensure that there is no risk of damage not even cosmetic damage.</p> <p>Section 15.4.1.5 of Volume 3 of the EIAR discusses the potential vibration impacts during operation. This assessment has concluded that at distances of greater than 4.5m from the track perceptible vibration within buildings will not occur.</p> <p>In conclusion the vibration impacts at Ravens Court during operation will not cause any long-term damage and are expected to be imperceptible.</p>
9	7	"Noise is also greatly increased when a Luas turns, we will have a 90° bend to the north of the estate on Mellows Road and a curve directly at the front of the estate as the Luas turns to cut through the Gardaí."	Please refer to response provided to Item No. 8 above.
10	7	"At present in Ravens Court Houses number 1 and 2 are already affected at nighttime by noise from the sirens in the garda station carpark, with the carpark being moved to the rear of the station this noise will now affect all the residents of Ravens Court and many houses on Cardiff castle Road."	Please refer to response provided to Item No. 8 above.
11	7	"It will negatively impact our residents with existing complex needs with regards to access in/out, access to emergency services etc."	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run, the limits of which will be clearly delineated at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
12	7	"When asked emergency services accessing the estate such as ambulance/fire engines the Luas project manager suggested they could park across the road and walk to the houses. This is not acceptable and dangerous."	Please refer to Item No.11 above.
13	8	<p>Safety (Erins Isle GAA club, and Mellows Park beside Luas tracks)</p> <p>"The section of the track opposite Erins Isle greatly concerns me also as my daughter and son are members of Erins Isle GAA club, the idea of having anyone not just kids having to leave the clubhouse and cross the tracks and play a match or train beside them seems very dangerous to me."</p>	The proposed Scheme will reconfigure existing pathways in Farnham and Mellows Park so that the new uncontrolled pedestrian crossings of the Luas line are situated in positions that reflect desire lines and offer good visibility. Pedestrians intending to cross the Luas tracks will be presented with the standard suite of traffic signs, pavement markings and surface treatments to alert them of the presence of the crossing. At Farnham and Mellows ball stop protective netting is provided.
14	8	"This also goes for the football pitch in Mellows Park being beside the tracks also."	Please refer to response provided to Item No.13 above.

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15	8	<p>"Blocking in a cul-de-sac and travelling through an access road (Ravens Court and St Margaret's Court). TII engineers have stated that on the construction of any Luas project crossing an access road to a cul-de-sac should be avoided where possible so surely a re-think is required here, there was multiple other routes that could have been chosen."</p>	<p>An Option Selection study was carried out in two stages. In Stage 1, an initial high-level assessment was conducted - sometimes called a "sifting" process - to evaluate different route options. After this process, four options were selected for further review in Stage 2. In January 2020, the Emerging Preferred Route (EPR) was identified, and a Non-Statutory Public Consultation (NSPC) was held to gather feedback from the public and stakeholders. The input received during the consultation was carefully reviewed alongside additional proposed improvements to the route and its design. As a result of this feedback and analysis, several changes were made to the EPR, leading to the selection of the final Preferred Route (PR). Chapter 4 – Alternatives Considered provides details of the various alternatives considered during the preliminary design development stage. These alternatives underwent a full suite of environmental assessments to ensure they were thoroughly evaluated. Based on this review, adjustments were made to the alignment at Ravens Court/Mellowes, leading to the final selection of the Preferred Route (PR). As described in Chapter 1 - Introduction, section 1.9 the consultation on the Preferred Route took place over an eight-week period from December 7, 2021, to January 31, 2022. As part of this process, an online meeting was held with Ravens Court residents on December 8, 2021, followed by an in-person meeting on January 8, 2022. Additionally, several meetings have taken place with TII and local residents to discuss alternative alignments at Ravens Court and gather further input.</p>
16	8	<p>"When planning a new housing estate there should be at least 10% of the overall kept for use as a public/communal greenspace, if the Luas was installed with the measurements given to us by the Luas team, Ravens court would be left with just 5.8% public greenspace as the estate at present only has 10.5% public greenspace."</p>	<p>Existing Ravens Court – 2815 m² (based on OS tile) Existing green space – 300 m² (based on survey) Proposed Ravens Court = 2696 m² (OS based) Proposed green space = 224 m² (~8,5% of overall proposed, survey based)</p> <p>The references in the submission to 10% relates to the Sustainable and Compact Settlements Guidelines for Planning Authorities. These state generally that "the requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.</p> <p>It goes onto say that:</p> <p>In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.</p> <p>Furthermore, the 10% open space requirement outlined in the Sustainable and Compact Settlements Guidelines for Planning Authorities applies specifically to new planning applications for housing developments and does not extend to existing developments. As such, its relevance to this submission is misplaced. Additionally, the guidelines allow for flexibility in meeting open space requirements, recognising that in certain cases, on-site provision may not be feasible due to site constraints. In these instances, planning authorities may allocate open space elsewhere, such as through the development of new parks or the enhancement of existing public amenities or may seek financial contributions under Section 48 of the Planning and Development Act 2000 (as amended) in lieu of on-site provision. Therefore, the rigid interpretation of the 10% requirement does not align with the intent or application of the guidelines.</p>
17	8	"It will greatly reduce the size of an already small estate."	Please refer to response to Item No.16 above.
18	9	<p>"Carparking is already at a premium in Ravens Court pushing our boundary wall inwards will greatly reduce this space. We already have overflow onto Cardiff castle Road sometimes when there is nowhere else to park."</p>	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and preventing and limiting illegal parking in this area] at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to</p>

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			<p>footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use.</p> <p>However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.</p>
19	9	"It will make access for bin trucks, skip trucks, oil deliveries and any other deliveries to the residents even more difficult."	<p>TII does not accept that the proposed Scheme will make access for bin trucks, skip trucks, oil deliveries and any other deliveries to the residents even more difficult.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
20	9	"Reducing the size will make it harder for emergency services to gain access."	TII does not accept that the proposed Scheme will make it harder for emergency services to gain access. Please refer to Item No.11 above.
21	9	"It will decrease greenspace that the residents committee have worked so hard to maintain."	<p>Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>The proposed Luas Finglas will require the relocation of the western boundary wall 2.25m high, to be rebuilt 4m closer to the residential properties and reducing the amount of grass in the semi-private open space. The construction works would also require the removal of 2 trees along this area. The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit it smaller in size. As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents. Additional landscape design mitigation measures could be proposed that are not currently shown on the landscape design drawings, these measures are listed below. They would not mitigate the loss of green space, but they would enhance the quality of the semi- private open space in terms of functional and aesthetics.</p> <ul style="list-style-type: none"> Feature tree planting along the western boundary of the courtyard to reduce visibility of the OCS and to further enclose the cul de sac and retain the intimate character of the area. Evergreen flowering climbing plants grown against the proposed wall which will enhance the western boundary and improve the view in that direction from the residential properties. Steet furniture i.e. south and east facing seating adjacent to the boundary wall to increase outdoor use of the space for courtyard residents. Grasscrete paving within the parking spaces of the courtyard to reduce the amount of hard surface.
22	9	"It will decrease the playing area currently used by our children. As I said before this space is already minimal."	Please refer to response provided to Item No. 21 above.
23	9	"Negative Impact on property prices - In most cases the values of properties tend to increase if it's near the Luas but studies show that people want to be close but not too close to LRV lines and with my front door being within 30 metres of a track I think that would be considered too close thus negatively affecting the value of the properties in Ravens Court, I would highly anticipate that our properties would be valued higher as they are now, as a secluded , enclosed , quiet , private and safe cul-de-sac within minimal passing traffic compared to what is being proposed."	Section 8.6.3.1 of the Population chapter of the EIAR describes the possible impact on local property prices based on a review of the literature associated with previous light rail schemes in Ireland. Typically, it has been found that property prices tend to rise in the vicinity of stations. It is also acknowledged in this section that the value of properties can also fall if subject to negative environmental effects by virtue of being in very close proximity to tracks. The outcome for Ravens Court is therefore subject to some uncertainty in that, while the estate is located close to the LRT and therefore subject to a moderate negative effect with regard to noise (mitigated by way of a noise barrier). The estate is also located within 5 minutes' walk of the proposed Finglas Village Stop. While there will be a negative effect during construction on two private gardens and an area of the public green space as noted in 5.2.9.4, the estate will also continue to be situated within a landscaped walled enclosure and so visibly separated from passing LRVs.
24	10	"Noise and disruption - - with the work from home initiative, many more people are at home regularly working. - study disruption for school and college students in the direct vicinity of the LRTs."	Section 15.4.1.2 of Volume 3 of the EIAR assessed the potential for the construction stage to generate noise impacts. The conclusion of this section was that Ravens Court would experience a negative significant to very significant noise impact during construction, please refer to Table 15-28. As a result of this outcome mitigation measures have been specified within Section 15.5.1 of Volume 3 of the EIAR to reduce the noise impacts during construction.

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			<p>With the mitigation measures in place the residual noise impact at Ravens Court during construction reduces to a moderate to significant noise impact. The utility diversion works will generate the highest impact; however, the duration of that work will be short.</p> <p>Noise - Section 15.4.1.2 of Volume 3 of the EIAR assessed the potential for the construction stage to generate noise impacts. The conclusion of this section was that Ravens Court would experience a negative significant to very significant noise impact during construction, please refer to Table 15-28. As a result of this outcome mitigation measures have been specified within Section 15.5.1 of Volume 3 of the EIAR to reduce the noise impacts during construction.</p> <p>With the mitigation measures in place the residual noise impact at Ravens Court during construction reduces to a moderate to significant noise impact. The utility diversion works will generate the highest impact; however, the duration of that work will be short.</p> <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p> <p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p> <p>Notwithstanding this, the assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design which screens Ravens Court from the Luas tracks. In conclusion the noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p>
25	10	<p>"I have serious concerns with the overall preferred route as it is at the moment the environmental impact due to the amount of green areas destroyed 7 in total (Tolka Valley Park, Barnamore Park, Farnham Park/Erins Isle GAA playing pitches , Farnham green area, Cardiff castle Road green area , Ravens Court green area and Mellows park) well established trees will have to be removed in these areas."</p>	<p>TII does not accept the assertion that green areas will be destroyed. The proposed Scheme has been designed to minimise the impacts on these areas through which the Luas runs. The alignment has been adjusted to minimise the numbers of mature trees impacted and landscape proposals to enhance and protect biodiversity along the corridor of the Luas have been included in the proposed Scheme (refer to EIAR Chapter 9: Biodiversity).</p>
26	10	<p>"Parking at Finglas civic The removal of the carpark at Finglas civic centre is a worry as the "Finglas village stop" will have just 40 carparking spaces approx. As it stands this carpark would be full a lot of the time as it serves the swimming pool, the football pitches, the astro pitches, the gym, the creche the playground, the youth Centre, the civic offices, the Garcia station and also the social welfare office where will this overflow of cars go when the largest section of the carpark is gone, it will impact the surrounding areas. Including Cardiff castle Rd and Ravens Court as well as Mellows estate as was recently seen when there was a large gathering there and that was with the carpark being fully used as is."</p>	<p>The Proposed Scheme will provide a new public transport connection, together with connections to local bus services, making Finglas Sports and Leisure Centre more accessible to people within a larger catchment and enhancing its ability to serve as a public community facility. In addition, a new cycle lane is included in the design together with a covered bicycle parking facility. An ESB e-bike charging facility has already been installed outside the Leisure Centre. The combination of public transport and cycling infrastructure will be particularly beneficial to young people and others who are likely to have more limited access to private vehicles. The Finglas Village stop will be located within a new plaza in front of the Leisure Centre, providing an attractive and car-free environment. The negative effect of loss of car parking from outside of the Finglas Sports and Leisure Centre is acknowledged in Section 8.4.3. This loss will be partly compensated for by new parking to the rear of the building from where safer access can be provided from Cardiff Castle Road.</p> <p>A loss of public parking is needed to facilitate the Luas alignment and Finglas Village stop. In the longer term, once operational Luas will provide an alternative to car use. TII will continue to work with DCC and other stakeholders to minimise impacts in the area during both the construction and operational phase.</p>
27	11	<p>"The needs of the people of Finglas are not being met by doing this with no parking at the St Helenas stop and limited parking in an already busy carpark at the village stop it does feel like more of a bypass of Finglas especially that the village stop is not really in the village at all."</p>	<p>Please refer to response to Item No.26 above and Item No.28 below.</p>
28	11	<p>"That's why I feel this route would be better suited to either be pushed east to the N2 to be more centrally located to serve both sides of Finglas or to be pushed west to go up Cardiffsbridge Road to at least serve a more densely populated area. Both of these routes were considered, and we have never been told why they didn't want to pursue them except for being told it would bring to much disruption during construction."</p>	<p>A comprehensive two-stage assessment process was undertaken to determine the Emerging Preferred Route (EPR) for Luas Finglas, including the selection of appropriate stop locations. This assessment was conducted in accordance with the Department of Transport, Tourism and Sport (DTTas), namely the Common Appraisal Framework (CAF) for Transport Projects and Programmes (March 2016) and best standard practices.</p>

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			<p>As detailed in Section 4.8 of Chapter 4 of the EIAR, the identification of the EPR involved a thorough evaluation of multiple route and stop location options, following a two stages process.</p> <p>The process commenced with a “Stage 1 Option Selection Report for Luas Finglas” in order to develop further the light rail network in Dublin. This report was completed in August 2019, setting out the initial route options and concluding with the identification of three shortlisted options to be further optimised within a Luas Finglas Options Selection Report Stage 2. The Option Selection Report Stage 1 is included in Volume 5 - Appendix A4.1 of this EIAR. This Stage 1 Options Selection report considered an initial high-level route options assessment, or ‘sifting’ process, which appraised routes in terms of ability to achieve the proposed Scheme objectives and whether they could be practically delivered.</p> <p>The initial Stage 1 Options Selection Report (August 2019) assessed 14 route options based on key criteria, including:</p> <ul style="list-style-type: none"> ▪ Demand and catchment area analysis within a 500m and 1km radius ▪ Proximity and serviceability to Finglas Village ▪ Directness of the route and overall alignment efficiency ▪ Interaction with the existing road network and at-grade crossings <p>Table 4-8 provides an overall summary of the MCA1 route option assessment results. These options were refined at a later stage, but the location of each stop was established at this first stage.</p> <p>The assessment demonstrated that a stop at Tolka Valley Park was not justified from a catchment perspective, as it did not provide sufficient demand or accessibility advantages when compared to other selected stop locations. Additionally, the primary stop locations were determined at the initial stage based on their ability to maximise ridership, connectivity, and network integration.</p> <p>Based on this detailed assessment, the preferred stop locations were identified as part of the Emerging Preferred Route (EPR) and subsequently refined during the development of the Preferred Route (PR). The selected stops represent the best-performing locations in terms of overall scheme objectives and transport planning guidelines.”</p> <p>An option east similar to this was assessed, Option 3K. This option was brought forward following the initial long list sifting exercise. A Multi Criteria Analysis (MCA) was then conducted on 14 Options including this Option 3K. This MCA assessed the options under Economy, Integration, Environment, Accessibility & Social Inclusion and Safety. The assessment concluded that this option (3K) scored significantly lower than other options on Social Inclusion, Safety, and Compatibility with Development Plans, lower than other options on Integration with Transport Policies and Impact on Material and Cultural Assets, but it delivered some or significant advantages over other options on Journey Time (very fast option), Catchment, and Key Trip Attractors. One result of this Stage 1 assessment was that Option 3K was not brought forward to the next stage. Other options running up Cardiffsbridge Road were also assessed (Options 1A and 1B). These options were ruled out due to them being too far from the core of the village, having a high number of road junctions and being longer than other options. The Options brought forward were Options 2A, 3A and 3J. Option 3J which does follow part of Finglas Road was brought forward to Stage 2 Option Selection. Section 4.8.2 of the EIAR sets out the detailed assessments conducted including Benefit Cost Ratio and Multi Criteria Assessments which determined the Emerging Preferred Option, Route 2A.</p>
29	11	“At the moment it only serves to destroy and disrupt green areas”	Please refer to response to Item No.25 above.
30	11	“Looks as though it is being put through the path of least resistance instead of servicing the needs of the entire Finglas community.”	Please refer to response to Items No.25 and 28 above.
31	11	“I would like to see the Viillage stop actually be in the Village as it stands it will be over 500 metres from the village centre. Having it in the village would make it more accessible to a lot more people and also serve to rejuvenate the village and surrounding areas.”	<p>A comprehensive two-stage assessment process was undertaken to determine the Emerging Preferred Route (EPR) for Luas Finglas, including the selection of appropriate stop locations. This assessment was conducted in accordance with the Department of Transport, Tourism and Sport (DTTas), namely the Common Appraisal Framework (CAF) for Transport Projects and Programmes (March 2016) and best standard practices.</p> <p>As detailed in Section 4.8 of Chapter 4 of the EIAR, the identification of the EPR involved a thorough evaluation of multiple route and stop location options, following a two stages process.</p> <p>The process commenced with a “Stage 1 Option Selection Report for Luas Finglas” in order to develop further the light rail network in Dublin. This report was completed in August 2019, setting out the initial route options and concluding with the identification of three shortlisted options to be further optimised within a Luas Finglas</p>

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			<p>Options Selection Report Stage 2. The Option Selection Report Stage 1 is included in Volume 5 - Appendix A4.1 of this EIAR. This Stage 1 Options Selection report considered an initial high-level route options assessment, or 'sifting' process, which appraised routes in terms of ability to achieve the proposed Scheme objectives and whether they could be practically delivered.</p> <p>The initial Stage 1 Options Selection Report (August 2019) assessed 14 route options based on key criteria, including:</p> <ul style="list-style-type: none"> ▪ Demand and catchment area analysis within a 500m and 1km radius ▪ Proximity and serviceability to Finglas Village ▪ Directness of the route and overall alignment efficiency ▪ Interaction with the existing road network and at-grade crossings <p>Table 4-8 provides an overall summary of the MCA1 route option assessment results. These options were refined at a later stage, but the location of each stop was established at this first stage.</p> <p>The assessment demonstrated that a stop at Tolka Valley Park was not justified from a catchment perspective, as it did not provide sufficient demand or accessibility advantages when compared to other selected stop locations. Additionally, the primary stop locations were determined at the initial stage based on their ability to maximise ridership, connectivity, and network integration.</p> <p>Based on this detailed assessment, the preferred stop locations were identified as part of the Emerging Preferred Route (EPR) and subsequently refined during the development of the Preferred Route (PR). The selected stops represent the best-performing locations in terms of overall scheme objectives and transport planning guidelines.</p>
32	11	"The St Helenas Stop is in an area that is dominated by anti-social behaviour at nighttime and with its isolation from nearby housing and shops I don't think it will be useful where it is."	<p>The areas around the stops are designed with security and safety in mind. To this end there is suitable lighting, CCTV and emergency call points on all stops. Section 2.2.4 St Helena's of Appendix A21.2 - Urban Integration Report of Chapter 21 - Landscape and Visual Amenity addresses these issues. By animating the areas around the stop and taking advantage of passive security of the passing LRVs and increased activity from the active travel measures the issue of anti-social behaviour will be reduced. During the operational phase security and safety issues such as anti-social behaviour is actively managed by the operator.</p>
33	12	"This area was never designed to take a Luas."	<p>As stated in Volume 2 Chapter 2 of the EIAR, Section 2.2, The development of the proposed Scheme is supported by numerous policies at National and Local level. These include:</p> <p>National Development Plan 2021-2030 - The NDP emphasises the important requirement to improve accessibility between key urban centres of population, in parallel with the initiation of compact growth of urban centres. Chapter 9 relates to NSO 4 of the NPF and the delivery of Sustainable Mobility. It outlines five key Strategic Investment Priorities to support this, of which three include: Active Travel, MetroLink and Light Rail.</p> <p>The NDP identifies the progress made on the proposed Scheme as well as continued support for project development.</p> <p>'Luas Finglas is the most advanced with approval recently received under Decision Gate 0 (Strategic Assessment) of the Public Spending Code and the NDP will permit the project continue to progress in the coming years, with work already underway in relation to developing its Preliminary Business Case' Based on the contents of the NDP, Luas Finglas is an identified investment priority which will directly support:</p> <ul style="list-style-type: none"> ▪ Active travel through greater accessibility and connectivity of the Luas service; ▪ Connecting a wider Luas catchment with the rail network at Broombridge Station, resulting in enhanced public transport integration; and ▪ Underpinning future residential development such as that proposed in the Jameson Masterplan 2022 – 2028 and the Baile Bogáin (Ballyboggan) Draft Local Area Plan (LAP) 2024-2030, resulting in sustainable communities and transport-led development. <p>The Dublin City Development Plan 2022-2028, Section 13.5 of the Plan identifies the provision of the proposed Scheme as an important part of the overall development of the area, noting:</p> <ul style="list-style-type: none"> ▪ There is an opportunity to address barriers to movement in Finglas Village through BusConnects and Luas Finglas proposals; ▪ That a key green infrastructure route shall be accommodated along the line of the proposed Luas Finglas route, linking the Jamestown lands in the north to Tolka Valley Park in the south;

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			<ul style="list-style-type: none"> That the design of Luas Finglas will directly inform the master planning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network, providing a key link between proposed open spaces; That development ratios, densities and height will be developed to avail of proposed public transport infrastructure and the development of a sustainable and compact urban form <p>Similarly, the delivery of the Luas expansion programme, which includes Luas Finglas, is supported under Objectives CMO23 and CMO24 of Fingal County Development Plan 2023- 2029:</p> <ul style="list-style-type: none"> Objective CMO23 – Enabling Public Transport Projects: ‘Support the delivery of key sustainable transport projects including MetroLink, BusConnects, DART+ and Luas expansion programme so as to provide an integrated public transport network with efficient interchange between transport modes to serve needs of the County and the mid-east region in collaboration with the NTA, TII and Irish Rail and other relevant stakeholders’; and Objective CMO24: ‘Support NTA and other stakeholders in implementing the NTA Strategy including MetroLink, BusConnects, DART +, Luas and the GDA Cycle Network’.”
34	12	“I reject the proposal that it cannot be brought up the N2 Finglas dual carriageway as we have seen before on both the red and green lines it has been brought along much busier roads. And if its a case of traffic congestion during construction this should not be taken as a reason not to do it because it is the residents of Finglas that will have to live with the finished project.”	<p>An option similar to this was assessed, Option 3K. This option was brought forward following the initial long list sifting exercise. A Multi Criteria Analysis (MCA) was then conducted on 14 Options including this Option 3K. This MCA assessed the options under Economy, Integration, Environment, Accessibility & Social Inclusion and Safety. The assessment concluded that this option (3K) scored significantly lower than other options on Social Inclusion, Safety, and Compatibility with Development Plans, lower than other options on Integration with Transport Policies and Impact on Material and Cultural Assets, but it delivered some or significant advantages over other options on Journey Time (very fast option), Catchment, and Key Trip Attractors. The result of this Stage 1 assessment was that Option 3K was not brought forward to the next stage. The Options brought forward were Options 2A, 3A and 3J. Option 3J which does follow part of Finglas Road was brought forward to Stage 2 Option Selection. Section 4.8.2 of the EIAR sets out the detailed assessments conducted including Benefit Cost Ratio and Multi Criteria Assessments which determined the Emerging Preferred Option, Route 2A.</p>
35	12	“With regards to the one face to face meeting we had with TII in Ravens Court- it was clear that some representatives had never seen the estate before, they had to park on mellows road as the parking situation is already an issue and when asked if they would be happy with it running by one of their homes the answer was NO. This is completely disrespectful to the residents - in other words it’s okay for us to live with it, but the representatives pushing the proposal would not.”	<p>This meeting (on 8th January 2022) was TII's first in person meeting Ravens Court residents on site, and TII understands that aspects of the meeting caused concern. TII also recognises that parking is an issue for residents, as evidenced by the experience of some of TII's representatives on the day. Addressing impacts on parking, both during construction and operation, is a key consideration in the project's planning and design. Please also refer to Table 1-9 of the EIAR, which summarises issues raised by residents during consultation on the Preferred Route.</p> <p>The Luas Finglas project will deliver significant transport and environmental benefits to the Finglas area. However, TII fully recognises that these broader benefits must be balanced, while also minimising disruption and impacts on existing communities.</p>
36	12	“Again, when asked why the sudden change of proposal the Luas project manager stated they didn't have buy in from the Garda station and had been negotiating with them. Again, we find it extremely disrespectful to engage with Gardaí before the affected residents, as we said the Gardaí don't live there.”	<p>TII understands and acknowledges the concerns of residents regarding the sequence of engagement, and the perception that discussions with An Garda Síochána were prioritised over communication with affected residents.</p> <p>Following the feedback received from the local community during the first NSPC on the Emerging Preferred Route (July to September 2020), TII initiated discussions with An Garda Síochána to explore alternative options. Please refer to Section 4.9.7 of the EIAR for further details on how the EPR was further assessed and compared to a number of alternatives routes between Cappagh Road and Mellows Road.</p> <p>It is important to note that engagement is iterative, and comments and feedback are taken on board throughout the project lifecycle. TII's intention is never to prioritise one stakeholder group over another. Engagement with both An Garda Síochána and residents is important.</p> <p>After the second NSPC and based on feedback received from Ravens Court residents and An Garda Síochána, TII developed the RO application design solution. This resulted in moving the alignment further west, which minimises the impact on Ravens Court residents insofar as possible.</p> <p>TII remains committed to open and transparent communication with all residents affected by the Luas Finglas project.</p>

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37	12	"We are being asked to give our feedback on a proposal that the Luas project manager quite evidently did not do a lot of research into - what ever happened to an informed decision?"	TII understands and acknowledges the concern that the project may not be based on sufficient research, and the issue raised regarding informed decision making. Engagement is iterative, and comments and feedback are taken on board throughout the project lifecycle. The EIAR documents this comprehensive process in detail. Key considerations in the proposed alignment at Ravens Court and Cardiff Castle Road are described in Chapter 4 (Alternatives Considered). Information on the assessment of Population, Land Take, Noise & Vibration and Material Assets: Traffic & Transport can be found on Chapters 8, 12, 15, and 18 respectively.
38	13	"Similarly with regards to the recent objection to show us the risk register, without knowledge of the risks that TII are willing to take with our environment, our living space and ultimately ours and our children's lives, it wasn't possible for us to engage in a meaningful consultation process."	<p>The risk register referred to, which was previously requested from TII under the Freedom of Information Act 2014, contains information pertaining to the functions and negotiations of TII.</p> <p>TII is committed to addressing risks throughout the planning, delivery and operational stages of Luas Finglas. The safe operation of Luas is regulated in Ireland by the CRR and TII will continue to engage with CRR throughout the project, to ensure that any hazards are properly controlled and managed.</p> <p>Luas has a strong safety record in Dublin, and this new extension is designed with the same required high safety standards.</p> <p>Identified risks, and the measures to control those risks, are comprehensively addressed in the development of the design and the EIAR.</p> <p>Information on pedestrian safety risks is presented in:</p> <ul style="list-style-type: none"> Volume 3, Chapter 18 of the EIAR, Table 18-20: Area 32 – Significance of Effects for Pedestrian Impact during Operational Phase, and Volume 5 of the EIAR, Appendix A18.2: Pedestrian and Cycle Infrastructure <p>It is assessed that walking infrastructure (pedestrian crossing and raised table) associated with the proposed Scheme will result in a Positive Moderate effect on pedestrian safety.</p>
39	13	"We also feel that TII are being deliberately misleading in the wording of this proposal in saying that the new Luas line will pass by the front of Ravens Court, it is unmistakably going through the Ravens Court estate."	TII does not agree with the assertion that the new Luas line will be going through the Ravens Court estate. The eastern side of the Luas line will occupy a strip of land which is currently green space for Ravens Court Estate and garden space for two properties in Ravens Court.
40	14	"The bins have been put out for collection for the following morning which takes up the path at the entrance. As it stands the bin collection companies only reverse to the entrance as they cannot fit the trucks in."	Please refer to response to Item No.19 above.
41	14	"We were informed by TII that, this is not their problem."	Please refer to response to Item No.19 above.

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1	7	"The construction phase will result in significant works to St. Margaret's Road and redesign and reconfiguration of the existing entrance to the Lidl Supermarket. This will make the Lidl supermarket difficult to access for customers as temporary road layouts and additional traffic signals will be required. In a worst-case scenario, the store may need to cease trading for a period of time or work to restricted trading hours."	<p>It is acknowledged that temporary road layouts and additional traffic signals will be required to complete the works. The business will not be required to close for the works. It will be a requirement of the construction contract to maintain continuity of access and address any traffic conflicts, including for HGVs, throughout construction. As noted in Section 1.3.1 of the CTMP "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." No impact is envisaged to traffic and delivery movements in the permanent scheme, and this be maintained through construction.</p> <p>Traffic control measures to be maintained for St Margaret's Road are outlined in the CTMP, Volume 5 Appendix A6.2 Table 6-2 of the EIAR. Phased lane closures will be required for the works. Some limited road closures will be required for works along St Margarets Road also. The intention is these will be undertaken as night works to reduce disruption.</p>
2	7	"In addition, HGV access to the Lidl Supermarket for servicing purposes will be impacted resulting in additional on-site manoeuvring, with potential for traffic conflicts, and disruption of deliveries to the existing supermarket."	<p>Please refer to response to Item No.1 for construction phase HGV access impacts.</p> <p>In relation to the permanent scheme there is only a slight change to Lidl's internal layout at their entry and is unlikely to cause significant disruption of deliveries.</p>
3	7	<p>"The south and southeastern boundary of the existing Lidl Supermarket will be acquired and set back into the Lidl site to accommodate the realigned St. Margaret's Road. As a result, the existing Lidl car parking provision will be reduced by c.35 car parking spaces.</p> <p>This represents a loss of c.38% of the existing car parking provision for the supermarket. Customers will find car parking more difficult to secure within the site and will travel to alternative supermarkets. Based on the existing scenario, the supermarket will not continue to function with the loss of such a significant number of car parking spaces when compared to the no scheme scenario.</p> <p>The Luas Finglas EIAR (Chapter 5, page 56) states that provision is made for use of the eastern half of the ground floor of the P&R (c. 40no. spaces) by Lidl."</p>	<p>While Lidl Ireland GmbH's concerns are noted regarding the impact of the Proposed Development in terms of the loss of c. 35 car parking spaces, this must be viewed in the context of the significant increase in public transport accessibility that the Lidl store will be afforded by the delivery of the Luas Finglas. Alongside this the store is set to benefit from its adjacency to a large P&R facility and significant future 'residential led mixed use' development as set out in the Jamestown Masterplan, which is predicated upon the areas location along the Luas corridor.</p> <p>In land use policy terms, the site on which the P&R facility is proposed is zoned Z6 - Employment/Enterprise in the Dublin City Development Plan 2022-2028 with the objective to:</p> <p>'provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'</p> <p>Section 14.7.6 of the Dublin City Development Plan 2022-2028 establishes 'permissible' and 'open to consideration' uses on lands zoned Z6 Employment/Enterprise. It confirms that a 'park and ride facility' is a permissible use on such lands, and as such, one which is fully supported in policy terms under the operative development plan.</p> <p>Section 14.7.6 of the Dublin City Development Plan 2022-2028 states that that "uses in the Z6 zone are likely to generate a considerable amount of traffic by both employees and service traffic. Sites should, therefore, have good vehicular and public transport access". The provision of Luas Finglas will directly support existing and future businesses across the wider land use objective deliver on this by means of high frequency public transport.</p> <p>Our assessment is that there are 99 existing car parking spaces. 31 of these are impacted by the works of which 12 can be maintained without reconfiguration.</p>
4	7	"However, Lidl customers cannot access these spaces if the supermarket remains in its current configuration and therefore this offer or mitigation only applies in a redevelopment scenario. The scenario presented in the RO therefore does not apply unless the existing store is redeveloped and this is not certain and is not within the scope of the current RO application."	<p>As set out at Section 5.8.6 of Chapter 5 of the EIAR, the TII Luas Finglas team as engaged with Lidl and explored a number of options to develop this site, with a view to maximising the Park and Ride benefits, while facilitating also the re-development of the lands by Lidl for their own future needs.</p> <p>In that regard, Section 5.8.6 of the EIAR includes at Figure 5-16 a drawing of the proposed ground floor layout of the Park and Ride together with the existing layout of the Lidl site. This is the layout the subject of the RO application and is that shown on [The relevant drawings and these form part of the proposed Scheme which TII is seeking approval to build].</p> <p>Section 5.8.6 also includes at figure 5-17 a drawing showing an indication of how the ground floor of the Park and Ride could potentially be used by Lidl in a future redevelopment scenario by Lidl, based on TII's understanding of Lidl's potential future development proposals. This drawing indicates how the rear ground floor area of the Park and Ride might be utilised in the future by Lidl in the event of a redevelopment of the Lidl site, but obviously this drawing is for information, simply showing a possible future layout by Lidl, and is not something that is the subject of the RO application.</p>

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			Indeed, the EIAR is clear in that any potential future car parking spaces that may be available for Lidl's future purposes are in the scenario of a Lidl redevelopment and should the necessary planning permission be procured for same by Lidl. This is specifically noted on Figure 5-18 of the EIAR which refers to "Partial use at ground floor level by others, subject to separate planning by landowner". This is also reflected in the RO Structures Drawings (see drawing D1-ST 33 B-C/3), Alignment Drawings (see drawing D1-GA 33 B-C), and Landscape Drawings (see drawing D1-AL 33 B-C)
5	7	"As part of the proposed Luas Finglas works, the existing ESB substation at the St. Margaret's Road boundary is proposed to be relocated north and into the Lidl supermarket site. As illustrated on the Railway Order drawings, the ESB substation is proposed to be located in the existing vehicular circulation isle within the car parking. For reasons related to traffic hazard, TII should find an alternative location for the ESB substation, integrated into the southern site boundary and out of parking circulation routes."	Relocation of the proposed substation away from the isle within the carpark can be investigated further during the detailed design phase.
6	8	"A plot of ground (ref. DI-33B-T15) is proposed to be permanently acquired to the rear of the existing Lidl supermarket. The acquisition of these lands will have implications for the maintenance and management of the rear of the existing supermarket."	Reference is D1 33B T15 which is temporary land take.
7	8	"The acquisition of the Discount DIY site for a Park and Ride (P&R) significantly impacts on the potential development of the overall lands whether independently or as an integrated development across both sites. As an independent property, the Discount DIV site is an established commercial premises with significant development potential. This is evidenced by the 6-storey building now proposed by TII which has a floor area of 19,250sqm. The acquisition of these lands mean that this potential is lost to Lidl permanently."	<p>While Lidl Ireland GmbH's concerns are noted regarding the impact of the Proposed Development in terms of the loss of car parking spaces, this must be viewed in the context of the significant increase in public transport accessibility that the Lidl store will be afforded by the delivery of the Luas Finglas. Alongside this the store is set to benefit from its adjacency to a large P&R facility and significant future 'residential led mixed use' development as set out in the Jamestown Masterplan, which is predicated upon the area's location along the Luas corridor.</p> <p>In land use policy terms, the site on which the P&R facility is proposed is zoned Z6 - Employment/Enterprise in the Dublin City Development Plan 2022-2028 with the objective to:</p> <p>'provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'</p> <p>Section 14.7.6 of the Dublin City Development Plan 2022-2028 establishes 'permissible' and 'open to consideration' uses on lands zoned Z6 Employment/Enterprise. It confirms that a 'park and ride facility' is a permissible use on such lands, and as such, one which is fully supported in policy terms under the operative development plan. Section 14.7.6 of the Dublin City Development Plan 2022-2028 states that that "uses in the Z6 zone are likely to generate a considerable amount of traffic by both employees and service traffic. Sites should, therefore, have good vehicular and public transport access". The provision of Luas Finglas will directly support existing and future businesses across the wider land use objective deliver on this by means of high frequency public transport.</p> <p>Any issues about development potential and site value etc will be addressed via the CPO process in the event of a RO granting permission. Reference the Compulsory Purchase Order (CPO) Guide, November 2024.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the Luas Finglas EIAR 2024, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p>

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			<p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p> <p>Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p>
8	8	"A redevelopment scenario was discussed with TII and over several meetings over a period of time between 2021 to 2024. While options were discussed which involved redevelopment of the LIDL supermarket site to coordinate with the proposed 350-space P&R building, no formal agreement was reached. In that scenario, as the EIAR documents outline, parking spaces (c.40no.) within the P&R building (ground floor) would be reserved for Lidl."	Please refer to response to Item No. 4 above.
9	8	"The RO/ CPO proposals have significant implications for the trading of the existing Lidl supermarket and the commercial implications of these impacts will need to be addressed."	Please refer to responses to Items No. 1, 3, 4 and 7 above.
10	8	"The main concerns in this regard relate to access to the supermarket during construction and the permanent loss of 35 parking spaces."	Please refer to response provided to Item No. 1 and 3 above.
11	8 and 9	"Without prejudice, Lidl is willing to continue to explore the option of redevelopment of their supermarket to integrate with the future P&R structure. In that context, the Railway Order drawings and the Railway Order - Part 2: Railway Works and Related Provisions and associated Schedule - should be amended to more clearly describe and define the accommodations for Lidl within the proposed P&R. This shall describe the details of the access arrangements and number of car parking spaces to be provided for Lidl."	<p>As Lidl note in their submission and as also mentioned above and set out in Section 5.8.6 of the EIAR there has been engagement by TII with Lidl over the last number of years, and TII will continue to engage with Lidl as appropriate, as TII will with all impacted landowners as appropriate.</p> <p>However, the Park and Ride facility at this location is a critical part of Luas Finglas and is a stand-alone and independent facility that is being provided as part of Finglas, as is explained and set out in the EIAR and in particular section 5.8.6 of chapter 5 of the EIAR. Also, as mentioned above (in response to Item 4), the potential for the use of the area identified at the rear of the ground floor of the Park and Ride is clearly set out and explained in the EIAR and set out on the relevant RO Drawings and is repeated above.</p> <p>TII will continue to engage with Lidl to review interfaces and exchange design information as the project progresses. However, TII does not intend to include specific details on the access arrangements, nor number of car parking spaces to be provided for Lidl, which will be subject to a separate planning application for the redeveloped site. Figure 5-18 of the EIAR refers to "Partial use at ground floor level by others, subject to separate planning by landowner. This is also reflected in the RO Structures Drawings (see drawing D1-ST 33 B-C/3), Alignment Drawings (see drawing D1-GA 33 B-C), and Landscape Drawings (see drawing D1-AL 33 B-C).</p>

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1	2	"Decrease playing area currently used by children to play"	<p>Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>The proposed Luas Finglas will require the relocation of the western boundary wall 2.25m high, to be rebuilt 4m closer to the residential properties and reducing the amount of grass in the semi-private open space. The construction works would also require the removal of 2 trees along this area. The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit it smaller in size.</p> <p>As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents. Additional landscape design mitigation measures could be proposed that are not currently shown on the landscape design drawings, these measures are listed below. They would not mitigate the loss of green space, but they would enhance the quality of the semi-private open space in terms of functional and aesthetics.</p> <ul style="list-style-type: none"> Feature tree planting along the western boundary of the courtyard to reduce visibility of the OCS and to further enclose the cul de sac and retain the intimate character of the area. Evergreen flowering climbing plants grown against the proposed wall which will enhance the western boundary and improve the view in that direction from the residential properties. Street furniture i.e. south and east facing seating adjacent to the boundary wall to increase outdoor use of the space for courtyard residents. Grasscrete paving within the parking spaces of the courtyard to reduce the amount of hard surface.
2	2	"Decrease parking availability"	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and limiting illegal parking at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use.</p> <p>However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.</p>
3	2	"Pose safety risks to elderly/vulnerable and children coming to and from the estate."	<p>TII understands the concerns about the safety of pedestrians, especially children, at the entrance to Ravens Court and along Cardiff Castle Road, with the introduction of the Luas. TII is dedicated to delivering a Luas system that is safe for all road users and will implement appropriate operational or design safeguards as necessary.</p> <p>The Luas Finglas project incorporates several key features to protect pedestrians in this particular area:</p> <ul style="list-style-type: none"> Slow LRV Speeds: LRVs will be travelling at a low speed near the entrance to Ravens Court. This is due to the nearby signalised junction at Mellowes Road, the layout of the track as approach and depart Luas Finglas LRV stop, and the proximity to the estate entrance. Slow speeds significantly reduce the risk of accidents. Clear Visibility: The design ensures that both LRV drivers and pedestrians will have a clear, unobstructed view of each other. Driver Training: Luas drivers are trained to operate the vehicle on the route. They will be aware of pedestrian crossing locations and desire lines along the route. Designated Pedestrian Crossings: There will be clearly marked pedestrian crossings near the entrance to Ravens Court, providing safe and designated places for residents to cross the tracks. These crossing will comply to all relevant safety standards. Separate Footpaths: Continuous footpaths run alongside the tracks, keeping pedestrians safely separated from both the LRVs and road traffic.

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			<p>▪ Safety Regulation: The safe operation of Luas is regulated in Ireland by the CRR and TII will continue to engage with CRR throughout the project, to ensure that any hazards are properly controlled and managed.</p> <p>Luas has a strong safety record in Dublin, and this new extension is designed with the same required high safety standards. The design meets all relevant safety regulations and guidelines for pedestrian safety near light rail lines.</p> <p>Regarding the issue of access to Ravens Court by pedestrians, including children, older people and persons with disability, an uncontrolled intersection is proposed at the entrance to the estate. The LRT crossing outside of the boundary to the estate, together with passing LRVs, will introduce an element of social and physical severance which is assessed in Section 8.4.3.2 as being significant, negative and long-term. The effect of this severance will be mitigated as far as possible by a slight relocation of the entrance to maximise visibility for people entering or leaving the estate. A pathway will be provided from Ravens Court to the green space to the south and secure fencing will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature needed to join Mellowes Road. Some relief from severance is also provided by the new direct access that will be provided alongside the LRT to community facilities on Mellowes Road.</p> <p>The proposed Scheme has been designed to ensure that pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards.</p> <p>Additionally, the distance from the LRV swept path envelope to the wall at the point where pedestrians emerge from the northern footpath at Ravens Court is over 2.6m, providing a wide dwell area and allowing sufficient space for pedestrians to assess approaching LRVs before crossing.</p> <p>Pedestrians intending to cross the Luas tracks will be presented with the standard suite of traffic signs, pavement markings and surface treatments to alert them of the presence of the crossing.</p>
4	2	"Pose safety risks with possible access blockage."	<p>TII understands the concern about the possibility of a LRV blocking the entrance to Ravens Court, particularly in an emergency. It is important to note that this type of scenario (a vehicle potentially obstructing access) isn't unique to this location, and this is a consideration throughout the Luas network. Maintaining both pedestrian and vehicular access, is a key design principle for the Luas system.</p> <p>The design allows for, even in the unlikely event of a LRV breakdown at the entrance, maintaining pedestrian access to and from the estate. Footpaths are also alongside the tracks, allowing emergency services personnel (paramedics, firefighters) to reach the estate on foot if needed.</p> <p>The section of track near Ravens Court is designed to be low speed and is also relatively flat. These characteristics further reduce the likelihood of a LRV breakdown.</p> <p>In the unlikely event of a LRV breakdown, the Luas Operator would urgently address this in order to restore normal service, involving measures to quickly clear the obstruction. This includes, where necessary, having the capability to tow an LRV.</p>
5	2	"Pose safety risk in relation to emergency service access"	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
6	2	"Decrease greenspace that the residents committee have worked so hard to maintain."	Please refer to response provided to Item No. 1 above.
7	2	"Will increase noise"	Noise - Section 15.4.1.2 of Volume 3 of the EIAR assessed the potential for the construction stage to generate noise impacts. The conclusion of this section was that Ravens Court would experience a negative significant to very significant noise impact during construction, please refer to Table 15-28. As a result of this outcome

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			<p>mitigation measures have been specified within Section 15.5.1 of Volume 3 of the EIAR to reduce the noise impacts during construction.</p> <p>With the mitigation measures in place the residual noise impact at Ravens Court during construction reduces to a moderate to significant noise impact. The utility diversion works will generate the highest impact; however, the duration of that work will be short.</p> <p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p> <p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline. Notwithstanding this, the assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design which screens Ravens Court from the Luas tracks. In conclusion the noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p>
8	2	"Will bring vibrations"	<p>Vibration - With regards to vibration during construction Section 15.2.4.7 of Volume 3 of the EIAR sets vibration thresholds which the construction stage of the proposed Scheme must remain within. Section 15.5.1.1 of Volume 3 of the EIAR specifies that monitoring must be undertaken during construction to ensure the works remain within the thresholds specified. The vibration thresholds outlined within the EIAR are to ensure that there is no risk of damage not even cosmetic damage.</p> <p>In the vicinity of Ravens Court, the proposed track operates at low speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 4 of the EIAR.</p> <p>Section 15.4.1.5 of Volume 3 of the EIAR discusses the potential vibration impacts during operation. This assessment has concluded that at distances of greater than 4.5m from the track perceptible vibration within buildings will not occur.</p> <p>In conclusion the vibration impacts at Ravens Court during operation will not cause any long-term damage and are expected to be imperceptible.</p>
9	2	"Will negatively impact the housing estate visually"	<p>Please refer to response to Item No. 1 above. Please note that the assessments of the visual impacts of the proposed Scheme are detailed in Chapter 21 - Landscape and Visual Amenity assessments- section 21.4 Potential Impacts.</p>
10	2	"Will de-value our homes"	<p>Section 8.6.3.1 of EIAR Chapter 8 (Population) describes the possible impact on local property prices based on a review of the literature associated with previous light rail schemes in Ireland. Typically, it has been found that property prices tend to rise in the vicinity of stations. It is also acknowledged in this section that the value of properties can also fall if subject to negative environmental effects by virtue of being in very close proximity to tracks. The outcome for Ravens Court is therefore subject to a degree uncertainty in that, while the estate is</p>

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			located close to the LRT and therefore subject to a moderate negative effect with regard to noise, however it is also located within 5 minutes' walk of the proposed Finglas Village Stop. While there will be a negative effect during construction on two private gardens and an area of the public green space, the estate will also continue to be situated within a landscaped walled enclosure and therefore, visibly separated from passing LRVs.
11	2	"Will restrict essential services such as bin collection and oil delivery"	<p>TII does not agree with the assertion that that the proposed Scheme will restrict essential services such as bin collection and oil delivery.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
12	2	"Leave us with less than 10% green space. None of the 12 houses in our small estate have front gardens, and so taking away the little communal green space we have will be detrimental to our children who play together there, and our residents who take such pride in this area, with planting of flowers and scrubs and winning an award for this green space at Tidy Towns."	Please refer to response to Item No. 1 above.
13	3	"Pose serious congestion issues outside Ravens Court and on Cardiff castle road - on a road that is already massively congested during peak hours."	<p>Section 18.4.3.8 of Chapter 18 of the EIAR outlines the General Traffic Impact Assessment during the operational phase of the proposed Scheme. To determine the impact that the proposed Scheme has in terms of general traffic redistribution on the study area, the Local Area Traffic Model has been used to identify the difference in general traffic flows between the Do Minimum and Do Something scenarios. Figure 18-31 and 18-32 of the EIAR illustrate the flow differences on road links within the study area as a result of the proposed scheme in the opening year (2035) AM and PM peak hours. The results indicate a change in traffic volume along the Cardiff Castle Road of less than 100 vehicles (combined 2-directions) as a result of the proposed scheme.</p> <p>As outlined in Chapter 18 Traffic and Transport of the EIAR, TII's Traffic and Transport Assessment Guidelines (May 2014) define a threshold for assessment of 100 vehicles (combined 2-way flow) in the peak hours (Figure 18-30 of the EIAR). This threshold aligns with an approximate 1 vehicle per minute increase per direction on any given road. Where changes in traffic volumes as a result of the proposed Scheme are less than the 100 vehicle threshold (as is the case here), then the impacts are deemed to be "Not Significant".</p>
14	3	"Potentially Running through a heritage site (Cardiff Castle)."	<p>This submission raises concern that the proposed Scheme will potentially run through a heritage site (Cardiff Castle; House 17th Century; RMPDU014-066003-; EIAR ref. CHC032). As detailed in Table 20.8 of Volume 3 of the EIAR, this cultural heritage constraint comprises a demolished 17th Century house (EIAR ref. CHC032) and its recorded location, on the west side of Cardiff Castle Road, is now occupied by modern housing. As illustrated in Figure 20.1 (Sheet 2 of 3) of Volume 4 of the EIAR, the recorded location of this constraint, as based on an assessment of historic cartographic sources and the Record of Monuments and Places (RMP), is outside the boundary of the proposed Scheme and no direct or indirect impact on this constraint was identified through the EIAR process.</p> <p>An area of archaeological potential (AAP - EIAR ref. CHC033) which lies to the south east of Cardiff Castle, and to the south of Ravenscourt, and identified to be a potential burial ground was subject to Targeted Archaeological Test Excavations during Luas Finglas slit trench works as detailed in Section 20.3.1.4 of Volume 3 of the EIAR, nothing of archaeological significance was identified in the two trenches excavated. A full copy of the report on this archaeological site investigation is provided in Appendix 20A.2 of Volume 5 of the EIAR.</p> <p>In conclusion, potential impacts on Cardiff Castle (EIAR ref. CHC032) and an area of modified parkland (EIAR ref. CHC033) to the east of its recorded location have been robustly assessed in the EIAR submitted with the RO. Cardiff Castle has been demolished, and its location is outside the proposed Scheme boundary in an area occupied by modern housing. A neutral impact on this constraint will, therefore, occur.</p> <p>It is important to note that the general lands and environs of Cardiff Castle (CHC032) are within the Zone of Archaeological Potential (ZAP) for the Historic Town of Finglas (RMP DU014-066-; EIAR ref. CHC026) as shown on Figure 20.1, (Sheet 2 of 3) of Volume 4 of the EIAR. As detailed in Section 20.5.1 the TII Project Archaeologist will agree a Cultural Heritage Strategy for Luas Finglas; this is in accordance with the TII 2017 Code of Practice for Archaeology as agreed with the Minister for Arts Heritage Gaeltacht Regional and Rural Affairs (now Minister of Housing, Local Government and Heritage [MHLGH]). As the proposed Scheme is located within the ZAP for the Historic Town (CHC026) it is a legal requirement that all works in this area are</p>

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			archaeologically monitored under a Section 26 Licence to Excavate (National Monuments Act 1930 [as amended]). for Table 20.9 of Volume 3 of the EIAR, mitigation measures comprising archaeological monitoring of enabling and construction works have been provided for the area of modified parkland to the east of the recorded location of Cardiff Castle. In the event that any archaeological remains are confirmed in this area further mitigation such as preservation in situ or preservation by record (full archaeological excavation) will be agreed by the TII Project Archaeologist in consultation with the Ministers Office. and residual effects will be imperceptible to slight.
15	3	"Will negatively impact resident's mental health secondary to the continued stress." The submission refers to other health issues.	<p>These impacts are assessed in detail in the Human Health Chapter 7 of the EIAR. Specifically, section 7.2.2.8 addresses the methodology used to assess the potential for psychological effects, while sections 7.4.2.1 and 7.4.2.2 assess the potential psychological impacts during both the construction and operational phases of the proposed Scheme.</p> <p>While it is accepted that some loss of space and amenity is unavoidable, particularly during the construction phase, this will be minimised where at all possible.</p> <p>It should also be noted that there is potential for positive psychological effects in the operational phase and some of the greatest benefits are available to residents who live close to the line. It may be of some comfort to note that there haven't been reported increased mental health problems adjacent to previous Luas lines and this is reassuring.</p> <p>The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p>
16	3	"Will negatively impact our residents with existing complex needs with regards to access in/out. access to emergency services etc."	<p>The proposed Scheme is designed to ensure that drivers exiting Ravens Court and crossing the Luas line, have appropriate visibility in accordance with relevant design standards.</p> <p>The visibility distances in the proposals significantly exceed the minimum requirements, ensuring that drivers have sufficient sightlines before entering the Luas corridor.</p> <p>Please refer to response to Item No.3 above regarding pedestrian access.</p> <p>Please refer to response to Item No. 5 regarding access for emergency services.</p>
17	3	"I strongly reject the proposal of Luas route. I feel that it is a badly thought route. not only taking the little green space our estate has, but also four other much needed green spaces in the area. I would also like to note that I am not opposed to Luas Finglas - I think it has the potential to bring a lot to the area if appropriate planning was exercised, for example have they considered bringing it up the Finglas Road Dual Carriage Way, it would not only be a less disruptive route as regards to residential and green spaces, but also in the long run a safer route with the potential of lower rate of anti-social behaviour. Using the Finglas Road Dual Carriage Way would also better facilitate those residents in East Finglas, as the proposed route now only through Finglas South and West (TII call the stop at Finglas Garda Station, Finglas Village, which is not true, this is Mellows Road. Finglas West)."	<p>An option similar to this was assessed, Option 3K. This option was brought forward following the initial long list sifting exercise. A Multi Criteria Analysis (MCA) was then conducted on 14 Options including this Option 3K. This MCA assessed the options under Economy, Integration, Environment, Accessibility & Social Inclusion and Safety. The assessment concluded that this option (3K) scored significantly lower than other options on Social Inclusion, Safety, and Compatibility with Development Plans, lower than other options on Integration with Transport Policies and Impact on Material and Cultural Assets, but it delivered some or significant advantages over other options on Journey Time (very fast option), Catchment, and Key Trip Attractors. The result of this Stage 1 assessment was that Option 3K was not brought forward to the next stage. The Options brought forward were Options 2A, 3A and 3J. Option 3J which does follow part of Finglas Road was brought forward to Stage 2 Option Selection. Section 4.8.2 of the EIAR sets out the detailed assessments conducted including Benefit Cost Ratio and Multi Criteria Assessments which determined the Emerging Preferred Option, Route 2A.</p>

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1	3	"Preferred Luas Route passing directly in front of Ravenscourt and also the acquiring at least 3 metres of land from the small Estate of 12 houses."	Permanent land acquisition of existing green space will vary in width from 2.3m to 3.7m as indicated on property drawing D1 P32 D-O.
2	3	<p>"Parking</p> <p>At the moment we have 10 Car Park space's for 12 House's and 5 of these houses currently have 2 cars so that is 17 cars are parked in the estate at any given time so as you can imagine even without visitors we have no space at all"</p>	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and preventing and limiting illegal parking in this area] at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use.</p> <p>However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.</p>
3	3	"We put our Black, Green and Brown Bins on the pathway to the entrance of our Estate every Wednesday for collection and they are placed where the Luas will be taking that area."	Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.
4	3	"According to the plans the Luas will be running on average every 3 to 4 minutes each way and as we only have 1 entrance into our Estate this is bound to cause an issue with traffic in and out of the Estate all day and every day"	<p>TII acknowledges the concerns raised regarding potential traffic disruption at the estate entrance due to the Luas crossing. The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p> <p>The design of the crossing prioritises safety and the minimisation of delays through the following measures:</p> <p>Low LRV Speed: LRVs will be limited to a maximum speed of 10 km/h at this location, ensuring sufficient stopping distances and safe interaction with vehicular traffic.</p> <p>High Visibility: The crossing has been designed to ensure excellent visibility for both vehicle drivers and LRV drivers.</p> <p>Controlled Interaction: The combination of low LRV speed and high visibility is intended to facilitate controlled and predictable interaction between LRVs and vehicles.</p> <p>It is important to note that the crossing of estate entrances, non-signalised junctions, and entrances to car parks by LRVs is a feature of the existing Luas network and is managed safely and effectively. The design principles at the Ravens Court entrance are consistent with those used in these existing situations.</p>
5	3	"There are young kid's living in the estate as well and play on the green to the left of the Estate so the only way they can access the green will be crossing the dangerous Luas tracks so as you can imagine the safety of the kids is surely going to be compromised."	The existing greenspace to the south of Ravens Court will still be accessible and usable by residents of Ravens Court. A footpath is proposed as part of the proposed Scheme running between the Luas line and the boundary to Ravens Court, specifically to facilitate residents of Ravens Court to access this green space and without needing to cross the LRV line. RO Landscape Drawing Plan No. D1-AL 32 3-4
6	3	<p>"Emergency Services and other services access</p> <p>When the houses are getting an Oil delivery the Estate is completely blocked and that's before they take planned 3 metres from the Estate. They have not taken into consideration if an Ambulance or Fire Engine needs to access the Estate to deal with an Emergency."</p>	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRT will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle</p>

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			operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator. Please refer to response Item No.3 above regarding access for service providers and deliveries.

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1	2	<p>"The Bord is aware that the Planning and Development Act 2000 is to be repealed by the Planning and Development Act 2024 as soon as it is commenced. The Bord should indicate the legislation under which this application is to be considered and should also indicate the provisions of the Planning and Development Act 2024 which will apply, and which will ensure the incorporation and application of the compensation provisions of the 1919 Act to this case."</p>	<p>As the Board is aware, TII has applied to the Board for the Railway (Luas Finglas – Broombridge to Charlestown) Order [2024] pursuant to section 37(1) of the Transport (Railway Infrastructure) Act 2001 (as amended).</p> <p>In relation to the applicable compensation provisions, as set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>The enactment of the Planning and Development Act 2024, which provides for the repeal of the Planning and Development 2000 (as amended), does not impact the application of the above provisions in respect of Luas Finglas.</p> <p>For completeness, it is noted that while the Planning and Development Act 2024 has been enacted, the majority of the Planning and Development Act 2024 has yet to be commenced by Statutory Instrument. Further, while the Planning and Development Act 2024 provides for the repeal of the Planning and Development Act 2000 (as amended), it is anticipated that this will occur in stages, as the corresponding provisions of the Planning and Development Act 2024 are commenced over time.</p>
2	2	<p>"The acquiring Authority have not demonstrated that funding is available to implement the proposed Scheme and complete its construction. The lack of funding through to completion will cause unfair delay in the implementation of the project."</p>	<p>All major publicly funded infrastructure projects, including Luas Finglas, are subject to the Public Spending Code (https://assets.gov.ie/20041/e8edcfee69f84876990fa6ebf4bed13f.pdf) which requires the production of appropriate economic appraisals and business cases.</p> <p>The Preliminary Business Case for Luas Finglas, which sets out the key costs and benefits of the proposed Scheme, is at the following link. https://www.nationaltransport.ie/publications/luas-finglas-preliminary-business-case/</p> <p>In October 2024, the Government consented to approval in principle for the Luas Finglas project at Approval Gate 1 of the Infrastructure Guidelines. TII then lodged the RO application for the project with the Board in November 2024.</p> <p>Should the RO for the Luas Finglas project be granted, a detailed business case and procurement strategy will then be provided to Government for consideration. As is the case with all major projects, Government consent must then be acquired at Approval Gate 3 of the Infrastructure Guidelines for funding to be secure for the project and for construction to commence.</p>
3	2	<p>"Furthermore, detailed final design drawings for the Scheme should be submitted to the Bord for their approval as part of this application. The lack of final design drawings will also create delays if the Scheme is approved and most importantly will create uncertainty over an unacceptably long period of time in relation to the future development of the claimants' retained lands."</p>	<p>The drawings provided are to illustrate the proposed Scheme for the planning process and to inform the EIAR. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and all stakeholders will be kept informed and advised in accordance with the procedures set out in Chapter 6 Construction activities and CTMP.</p>
4	2	<p>"In addition, the deviation areas contained in the application make it extremely difficult for my client to progress with any proposals to redevelop the site."</p>	<p>Chapter 5 - Description of Proposed Scheme, Appendix A5.2 (Volume 5) deals with limits of deviation wider effects. Section 1.4 of this report identifies a number of locations where it is not possible not apply LODs due to constraints in the immediate vicinity of the proposed Scheme. This restriction includes the alignment along St Margaret's Road due to the existing / realigned St, Margaret's Road, the land available and the proximity to existing properties.</p>

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5	2	<p>"Together these constitute a contravention of the landowners' rights under Article 1 of the First Protocol of the Convention on Human Rights and which Article was considered in Sporrong and Lönroth v Sweden, (1982) 5 EHRR 35 and also in Skibinscy v Poland, Appl No 52589/99. The Bord has refused previous CPO's on grounds including consideration of both the landowners Constitutional Rights and the protection offered by the European Human Rights Convention."</p>	<p>Please refer to response to Item No.1 above.</p> <p>"In their submission on behalf of Megrick Limited in respect of Luas Finglas, Ciaran Sudway & Associates Limited contend, without explanation or reasoning, that the proposed acquisition of Megrick's lands "constitute a contravention of the landowners' rights under Article 1 of the First Protocol of the Convention on Human Rights".</p> <p>Article 1 of the First Protocol to the European Convention on Human Rights states:</p> <p>"Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.</p> <p>The preceding provisions shall not, however, in any way impair the right of a State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure the payment of taxes or other contributions or penalties."</p> <p>There are no breaches of Megrick Limited's rights under Article 1.</p> <p>Article 1 of the First Protocol (peaceful enjoyment of possessions) itself qualifies the right to the peaceful enjoyment of possessions by reference to the concept of public or general interest, a concept given a broad interpretation by the European Court of Human Rights.</p> <p>The compulsory acquisition of the lands from Megrick Limited are necessary for the implementation of Luas Finglas. As referred to in the Luas Finglas EIAR Chapter 12 – Land Take, Table 12-11: Land take Impact Assessment in Area 33 plots 33B - A30 and A31 , 331-A1, 33B-T13, 331-T1, and 331-T2 are required for the construction and operation of Luas Finglas including the construction of trackwork, utilities diversions, provision of new boundaries, provision of new access roads, landscape works and includes temporary acquisition of lands to allow the safe construction of boundary walls and fences. The extents of the land take and works required are illustrated in the property drawings specifically D1-P33 B-C and the alignment drawings D1 -GA33 B-C, D1-GA33 1-2. The landscape drawings D1 -AL33 B-C and D1-AL33 1-2 show the works required including footpaths, road layout, landscape treatment and roads and crossings.</p>
6	23	<p>"The Fourth Schedule to the CPO sets out the "Land of which Temporary Possession may be taken". S. 213 of the Planning and Development sets out clearly that lands may be permanently or temporarily acquired and that easements, wayleaves etc may be permanently or temporarily interfered with. However, S. 213 does not allow for possession of lands to be taken on a temporary basis. In the event that the lands are in fact to be acquired temporarily then the CPO must state the precise nature of the interest to be acquired including the duration of time for which they are to be acquired. Information must also be provided on the precise works that are to be carried out on, over or under these lands."</p>	<p>As referred to in the Luas Finglas EIAR Chapter 12 – Land Take, Table 12-11: Land take Impact Assessment in Area 33 plots 33B-T13, 331-T1, and 331-T2 are required for the construction and operation of Luas Finglas including the construction of trackwork, utilities diversions, provision of new boundaries, provision of new access roads, landscape works and includes temporary acquisition of lands to allow the safe construction of boundary walls and fences. The extents of the land take and works required are illustrated in the property drawings specifically D1-P33 B-C and the alignment drawings D1 -GA33 B-C, D1-GA33 1-2. The landscape drawings D1 -AL33 B-C and D1-AL33 1-2 show the works required including footpaths, road layout, landscape treatment and roads and crossings. Further, all of the lands and rights in lands proposed to be acquired pursuant to the RO are necessary and required for the construction and operation of Luas Finglas and there is no question of these acquisition being excessive.</p> <p>The expected overall construction programme for the main works is identified in Section 6.3.3 of Volume 5, Chapter 6 of the EIAR as 3.5 years. However, this is the overall timescale for the entire project and the construction works which may directly impact Megrick Ltd. will be shorter. Volume 5, Chapter 6, Section 6.3 and Figure 6-2 of the EIAR identifies the estimated phased durations of the work in this area. The overall works duration within S33.3 and S33.4 along St Margret's Road are estimated to be 18 months in total. This is considered comparable to similar projects for the complete scope of work within these sections. As noted in Section 6.3.3 "The programme for the construction of the proposed Scheme has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional. "</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and

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			<ul style="list-style-type: none"> a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p>
7	23	<p>"The lands being permanently acquired in Plot No. D1-331-A1 cause considerable severance to my clients retained property and it appears that these lands are being acquired solely to provide access to the retained lands of adjoining owners. If this is the case, then I would suggest that the acquiring Authority has not made a case for the inclusion of these lands in the CPO. It is not known whether this access will be a private road or a public road and neither TII or the NTA are a road Authority with the capacity to take these lands in charge. This Plot together with the associated "temporary" plots should be removed from the CPO."</p>	<p>The lands owned by Megrick Limited which are proposed to be permanently acquired in Plot No. D1-331-A1 are required for the purposes of the construction of a new public access road at this location to access two neighbouring sites whose access to St. Margaret's Road is being removed to facilitate construction and ensure efficient operation of the Luas service. The access road is aligned with the Jamestown Business Park Masterplan and will serve future development in this location and it will be taken in charge by DCC, as has been discussed with the representatives of owners of plot D1-331-A1 during the non-statutory consultation period in March 2022 and more recently in January 2024 as part of a pre-planning application discussion.</p> <p>Details of the proposed access road can be found in the proposed Scheme drawings for alignment (D1-GA-33 1-2) , and Landscape (D1-LA-33 1-2) and it is included in Luas Finglas EIAR Chapter 2 – Planning and Policy Context, Chapter 5 – Description of the proposed Scheme, Chapter 6 – Construction Activities, Chapter 8 – Population, and Chapter 18 – Material Assets: Traffic and Transport.</p> <p>There is no question but that this plot is required for the construction and operation of Luas Finglas and to ensure that access is provided to the otherwise landlocked premises as described above ultimately becoming a part of the planned circulation routes indicated in the Jamestown Business Park Masterplan and this is a proportionate use of TII's CPO powers and that it falls within the provisions of the 2001 Act as described below.</p> <p>In that regard, in the context of a RO, section 44 of the Transport (Railway Infrastructure) Act 2001 (as amended) (the "2001 Act") provides the statutory authority for the acquisition of land as part of a RO:</p> <p>"44. (1) A railway order shall contain such provisions as the Board considers necessary or expedient for the purpose of the order.</p> <p>(2) Without prejudice to the generality of subsection (1), a railway order may—</p> <p>(a) specify any land or any substratum of land, the acquisition of which is, in the opinion of the Board, necessary for giving effect to the order,</p> <p>(...)</p> <p>(f) without prejudice to paragraph (g), contain such provisions as the Board thinks proper for the protection of the public generally, of local communities and of any persons affected by the order,</p> <p>(...)</p> <p>(i) contain such provisions ancillary or incidental to any of the matters aforesaid as the Board considers necessary and proper"</p> <p>Therefore, the Railway Order may specify lands, the acquisition of which is, in the opinion of the Board, necessary for giving effect to the order and may also contain such provisions as the Board thinks proper for the protection of any persons affected by the order (for example, the businesses fronting St Margaret's Road) and such provisions ancillary or incidental to any of the other matters as the Board considers necessary and proper.</p> <p>Finally, the lands identified at Plot No. D1-331-A1 are absolutely necessary for giving effect to the Luas Finglas Railway Order which clearly advances the common good and the proposed acquisition is proportionate to meet the community need at this location."</p>

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1	3	<p>"The Railway Order was submitted on 18th November 2024, and all matters regarding the design of Luas Finglas are now in the hands of An Bord Pleanála. However, we only received our Railway Order pack on the 18th of November 2024, giving us no time to make observations or raise concerns before the submission. This lack of opportunity for input has left us in a difficult position, as we now need to address the significant impacts this project may have on our centre."</p>	<p>As detailed in Section 1.9 of Chapter 1 of the EIAR, the consultation process provided multiple opportunities for stakeholders to engage with TII. The announcement of the Emerging Preferred Route (EPR) on 28th July 2020 initiated a three-week non-statutory public consultation period, supported by a comprehensive stakeholder and community engagement program. Despite COVID-19 restrictions, TII adapted by conducting online consultations and facilitating socially distanced face-to-face meetings when requested. Issues raised during this process were considered and incorporated where feasible, shaping the subsequent Preferred Route design. Further engagement continued through an eight-week public consultation from December 2021 to January 2022, allowing stakeholders to provide written submissions via online forms, email, or post. Additionally, TII maintained ongoing dialogue with affected landowners from 2019 through 2024, ensuring continued opportunities for discussion.</p> <p>In addition, Article 175(4)(a) of the Planning and Development Act 2000, as amended, states that: "Before a local authority makes an application for approval under subsection (3), it shall—</p> <p>(a) publish in one or more newspapers circulating in the area in which it is proposed to carry out the development a notice indicating the nature and location of the proposed development and</p> <p>(b) (i) stating that—</p> <p>(I) it proposes to seek the approval of the Board for the proposed development,</p> <p>(II) an environmental impact statement has been prepared in respect of the proposed development,</p> <p>(ii) specifying the times and places at which, and the period (not being less than 6 weeks) during which, a copy of the environmental impact statement may be inspected free of charge or purchased..."</p> <p>In this instance, the public display for the proposed Scheme was set from 22nd November 2024 to 20th January 2025, a period of 8 weeks. This time frame effectively accommodated the Christmas break and ensured that the statutory requirement for a 6-week consultation period was met, providing stakeholders ample opportunity to review the documents and make submissions to the Board. Whilst TII acknowledges that the timing coincided with the holiday season, the consultation period was extended to allow for this, ensuring that affected parties had a sufficient window to engage with the process.</p>
2	3	<p>"The removal of the car park outside the FYRC building in the project plans is a significant concern. The removal of this parking area will increase reliance on the parking in front of Mellow Spring. This car park is an essential resource for our staff, many of whom commute to work"</p>	<p>The Proposed Scheme will provide much improved public transport access to community facilities on Mellowes Road with benefits for Mellow Spring Childcare. A loss of public parking is needed to facilitate the Luas alignment and Finglas Village stop. In the longer term, once operational Luas will provide an alternative to car use.</p> <p>The Population assessment (8.4.3.2) acknowledges the potential impact of any loss of car parking due to the Proposed Scheme "particularly on users of the childcare facility". During the construction phase, Mitigation measures are recommended in Section 8.5.2 to include "alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare/Mellow Spring Childcare Centre to compensate for existing spaces lost during construction".</p> <p>The proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area. A public right of way is to be maintained throughout construction, and this is identified on RO property drawing D1-P32-D-O. Specific parking arrangements are addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12. "The appointed Contractor will provide temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare / Mellow Spring Childcare Centre to compensate for existing spaces lost during construction. Consideration will be given to the car parking needs of employees of the Finglas Resource Centre to avoid competition for remaining places." Continuity of access is to be maintained as identified in Luas Finglas EIAR 2024 Chapter 6 – Construction Activities Appendix A6.2 - CTMP.</p> <p>TII is continuing to engage with DCC regarding parking arrangements for staff at the Finglas District centre.</p>
3	3	<p>"Could we discuss the possibility of creating alternative parking arrangements to support our staff during this time and on a permanent basis?"</p>	<p>Please refer to response to Item No. 2 above.</p>
4	3	<p>"We request a timeline for when the land will be under temporary possession. During this period, will access to the front of our building be restricted? Families currently access our building from both the front and rear entrances. It is essential to establish safe entry and exit routes for children and families during construction"</p>	<p>As identified on RO property drawing D1-P32-D-O a public right of way is to be maintained throughout construction for the safe access is to be maintained to Mellow Springs facilities. Temporary lands will be necessitated to complete the proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area.</p>

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			This will be implemented as noted in Section 1.3.1 of the CTMP "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." The implementation of this and specific parking arrangements is also addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12.
5	3	"If public and private rights of way are extinguished, would Mellow Spring need to cease operations or relocate? Relocating would present a significant challenge, given the difficulty of finding a premises large enough for our 135 children. Could you clarify whether temporary or permanent shutdowns are anticipated, and how such disruptions will be communicated?"	<p>As identified on RO property drawing D1-P32-D-O a public right of way is to be maintained throughout construction for the safe access is to be maintained to Mellow Springs facilities. As such, there will be no requirements for Mellow Springs to cease to operate from the location and have to relocate. There will be no shutdowns, temporary or permanent.</p> <p>The implementation of this and specific parking arrangements is addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12.</p> <p>It is also addressed in the EIAR Chapter 6 Construction Activities and Appendix A6.2 the CTMP. Specifically, continuity of access will be maintained throughout construction. As noted in Section 1.3.1 of the CTMP "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area."</p> <p>There will be a need to ensure the safety of users of Mellow Spring Childcare during the construction phase that could involve the use of hoarding and the short-term re-routing of access within a small area, there will be no need to remove access. Measures will also be taken to ensure the continued safe and convenient access of persons with mobility issues, including persons with disabilities and parents with buggies. During the operational phase, the proximity of the Finglas Stop will greatly improve the facility's accessibility and its ability to cater for the needs of parents</p>
6	3	"Construction activities near our centre could pose risks to our families and staff, who access the building daily. We propose conducting regular risk assessments and holding health and safety meetings to identify and mitigate potential hazards."	<p>As identified in Section 6.9 of Chapter 6 of the EIAR "The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated by the Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS) which will address health and safety issues from the design stages through to the completion of the Construction Phase. This plan will be reviewed as the proposed Scheme progresses. The contents of the Health and Safety Plan will follow the requirements of the Regulations. In accordance with the Regulations, a PSDP has been appointed and PSCS will be appointed as appropriate." This will include ensuring arrangement are put in place for the safety of the public. TII will continue to engage with the stakeholders at all stages of the process to ensure business concerns are considered to the fullest extent possible.</p> <p>Please also refer to response to Item No. 5 above.</p>
7	3	"Our designated sleep room, located at the front of the building, is in use throughout the day. Could you provide assurances that LRV noise will not disrupt the building's interior? We request the inclusion of proven soundproofing measures, such as cladding or soundproof windows, to minimise disruptions, particularly for our young children."	<p>Mellow Spring Childcare have raised concerns regarding noise impacts on their premises during the operation of the Luas. Section 15.4.1.5 of Volume 3 of the EIAR assesses the operational phase noise impacts of the proposed Scheme. Specifically, noise model receptor R084 which is located at the external façade of the Mellow Spring Childcare building. Figure 15.2 of Volume 4 of the EIAR illustrates the location of these and all other noise model receptors.</p> <p>The calculated unmitigated noise level during operation of the proposed Scheme at R084 is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none">Daytime Noise dB LAeq,16hrDaytime Peak Hour Noise dB LAeq,1hrNight-time Noise dB LnightNight-time Peak Hour Noise dB LAeq,1hr <p>In the case of receptor R084 only the daytime noise level is relevant as the building is not operated at night. The daytime noise levels due to operation of the Luas is of the order of 53 dB LAeq,16hr. This absolute noise</p>

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			<p>level is lower than the threshold of 55dB for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR.</p> <p>Furthermore, to put the calculated noise level in context reference is made to the noise monitoring described in Section 15.3.1 of Volume 3 of the EIAR. The closest monitoring location to the Mellow Spring Childcare building was AT6, as illustrated in Figure 15.1 of Volume 4 of the EIAR, which is on Mellowes Rd. Noise levels measured at this location were of the order of 68dB during the daytime. Therefore, the new noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic.</p> <p>Finally, in the vicinity of the Mellow Spring Childcare building the proposed track operates at low speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 3 of the EIAR.</p> <p>In conclusion the noise impact at the Mellow Spring Childcare facility has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant. Therefore, the inclusion of proven soundproofing measures, such as cladding or soundproof windows, to minimise disruptions, particularly for our young children is not required.</p> <p>The issue of construction noise has been considered, and a noise management plan is a requirement of the contractors work plan. Please refer to Table A6 1-5: Mitigation and Monitoring Measures (Construction Phase) of the Luas Finglas Preliminary Design & Statutory Process Construction Environmental Management Plan.</p>
8	4	<p>"The proposed Finglas Village Stop outside our centre could increase footfall, leading to concerns such as:</p> <ul style="list-style-type: none"> Anti-Social Behaviour: Potential drug use, trafficking, or loitering that could make families hesitant to use our services. Congregating Gangs: Increased activity could deter service users from feeling safe at Mellow Spring. " 	<p>The high sensitivity of the Mellow Spring Childcare is acknowledged in Section 8.2.5 (Population) of the EIAR. The Finglas Village stop will be located within a safer car free environment of a new civic plaza. The environment will be open, and the childcare centre will be very visible from the stop and so easy to locate. It is likely that the stop will result in greater footfall, and this will have a mixture of implications for sensitive subsets of the population, including parents with children. The number of people alighting at the stop will, in itself, provide for natural surveillance with regard to anti-social behaviour, combined with the provision of good lighting, security cameras and emergency help buttons.</p>
9	4	"Risk of injury: Young people unfamiliar with the new surroundings may face increased risks of accidents or incidents."	<p>Please refer to response provided to Item No. 4 above regarding provision of safe access during construction.</p> <p>The permanent scheme will provide a revised layout parking facility with a change to how drivers access it, and with footpath access provided between the car park and the current entry to the childcare facility, that element of the proposed works resembles the current arrangement. The introduction of the Luas line will require greater awareness by all road users at this location as they adapt to their new surroundings. The Luas line will have a knee-rail fence and a landscaped strip between the footpath and Luas line leading up the pedestrian crossing point, thereby acting as a barrier between the Luas and footpath. The speed of the Luas will be very low due to the presence of the LRV stop.</p>
10	4	"Explore alternative parking arrangements for staff."	Please refer to response provided to Item No. 2 and 3 above.
11	4	"Provide clear timelines and discuss the potential for rear access during temporary possession."	Please refer to response provided to Item No. 4 above.
12	4	"Implement soundproofing measures to mitigate noise disruption."	Please refer to response provided to Item No. 7 above.
13	4	"Conduct regular risk assessments and health and safety meetings to address construction related risks."	Please refer to response provided to Item No. 6 above.
14	4	"Confirm if operations will need to cease and provide relocation support if required."	Please refer to response provided to Item No. 5 above.
15	4	"Discuss security measures for the Finglas Village Stop to minimise risks for our service users."	Please refer to response provided to Item No.8 and 9 above.

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1	2	"At the moment we have 10 car park space's for 12 house's and 5 of these houses currently have 2 cars so that is 17 cars are parked in the estate at any given time so as you can imagine even without visitors we have no space at all"	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and limiting illegal parking at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use.</p> <p>However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.</p>
2	2	"We put our Black, Green and Brown Bins on the pathway to the entrance of our Estate every Wednesday for collection and they are placed where the Luas will be taking that area. According to the plans the Luas will be running on average every 3 to 4 minutes each way and as we only have 1 entrance into our Estate this is bound to cause an issue with traffic in and out of the Estate all day and every day"	<p>The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
3	2	"We have young kid's living in our Estate as well and play in the green to the left of the Estate so the only way they can access the green will be crossing the dangerous Luas tracks so as you can imagine the safety of the kids is surely going to be compromised."	The existing greenspace to the south of Ravens Court will still be accessible and usable by residents of Ravens Court. A footpath is proposed as part of the proposed Scheme running between the Luas line and the boundary to Ravens Court, specifically to facilitate residents of Ravens Court to access this green space and without needing to cross the LRV line. RO Landscape Drawing Plan No. D1-AL 32 3-4
4	2	"When the houses are getting an Oil delivery the Estate is completely blocked and that's before they take planned 3 metres from the Estate."	<p>Please refer to response to Item No.2 above</p> <p>Permanent land acquisition of existing green space will vary in width from 2.3m to 3.7m.</p>
5	2	"Impact on property prices"	"Section 8.6.3.1 of EIAR Chapter 8 (Population) describes the possible impact on local property prices based on a review of the literature associated with previous light rail schemes in Ireland. Typically, it has been found that property prices tend to rise in the vicinity of stations. It is also acknowledged in this section that the value of properties can also fall if subject to negative environmental effects by virtue of being in very close proximity to tracks. The outcome for Ravens Court is therefore subject to a degree uncertainty in that, while the estate is located close to the LRT and therefore subject to a moderate negative effect with regard to noise, it is also located within a 5 minute walk of the proposed Finglas Village stop. While there will be a negative effect during construction on two private gardens and an area of the public green space, the estate will also continue to be situated within a landscaped walled enclosure and therefore, visibly separated from passing LRVs.
6	2	"Our Estate is a lovely small private place to live and I feel with the Luas running every 3 to 4 minutes will significantly devalue our Homes."	Please refer to response to Item No. 5 above
7	2	"We are going to be basically blocked in by the Luas with its regular running every few minutes plus"	<p>TII acknowledges the concerns raised regarding potential traffic disruption at the estate entrance due to the Luas crossing.</p> <p>The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p> <p>The design of the crossing prioritises safety and the minimisation of delays through the following measures: Low LRV Speed: LRVs will be limited to a maximum speed of 10 km/h at this location, ensuring sufficient stopping distances and safe interaction with vehicular traffic.</p>

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			<p>High Visibility: The crossing has been designed to ensure excellent visibility for both vehicle drivers and LRV drivers.</p> <p>Controlled Interaction: The combination of low LRV speed and high visibility is intended to facilitate controlled and predictable interaction between LRVs and vehicles.</p> <p>It is important to note that the crossing of estate entrances, non-signalised junctions, and entrances to car parks by LRVs is a feature of the existing Luas network and is managed safely and effectively. The design principles at the Ravens Court entrance are consistent with those used in these existing situations.</p> <p>In addition, due to the low volume of vehicular traffic using the Ravens Court estate entrance and the excellent sightlines at the crossing, signalisation is not required. This means that residents will not experience delays waiting for traffic signals to change when entering or exiting the estate."</p>
8	2	"When they are actually constructing the project and they have not taken into consideration if an Ambulance or Fire Engine needs to access our Estate to deal with an Emergency"	<p>Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>As detailed in section 1.3.1 of the CTMP (Appendix A6.2) When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.</p>

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1	3	"I don't believe you have thought through this decision properly" "you can't have done a thorough survey of the area"	<p>TII confirms that a robust option selection process was undertaken to determine the alignment for proposed Scheme. As described in Chapter 1 - Introduction, section 1.9 the consultation on the Preferred Route took place over an eight-week period from December 7, 2021, to January 31, 2022. As part of this process, an online meeting was held with Ravens Court residents on December 8, 2021, followed by an in-person meeting on January 8, 2022. Additionally, several meetings have taken place with TII and local residents to discuss alternative alignments at Ravens Court and gather further input.</p> <p>The Option Selection study was carried out in two stages. In Stage 1, an initial high-level assessment was conducted - sometimes called a "sifting" process - to evaluate different route options. This assessment considered how well each route could meet the project's goals and whether they could realistically be built. A total of 29 potential route options were explored at this stage.</p> <p>After this process, four options were selected for further review in Stage 2. In January 2020, the Emerging Preferred Route (EPR) was identified, and a Non-Statutory Public Consultation (NSPC) was held to gather feedback from the public and stakeholders. The input received during the consultation was carefully reviewed alongside additional proposed improvements to the route and its design. As a result of this feedback and analysis, several changes were made to the EPR, leading to the selection of the final Preferred Route (PR). Chapter 4 – Alternatives Considered provides details of the various alternatives considered during the preliminary design development stage.</p> <p>One of the key changes involved the area around Mellowes Crescent and Mellowes Court. Originally, the proposed route passed through the Mellowes Crescent and Court estates, forming a sharp "S" curve before crossing Mellowes Road about 40 metres west of Finglas Fire Station. During the public consultation held from July to September 2020, residents expressed concerns that this design could divide their community. To address these concerns, the Luas Team carried out further assessments, comparing the EPR to alternative route options between Cappagh Road and Mellowes Road. These alternatives underwent a full suite of environmental assessments to ensure they were thoroughly evaluated. Based on this review, adjustments were made to the alignment at Ravens Court/Mellowes, leading to the final selection of the Preferred Route (PR).</p>
2	3	"Part of our estate is being taken to accommodate this preferred route. Currently there is little space for residents to park their cars, if part of the estate is taken this will leave the already tight parking facility even more stretched. We already have to park cars on what little green space we have due to the limited number, and this will be stripped away from us further. There are more cars in the estate, and I guarantee the days you came to "investigate" the area you came at 10/11 am when everybody was out working and thought there's loads of space for us to steal."	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and limiting illegal parking at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use.</p> <p>However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.</p>
3	3	"Ravenscourt is a very small, quiet estate and with a Luas running roughly every 5 minutes I believe both ways this will lead to a very noisy and unsafe place to live as a walkway is also planned."	<p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p> <p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8</p>

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			<p>is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p> <p>Notwithstanding this, the assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design which screens Ravens Court from the Luas tracks.</p> <p>In conclusion the noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p> <p>In terms of the walkway, the proposed Scheme is dedicated to promoting a sustainable modal shift by encouraging public transport and active travel.</p> <p>In terms of security, the increased activity in the vicinity of stops, and the provision of LRT services will provide a level of passive surveillance by drivers and passengers.</p>
4	3	"We have no gas plumbed into our estate which means all the residents have oil heating. Currently when a truck is delivering oil to a house nobody can get in or out of the estate until the truck has finished its delivery. Now it takes about 10 minutes for a truck to deliver oil with taking out the pipes and filling the tanks. If a Luas is running every few minutes this truck will be on the tracks as it will have nowhere else to go. This will result in the Luas having to wait for the delivery to be finished."	Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.
5	3	"If emergency vehicles need to access a house urgently this will prove to be very difficult as with cars parked everywhere and a Luas running every few minutes it will be impossible to get to the emergency in quick time. This could result in someone losing their life."	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged.</p> <p>Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
6	3	"Also, God forbid there was a fire in one of the houses emergency vehicles would be unable to access the estate. Fire engines, ambulances, Garda vehicles and a Luas running. Would be total chaos and again loss of life."	Please refer to response to Item No.5 above.
7	3	"Currently we place our bins at the part of the estate where the Luas tracks plan to go. The bin truck won't enter the estate as it is too tight for it to manoeuvre. Our bins are left out at the entrance (where the Luas is running) and are collected from there. Again, takes about 6-8 minutes for a collection to happen and with a Luas every few minutes 2 will probably have to wait on the collection to finish."	Please refer to response Item No. 4 above.
8	3	"Apart from the noise of the Luas, the screeching of the brakes and the bell ringing as it takes the turn at the top of the estate."	<p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p> <p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that</p>

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			<p>slightly exceed the night-time absolute threshold of 45dB L_{night} as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p> <p>Notwithstanding this, the assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design which screens Ravens Court from the Luas tracks.</p> <p>In conclusion the noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p> <p>In the vicinity of Ravens Court, the proposed track operates at low speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 4 of the EIAR.</p> <p>Noise of Luas bell - In this particular location, with pedestrians set well back from the rail at controlled crossing points, which are also signalised together with LRV/road traffic, there should be no need for drivers to activate bells during normal operation.</p>
9	3	"When the construction of the tracks is happening, it will be impossible for the residents to come and go with ease as I mentioned earlier only one entrance in and out."	<p>As detailed in section 1.3.1 of the CTMP (Appendix A6.2) When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.</p>

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1	4	<p>"From the outset, this submission requests that An Bord Pleanála duly consider the negative implications arising on our client's lands. It is strongly contended that the proposed development has not had regard to the daily operations and development capacity of our client's lands at Manhattan Peanuts Ltd."</p>	<p>TII in the design, preparation, and assessment of proposed Scheme has had full regard to the daily operations and development capacity at Manhattan Peanuts Ltd. as discussed in more detail in the responses below.</p> <p>The proposed Scheme design and EIAR has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, , the Transport (Railway Infrastructure) Act 2001 (as amended) and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme and following an extended non-statutory public consultation process as evidenced in Luas Finglas EIAR Chapter 1 - Introduction and Luas Finglas EIAR 2024 Volume 1: Non-Technical Summary SECTION 6: CONSULTATION. The proposed Scheme has been designed to minimise as far as possible impacts on existing occupied premises on either side of the alignment.</p> <p>The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the Luas Finglas EIAR 2024. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and the stakeholders will be kept informed and advised in accordance with the procedures set out in Luas Finglas EIAR 2024 Chapter 6 Construction activities and CTMP.</p> <p>Access from to the premises will be maintained throughout construction and alternative access will be provided prior to the existing access from St. Margarets Road being removed. A key consideration is traffic management during the construction stage so as to minimise the impact on the local community and traffic network, the works will be carried out in accordance with Volume 5, Chapter 6 of the EIAR and Appendix A6.2 the CTMP. Specifically, continuity of access will be maintained throughout construction. As noted in Section 1.3.1 "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area." No impact is envisaged to traffic and delivery movements during the operational phase of the proposed Scheme, and this will be maintained through construction.</p> <p>Chapter 2 of the submitted Luas Finglas EIAR 2024 establishes the overarching strategic approach to the Dublin City Council Development Plan 2022-2028 to 'to develop a low carbon, sustainable, climate resilient city'. The Plan identifies that key strategic transport projects, including Luas line extensions, will 'continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years'. The Chapter confirms that the extension of Luas to Finglas is supported directly under Policy SMT22 and that the design of Luas Finglas will inform the masterplanning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the Manhattan Peanuts lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network, providing a key link between proposed open spaces. It is further added that future development ratios, densities and height will be formed in this area to avail of this proposed public transport infrastructure and the development of a sustainable and compact urban form.</p> <p>As set out in Chapter 2 of the EIAR acknowledges that in February 2024, Dublin City Council adopted Variation No. 4 of the 2022 Dublin City Development Plan. This variation related to SDRA 3 Finglas Village Environs and Jamestown Lands and the incorporation of Jamestown Masterplan 2023 into the Development Plan by way of a new appendix. It is stated in the submission that the presence of the site within SDRA means it has significant development capacity but that the proposed scheme will have a negative impact on the lands. In policy terms, the Jamestown Masterplan 2023 is a detailed refinement of the SDRA framework – it is the policy instrument by which future development potential is identified and will be delivered. Part of the subject lands are identified for future 'residential led mixed use' having regard to their location along the Luas corridor, with the eastern component part of earmarked public open space.</p>
2	7 and 8	<p>"It is considered that the these works as part of the proposed development will significantly impact the ability of the subject lands to carry out their daily operations by impeding access to the site and resulting in complications for the future development of the site."</p>	<p>Noted. This is a statement to ABP and for the responses from TII please refer to items below.</p>
3	8	<p>"We would therefore request that the proposed works with regard to the subject lands should be revised to provide for an alternative solution to the route which is proposed within the boundary of the subject site, which would provide for a significant reduction of the impacts of the works on the subject lands."</p>	<p>Noted. This is a request to ABP and for the responses from TII please refer to items below.</p>

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4	8	<p>"The following text is an extract from Luas Finglas EIAR Chapter 5:</p> <p>The proposed Scheme necessitates the demolition and relocation of an electrical substation at the Manhattan Peanuts premises. The scheme proposes to remove access from the front of a number of premises along St Margaret's Road and a proposed rear access road is included in order to preserve vehicular access to these businesses. These alternative accesses will integrate with the Jamestown Masterplan infrastructure under development by DCC. Consultations with regard to the proposed accesses with DCC and the impacted landowners/leaseholders are ongoing.</p> <p>It is at the request of our clients that a site-specific solution is explored and implemented in order to ensure minimal interventions which have significant impacts on existing site conditions, with particular regard to the subject site situated at McKee Avenue and St. Margaret's Road."</p>	<p>The proposed access road at the rear of the premises is provided to ensure continuity of access for the general public and to provide access for the current business, and the site specific solution included as part of Luas Finglas has been developed following discussions with their representatives as indicated in Luas Finglas EIAR Chapter 1 - Introduction , Table 1-10: Key stakeholders and number of meetings held between 2020 and 2024, and has been designed so as to minimise impacts on adjoining landowners. The access road is aligned with the Masterplan for the Jamestown Business Park and has been discussed and developed in consultation with the relevant departments of Dublin City Council. It is the intent of TII to continue dialogue with all affected parties through the detailed design phase.</p>
5	13	<p>"The subject site is located within SDRA 3 - Finglas Village Environs and Jamestown Lands. These lands have been designated as an SDRA due to the proposed new public transport network under the new Luas Green Line extension and BusConnects. The plan recognises that the 214 lands constitute an important land bank for employment use in the city which it is considered strategically important to protect. The primary objective is to facilitate long-term economic development and regeneration in the city region. Relevant principles to achieving the objective of this zone are as follows:</p> <p>To support the economic revitalisation of Finglas Village.</p> <p>To provide for more varied and intense mix of uses within the Dublin Metropolitan Area.</p> <p>To maximise the potential of a well-connected but underutilised brownfield area located adjacent to the proposed Luas green line extension to Finglas, and proposed Finglas Core Bus Corridor.</p> <p>The lands situated to the north-east, along Jamestown Road, shall be developed at an approximate ratio of 70% employment/commercial (gross) and 30% residential (gross), to support the continuation of a sustainable working community in the area.</p> <p>The subject lands are considered to have significant development capacity due to the site's locational context, availability of services and amenities and support within the Development Plan for development of vacant and underutilised sites in well-served areas. It is considered, however, that the proposed development will have negative impacts on our client's land, significantly reducing the operational potential of the lands."</p>	<p>As set out in Chapter 2 of the submitted EIAR establishes the overarching strategic approach to the Dublin City Council Development Plan 2022-2028 'to develop a low carbon, sustainable, climate resilient city'. The Plan identifies that key strategic transport projects, including Luas line extensions, will 'continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years'. The Chapter confirms that the extension of Luas to Finglas is supported directly under Policy SMT22 and that the design of Luas Finglas will inform the masterplanning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the Manhattan Peanuts lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network, providing a key link between proposed open spaces. It is further added that future development ratios, densities and height will be formed in this area to avail of this proposed public transport infrastructure and the development of a sustainable and compact urban form.</p> <p>As set out in Chapter 2 of the prepared EIAR, in February 2024, Dublin City Council adopted Variation No. 4 of the 2022 Dublin City Development Plan. This variation related to SDRA 3 Finglas Village Environs and Jamestown Lands and the incorporation of Jamestown Masterplan 2023 into the Development Plan by way of a new appendix. The subject lands are identified for future 'residential led mixed use' having regard to their location along the Luas corridor.</p> <p>The submission states generally that the proposed Scheme design is not consistent with the Jamestown Masterplan, but it does not substantiate this. Chapter 2 of the Masterplan establishes the urban structure for the future development of the area. Figure 2.1 establishes the 'private vehicle access & movement strategy' for the area. As illustrated above, the proposed Scheme complies with the adopted movement strategy and will deliver a local street consistent with the Masterplan framework (refer to plan no. D1-GA 33 1-2). Further, while not mentioned in the submission, the Jamestown Masterplan includes another potential future local road north through the subject lands. The future delivery of this, independent of the Luas Finglas project, has land take implications for any redevelopment of the site.</p> <p>Chapter 6 of the Jamestown Masterplan identifies that western parts the subject lands are situated in the Phase 2 development area, with the following a key infrastructure requirement:</p> <p>"Luas Finglas either under construction or operational before the granting of planning permissions for residential developments".</p> <p>The eastern part of the site is in Phase 1 indicating that the site can be serviced earlier subject to delivery of key access streets in that phase.</p> <p>The Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. The subject lands are located in area A with the following measures identified:</p> <p>"Access to the Manhattan Peanuts and Murdock's site to be provided from a new access street off McKee Avenue to the property boundary, if Luas Finglas operations prevent the continuation of access from St Margaret's Road. Any proposed expansion of Manhattan Peanuts and Murdock's existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site".</p> <p>It follows that the adopted Jamestown Masterplan allows for alternative access arrangements to be developed to support the maintenance of the existing use on the site.</p> <p>[Note: it is recommended that the site-specific access solution from McKee Avenue be reviewed to minimise any potential impact. Delivery of this to be sequenced ahead of closure of St Margaret's Road access]</p>

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6	13	<p>"The principal concern of our client arising from the proposed railway order application relates to the negative impact of the works on the access to the subject lands.</p> <p>Transport Infrastructure Ireland intends to develop Luas Finglas within the next 15 no. years and so the proposed development as included with the railway order application proposes significant impacts to the capacity of the lands to develop, due to the works required to facilitate the route."</p>	Please refer to response to Items No. 4 and 5 above.
7	16	<p>"While it is acknowledged that the proposed works are to provide the necessary infrastructure improvements to facilitate the expansion of the Luas network, it is at the request of our client that an alternative solution to the proposed works is proposed in order to ensure the protection of the existing businesses and development capacity of the site."</p>	<p>The proposed Scheme has been through a series of non-statutory public consultation and direct meetings with stakeholders as detailed in Luas Finglas EIAR 2024 Chapter 1: Introduction and in Luas Finglas EIAR 2024 Volume 1: Non-Technical Summary: Section 6 Consultation. The Environmental Impact Assessment (EIA) has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme. The RO application comprises a detailed environmental impact assessment that has identified and assessed the potential environmental impacts of Luas Finglas and proposed mitigations for these impacts where necessary.</p> <p>TII confirms their intention to continue engagement with all the stakeholders and their representatives during the detailed design and construction stages.</p>
8	16	<p>"Murdock Builders Merchants currently operate a clockwise one-way system, with entry along the lefthand side of the building to the north of the site. Entry to and exit from the site is via the same gate. Regular customers park and load in the yard to the rear of the building, to the east of the site. Intermittent customers will generally follow the one-way system and park in one of the 12 parking bays to the front of the building. If they require yard goods, they then follow the one-way system around the back of the building, load and then exit.</p> <p>Larger supplier vehicles are unable to use the one-way system and turn in the yard area and are directed out against the one-way flow."</p> <p>"The proposed Luas Finglas route, running along St Margaret's Road is located within a portion of the Murdock Builders Providers site. Therefore, the occupiers will be unable to maintain their current system."</p>	TII acknowledges that a change to the current circulation and access arrangement is required and this is recognised in the proposed Scheme and assessments as detailed in Luas Finglas EIAR Chapter 12 – Land Take, and Luas Finglas EIAR 2024 Chapter 8 – Population and during discussions with the stakeholders including Murdock's Builders Merchants (Ireland) Ltd. when alternative access, parking etc was discussed.
9	16	<p>"It is also worth noting that two of the existing external fire exists are located on the St Margaret's Road elevation of the building. These will also be impacted by the proposed route."</p>	Fire exit routes to St Margaret's Road are still available from the building as a footpath is provided alongside the building.
10	16	<p>"Murdock Builders Providers welcome the alternative access route which is proposed under the current Railway Order. This will ensure their existing 414 vehicular movements, and 120 pedestrian movements can continue without any impact on the Luas' journey."</p>	Noted
11	17	<p>"It is at the request of our client that an alternative solution to the proposed works is proposed in order to ensure the protection of the existing businesses and development capacity of the site."</p>	Please refer to response to Items No. 4 and 5 above.
12	17	<p>"However, the proposed access road from McKee Avenue to the south involves a large portion of land directly east of the Murdock Builder's Merchants site and does not create an acceptable entrance to Murdock's site. Essentially, the design of the access road, as currently proposed by Transport Infrastructure Ireland, is harmful to Murdock's daily operations and future plans."</p>	Please refer to response to Item No. 8 above. TII confirms their intention to continue engagement with the stakeholders and their representatives during the detailed design and construction stages
13	17 and 18	<p>"Therefore, Murdock's must enter into a commercial agreement with the neighbouring landowner in order to design and implement an entrance and parking area that is functional and appropriate. The cost of which, will need to be included in the compensation afforded to those impacted by Luas Finglas.</p> <p>If Murdock's Builders Merchant is to be accessed from the rear, as proposed within the Railway Order, then the existing warehouse will need to be entirely reconfigured. Currently, the retail area is to the front of the warehousing facing St Margaret's Road with the building material storage area to the rear of the warehouse. The new entrance will demand that these areas are reversed. The retail shop will need to be relocated to the rear of the warehouse to allow customers to safely access the shop and the building material store will need to be relocated to the new rear of the warehouse. This will require a total strip of the existing warehouse and a rebuild of the retail shop and storage areas at a substantial cost.</p> <p>Essentially, the retail area and warehouse will need to be relocated and reconfigured as the new rear entrance will not be appropriate for the store in its current format and would result in a health and safety risk to anyone visiting the premises. The compensation afforded will also need to take account of this required change."</p>	<p>TII confirms their intention to continue engagement with the stakeholder and their representatives during the detailed design and construction stages.</p> <p>As set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, compensation is not a factor in the assessment of impacts nor the mitigation thereof for the purposes of the environmental impacts assessment to be conducted by the Board. However, as is also set out in section 12.5.2 of Chapter 12: Land Take of the EIAR, pursuant to section 45(1) of the Transport (Railway Infrastructure) Act 2001 (as amended), upon commencement of the RO, TII will be authorised 'to acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order and, for that purpose, the RO shall have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No.2) Act 1960 (inserted by Section 86 of the Housing Act 1966), which has been duly made and confirmed' with necessary modifications. Accordingly, TII is authorised to serve a Notice to Treat pursuant to the provisions of the Housing Act, 1966 (as amended), including Section 79 thereof.</p> <p>Therefore, in the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement,</p>

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			<p>will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p>
14	18	"The disruption caused by the proposed works will have a detrimental impact on Murdock's business operations. Delays in service due to altered traffic flows and increased manoeuvring times for HGVs will result in slower turnaround times for deliveries and collections. This will lead to frustration and inconvenience for their customers, who rely on timely service for their projects and businesses and increase the likelihood of customers seeking alternative suppliers who can offer more efficient service, resulting in a loss of business and revenue for Murdock's."	Noted. Please refer to response to Item No. 13 above.
15	18	"Murdock's will be able to design their own new entrance to the site, as well as include a small accompanying car parking area. Therefore, we would request that the access route is substantially minimised in order to allow our client to continue to operate, in line with the adopted Jamestown Masterplan."	<p>Please refer also to the response to Item No.4 above.</p> <p>TII confirms its intention to continue engagement with the stakeholders and their representatives during the detailed design and construction stages with regard to the access route.</p> <p>The submission states that the access road in the RO does not align with the Jamestown Masterplan, but the basis for this view is not established. Chapter 2 of the Masterplan establishes the urban structure for the future development of the area. The adopted Jamestown Masterplan establishes the 'private vehicle access & movement strategy' for the area. As illustrated, the Proposed Development complies with the adopted movement strategy and will deliver a local street consistent with the Masterplan framework.</p>
16	19	"It is also worth noting that the access road, as depicted within the Railway Order does not align with that contained within the Jamestown Masterplan. The documents submitted as part of the Railway Order refer to the Jamestown Masterplan as being "under development". This would seem to indicate that Transport Infrastructure Ireland have not updated the EIA since the Masterplan has been adopted, even though Transport Infrastructure Ireland were included in discussions surrounding the adoption of the Masterplan. Therefore, the submitted EIA is inaccurate and a true assessment of the impact of the scheme as it affects Murdock's is challenged without accurate final design drawings, thus limiting the scope of the objection here lodged."	<p>The submission states that the access road in the RO does not align with the Jamestown Masterplan and suggests that the EIAR does not reflect the adoption of the Jamestown Masterplan. For clarity, on 12 February 2024, pursuant to Section 13 of the Planning and Development Act 2000, as amended, the Members of Dublin City Council resolved to adopt Variation No. 4 of the Dublin City Development Plan 2022-2028, in respect of SDRA 3 – Finglas Village Environs and Jamestown Lands and the incorporation of the Jamestown Masterplan 2023 into the Development Plan by way of a new appendix and this is set out in Chapter 2 Section 2.2.5 (Local Policy Context) of the EIAR.</p> <p>Chapter 2 of the Masterplan establishes the urban structure for the future development of the area and is an important consideration for the proposed scheme.</p> <p>As set out in Chapter 2 Section 2.2.5 of the EIAR, the proposed scheme (referred to in the masterplan as Luas Finglas) is aligned with the Jamestown Masterplan and the vision set out in the masterplan i.e. "The Jamestown Masterplan will regenerate 43 hectares of strategically placed low intensity industrial lands and will deliver a sustainable, mixed-use neighbourhood with a focus on new homes, creating new and supporting existing jobs, complemented with high quality community amenities and open spaces. Capitalising on significant state investment in public transportation (Luas Finglas and BusConnects), Jamestown has the potential to become an exemplar in urban design-led planning, underpinned by sustainable mobility, green infrastructure and sustainable urban drainage, addressing climate change adaptation."</p> <p>The Masterplan includes measures to support existing uses while facilitating envisaged masterplan change in the area. In this regard, TII notes that Section 6 of the Jamestown Masterplan does not restrict the provision of such an access to service established businesses:</p> <p>"Any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site".</p> <p>Having regard to the above, the Luas Finglas scheme complies with the Jamestown Masterplan.</p>

Submission No.	34		
Submitted by	Murdock Builders Merchants (Ireland) Limited (Hughes Planning & Development Consultants on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
			<p>TII notes that the submission made by Dublin City Council, that confirms that regenerative mixed use development proposals along the proposed route at, inter alia, Jamestown, “have / are being developed to ensure compatibility with the project delivery and future operation” of the Luas.</p> <p>Therefore, there is no question but that the EIAR for Luas Finglas is accurate and fully reflects the adopted Jamestown Masterplan, and that the Board has sufficient information to enable it to carry out an environmental impact assessment of Luas Finglas.</p>
17	19	“We would strongly request that a condition is attached to the railway order which instructs the developer that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access from being removed.”	<p>TII confirms that access will be maintained at all times and that any disruptions will be discussed with the landowners in advance in accordance with EIAR Chapter 6 (Construction Activities) and Appendix A6.2 (CTMP). Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in EIAR Chapter 6 (Construction Activities). The sequencing of the programme is shown in Figure 6-2: Construction Programme, Section 6.3.3. Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP.</p> <p>Specific measures for St Margaret's Road are also included in the A6.1 CEMP Table A6 1-5 including Mitigation number PM-23 “TII will ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the Jamestown Masterplan, where existing access will be directed impacted by the proposed Scheme. Provide highly visible signage to direct customers and suppliers to this new access”. There is therefore no requirement for any condition in this regard to be attached to the RO.</p>
18	20	“There was not any phasing plans submitted as part of the Railway Order and therefore the sequencing of the construction of Luas Finglas is unknown. This is a significant oversight by the Applicant. As it stands, there are no measures to ensure that our client can access their site continuously, as the Luas extension is being constructed.”	<p>The existing access will not be removed until the new road and access is available to use. Construction phasing has been considered throughout the process, and this is detailed in Section 6.3 Construction Phasing in Chapter 6 of the Luas Finglas EIAR 2024. The sequencing of the Programme is laid out in Section 6.3.3 where works along St Margaret's Road are estimated to be undertaken in the initial 18 months of the programme.</p> <p>Measures to ensure continuity of access are addressed in Section 1.3.1 of the CTMP as referred to in a previous response.</p> <p>Specific measures for St Margaret's Road are also included in the A6.1 CEMP Table A6 1-5 including Mitigation number PM-23 “TII will ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the Jamestown Masterplan, where existing access will be directed impacted by the proposed Scheme. Provide highly visible signage to direct customers and suppliers to this new access”</p>
19	20	“Given the lack of a detailed design of the actual scheme and ...”	<p>The EIAR has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, the Transport (Railway Infrastructure) Act 2001 (as amended), and the Planning and Development Act 2000, (as amended), ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme. The RO application comprises includes a detailed environmental EIAR that has identified and assessed the potential environmental impacts of Luas Finglas and identified proposed mitigations for these impacts where necessary.</p> <p>The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the EIAR. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and the stakeholders will be kept informed and advised in accordance with the procedures set out in Luas Finglas EIAR 2024 Chapter 6 Construction activities and CTMP.</p>
20	20	“...the lack of a detailed scheme of mitigation measure showing how the business is to operate, it is our view that it would be premature for the Board to approve the scheme at this juncture.”	Please refer to response to Item No. 19 above.
21	20	“We request, in the strongest possible terms, that a condition is attached to the Railway Order which instructs the developer that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access from being removed.”	Please refer to response provided to Item No.17 above.
22	20	“It appears that due regard has not been had for the impact on our client's site and its daily operations.”	Please refer to responses provided to Items No.7, 8 and 19 above.
23	20	“The proposed works will significantly reduce accessibility and the potential for our client to expand, therefore impacting on the land value.”	Please refer to responses provided to Item No.13 above.

Submission No.	34		
Submitted by	Murdock Builders Merchants (Ireland) Limited (Hughes Planning & Development Consultants on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
24	20	"It is considered that the proposed works, specifically those impacting existing retailers on St. Margaret's Road have been designed without due regard to the subject lands within our client's ownership."	Please refer to response provided to Item No.7 above.
25	20	"In sum, Murdock's Builders Merchants will be severely affected by the proposed Railway Order"	Please refer to responses above on specific issues raised.
26	20	"A generic solution is proposed by Transport Infrastructure Ireland as opposed to an engineered site-specific solution. It is requested that the new access route from McKee Avenue should be revised to mitigate the proposed impacts on the subject lands. We would therefore request that An Bord Pleanála consider the impacts of the proposal to ensure that the route works are revised to provide for such which will have a significantly reduced impact on our client's lands."	Please refer to response provided to Item No.7 above.
27	20	"The Environmental Impact Statement is and remains incomplete, due to the lack of proper information regarding how the proposed design correlates with the adopted Jamestown Masterplan."	Please refer to response provided to Item No.16 above.
28	20	"If the Board is minded to approve the Order, then a condition must be attached to the Railway Order which instructs the developer that the proposed road from McKee Avenue is built and in operation prior to the St. Margaret's front access from being removed."	Please refer to response provided to Item No.17 above.
29	20	"The scheme will have a severely detrimental effect on the Murdock's business enterprise, the enjoyment of the property and the ability to sustain, develop and diversify the business practices when required in order to maintain the viability of the business."	Please refer to responses above on specific issues raised.

26Submission No.	35		
Submitted by	National Transport Authority		
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1	7	"It is the view of the NTA that the proposed development should, where feasible, cater for the delivery of elements of the cycle network within and adjacent to its boundary and provide for the maximum level of continuity between cycle elements of the proposed scheme and the wider network. However, it is not the purpose of the proposed development to provide for all elements of the Finglas cycle network to the west of the Finglas Road. In this regard, the NTA is satisfied that the proposed development would make a positive contribution to achieving the objectives of the GDA Cycle Network Plan within the constraints of a light rail scheme."	The NTA's perspective on incorporating elements of the cycle network within and adjacent to the proposed development is acknowledged. The Luas Team remains committed to ensuring that, where feasible, the proposed Scheme enhances cycling connectivity and aligns with the objectives of the GDA Cycle Network Plan. During the development of the design TII has liaised with the NTA in relation to the provision of cycle infrastructure and consistency with the GDA Cycle Network Plan. Within the constraints of a light rail scheme, TII will contribute meaningfully to improving cycling infrastructure, facilitating modal shift, and promoting LRT-cycle integration.
2	7	"To maximise this contribution, the applicant should ensure that the design reflects the latest requirements of the NTA's Cycle Design Manual, particularly in relation to the widths of some links and the continuity between sections. It is the NTA's understanding, as the Approving Authority for this project, that it is the intention of the applicant to address these matters through the planning and detailed design process and that the attachment of a condition in this regard would be welcome...NTA Recommendation : The NTA recommends that a condition is attached to any approved Railway Order which states that cycling facilities will be provided in a manner which is consistent with the NTA's Cycle Design Manual."	The recommendation from the NTA regarding adherence to the Cycle Design Manual is acknowledged and accepted. Cycling facilities will be reviewed and amended as necessary during the Detailed Design stage to ensure full compliance with the latest requirements of the manual. A condition attached to the RO in this regard is acceptable, and the Luas Team remains committed to delivering high-quality cycling infrastructure that aligns with national standards and supports sustainable transport objectives.
3	7 & 8	"The NTA, in March 2024, was granted permission by An Bord Pleanála for the construction of the Ballymun / Finglas to City Centre Bus Connects Core Bus Corridor Scheme (ABP Reg. Ref. No. HA29S.314610). Part of this permitted scheme overlaps with the proposed development at the North Road/ St. Margarets' Road junction. The NTA is satisfied that the design of Luas Finglas adequately considers the requirements of the BusConnects scheme ensuring the objectives of BusConnects will continue to be delivered. To date there has been a high level of co-ordination between the Luas Finglas and BusConnects projects and NTA it is intended to continue this coordination between TII and the NTA during the detailed design, construction, and operational phases as necessary. As the NTA is the Approving Authority for Luas Finglas and the Sponsoring Agency/ applicant for the BusConnects scheme, the required coordination will be undertaken as a matter of course. NTA Recommendation: The NTA recommends that a condition is attached to any approved Railway Order which states that TII will liaise and co-ordination with the NTA BusConnects Ballymun / Finglas to City Centre Core Bus Corridor Scheme Project team."	TII will continue to liaise with the NTA BusConnects Ballymun/Finglas to City Centre Core Bus Corridor Scheme Luas Team, and any condition attached to the RO requiring such coordination is acceptable and will be implemented.

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Submitted by	Niamh Mooney & Darren Hanlon		
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1	2	"Per maps provided and remote meeting with TII in October 2024, the distance between the walled access point to and from Ravens Court and planned Luas tracks, will be 2 metres (at a minimum). Before a vehicle or person enters into this 2 metre space in order to leave Ravens Court, TII have acknowledged there will be a "blind spot" for both the Luas drivers and those trying to leave Ravens Court, due to the position of a neighbour's walled back garden." This is a significant danger, which was not raised in TII's EIAR."	<p>While the presence of a boundary wall may create some level of obstruction at close range, the design has been developed to provide visibility distances above the required minimums. These measures are taken to ensure that both drivers and pedestrians can make safe and informed decisions before entering the Luas corridor.</p> <p>The proposed Scheme has been designed to ensure that drivers exiting Ravens Court and crossing the Luas line, have appropriate visibility in accordance with relevant design standards.</p> <p>The visibility distances in the proposals significantly exceed the minimum requirements, ensuring that drivers have sufficient sightlines before entering the Luas corridor.</p>
2	2	<p>Risks of Major Accident and Disasters (page 59, point 10.16 of TII's EIAR 2024 (EIAR))</p> <p>"Under the Risk of Major Accident and Disasters, TI I states "there were several risks that were deemed low and were not considered further. No high risks were identified." "Significant risks related to infectious disease such as Covid-19". This totally plays down the very real risk to life that Ravens Court residents raised..."</p>	<p>The Major Accidents and Disasters chapter in an Environmental Impact Assessment (EIA), as per EPA guidelines, assesses the likelihood and consequences of significant accidents or disasters arising from the proposed project. Its purpose is to evaluate risks related to hazardous materials, technological failures, environmental hazards (e.g., fires, explosions, chemical spills), and natural disasters (e.g., floods, earthquakes) that could cause serious harm to human health, the environment, and infrastructure.</p> <p>Design-related risks addressed under Health and Safety regulations, engineering standards, and project design reviews, rather than environmental risk assessments. The Major Accidents chapter focuses on low-probability, high-consequence events linked to hazardous materials, natural disasters, and large-scale failures impacting the environment and human health.</p>
3	3	"...risks which were never addressed by TII, other than to incorrectly say that there are no known fatalities, due to Luas drivers not able to stop in time, to avoid colliding with a person, when quite a few deaths were caused by this, as reported in the media over the years."	<p>TII understands the concerns about the safety of pedestrians, especially children, at the entrance to Ravens Court and along Cardiff Castle Road, with the introduction of the Luas. TII is dedicated to delivering a Luas system that is safe for all road users and will implement appropriate operational or design safeguards as necessary.</p> <p>The Luas Finglas project incorporates several key features to protect pedestrians in this particular area:</p> <ul style="list-style-type: none"> Slow LRV Speeds: LRVs will be travelling at a low speed near the entrance to Ravens Court. This is due to the nearby signalised junction at Mellowes Road, the layout of the track as approach and depart Luas Finglas LRV stop, and the proximity to the estate entrance. Slow speeds significantly reduce the risk of accidents. Clear Visibility: The design ensures that both LRV drivers and pedestrians will have a clear, unobstructed view of each other. Driver Training: Luas drivers are trained to operate the vehicle on the route. They will be aware of pedestrian crossing locations and desire lines along the route. Designated Pedestrian Crossings: There will be clearly marked pedestrian crossings near the entrance to Ravens Court, providing safe and designated places for residents to cross the tracks. These crossing will comply to all relevant safety standards. Separate Footpaths: Continuous footpaths run alongside the tracks, keeping pedestrians safely separated from both the LRVs and road traffic. Safety Regulation: The safe operation of Luas is regulated in Ireland by the CRR and TII will continue to engage with CRR throughout the project, to ensure that any hazards are properly controlled and managed. <p>Luas has a strong safety record in Dublin, and this new extension is designed with the same required high safety standards. The design meets all relevant safety regulations and guidelines for pedestrian safety near light rail lines.</p> <p>Regarding the issue of access to Ravens Court by pedestrians, including children, older people and persons with disability, an uncontrolled intersection is proposed at the entrance to the estate. The LRV line crossing outside of the boundary to the estate, together with passing LRVs, will introduce an element of social and physical severance which is assessed in Section 8.4.3.2 as being significant, negative and long-term. The effect of this severance will be mitigated as far as possible by a slight relocation of the entrance to maximise visibility for people entering or leaving the estate. A pathway will be provided from Ravens Court to the green space to the south and secure fencing will ensure safe segregation from the LRV line. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature needed to join Mellowes Road. Some relief from severance is also provided by the new direct access that will be provided alongside the LRT to community facilities on Mellowes Road.</p>

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Submitted by	Niamh Mooney & Darren Hanlon		
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			<p>Additionally, the distance from the LRV swept path envelope to the wall at the point where pedestrians emerge from the northern footpath at Ravens Court is over 2.6m, providing a wide dwell area and allowing sufficient space for pedestrians to assess approaching LRVs before crossing.</p> <p>Pedestrians intending to cross the Luas tracks will be presented with the standard suite of traffic signs, pavement markings and surface treatments to alert them of the presence of the crossing.</p> <p>Regarding the issue of access to Ravens Court by pedestrians, including children, older people and persons with disability, an uncontrolled intersection is proposed at the entrance to the estate. The LRT crossing outside of the boundary to the estate, together with passing LRVs, will introduce an element of social and physical severance which is assessed in Section 8.4.3.2 as being significant, negative and long-term. The effect of this severance will be mitigated as far as possible by a slight relocation of the entrance to maximise visibility for people entering or leaving the estate. A pathway will be provided from Ravens Court to the green space to the south and secure fencing will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature need to join Mellowes Road. Some relief from severance is also provided by the new direct access that will be provided alongside the LRT to community facilities on Mellowes Road.</p> <p>The safe operation of a light railway is regulated in Ireland by the CRR and TII, or its contacted operator, is obliged to engage with them. Light rail systems in urban Dublin have been proven to have a relatively low incidence of accidents and these statistics are publicly available. This informed the determination of risk of a major accident and potential environmental impact associated with the proposed scheme. The benefits of the design of a light rail system is that it normally provides for a high degree of line of sight for those interacting with it thereby enhancing safety. Other measures such as LRV speed are determined according to the track layout and interactions with junctions. During operations, drivers are specifically trained to operate the vehicle on the route and to look out for key hazards associated with particular spatial elements of that route.</p>
4	3	"I have two young children, the risk posed by operation and construction are very concerning. The blind spot mentioned, and the speed of Luas (low speed area of 30km/h) can be fatal. Having a blind spot so near rail tracks is far from ideal and surely poses a risk of serious injury or death." "What about the primary schools surrounding Ravens Court and the children attending by walking down Cardiff Castle Road?"	<p>Please refer to response to Item No.1 above regarding alleged "blind spot" and boundary wall.</p> <p>Please refer to response to Item No.3 above regarding visibility for pedestrians.</p>
5		"Proper barriers and warnings are essential to prevent accidents."	<p>Standard Luas warnings for crossings will be provided for both drivers and pedestrians and will take the form of alternative surfacing, traffic signs and road markings.</p> <p>A gate is not feasible as there would be insufficient distance from the likely gate location to the Luas swept-path envelope. Any vehicle bigger than a car and waiting for the gate to open could therefore potentially cause an obstruction on the Luas track. There are also safety concerns with having an unsupervised automatic gate near to where children might be playing.</p>
6	3	"Given there is only one way in and out of Ravens Court, and this will not change, residents did not receive a satisfactory answer as to how any needed emergency services - ambulance, fire brigade etc. would access the estate without delays - considering a Luas will be passing by, in both direction every 3.5 minutes at peak times, and 7.5 off-peak, likely up to 12.30pm (this is per TII at our remote meeting in October 2024). This is a significant risk to life that, again, was not outlined in TII's EIAR. Insufficient planning for emergency services access during or after the construction phase."	<p>The frequency of LRVs is described in more detail in Section 5.8.14 of the EIAR, where it is assumed that the proposed Scheme will be operated with a peak hour headway of 7½ minutes at the opening of the extension (year 2035) with 4 additional LRVs on-line. In the long-term horizon, the peak hour headway could be reduced to 5 minutes, with 6 additional LRVs on-line.</p> <p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>

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7	3	"Due to the single access area, and closeness of the tracks to it, residents will be running a gauntlet, trying to go about usual activities, it is highly impractical and dangerous to place Luas tracks at Ravens Court's only point of access."	Please refer to response to Item No.1 above regarding vehicular and pedestrian access.
8	3	"Oil deliveries, bin collections, general deliveries to residents will be impacted also, and those providing these services will also be put at risk of injury."	Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.
9	3	"By taking planned 3-4 metres from Ravens Court estate frontage, residents will be further hemmed in, with green space previously used for leisure and child play being used to park resident and visitor vehicles. The area is already used to full capacity."	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and limiting illegal parking at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use.</p> <p>However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.</p> <p>The proposed Luas Finglas will require the relocation of the western boundary wall 2.25m high, to be rebuilt between 3.7 and 2m closer to the residential properties and reducing the amount of grass in the semi-private open space.</p> <p>The construction works would also require the removal of 2 trees along this area. Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR. The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit it smaller in size.</p> <p>As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents. Additional landscape design mitigation measures could be proposed that are not currently shown on the landscape design drawings, these measures are listed below. They would not mitigate the loss of green space, but they would enhance the quality of the semi-private open space in terms of functional and aesthetics.</p> <ul style="list-style-type: none"> Feature tree planting along the western boundary of the courtyard to reduce visibility of the OCS and to further enclose the cul de sac and retain the intimate character of the area. Evergreen flowering climbing plants grown against the proposed wall which will enhance the western boundary and improve the view in that direction from the residential properties. Street furniture i.e. south and east facing seating adjacent to the boundary wall to increase outdoor use of the space for courtyard residents. Grasscrete paving within the parking spaces of the courtyard to reduce the amount of hard surface. <p>A loss of green space is acknowledged, but sufficient green space will remain to provide an amenity for children's play. A pathway will be provided from Ravens Court to the green space to the south. Secure fencing along this pathway will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature needed to join Mellows Road.</p>
10	3	"We have been told that this land grab could increase by 2 metres, due to "limits of deviation", after construction begins."	Appendix A5.2 (Volume 5) deals with limits of deviation wider effects. Section 1.4 of this report identifies a number of locations where it is not possible not apply LODs due to constraints in the immediate vicinity of the proposed Scheme. This restriction includes the alignment along Cardiff Castle and Ravens Court.

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11	3	"This greatly impacts negatively on the green space available and on mental health, due to the imprisoned feeling being imposed, because the little green space we did have is being taken. To note - Ravens Court won a Dublin City Council award in recent times, for our composting initiative and work on our green area, we have lost heart this year to continue our good work, because TII have made it clear our green area will be demolished to make way for the construction, necessary to facilitate the Luas."	<p>In relation to the potential effect on mental health this has been extensively discussed in the Human Health Chapter 7 of the EIAR. I would reference section 7.2.2.8 and the potential for psychological effects the methodology section as well as the psychological impacts of both the construction and operational phases which is outlined in 7.4.2.1 and 7.4.2.2.</p> <p>While it is accepted that some loss of space and amenity is unavoidable particularly during the construction phase this will be minimised where possible.</p> <p>It should also be noted that there are potential for positive psychological effects in the operational phase and some of the greatest benefits are available to residents who live close to the line.</p> <p>A loss of green space is acknowledged, but sufficient green space will remain to provide an amenity for children's play. A pathway will be provided from Ravens Court to the green space to the south. Secure fencing along this pathway will ensure safe segregation from the LRT. LRVs will be approaching at low speed at this point given the access to Ravens Court, the presence of pedestrian crossings and the tight curvature need to join Mellows Road.</p>
12	4	"TII say they can guarantee our houses are not close enough to the construction/tracks, to be affected by vibrations, they are more concerned about the impact vibration will have on the Garcia Station (per remote TII meeting held in October 2024). The Garda Station is not closer than our houses to the tracks and construction sites, so this statement about the Garda Station being more affected, is a concern. Houses are already 40 or so years old, so could be vulnerable to long term damage during construction, utility upgrading and on-going Luas operations once all is in place."	<p>With regards to vibration during construction Section 15.2.4.7 of Volume 3 of the EIAR sets vibration thresholds which the construction stage of the proposed Scheme must remain within. Section 15.5.1.1 of Volume 3 of the EIAR specifies that monitoring must be undertaken during construction to ensure the works remain within the thresholds specified. The vibration thresholds outlined within the EIAR are to ensure that there is no risk of damage not even cosmetic damage.</p> <p>Section 15.4.1.5 of Volume 3 of the EIAR discusses the potential vibration impacts during operation. This assessment has concluded that at distances of greater than 4.5m from the track perceptible vibration within buildings will not occur. In conclusion the vibration impacts at Ravens Court during operation will not cause any long-term damage and are expected to be imperceptible.</p>
13	4	"On maps received in out Notice Pack we at Number 11 will have a period of time where our designated car space is unavailable. There was no answer when I queried what work would take place so close to my house and why outside my door needs to be dug up. I was also given no alternative on where to safely park our car/van during these works and no idea as to the length of this disruption not only to our parking but also to our footpath that leads directly to my front door. As I mentioned I've two young kids so this information is essential in our daily routines of school/creche/work pick up & drop off."	<p>As detailed in section 1.3.1 of the CTMP (Appendix A6.2) When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area.</p> <p>Section 1.3.16 deals with road closures - Road closures and diversions will need to be carried out during the Construction Phase of the proposed Scheme; however, these measures will be minimised wherever possible. Where necessary, road closures and diversions will take into consideration the impact on road users, residents, businesses etc. Road closures and diversions will be carried out with regard to Chapter 8 of the Traffic Signs Manual. All road closures and diversions will be consented to DCC and FCC, in consultation with the local authority and An Garda Síochána, as necessary. Access will be maintained for emergency vehicles along the proposed Scheme, throughout the Construction Phase.</p> <p>The works entail provision of a new boundary treatment, the new access arrangement, utility works and finishes. It is expected this would take 2 months.</p>
14	4	"On top of structural damage being a concern, the noise levels will increase significantly. TII say, because the LRVs will be slowing on approach to Ravens Court, and there will be grass tracks, the noise will be minimal - the key word here is "slowing", which means applying the breaks - I think we all know what that will sound like, we hear it enough when in Dublin City Centre - it is not pleasant and will be persistent."	<p>Section 15.4.1.5 of Volume 3 of the EIAR discusses the potential vibration impacts during operation. This assessment has concluded that at distances of greater than 4.5m from the track perceptible vibration within buildings will not occur. In conclusion the vibration impacts at Ravens Court during operation will not exceed a limit that may cause structural damage to property.</p> <p>Please refer to response to Item No. 5 below in relation to noise levels.</p>
15	4	"I note on page 37 of TII's EIAR, under "Human Health, point 10.1" it states "While some residents near new LRT stops may experience new noise sources, there will be no perceptible change in environment noise for most people." I guess the 40 or so Ravens Court residents will not be most people, and this noise pollution will be constant. Not to mention for those residents on the other side of the tracks along Cardiff's Castle Road."	<p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr

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Submitted by	Niamh Mooney & Darren Hanlon		
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			<p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p> <p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p>
16	5	<p>“I strongly believe that, had the Luas route come through Tolka Valley Park, taken a right along Tolka Valley Road, taking unused land to the front of the run down industrial estate there (opposite The Tolka, Prospect Hill Apartments), taken a left, to be adjacent Finglas Road (there is grass and large pathways all along here up to the Finglas Fly Over; this Flyover ends almost directly opposite Mellowes Park, where the current route is going to go towards Charlestown), disturbance to people's property and lives, could have been kept to a minimum. It is also a route with a lot of apartments along it, which would house a lot of Luas' customers.</p> <p>Another alternative that was never fully considered was the Luas going up Ratoath Road and turn onto Cappagh Road. This would have offered a service to the new residents of 8th Lock apartments as well Scribblestown Rise which lacks public transport services. It would also cater to patients/visitors to Cappagh Hospital as well as Coláiste ide giving Finglas a greater scope of people travelling into Finglas.”</p>	<p>An option east similar to this was assessed, Option 3K. This option was brought forward following the initial long list sifting exercise. A Multi Criteria Analysis (MCA) was then conducted on 14 Options including this Option 3K. This MCA assessed the options under Economy, Integration, Environment, Accessibility & Social Inclusion and Safety. The assessment concluded that this option (3K) scored significantly lower than other options on Social Inclusion, Safety, and Compatibility with Development Plans, lower than other options on Integration with Transport Policies and Impact on Material and Cultural Assets, but it delivered some or significant advantages over other options on Journey Time (very fast option), Catchment, and Key Trip Attractors. The results of this Stage 1 assessment were that Option 3K was not brought forward to the next stage. An option running up Ratoath Road and turning onto Cappagh Road was not considered. This is even further west than the options running up Cardiffsbridge Road (Options 1A and 1B). These options were ruled out due to them being too far from the core of the village, a high number of road junctions and being longer than other options. An option running up Ratoath Road would be even further from the Village, would also have a large number of junctions and would be even longer - approximately 5.5km thereby adding significant cost and run times. The Options brought forward were Options 2A, 3A and 3J. Option 3J which does follow part of Finglas Road was brought forward to Stage 2 Option Selection. Section 4.8.2 of the EIAR sets out the detailed assessments conducted including Benefit Cost Ratio and Multi Criteria Assessments which determined the Emerging Preferred Option, Route 2A.</p>
17	5	<p>“All along TI l's language, in the few meetings held with us, has been when this happens, not if, so it is very defeating to deal with that, and to have concerns brushed under the carpet, and not discussed properly. I feel this objection is the last chance for someone to challenge TII's plans, and highlight how dangerous they are, with risk factors needing to be acknowledged officially and addressed. I believe there was insufficient consideration of feedback from local communities, stakeholders, or experts and concerns that the planning process failed to provide transparency.”</p>	<p>TII regret that the impression was given that residents’ concerns were ignored. This is far from the case. TII has consulted extensively on the development of the proposed Scheme.</p> <p>As described in Chapter 1 - Introduction, section 1.9 the consultation on the Preferred Route took place over an eight-week period from December 7, 2021, to January 31, 2022. As part of this process, an online meeting was held with Ravens Court residents on December 8, 2021, followed by an in-person meeting on January 8, 2022. Additionally, several meetings have taken place with TII and local residents to discuss alternative alignments at Ravens Court and gather further input.</p> <p>The Option Selection study was carried out in two stages. In Stage 1, an initial high-level assessment was conducted - sometimes called a "sifting" process - to evaluate different route options. This assessment considered how well each route could meet the project’s goals and whether they could realistically be built. A total of 29 potential route options were explored at this stage.</p> <p>After this process, four options were selected for further review in Stage 2. In January 2020, the Emerging Preferred Route (EPR) was identified, and a Non-Statutory Public Consultation (NSPC) was held to gather feedback from the public and stakeholders. The input received during the consultation was carefully reviewed alongside additional proposed improvements to the route and its design. As a result of this feedback and analysis, several changes were made to the EPR, leading to the selection of the final Preferred Route (PR). Chapter 4 – Alternatives Considered provides details of the various alternatives considered during the preliminary design development stage.</p> <p>One of the key changes involved the area around Mellowes Crescent and Mellowes Court. Originally, the proposed route passed through the Mellowes Crescent and Court estates, forming a sharp "S" curve before crossing Mellowes Road about 40 metres west of Finglas Fire Station. During the public consultation held from July to September 2020, residents expressed concerns that this design could divide their community. To address these concerns, the Luas Team carried out further assessments, comparing the EPR to alternative route options between Cappagh Road and Mellowes Road. These alternatives underwent a full suite of</p>

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			environmental assessments to ensure they were thoroughly evaluated. Based on this review, adjustments were made to the alignment at Ravens Court/Mellowes, leading to the final selection of the Preferred Route (PR).
18	5	"Reiterating Risk to Life - I truly believe there will be a serious injury or accident, given the closeness of the tracks to the only access point for Ravens Court - TII acknowledges the blind spot that will be present here"	Please refer to response to Item No. 1 above.
19	5	"How this is not a strong feature within their EIAR is very concerning to me and shows me that TII's EIAR is a ticking of the box exercise, not a real duty of care report."	<p>TII confirms that the development of the EIAR is not a box ticking exercise. The proposed Scheme has been through a series of non-statutory public consultations and direct meetings with stakeholders as detailed in Luas Finglas EIAR 2024 Chapter 1: Introduction and in Luas Finglas EIAR 2024 Volume 1: Non-Technical Summary: Section 6 Consultation.</p> <p>The Option Selection study was carried out in two stages. In Stage 1, an initial high-level assessment was conducted - sometimes called a "sifting" process - to evaluate different route options. This assessment considered how well each route could meet the project's goals and whether they could realistically be built. A total of 29 potential route options were explored at this stage.</p> <p>The Environmental Impact Assessment (EIA) has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme. The RO application comprises a detailed environmental impact assessment that has identified and assessed the potential environmental impacts of Luas Finglas and proposed mitigations for these impacts where necessary.</p>

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Submitted by	Paul McAuliffe T.D.		
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1	3	“I am also hopeful that the project can be brought forward to an earlier construction date in the review of the National Development Plan.”	Noted.
2	3	“I welcome the proposals not to open pedestrian access from Lakeglen following a request by residents. It is important that this request is fulfilled.”	This commitment remains unchanged since feedback received from NSPC number 1.
3	3	“As outlined in the non-technical summary for the railway order "In order to accommodate the proposed scheme, the pitches are to be modified and relocated." I believe this is an opportunity for an all-weather pitch to build at this location to help combat the ongoing issue of pitches being called off in bad weather. Dublin City Council have also looked at providing an all-weather facility on site and a nearby site in conjunction with a number of clubs.”	<p>This submission queried the viability of delivering an all-weather pitch as part of the pitch relocation works to combat the ongoing issue of cancellations during adverse weather conditions. The Ecologist classified this grassland habitat type as of County level ecological importance, given its capacity to support the foraging activities of the internationally important Light-bellied Brent Goose and other protected wintering bird species (see Biodiversity Chapter 9, sub-sections 9.3.2.1 - Amenity (improved) grassland (GA2) and 9.3.2.3 - Wintering Birds). Furthermore, the operations of an all-weather pitch would also negatively impact all the other local fauna of value (e.g., breeding bird species of conservation concern) as a result of the consumption of the associated inorganic materials. For this reason, the provision of an all-weather pitch was not suitable at this location.</p> <p>Although the inclusion of an all-weather pitch was not feasible from a biodiversity standpoint, the playing pitches will be re-aligned and equipped with a new subsurface drainage system. The specific details of this system will be finalised during the detailed design phase. The project will involve installing a drainage network and associated outfall pipes, a stone subbase, and all associated works. Additionally, attenuation measures will be implemented along the perimeter of the new pitches to manage stormwater discharge. The stormwater from the pitches will be directed to an existing stormwater network through a flow control mechanism (such as a Hydrobrake or equivalent), which will limit surface water to the predevelopment runoff rate.</p> <p>The final proposed solution for the relocated pitches, including associated facilities, was developed in close consultation with Erin’s Isle GAA club, Rivermount FC and DCC. Enhanced spectator viewing areas and a Changing and Storage facility are also proposed as part of the proposed Scheme, as shown on the associated Structural Drawing (Structures Plan Number: D1-ST 32 B-C/1).</p> <p>TII recognises the important role of Erin’s Isle GAA and Rivermount FC clubs within the local community. TII is fully committed to continued liaison with Erin’s Isle GAA club, Rivermount FC club and DCC, in order to minimise disruption to the playing pitches during any reconfiguration works.</p>
4	3	“As also outlined it is also important that safe crossing points for pedestrians have been provided at the alignment and Farnham Drive to facilitate access for the Erin's Isle GAA club" is prioritised during the development.”	As shown in the RO Landscape Drawings (Landscape Plan Number: D1-AL 32 B-C1), Safe crossing points of the Luas line are proposed at two locations to facilitate pedestrian access to the Farnham pitches, including access to Erin's Isle GAA club. These crossings are prioritised as part of the proposed Scheme.
5	3	Ravenscourt and Cardiffcastle Road - block of cul de sac. “There are a number of specific issues relevant to Ravenscourt that residents have raised directly with me including the issue of the small single entrance.”	Noted. TII recognises your representations over the course of the project to address and resolve resident concerns. Specific replies are contained in the individual submissions received from residents.
6	3	Ravenscourt and Cardiffcastle Road - loss of green areas. “The removal of the small green space in the communal area is concerning, especially given that they have no front gardens”	<p>Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit it smaller in size. As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents.</p>
7	3	“There are issues with parking at present in Ravenscourt which will be exacerbated with the proposed changes”	<p>As shown on the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces at Ravens Court. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that a maximum of three unofficial on-street parking spaces will be affected—these are instances where drivers park partially on the footpath, which is both illegal and obstructive. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, preventing illegal parking in this area.</p> <p>The provision of the Luas and nearby Finglas stop will offer an alternative means of accessing Ravenscourt and other nearby locations.</p>

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8	3	“The impact of the operational noise from the Luas will also be an issue for both Ravenscourt and Cardiffcastle Road residents as the line runs so close to the front of their houses.”	<p>The conclusion of the assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p> <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p> <p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p>
9	3	“The Finglas Youth Resource centre has raised a number of concerns with me in relation to the loss of car parking at the front of their building. These should be addressed directly with the FYRC given the importance of the service in the Finglas community.”	<p>TII is continuing to engage with DCC regarding parking arrangements for staff at the Finglas District centre. Please note that as shown on the proposed Scheme alignment and landscape drawings the publicly accessible parking area directly in front of the resource centre will be permanently removed.</p> <p>The proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area. A public right of way is to be maintained throughout construction, and this is identified on RO property drawing D1-P32-D-O. Specific parking arrangements are addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12. "The appointed Contractor will provide temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare / Mellow Spring Childcare Centre to compensate for existing spaces lost during construction. Consideration will be given to the car parking needs of employees of the Finglas Resource Centre to avoid competition for remaining places." Continuity of access is to be maintained to FYRC as identified in Luas Finglas EIAR 2024 Chapter 6 – Construction Activities Appendix A6.2 - CTMP.</p>
10	3	“Lack of clarity around temporary possession. These should be addressed directly with the FYRC given the importance of the service in the Finglas community.”	<p>The details of the timing and any necessary access arrangements will be further developed during the detailed design stage. At the construction phase, communication will be provided to FYRC regarding the timescale and any specific arrangements for access, safety, and other relevant factors, in line with the Construction Activities outlined in Table 6-2 of Chapter 6 and Section 1.3.1 of the CTMP (Appendix A6.2).</p>
11	3 and 4	“The non-technical summary states that "A minor adjustment of the soccer pitch in Mellowes Park is required to accommodate the LRT alignment and adjacent footpath" This project is a great opportunity to redesign Mellowes Park in conjunction with the Parks Department of Dublin City Council and residents, so it will become better utilised and have an improved the public realm.”	<p>The proposed minor adjustment to the soccer pitch in Mellowes Park is a necessary requirement to accommodate the LRT alignment and adjacent footpath. Whilst a broader redesign of the park is outside the scope of this project, TII will liaise with Dublin City Council on possible modifications.</p>
12	4	“While "The Finglas Road/ North Road roundabout is reconfigured to provide a signal controlled junction with the LRT and pedestrian crossings integrated into the signalling sequence" there is no mention of the changes proposed by the Finglas to City Centre core bus corridor including an opening from the old North Road onto the N2. This area should be pedestrian friendly, and residents should be consulted before any major changes take place.”	<p>This opening from the old North Road onto the N2 (BusConnects proposal) is not required as part of Luas Finglas. If the opening is in place before Luas Finglas, the opening will be closed again and moved further north towards the junction, as shown on the RO drawings. TII has discussed this matter with residents and understand their concerns. TII will continue to consult with the residents and stakeholders</p>
13	4	“Concerns remain about the potential noise from the substation given its proximity to local houses.”	<p>Section 14.4.1.5 of Volume 3 of the EIAR assesses all noise emissions related to the operation of the proposed Scheme including the substations proposed. In this instance the substation equipment is fully enclosed within a masonry structure which effectively contains the noise. The EIAR confirms noise from the substation is not significant and has an expected absolute noise level of less than 42dB(A) at 10m. The assessment has concluded that noise impacts do not occur as a result of any substation installations including the one near the St Margaret’s Road stop.</p>
14	4	“Residents of St Margaret's Court remain adversely affected by the proposed route.”	<p>Noted. The significance of the impacts on residents of St Margaret's Court have been assessed in detail in the RO application EIAR and mitigation measures have been proposed.</p>
15	4	“While additional land has been bought to the side of the estate and this is welcomed, the provisions for parking for residents at the back of the estate remain unresolved.”	<p>Changes to the residential amenity within St Margaret’s Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. This is due to the relocation of the northern boundary wall to include the trees and grass area adjacent to the Road (Road leading to Jamestown Business Park). The trees and grass will become semi-private open space for the residents of St Margaret’s Court and will include additional parking spaces to ensure sufficient parking for residents and visitors. TII confirm continuing dialogue with residents and DCC regarding the detail of the additional parking provision.</p>

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Submitted by	Paul McAuliffe T.D.		
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16	4	"While the non-technical summary states that the "The proposed Scheme has also taken account of future connections proposed as part of the Jamestown Business Park redevelopment including an access onto McKee Avenue." There is no mention of pedestrian improvements from Jamestown Road to St Margaret's stop or the Charlestown stop to allow access from Jamestown Road. This connectivity is vital for Finglas East and to ensure that the Finglas Luas is fully connected."	Footpath facilities and connectivity will be considerably enhanced by the proposed Scheme in the vicinity of the Charlestown stop. In addition, there are footpaths on both sides of St Margaret's Road providing facility for connections to Jamestown Business Park. Jamestown Road pedestrian connections to Charlestown stop are illustrated on the landscape drawings (please see drawing reference D1-AL33-D-O).
17	4	"While TII rejected Dublin City Councils request to extend the preferred route to a Park and Ride facility near Dublin Airport or a terminus next to the proposed Northwood Metrolink providing connectivity to Dublin Airport this should be examined in further years when the Metrolink project is also operational."	<p>There is currently no policy supporting the extension of the green line to Ballymun or Metrolink and this is beyond the scope of this application.</p> <p>The Transport Strategy for the Greater Dublin Area, as approved by the Minister for Transport in January 2023, provides the statutory basis for investment in transport infrastructure and services for Dublin up to 2042. The proposals therein were derived on the basis of a comprehensive assessment of forecast transport demand over the next 20 years. In the case of Finglas and Ballymun, the analysis confirmed that both areas would be required to be served by the pre-existing proposals. In the case of Finglas, it was determined that demand on this corridor would be accommodated by a combination of high-frequency bus and Luas, the latter of which would also cater for some longer-distance demand via a Park and Ride at St Margaret's Road. In the case of Ballymun, the MetroLink which will also serve the major town of Swords and Dublin Airport has long been planned to be routed through this suburb with a stop in the Town Centre and will be complemented by the BusConnects network.</p> <p>Extending Luas Finglas, which is approximately 4km in length by a further 3km eastwards from Charlestown to Ballymun was not considered for the following reasons:</p> <ul style="list-style-type: none"> It would add significantly to the cost of the project; The demand for travel between Finglas and Ballymun would be unlikely to justify investment in light rail and is currently being met by the N6 and N4 bus services; and Demand from Ballymun to the City Centre will be met by MetroLink and the recently approved BusConnects project. <p>Both Luas Finglas and MetroLink have been through extensive public consultation processes and changes to their routings, alignments and detailed designs over the last number of years. RO applications have been made to the Board and in the case of MetroLink, an oral hearing has occurred. As both projects are currently under consideration by the Board, no material changes to either can be made.</p> <p>NTA and TII, intend to deliver both rail projects once the ROs are approved, subject to funding availability.</p> <p>Under the Dublin Transport Authority Act, the Transport Strategy for the Greater Dublin Area is reviewed every 6 years.</p>

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Submitted by	Rory Hearne T.D.		
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1	3	"At the same time, this vital project must be delivered while taking into account the legitimate concerns of those in Finglas who could potentially be inadvertently negatively impacted by its delivery. It is paramount that every possible effort is made by TII, the NTA and An Bord Pleanála to find practical solutions to the issues raised by residents affected."	The proposed Scheme design and Environmental Impact Assessment (EIA) has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme and following an extended public consultation process as evidenced in Luas Finglas EIAR Chapter 1 - Introduction and Luas Finglas EIAR 2024 Volume 1: Non-Technical Summary Section 6: Consultation. TII confirms its intention to continue to engage with the stakeholder and their representatives during the detailed design and construction stages to minimise impacts to the fullest extent possible.
2	3	"I recognise that, notwithstanding issues with consultation with residents and local groups during the earlier stages of the Luas Finglas plans, significant effort has been made to engage with stakeholders and people in Finglas. I would strongly emphasise the need for this engagement and consultation to continue as the project moves to its next phase."	TII confirms its intention to continue to engage with the stakeholders and their representatives during the detailed design and construction stages to minimise impacts to the fullest extent possible.
3	4	"There are several houses on St Margaret's Road, opposite the entrance to McKelvey, which will have some of their driveways/front gardens removed under the current plans. To accommodate for this, these residents are due to get their own parking spaces at the back of estate and will, to my knowledge, will be assisted financially in this regard."	<p>TII confirms that the reconfiguration parking spaces including issues of security/CCTV, landscape etc. is under discussion with residents, in consultation with Dublin City Council. In the event that the RO is approved and TII exercises its powers of acquisition thereunder and proceed to serve Notices to Treat once the RO becomes operative, those parties with interests in the lands and rights in lands being acquired will be entitled to submit a claim for compensation which, in default of agreement, will be determined by a Property Arbitrator in accordance with the relevant statutory provisions namely, the Acquisition of Land (Assessment of Compensation) Act 1919 as amended and extended by section 69 and the Fourth Schedule of the Local Government (Planning and Development) Act 1963 and section 48 of the Planning and Development (Strategic Infrastructure) Act 2006.</p> <p>TII understands and acknowledges the importance for residential and commercial property owners to be able to plan their affairs with as much notice and certainty as possible.</p> <p>TII has published:</p> <ul style="list-style-type: none"> a CPO guide, which provides an overview of the various stages involved in the application for such a RO, including the land acquisition process; and a Land Acquisition Strategy, which sets out arrangements proposed for the provision of information and assistance to owners and occupiers of residential and of business properties which are proposed to be compulsorily acquired <p>This information can be accessed on the Luas Finglas project website here: https://www.luasfinglas.ie/#cpo</p>
4	4	"It is important that stakeholders engage with these residents in relation to where exactly their parking spaces will be and how exactly this arrangement will operate."	Please refer to response to Item No. 3 above.
5	4	"St Margaret's Court: Residents living at the back of St Margaret's Court (in the cul-de-sac) have also expressed serious concerns regarding the potential loss of their green space. This green space is often used by the residents for socialising, for children to play, for hosting birthday parties, and it generally improves residents' wellbeing."	<p>Changes to the residential amenity within St Margaret's Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 12 properties in St Margaret's Court are referred to as visual receptors (R151) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>The proposed Luas scheme at St Margaret's Court will result in an increase in semi-private open space to the rear of the properties in this location. This is due to the relocation of the northern boundary wall to include the trees and grass area adjacent to the Road (Road leading to Jamestown Business Park). The trees and grass will become semi-private open space for the residents of St Margaret's Court and will include additional parking spaces to ensure sufficient parking for residents and visitors.</p>
6	4	"I would strongly urge a solution which results in this green space being retained or provided elsewhere in the cul-de-sac."	Please refer to response to Item No.3 above.
7	4	"These same residents are also very concerned about the possible lack of availability of parking in the estate because of the current plans. Residents of this estate already have issues with non-residents using the estate to park their cars, and they are fearful that the existing Luas Finglas plans will exacerbate this issue."	Please refer to response to Item No.3 above.
8	4	"It is crucial that the outstanding issues in terms of parking and outdoor amenities be addressed well in advance of construction work and that ongoing consultation with residents continues."	Please refer to response to Item No.3 above.
9	4	"Residents are also querying what will be done in relation to the noise of LRVs operating in such close proximity to their homes."	Section 15.4.1.5 of Volume 3 of the EIAR assesses the operational phase noise impacts of the proposed Scheme. Specifically, noise model receptor R151 is located at the external façade of the St Margarets Court

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			<p>facing the proposed tracks. Figure 15.2 of Volume 4 Chapter 15 Noise and Vibration of the EIAR illustrates the location of this and all other noise model receptors.</p> <p>The calculated noise level during operation of the proposed Scheme at R151 is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise at St Margarets Court for both the average and peak hour of day or night-time operation is slight as the overall noise increase is less than or equal to 1dB above baseline. Therefore, no mitigation is required at this location.</p>
10	4	"Those living in Ravens Court have also raised the matter of a potentially significant loss of green space in their estate. Further to the above in relation to the green space at St Margaret's Court, such green spaces are of vital important to communities and are used for a range of activities and purposes which serve to improve residents' health and overall wellbeing."	<p>Several submissions describe that the loss of green space used for children's play in combination with the presence of car parking within the courtyard will lead to unsafe conditions for children to play.</p> <p>Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents.</p>
11	5	"I am concerned about access to the estate under the current proposals. LRVs passing the entrance to the estate every few minutes could make entering and exiting the estate very dangerous, particularly for young children."	<p>The proposed Scheme has been designed to ensure that both drivers exiting Ravens Court and pedestrians crossing the Luas line have appropriate visibility in accordance with relevant design standards. The available sight distances will exceed the minimum requirements set out in national guidelines.</p> <p>The proposed Scheme design has been developed to provide visibility distances well above the required minimums. These measures ensure that both drivers and pedestrians can make safe and informed decisions before entering the Luas corridor.</p>
12	5	"Every possible mitigation risk should be put in place in this respect and, if sufficient mitigation measures cannot be introduced to address these safety concerns, the route may need to be further revised."	Please refer to response to Item No.11 above.
13	5	"Residents also want to know what will be done to alleviate their concerns about a severe lack of parking spaces in their estate. They fear that the current proposals will make this issue much worse."	As indicated on the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking. It is estimated that a maximum of three unofficial on-street parking spaces will be affected.
14	5	"Another serious concern of residents is that access for emergency services vehicles may be impacted by the current proposals."	Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.
15	5	"Ravens Court's residents have also made representations regarding the potential of significant disruption, including in the form of noise from LRVs passing by, and would like to be informed of how this disruption would be significantly mitigated or addressed in full."	<p>Section 15.4.1.5 of Volume 3 of the EIAR assesses the operational phase noise impacts of the proposed Scheme. Specifically, noise model receptors R076 to R080 are located at the external façades of the Ravens Court residences. Figure 15.2 of Volume 4 Chapter 15 - Noise and Vibration of the EIAR illustrates the location of these and all other noise model receptors.</p> <p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p> <p>Notwithstanding this, the assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design which screens Ravens Court from the Luas tracks.</p> <p>In conclusion the noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p>
16	5	"FYRC is highly concerned about disruption to its services as part of the 2nd, 4th, 9th and 10th schedules under the railway order. "	See responses provided to Items No.17, 18 and 19 below
17	5	Finglas Youth Resource Centre: land take (car parking)	TII is continuing to engage with DCC regarding parking arrangements for staff at the Finglas District centre. Please note that as shown on the proposed Scheme alignment and landscape drawings the publicly accessible

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		"In terms of the second schedule, land required includes the car park outside the FYRC building which is an essential resource for the Centre's staff. FYRC would like alternative parking arrangements considered so that staff are not negatively impacted during the 2nd schedule and going forward."	parking area directly in front of the resource centre will be permanently removed. Please also refer to response to Item No. 19 below.
18	5	<p>Finglas Youth Resource Centre: land take (access and timeline)</p> <p>"FYRC also has questions about when the land will be under temporary possession under the 4th schedule and whether access to the front of the building will be restricted. If access to the front of the building is to be restricted, the Centre is asking that rear access be made available."</p>	<p>TII reassures FYRC that there is no requirement for the Centre to close, either temporarily or permanently. Access to the Centre will be maintained at all times throughout the construction process. As per RO Property Drawing D1-P32-DO, there will be a short-term need to cease use of the external area to adjust the boundary wall, but this will not significantly affect the Centre's operation.</p> <p>The details of these adjustments, including the timing and any necessary access arrangements, will be further developed during the detailed design stage. At the construction phase, communication will be provided to FYRC regarding the timescale and any specific arrangements for access, safety, and other relevant factors, in line with the Construction Activities outlined in Table 6-2 of Chapter 6 and Section 1.3.1 of the CTMP (Appendix A6.2).</p>
19	6	<p>Extinguished public or private RoWs - temporary or permanent shutdowns</p> <p>"In respect of public and private rights of way being extinguished under the 9th and 10th schedules, FYRC is asking about the possibility of the Centre having to cease operations or relocate. The Centre has reiterated how significant an impact this scenario would have on its service users who have developed such strong ties to the building and to its staff. If temporary or permanent shutdowns are expected, these disruptions must be notified to FYRC well in advance."</p>	<p>TII confirms that there is no requirement for the Centre to close, either temporarily or permanently. Access to the Centre will be maintained at all times throughout the construction process. As per RO Property Drawing D1-P32-D-O, there will be a short-term need to cease use of the external area to adjust the boundary wall, but this will not affect the Centre's operation. The details of these adjustments, including the timing and any necessary access arrangements, will be further developed during the detailed design stage. At the construction phase, communication will be provided to FYRC regarding the timescale and any specific arrangements for access, safety, and other relevant factors, in line with the Construction Activities outlined in Table 6-2 of Chapter 6 and Section 1.3.1 of the CTMP (Appendix A6.2).</p> <p>The proposed works include reconfiguration of the car park for the childcare/resources/sports centre in this area. A public right of way is to be maintained throughout construction, and this is identified on RO property drawing D1-P32-D-O. Specific parking arrangements are addressed in A6.1 CEMP Table A6 1-5 Mitigation Number PM-12. "The appointed Contractor will provide temporary alternative, nearby and convenient temporary parking and appropriately timed parking for people with disabilities and parents delivering children to Finglas Childcare / Mellow Spring Childcare Centre to compensate for existing spaces lost during construction. Consideration will be given to the car parking needs of employees of the Finglas Resource Centre to avoid competition for remaining places." Continuity of access is to be maintained to FYRC as identified in Luas Finglas EIAR 2024 Chapter 6 – Construction Activities Appendix A6.2 - CTMP</p>
20	6	<p>Safety during construction</p> <p>"Construction as part of the Luas Finglas project could also introduce significant risks for the young people who use the FYRC. FYRC has requested that risk assessments be carried out and that regular health and safety meetings take place to identify and mitigate potential hazards."</p>	<p>As identified in Section 6.9 of Chapter 6 - Construction Activities of the EIAR "The requirements of the Safety, Health and Welfare at Work Act 2005, the Safety, Health and Welfare at Work (Construction) Regulations, 2013 and other relevant Irish and EU safety legislation will be complied with at all times. As required by the Regulations, a Health and Safety Plan will be formulated by the Project Supervisor Design Process (PSDP) and Project Supervisor Construction Stage (PSCS) which will address health and safety issues from the design stages through to the completion of the Construction Phase. This plan will be reviewed as the proposed Scheme progresses. The contents of the Health and Safety Plan will follow the requirements of the Regulations. In accordance with the Regulations, a PSDP has been appointed and PSCS will be appointed as appropriate." This will include ensuring arrangement are put in place for the safety of the public. Risk assessments and regular health and safety meetings to identify and mitigate potential hazards are part of this process. In addition, Section 1.6 of the CEMP (Appendix A6.1) - deals with communications with the Public and Key Stakeholders as does Appendix A6.2 CTMP</p>
21	6	<p>"FYRC also wants to ensure that its building continues to be a safe and supportive environment for its users and the community, even after Luas Finglas is operational. While FYRC appreciates the proposal to plant additional trees near the counselling and training rooms, the Centre is concerned that this measure will not adequately mitigate noise. If assurances cannot be given that the building's interior will remain unaffected by LRV noise."</p>	<p>In the case of receptors R086 and R087 only the daytime noise levels are relevant as the building is not operated at night. The daytime noise levels due to operation of the Luas range from 50 – 52dB LAeq,16hr at R087 on the southern facade and are of the order of 59 dB LAeq,16hr at R086 on the southern facade. This absolute noise level is lower than the threshold of 60dB for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for commercial properties.</p> <p>Furthermore, to put the calculated noise level in context reference is made to the noise monitoring described in Section 15.3.1 of Volume 3 Chapter 15 Noise and Vibration of the EIAR. The closest monitoring location to the FYRC was AT6, as illustrated in Figure 15.1 of Volume 4 of the EIAR, which is on Mellowes Rd adjacent to the Finglas Counselling Service. Noise levels measured at this location were of the order of 68dB during the daytime. Therefore, the new noise from Luas operation will be several orders of magnitude lower than the existing baseline noise environment due to road traffic.</p>

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22	6	"It is essential that FYRC's requests for soundproofing measures such as cladding and soundproof windows are heard. Every effort should be made to avoid disruption of essential activities like counselling, meditation, and training in the Centre."	The assessment contained within Chapter 15 of Volume 3 of the EIAR submitted has demonstrated that the residual noise and vibration impact of both the operation and construction of the proposed Scheme is not significant and in many cases the impact is slight. Sound insulation measures to buildings along the proposed Scheme are therefore not required.
23	6	<p>"The Centre also wants to make sure that the Finglas Village stop being positioned at the heart of the new line, thus increasing footfall at the centre, does not lead to additional risk for the Centre and its users. To align with child protection and safety guidelines, the Centre has stated that it may need to transition from an open-door policy to an invitation-only one.</p> <p>Under these circumstances, the Centre maintains, the front door requires modifications and enhanced security features so that it is fit-for-purpose. The Luas development should enhance and support the Centre as a safe haven for its users."</p>	TII notes the concerns regarding safety and security of the proposed plaza area. the proposed Scheme will create a new space with an open area covered by CCTV and with passive security in place. TII confirms its commitment to continued dialogue with all impacted stakeholders during the detailed design and construction stage to ensure safety and security concerns are addressed appropriately.
24	7	"I must reiterate the disappointment expressed by so many people in the area about the omission of Ballymun from the Green Line extension. The limited scope of the Luas Finglas project is quite concerning and represents a missed opportunity to link the Luas Green Line and the proposed Metrolink. This would have provided unprecedented connectivity with the airport for Finglas and the greater Dublin area, as well as a quick and easily accessible link between the communities of Ballymun and Finglas, and Ballymun cross-city."	<p>There is currently no policy supporting the extension of the green line to Ballymun or Metrolink and this is beyond the scope of this application.</p> <p>The Transport Strategy for the Greater Dublin Area, as approved by the Minister for Transport in January 2023, provides the statutory basis for investment in transport infrastructure and services for Dublin up to 2042. The proposals therein were derived on the basis of a comprehensive assessment of forecast transport demand over the next 20 years. In the case of Finglas and Ballymun, the analysis confirmed that both areas would be required to be served by the pre-existing proposals. In the case of Finglas, it was determined that demand on this corridor would be accommodated by a combination of high-frequency bus and Luas, the latter of which would also cater for some longer-distance demand via a Park and Ride at St Margaret's Road. In the case of Ballymun, the MetroLink which will also serve the major town of Swords and Dublin Airport has long been planned to be routed through this suburb with a stop in the Town Centre and will be complemented by the BusConnects network.</p> <p>Extending Luas Finglas, which is approximately 4km in length by a further 3km eastwards from Charlestown to Ballymun was not considered for the following reasons:</p> <ul style="list-style-type: none"> It would add significantly to the cost of the project; The demand for travel between Finglas and Ballymun would be unlikely to justify investment in light rail and is currently being met by the N6 and N4 bus services; and Demand from Ballymun to the City Centre will be met by MetroLink and the recently approved BusConnects project. <p>Both Luas Finglas and MetroLink have been through extensive public consultation processes and changes to their routings, alignments and detailed designs over the last number of years. RO applications have been made to the Board and in the case of MetroLink, an oral hearing has occurred. As both projects are currently under consideration by the Board, no material changes to either can be made.</p> <p>NTA and TII, intend to deliver both rail projects once the ROs are approved, subject to funding availability.</p> <p>Under the Dublin Transport Authority Act, the Transport Strategy for the Greater Dublin Area is reviewed every 6 years.</p>
25	7	"The above also lends to the greater issue of a clear imbalance between the North and South of Dublin in respect of public transport. One can look at the length of the existing Green Line heading in the opposite direction as evidence of this. I would therefore request that TII, the NTA and An Bord Pleanála look immediately at extending the Luas Green Line to Ballymun, as a comprehensive public transport rail link for the north of the city."	Please refer to response provided to Item No. 24 above

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1	4	"The current design does not appear to recognise and reflect the importance of convenient intermodal transfers, with the existing set-down facilities at Broom bridge being lost without replacement and no seamless bus-Luas transfer facilities being provided elsewhere along the route."	The proposed scheme is dedicated to promoting a sustainable modal shift by encouraging public transport and active travel, thereby contributing to Ireland's Climate Action Targets. The bus turning area at Broombridge will be reconfigured to retain and enhance opportunities for intermodal transfers, incorporating bus bays on each side of the turning area and interchange with Irish Rail services including future upgraded Dart + services. Additionally, the proposed Scheme will provide secure and adequate cycle storage facilities, facilitating convenient access to various transport modes. The removal of the existing set down facilities aligns with the goal of reducing reliance on private car use. An existing car park to the south will support car-to-Luas transfers in the absence of the set down area. All stop locations include links to nearby or immediately adjacent bus stops and feature connectivity for cycles and footpaths to encourage active travel uses. Charlestown is designated as an interchange hub within the BusConnects network, enabling seamless transfers between bus services and Luas Finglas and BusConnects routes are located adjacent to other stops. Please refer to Luas Finglas EIAR Chapter 2 – Planning and Policy Context, Luas Finglas EIAR Chapter 3 – Need for the proposed Scheme, Section 3.5.4 Integration, Luas Finglas EIAR Chapter 5 – Description of the proposed Scheme, and Luas Finglas EIAR Chapter 18 – Material Assets: Traffic and Transport.
2	4 and 5	“Tie-in opportunities between the planned Luas Finglas and Luas Tyrrelstown do not appear to have been considered in the design of the former scheme, which might impede or delay delivery of the latter. The proposed Luas Finglas project is included as a key infrastructural intervention within the Greater Dublin Area Transport Strategy 2022-2042 (GOATS) - LRT3, which translates national environmental policy objectives into practically actionable mobility measures. GOATS has also recommended delivery of the Luas Green Line Extension to Tyrrelstown (LRT7) in the period beyond 2042.”	It is acknowledged that Greater Dublin Area Transport Strategy 2022-2042 includes for a post 2042 Light Rail extension of the green line to Tyrrelstown. Figure 12.7 of the GDA strategy indicates this as connecting to the existing Green Line / Luas Finglas at the Broombridge Stop area. The Tyrrelstown Luas line is subject to separate appraisal, planning and design work. Luas Finglas does not constrain the development of this future scheme.
3	5	“Construction of the planned Luas Finglas scheme is expected to have a transformative impact on mobility within its direct catchment and beyond, and as such its expedited delivery is fully supported by our Clients. At the same time, ABP and TII and are urged to adequately consider the scheme in the context of its integration with the remainder of Dublin's public transport system, so that its potential future benefits can be realised to the maximum extent. In particular, this should also include the integration of Luas Finglas and Luas Tyrrelstown schemes, the latter of which is programmed for subsequent delivery. In doing so, confidence can be provided that an upcoming planning decision by ABP relating to the former scheme does not prevent or delay delivery of the latter one. Given that Luas Tyrrelstown will directly serve the North Blanchardstown area, such consideration, as part of the Railway Order process, is strongly advocated by our Clients.”	Please refer to response to Item No. 2 above.
4	5	“It is recommended that, at a minimum, a tie-in location north of River Tolka be identified and preserved in the Luas Finglas design, and preferably also an alternative tie-in location between Ballyboggan Road and River Tolka. It should also be considered whether future construction of points on the Finglas branch to connect to the Tyrrelstown branch will have a substantial temporary impact on the operation of Luas to Finglas. If this is determined to be the case, the costs and benefits of early provision of switches at an identified preferred tie-in location as part of the currently advanced Luas Finglas project should be considered.”	Please refer to response to Item No. 2 above.
5	5	“The proposed Luas Finglas scheme design does not appear to have sufficiently exploited opportunities for enhanced public transport integration by optimising passenger transfer facilities'. Such omissions - specific examples of which are provided within the following bullets - are noted in the context of the ongoing changes to Dublin's public transport network advanced through the BusConnects programme, whose premise is an increased reliance on transfers rather than providing direct services at lower running frequencies. 'Further consideration should be given by the Applicant to optimising Luas to bus transfer facilities to enhance accessibility within a wider area”	Please refer to response to Items No.1 and 2 above.
6	5	“an eastbound N4 bus stop on Mellowes Road will be located directly adjacent to the Luas platform. While the provision of this eastbound bus stop is welcome, it is noted that a westbound bus stop has not been provided immediately adjacent to the Luas stop, with existing westbound bus stops located ca. 60 metres to the west (in front of the Garda station) and ca. 80 metres to the east (in front of the Intreo centre) being retained instead. A seamless door-to-door transfer opportunity, which has the potential to minimise Luas-bus transfer penalties, has therefore not been exploited.”	TII will continue to engage with NTA and BusConnects project teams to ensure project coordination.

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7	6	"It is recommended that seamless transfers at Finglas Village be facilitated by replacing the 2-no. existing westbound bus stops with a single new bus stop located on Mellowes Road directly opposite the Luas stop, with an appropriate pedestrian crossing point being provided along the most direct desire line. Furthermore, it is requested that the capacity of bus stops at Finglas Village be increased so that shuttle buses to the SI Campus and/ or other locations in North Blanchardstown can be accommodated in addition to frequent scheduled bus services."	Please refer to response to Item No. 1 and 6 above.
8	6 and 7	"The existing and proposed arrangements at this location are presented in Figure 3 (overleaf). As can be seen in the figure, the existing bus terminus features a single ca. 20 metres long bus stop in addition to 4 no. 14 metres long set-down bays and 2 no. wheelchair accessible car parking bays, with the bus stop being located ca. 50 metres to the west of the Luas terminus. It is now proposed to instead provide, at the same location, 2 no. ca. 24 metres long bus stops in addition to 2 no. wheelchair accessible car parking bays, while removing the set down bays. " "the proposed increased bus stop capacity is welcome, it is noted that two regular bus services are planned to terminate at Broombridge (L62 and L89), compared to a single one (40E) at present. There is a legitimate concern that the proposed stop arrangement, while accommodating turnaround of the planned scheduled services, will not offer capacity for shuttle buses or indeed additional regular services, should their provision be warranted by increased demand."	Please refer to response to Item No.1 and 5 above.
9	7	"It is deemed highly beneficial that a redesign of the Broombridge stop environs as a less compact bus hub, similar to those recently provided at Blanchardstown and Liffey Valley Shopping Centres, be pursued to future proof the scheme and accommodate both scheduled and non-scheduled bus services."	The existing interchange at Broombridge will be modified during the delivery of Luas Finglas. TII will continue to work closely with NTA and CIE to minimise any disruption during construction.
10	7	"It is also recommended that the public transport hub's layout be optimised by minimising the distance between bus stops, Luas platforms, and railway platform. In doing so, there would appear to be a benefit in relocating the bus terminus further east into the current car parking area."	Please refer to response to Item No. 9 above.
11	7	"(Due to the) project's construction phase extending to a number of years, it is requested that construction phase impacts on the operation and capacity of the Broom bridge bus and Luas termini be minimised. It is requested that any temporary bus stop arrangements provide extra capacity to enable their use by shuttle bus services in addition to the scheduled urban bus services."	Please refer to response to Item No. 9 above.
12	8	"The proposed P&R facility will create an opportunity to capture a notable proportion of car traffic to the SI Campus on event days, subject to the provision of shuttle bus services to the ultimate destination being provided. In this context it is noted that the proposed P&R facility will feature no bus transfer facilities, with no bus stops located on the R135 adjacent to the P&R entrance."	The current design of the Park and Ride facility as noted does not include a bus interchange however the proposed Scheme design does not preclude such provision should such a demand be identified and provision of same be approved.
13	8	"It is recommended that such stops are provided to enable occasional use of the P&R facility for transfers to shuttle buses, especially given the proposed removal of set-down facilities at the Broombridge stop. As an alternative measure, it is suggested that connectivity between the proposed P&R facility be improved by providing a more direct pedestrian route between the back of the P&R building and the St Margaret' s Road/ McKee Avenue Junction (via the existing supermarket site), with both the proposed bus stops and the Luas stop being located at that junction. In such case, capacity of the proposed bus stops should be increased so that potential shuttle services can be accommodated alongside scheduled urban bus services."	Please refer to response to item 12 above. Regarding the pedestrian link to St Margaret's Road. This option was examined including both ground level and overhead links and was not viable due to significant impacts on the existing supermarket, and particularly the loading bay. Provision of a direct link as part of the future redevelopment of the supermarket is anticipated and has been discussed with the owners. For more information, please refer to Luas Finglas EIAR, Chapter 4 – Alternatives Considered, section 4.9.11 Park & Ride.
14	11	"It is concerning that the proposed Luas Finglas design does not appear to have considered tie-in options to enable future delivery of the Tyrrelstown spur. It is strongly recommended that a high-level tie-in study be completed as part of the current Luas Finglas design process so it can be demonstrated how the proposed Luas Green Line Extension to Tyrrelstown can be connected to Luas Finglas without substantial impact on its operations or substantial construction work on the Finglas line. Considering potential routing of Luas Tyrrelstown, it is recommended that, at a minimum, a tie-in location north of River Tolka be identified and preserved in the Luas Finglas design, and preferably also an alternative tie-in location between Ballyboggan Road and River Tolka. It should also be considered whether future construction of points on the Finglas branch to connect to the Tyrrelstown branch will have a substantial temporary impact on the operation of Luas to Finglas. If this is determined to be the case, the costs and benefits of early provision of switches at an identified preferred tie-in location as part of the currently advanced Luas Finglas project should be considered."	Please refer to response to item No. 2 above.

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Submitted by	Susan Coughlan		
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1	3	"Part of our estate is being taken to accommodate this preferred route. Currently there is little space for residents to park their cars, if part of the estate is taken this will leave the already tight parking facility even more stretched."	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not impact existing resident car parking spaces. However, there will be a loss of some on-street parking at the entrance to Ravens Court, though this area is not designated for resident parking.</p> <p>It is estimated that three to four unofficial on-street parking spaces may be affected — these are instances where some drivers currently park partially or fully on the footpath, which is both illegal, obstructive and unsafe for vulnerable road users. As a result, the proposed Scheme brings a positive outcome, ensuring that footpaths remain clear and accessible, and limiting illegal parking at the entrance to the estate. The proposed Scheme will provide a Luas station within a short walking distance and access to footpaths and cycle tracks which are being delivered as part of the proposed Scheme. Such measures are geared towards encouraging a modal shift away from car use.</p> <p>However, if the residents want part of the greenspace to be repurposed for parking (as suggested by another resident), a solution may be to provide grasscrete parking in part of the greenspace for intermittent parking. TII will continue to engage with Ravens Court residents and DCC to agree the optimum final solution for the residents.</p>
2	4	"The green space that is being taken is where the little children play. There will be nowhere for the children to play safely as a combination of very little green space, and cars parked up everywhere (as not enough room to park) will lead to a very unsafe place for the children to play."	<p>Changes to the residential amenity within Ravens Court have been described and assessed in Chapter 21 - Landscape and Visual Amenity of the EIAR. The residents of 18 properties in Ravens Court are referred to as visual receptors (R076) in Chapter 21 of the EIAR and are shown in Figure 21.6 of Volume 4 of the EIAR.</p> <p>The proposed Luas Finglas will require the relocation of the western boundary wall 2.25m high, to be rebuilt 4m closer to the residential properties and reducing the amount of grass in the semi-private open space. The construction works would also require the removal of 2 trees along this area. The impact of the loss of green space on the residential amenity of the properties in the courtyard was assessed as Slight, Permanent and Negative, the courtyard will continue to function as a semi-private open space, albeit it smaller in size.</p> <p>As part of the detail design stage a comprehensive landscape plan will be prepared and agreed with residents. Additional landscape design mitigation measures could be proposed that are not currently shown on the landscape design drawings, these measures are listed below. They would not mitigate the loss of green space, but they would enhance the quality of the semi- private open space in terms of functional and aesthetics.</p> <ul style="list-style-type: none"> Feature tree planting along the western boundary of the courtyard to reduce visibility of the OCS and to further enclose the cul de sac and retain the intimate character of the area. Evergreen flowering climbing plants grown against the proposed wall which will enhance the western boundary and improve the view in that direction from the residential properties. Steet furniture i.e. south and east facing seating adjacent to the boundary wall to increase outdoor use of the space for courtyard residents. Grasscrete paving within the parking spaces of the courtyard to reduce the amount of hard surface.
3	4	"Ravenscourt is a very small, quiet estate and with a Luas running roughly every 5 minutes I believe both ways this will lead to a very noisy and... "	<p>Noise - Section 15.4.1.2 of Volume 3 of the EIAR assessed the potential for the construction stage to generate noise impacts. The conclusion of this section was that Ravens Court would experience a negative significant to very significant noise impact during construction, refer to Table 15-28. As a result of this outcome mitigation measures have been specified within Section 15.5.1 of Volume 3 of the EIAR to reduce the noise impacts during construction.</p> <p>With the mitigation measures in place the residual noise impact at Ravens Court during construction reduces to a moderate to significant noise impact. The utility diversion works will generate the highest impact; however, the duration of that work will be short.</p> <p>The calculated noise level during operation of the proposed Scheme at these receptors is detailed in Tables 15-32 and 15-33 of Volume 3 of the EIAR for the opening and design years respectively. These tables present the following noise levels,</p> <ul style="list-style-type: none"> Daytime Noise dB LAeq,16hr Daytime Peak Hour Noise dB LAeq,1hr Night-time Noise dB Lnight Night-time Peak Hour Noise dB LAeq,1hr <p>In the design year of 2057, which represents the worst-case scenario, the daytime noise levels due to operation of the Luas range from 45 – 51 dB LAeq,16hr while night-time noise levels range from 40 to 46dB Lnight.</p>

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Submitted by	Susan Coughlan		
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			<p>This absolute daytime noise level is lower than the threshold of 55dB LAeq,16hr for daytime noise as described in Section 15.2.4.8 of Volume 3 of the EIAR for residential properties. At night there are some locations that slightly exceed the night-time absolute threshold of 45dB Lnight as described in Section 15.2.4.8 of Volume 3 of the EIAR. For those properties where the threshold is exceeded the methodology outlined in Section 15.2.4.8 is followed to determine the significance of the impact. This is described in Tables 15-36 and 15-37 of Volume 3 of the EIAR.</p> <p>The conclusion of this assessment, which compares the future operational noise of Luas to the existing baseline, is that the increase in noise within Ravens Court for both the average and peak hour of night-time operation is slight as the overall noise increase is in the range of 1.1 to 1.8dB above baseline.</p> <p>Notwithstanding this, the assessment has taken into account the proposed solid 2m high boundary wall that has been incorporated into the design which screens Ravens Court from the Luas tracks.</p> <p>In conclusion the noise impact at Ravens Court has been robustly assessed in the EIAR submitted with the RO and mitigation in the form of floating slab track has been provided. The noise impact at this location is concluded to be not significant.</p> <p>In the vicinity of Ravens Court, the proposed track operates at low speed due to the proximity to Finglas Village Stop and the curvature of the track. The curvature of the track at this location has been identified as a potential risk in terms of the generation of additional noise and vibration during operation. Therefore, mitigation measures in the form of floating slab track have been provided in this location as illustrated in Figures 15-11 and 15-12 of Volume 4 of the EIAR.</p> <p>Noise of Luas bell - In this particular location, with pedestrians set well back from the rail at controlled crossing points, which are also signalised together with LRV/road traffic, there should be no need for drivers to activate bells during normal operation.</p> <p>One of the key changes involved the area around Mellowes Crescent and Mellowes Court. Originally, the proposed route passed through the Mellowes Crescent and Court estates, forming a sharp "S" curve before crossing Mellowes Road about 40 metres west of Finglas Fire Station. During the public consultation held from July to September 2020, residents expressed concerns that this design could divide their community. To address these concerns, the Luas Team carried out further assessments, comparing the EPR to alternative route options between Cappagh Road and Mellowes Road. These alternatives underwent a full suite of environmental assessments to ensure they were thoroughly evaluated. Based on this review, adjustments were made to the alignment at Ravens Court/Mellowes, leading to the final selection of the Preferred Route (PR).</p>
4	4	"unsafe place to live as a walkway is also planned."	<p>The proposed Scheme has been designed to ensure that drivers exiting Ravens Court and crossing the Luas line, have appropriate visibility in accordance with relevant design standards.</p> <p>The visibility distances in the proposals significantly exceed the minimum requirements, ensuring that drivers have sufficient sightlines before entering the Luas corridor.</p>
5	4	"If a Luas is running every few minutes this truck (to deliver oil) will be on the tracks as it will have nowhere else to go. This will result in the Luas having to wait for the delivery to be finished."	<p>Oil deliveries will have to be carried out from within the estate, tankers are typically 7.0-8.8m in length and may cause a temporary obstruction within Ravens Court. Trucks and pipes may not be placed on the tracks so as to obstruct the LRV.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park in front of the estate entrance where the LRT will run. The design assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.</p>
6	4	"If emergency vehicles need to access a house urgently this will prove to be very difficult as with cars parked everywhere and a Luas running every few minutes, it will be impossible to get to the emergency in quick time. This could result in someone losing their live."	<p>According to the RO Landscape Drawings (Plan Number D1-AL-32-3-4), the proposed Scheme does not encroach into the paved areas of the Ravens Court estate but only affects a portion of the green space. As a result, the manoeuvring space remains unchanged. Emergency services are always given priority over regular traffic, including Luas LRVs, as is standard practice on any road. In the event of an emergency, LRVs are expected to yield to emergency vehicles, just as other road users would. This ensures that ambulances, fire trucks, and police vehicles can respond swiftly to incidents without unnecessary delays. The operational protocols are designed to accommodate this priority, allowing emergency services to proceed safely and efficiently when required.</p> <p>Operators of service vehicles such as those for refuse collection and oil deliveries will not be able to park where the LRV line will run (the limits of which will be clearly marked) at the front of the estate entrance. The design</p>

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			assumption is that there will be no safety issues associated with alternative options available to service vehicle operators, however further engagement on this issue is possible at detailed design stage or through discussions between the CRR and TII or its contracted operator.
7	4	"Also, God forbid there was a fire in one of the houses emergency vehicles would be unable to access the estate. Fire engines, ambulances, Garcia vehicles and a Luas running. Would be total chaos and again loss of life. There is only one way in and out of the small estate so it is really not suitable to have the Luas running outside when there as so many scenarios which could halt it."	Please refer to response to Item No. 6 above
8	4	"Currently we place our bins at the part of the estate where the Luas tracks plan to go. The bin truck won't enter the estate as it is too tight for it to manoeuvre. Our bins are left out at the entrance (where the Luas is running) and are collected from there. Again, takes about 6-8 minutes for a collection to happen and with a Luas every few minutes 2 will probably have to wait on the collection to finish. "	Please refer to response to Item No.5 above.
9	4	"The screeching of the brakes and the bell ringing as it takes the turn at the top of the estate when the construction of the tracks is happening it will be impossible for the residents to come and go with ease as I mentioned earlier only one entrance in and out."	Please refer to response to Item No.1 above regarding noise and bell ringing. Please refer to response to Item No.3 above regarding construction and access concerns.

Submission No.	41		
Submitted by	Tempside Limited (Polonez Finglas) (Sudway & Company Limited Chartered Surveyors on their behalf)		
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1	2	Remove existing access. Replaced by rear access from Jamestown Industrial estate "Under the proposed scheme access to St Margarets Rd will be removed and it is proposed to replace the access with the access from the rear from Jamestown industrial estate as indicated in the attached drawings in appendix 2. However, the EIAR does not include any traffic movement surveys indicating how delivery trucks would make their deliveries to my client's business premises."	A thorough swept-path analysis was conducted during the design development process to assess vehicle access and manoeuvrability for the existing property. This analysis considered type of traffic movements required for Polonez. The existing access off St Margaret's Road consists of a gate opening measures 4.23m wide from the topographic survey. The largest vehicle capable of entry is a 10m rigid HGV, though manoeuvrability is tight. A 3-point turn is currently feasible, but it requires some parking bays to be vacated. Under the proposed Scheme, 10m rigid HGVs will still be able to access the site, but turning within the property will remain difficult. However, a 7.5-tonne, 7.17m rigid HGV will be able to access and perform a 3-point turn with ease, as confirmed by swept-path analysis. The swept-path analysis undertaken demonstrates that the proposed Scheme will facilitate the necessary vehicle movements while improving access conditions compared to the existing situation. TII confirms their intention to continue to engage with the stakeholders during the detail design and construction stages in accordance with Luas Finglas EIAR 2024 Chapter 6: Construction Activities and CTMP.
2	2	"There also does not appear to be any detailed design drawings of a new road and the only drawing which is available indicating any type of a road to the layout is contained in the landscaping section and the Alignment Details Book of the EIA. see appendix 2."	<p>The drawings provided are to illustrate the proposed Scheme for the approval process and to inform the Luas Finglas EIAR 2024. They are sufficiently detailed and comprehensive to facilitate the approval process, and they provide the necessary information to inform the Environmental Impact Assessment (EIA) to be carried out by the Competent Authority, being the Board. Further detailed design will take place following completion of the planning process, and all stakeholders will be kept informed and advised in accordance with the procedures set out in Luas Finglas EIAR 2024 Chapter 6 Construction activities and CTMP.</p> <p>It is important to note that property drawings are not intended to illustrate road layouts. Instead, their focus is on landownership and acquisition details. The design and alignment of the road are comprehensively presented in the RO alignment drawings (D1-GA33-1-2 and D1-GA33-C-D), which should be consulted for information related to the road layout.</p> <p>In addition, the landscape drawings referred to by the Submitter help to illustrate the proposed landscaping measures, including planting schemes, green spaces, and other environmental enhancements. These drawings play a key role in visualising how the proposed Scheme integrates with its surroundings, mitigating visual and environmental impacts while improving aesthetic and ecological value. They provide essential guidance for the implementation of landscaping elements, ensuring alignment with planning and environmental requirements.</p>
3	2	"It would appear from the information available that not alone has traffic movements not being considered but neither has the impact on pedestrians being considered as there appears to be no pedestrian access being provided to the premises."	A footpath is proposed between the new Luas tracks and the property boundary. Pedestrian access will be facilitated directly from St Margaret's Road to the retail unit in question. TII confirms their intention to continue to engage with the stakeholders during the detail design and construction stages in accordance with Luas Finglas EIAR 2024 Chapter 6: Construction Activities and CTMP.
4	2	Temporary acquisition of land "There also appears to be no consideration given to the effect of the temporary acquisition on the viability of my clients business and..."	<p>During the construction phase, TII will support the viability of affected businesses by ensuring uninterrupted access for businesses impacted by the proposed Scheme through new access arrangements prior to restriction or removal of existing access (reference Luas Finglas EIAR 2024 Chapter 6: Construction Activities and CTMP) and the provision of highly visible signage that will direct customers and suppliers to this new access. Temporary land acquisition along the front façade and to the west of the building will be limited to the timeframe needed for boundary relocation and establishment and utility diversions. Works will be phased to ensure continuous access and business operations. TII is committed to communicating with the Business Owner in advance of any works to minimise the impact of construction activities.</p> <p>Please also refer to response to item No. 3 above</p>

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Submitted by	Tempside Limited (Polonez Finglas) (Sudway & Company Limited Chartered Surveyors on their behalf)		
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5	2	"...how it would operate during the works."	<p>As noted in Luas Finglas EIAR 2024 Chapter 6: Construction Activities and as shown in the property drawings included with the proposed Scheme application, temporary working area to the front and west is required to construct the new boundary and the utility diversion and the duration for these will be limited to these specific works. The business owner will be communicated with in advance on any works and local arrangements made to mitigate any impact. For the remaining temporary area to the eastern boundary, the proposed Scheme proposes to remove access from the front of a number of premises along St Margaret's Road and a proposed rear access road is included in order to preserve vehicular access to these businesses. The implementation of this during construction is to be phased so as to ensure continuity of access and business operation is maintained during construction. As noted in Table A6 1-5 Mitigation number PM-15 of the CEMP the contractor is to "Ensure continuity of access for businesses on the east side of St Margaret's Road;"</p> <p>Specific measures for St Margaret's Road are also included in the A6.1 CEMP Table A6 1-5 including Mitigation number PM-23 "TII will ensure new access arrangements are in place for businesses on St Margaret's Road, and for residents of St Margaret's Court, consistent with the Jamestown Masterplan, where existing access will be directed impacted by the proposed Scheme. Provide highly visible signage to direct customers and suppliers to this new access"</p> <p>Also, in Section 1.3.1 of the CTMP "When roads and streets are being upgraded, there will be some temporary disruption / alterations to on street and off-street parking provision, and access to premises in certain locations along the proposed Scheme. Local arrangements will be made on a case-by-case basis to maintain continued access to homes and businesses affected by the works, at all times, where practicable. Details regarding temporary access provisions will be discussed with homes and businesses prior to construction starting in the area."</p>
6	2	<p>New access timeline</p> <p>"It is also clear from the correspondence provided by TII attached in appendix 3 that they are unsure as to when any new access will be provided in which case we fail to see how our business can stay in operation in the absence of such information."</p>	<p>The existing access will not be removed until the new road and access is available to use. The proposed Scheme proposes to remove access from the front of a number of premises along St Margaret's Road and a proposed rear access road is included in order to preserve vehicular access to these businesses. The implementation of this during construction is to be phased so as to ensure continuity of access is maintained during construction. As noted in Table A6 1-5 Mitigation number PM-15 of the CEMP the contractor is to "Ensure continuity of access for businesses on the east side of St Margaret's Road;" As noted above measures included in Section 1.3.1 of the CTMP.</p> <p>Please also refer to response to item No.5 above.</p>
7	3	"Again, we must reiterate that even if the proposed road as indicated in the documents provided by TII is constructed it will not meet the requirements that are needed to facilitate vehicular and pedestrian access to our clients Business premises."	Please refer to response provided in item No. 1 and 3 above.
8	3	"In the absence have a detailed analysis of the impacts the on the property in EIA it would seem towards that it is premature for the board to grant approval for this scheme as currently proposed as the EIA is in effect deficit in its assessment."	<p>The EIAR has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, the Transport (Railway Infrastructure) Act 2001 (as amended) and the Planning and Development Act 2000, (as amended), ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme.</p> <p>While the EIAR provides a comprehensive analysis of the expected impacts for the purposes of informing the environmental impact assessment to be carried out by the Board., it is important to note that detailed property-specific matters are typically addressed at later stages through mechanisms such as the detailed design phase, mitigation plans, and direct engagement with affected parties. Approval of the proposed Scheme does not preclude further refinements to minimise and mitigate potential impacts on individual properties. The purpose of the EIA process is not to resolve every minor detail at this stage, but rather to assess the likely significant effects overall environmental implications of the project on the environment taking into account the information presented in the EIAR, and any supplementary information provided. and outline appropriate mitigation strategies.</p> <p>As demonstrated in Table 12-11 of Chapter 12, before mitigation, the significance of effects on this property was considered "Very Significant". However, specific mitigation measures have been proposed, including the provision of a new road access from the rear, new directional signage. boundary treatment and landscaping. These measures substantially reduce the significance of residual impacts to "Significant".</p> <p>Therefore, the contention that the EIAR is deficient or that granting the RO approval would be premature is unfounded. The assessment has been conducted in line with all legal requirements including the EIA Directive and with regard to published and professional guidelines.</p>

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Submitted by	Tempside Limited (Polonez Finglas) (Sudway & Company Limited Chartered Surveyors on their behalf)		
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9	3	"In relation to the CPO we are of the view that the scheme as proposed is not fully designed..."	<p>Luas Finglas has been designed to such a level of detail (including at the location of the proposed compulsory acquisition of lands from Tempside Ltd/Polonez Finglas) such that all the environmental impacts can be assessed in line with the requirements of the EIA Directive, as is evident for the contents of the EIAR. All lands proposed to be compulsorily acquired that are required for the construction and operation of Luas Finglas are identified in the draft RO. In relation to the proposed compulsory acquisition of the lands from Tempside Ltd/Polonez Finglas:</p> <ul style="list-style-type: none"> There is a common good resulting from the acquisition of the lands in question, which lands are of central importance to the implementation of Luas Finglas. Luas Finglas, as part of an integrated transport solution will result in reliable, sustainable, affordable, integrated public transport that will support the economy, help Ireland meet its climate change targets in line with both the Climate Action Plan (CAP) 2024, and make Dublin a more liveable and sustainable area. Further detail in relation to the need for Luas Finglas is set out in Chapter 3 (Need for the proposed Scheme) of the EIAR. This need advances the common good which is to be met by the acquisition of the lands in question. As set out in Chapter 4 (Alternatives) of the EIAR, TII considered the reasonable alternatives to meet the community need, in accordance with the requirements of the EIA Directive. The proposed design of Luas Finglas (including the acquisition of land for that purpose) best advanced the objectives of the proposed Scheme. The compulsory acquisition of the lands from Tempside Ltd/Polonez Finglas are necessary for the implementation of Luas Finglas. The lands of Tempside Ltd/Polonez Finglas are required for the purposes of construction and operation of the LRT line, footpaths, landscaping, utilities diversions as referred to in Luas Finglas EIAR 2024 Chapter 12 – Land Take, Table 12-11: Land take Impact Assessment in Area 33 and as illustrated on the proposed Scheme alignment, landscape and property drawings included with the application. The proposed compulsory acquisitions in question are entirely proportionate, justified and are in the interests of the common good, and in such circumstances, there is no question of any breach of the constitutional rights of Tempside Ltd/Polonez Finglas which would warrant the Board refusing to grant the RO for Luas Finglas.

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Submitted by	Tempside Limited (Polonez Finglas) (Sudway & Company Limited Chartered Surveyors on their behalf)		
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10	3	" ...and that to allow the compulsory purchase of my client's interest in the lands would constitute a breach of their constitutional right to the quiet enjoyment of their property and should therefore be refused."	<p>The compulsory purchase of your client's interest in the lands does not constitute a breach of their constitutional right to the quiet enjoyment of their property. The proposed acquisition is being undertaken in accordance with all relevant legal and regulatory frameworks, ensuring that due process is followed and that the rights of property owners are respected.</p> <p>The acquisition is necessary for the greater public good, as it facilitates the implementation of the proposed scheme, which has been carefully planned and assessed to minimise any adverse impacts. Furthermore, your client will be entitled to fair compensation for the acquisition of their property, in line with statutory requirements and best practice guidelines.</p> <p>Luas Finglas has been designed to such a level of detail (including at the location of the proposed compulsory acquisition of lands from Tempside Ltd/Polonez Finglas) such that all the environmental impacts can be assessed in line with the requirements of the EIA Directive, as is evident for the contents of the EIAR. All lands proposed to be compulsorily acquired that are required for the construction and operation of Luas Finglas are identified in the draft RO. In relation to the proposed compulsory acquisition of the lands from Tempside Ltd/Polonez Finglas:</p> <ul style="list-style-type: none">There is a common good resulting from the acquisition of the lands in question, which lands are of central importance to the implementation of Luas Finglas. Luas Finglas, as part of an integrated transport solution will result in reliable, sustainable, affordable, integrated public transport that will support the economy, help Ireland meet its climate change targets in line with both the Climate Action Plan (CAP) 2024, and make Dublin a more liveable and sustainable area. Further detail in relation to the need for Luas Finglas is set out in Chapter 3 (Need for the proposed Scheme) of the EIAR. This need advances the common good which is to be met by the acquisition of the lands in question.As set out in Chapter 4 (Alternatives) of the EIAR, TII considered the reasonable alternatives to meet the community need, in accordance with the requirements of the EIA Directive. The proposed design of Luas Finglas (including the acquisition of land for that purpose) best advanced the objectives of the proposed Scheme.The compulsory acquisition of the lands from Tempside Ltd/Polonez Finglas are necessary for the implementation of Luas Finglas. The lands of Tempside Ltd/Polonez Finglas are required for the purposes of construction and operation of the LRT line, footpaths, landscaping, utilities diversions as referred to in Luas Finglas EIAR 2024 Chapter 12 – Land Take, Table 12-11: Land take Impact Assessment in Area 33 and as illustrated on the proposed Scheme alignment, landscape and property drawings included with the application. <p>As explained by the Supreme Court in Reid v Industrial Development Agency, a CPO must be “carried out in such a way that the impairment of the individual’s rights does not exceed that which is necessary to attain the legitimate object sought to be pursued”. Indeed, it is axiomatic that the acquisition of land and rights over land will result in interference with the use of those lands by owners/lessees/occupiers. However, in this instance, such interference is entirely proportionate to the legitimate aim being pursued by Luas Finglas, in the interests of the common good. The proposed compulsory acquisitions in question are entirely proportionate, justified and are in the interests of the common good, and in such circumstances, there is no question of any breach of the constitutional rights of Tempside Ltd/Polonez Finglas which would warrant the Board refusing to grant the RO for Luas Finglas.</p>

Submission No.	41		
Submitted by	Tempside Limited (Polonez Finglas) (Sudway & Company Limited Chartered Surveyors on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
11	3	"We would point out that the timing of the making of this order in November has meant that over the Christmas period when most people are off work a lot of the time allowed to consider this matter and to make the objections and submissions was lost to affected landowners and we therefore feel that an oral hearing is warranted in this instance."	<p>Article 175(4)(a) of the Planning and Development Act 2000, as amended, states that: "Before a local authority makes an application for approval under subsection (3), it shall—</p> <p>(a) publish in one or more newspapers circulating in the area in which it is proposed to carry out the development a notice indicating the nature and location of the proposed development and</p> <p>(b) (i) stating that—</p> <p>(I) it proposes to seek the approval of the Board for the proposed development,</p> <p>(II) an environmental impact statement has been prepared in respect of the proposed development,</p> <p>(ii) specifying the times and places at which, and the period (not being less than 6 weeks) during which, a copy of the environmental impact statement may be inspected free of charge or purchased..."</p> <p>In this instance, the public display for the proposed Scheme was set from 22nd November 2024 to 20th January 2025, a period of 8 weeks. This time frame effectively accommodated the Christmas break and ensured that the statutory requirement for a 6-week consultation period was met, providing stakeholders ample opportunity to review the documents and make submissions to the Board.</p> <p>While TII acknowledges that the timing coincided with the holiday season, the consultation period was extended to allow for this, ensuring that affected parties had a sufficient window to engage with the process.</p>

Submission No.	42		
Submitted by	The National Graves Association		
Item No.	Page No.	Observation Statement	TII Response
1	5	Temporary acquisition land. “We are concerned about the proposed temporary acquisition of land as shown on Drawing No. LDD101-BEV-PA-GZ33-XX-DR-TX-00425 (Rev C01). This includes the entire area of the memorial garden.”	As shown in the RO Property Drawings (Plan Number: D1-P33- D-C), the temporary land take covers the entire area of the memorial. This temporary acquisition is required to allow the demolition of the existing pedestrian bridge over the R135/N2. However, no works are anticipated withing the boundaries of the memorial site itself apart from protective measures to prevent accidental damage. As detailed in Table 20.9 of the EIAR (Chapter 20: Cultural Heritage), the location of proposed works within the environs of Liam Mellows Memorial Garden (EIAR ref. CHC039) will be protected by enclosing the works site with hoardings during construction works and the operation phase effect on the setting of this constraint will be a slight positive. Some minor access will be required for the erection and securing of this.
2	5	“We would like clarification as to whether the garden would be closed to the public, and if so, for how long.”	As noted above no works are anticipated within the boundaries of the memorial site. A secure hoarding will be erected to protect the area, and some minor access will be required for the erection and maintenance of this. However, this will not necessitate closing the park to the public. When the pedestrian bridge is being removed will likely need to be closed for safety reasons. This is estimated to be limited to the days either side of a night works operation in removing the bridge over the dual carriageway.
3	5	“Temporary possession. We would like confirmation of how long this would be for.”	Please refer to response in item No.2 above.
4	5	“We would like clarification of the intended use of the area if temporarily acquired.”	Please refer to response in item No.1 and 2 above.
5	5	“We would like confirmation that the statue and plinth will not be removed from site.”	TII confirms that the statue and plinth and also the flagpole and existing signage/fixtures will not be disturbed in any way. As detailed in Table 20.9 of the EIAR (Chapter 20: Cultural Heritage), the location of proposed works within the environs of Liam Mellows Memorial Garden (EIAR ref. CHC039) will be protected by enclosing the works site with hoardings during construction works and the operation phase effect on the setting of this constraint will be slight positive.
6	5	“We would like confirmation that the statue, flagpole and any other fixtures would be adequately protected if the area is temporarily acquired. This should include the provision of robust protective enclosures.”	Please refer to response in item No.5 above.
7	6	Proposed pedestrian path “We believe that the proposed pedestrian path should not extend eastwards from behind the Liam Mellows statue towards the N2, as shown on the below extract from Drawing LDD101-BEV-GA-GZ33-XX-DR-AL-00103 Rev C01: We believe that there is adequate public access from Casement Road to the N2 via the footpaths proposed on both sides of the road that leads from Casement Road to the location of the existing N2 roundabout. Extending the existing Liam Mellows Park path network from the Barry Avenue/Casement Road junction towards the N2 would be an efficient way to provide access to the eastern side of the park (as sketched in drawing extract above).”	The proposed path connects to the existing ramped paths (remaining in place from the existing bridge access) on either side of the memorial garden and is ramped down to provide access close to the new crossing of the N2. It replaces the elevated section of the bridge which is being removed and preserves as closely as possible an existing desire line for pedestrians. However, TII is satisfied to omit this section of footpath and will continue to engage with the stakeholders regarding the detailed design at this location.
8	6	“Removing the section of proposed path to the east of the Memorial Garden would remove passing pedestrian traffic from the immediate vicinity of the memorial garden and hence deter potential vandalism, littering and general antisocial behaviour.”	Opening up pedestrian routes will encourage more footfall; increased self-regulating and less chance of antisocial behaviour. However as noted in response to Item No.7 above, TII is satisfied to omit this section of footpath.
9	6 and 7	“We note that the incline on the existing paths surrounding the memorial garden is quite steep and can be dangerous during winter. Omitting the proposed section of path will enhance pedestrian safety and further protect the Liam Mellows monument.”	The proposed Scheme envisages retention of the ramps as they form an effective backdrop to the memorial and afford an elevated view of the memorial gardens. Removal of the ramps and replacing with level footpaths and a new boundary would entail significant works within the memorial gardens which TII wishes to avoid. TII is satisfied to consider resurfacing of the existing paths.

Submission No.	43		
Submitted by	Tricia Everitt		
Item No.	Page No.	Observation Statement	TII Response
1	4	<p>"Residents have been left out of consultations/meetings held by TII/Luas Finglas with other residents of the estate (houses number 1-4 at front which are directly impacted through CPOs and 5-12 at rear of estate which are not impacted)"</p> <p>"Lack of consultation from TII and Luas Finglas Team with residents in 1 - 4 St. Margaret's Court as to how they are being directly impacted by CPO on front of properties. Meetings have been held without us being invited or present and agreements made without our input. Emails from residents have gone unanswered for a number of months"</p>	<p>In the course of extensive consultation with residents, it was evident that there was disagreement on how to proceed between residents of houses 1-4 and 5-12. Therefore, some meetings took place with each group separately.</p> <p>In October 2024 a meeting was called by Dublin City Council to inform residents of parking regulations in estates taken in charge. TII was invited to that meeting and attended. Residents of 1-4 were not in attendance and TII was subsequently informed that DCC, due to a human error, did not notify them of the meeting. TII has subsequently followed up with a meeting with residents 1-4 on the evening of 26/11/24.</p>
2	4	"Lack of clarification on how residents in 1 - 4 St Margaret's Court will be accommodated in relation to the following concerns which were raised/identified in the proposed layout(s) offered by TII/Luas Finglas, some of which were but not limited to; loss or secure parking within the boundaries of the properties."	The design proposal includes for a total of 16 additional spaces to the rear of St Margaret's Court. TII confirms that the reconfiguration parking spaces including issues of security/CCTV etc. is still under discussion with residents, in consultation with Dublin City Council.
3	4	"Loss of capability for residents to have CCTV on their own properties for the monitoring of vehicles, ..."	Please refer to response to item No.2 above
4	4	"safety concerns in relation to persons and properties identified by the residents in 1-4 St Margaret's Court"	Please refer to response to item No.2 above
5	4	"No clear answers from TII and Luas Finglas Teams as to why certain proposals from residents in 1 - 4 St. Margaret's Court are not being considered"	TII confirms that the reconfiguration of the estate and provision of additional parking spaces is still under discussion with residents, in consultation with Dublin City Council.
6	5	"Below is an initial draft of what residents in 1 - a St Margaret's Court are proposing and similar has been forwarded to TII for consideration. Ideally, we would like to have additional spaces for visitors as marked by numbers 17-22 incorporated into the secure area specifically designated for these houses."	Following on from TII's last meeting on 26/11/12, in which residents 1-4 proposed an alternative refinement of the previously developed solution, in order to address maintenance related concerns for residents 1-4, TII has further discussed this matter with DCC. TII believe that a solution close to what was proposed by residents 1-4 can be achieved, which balances the needs of the front and rear residents. However, TII does not believe that a gate is the correct solution and believe that with demarcation and signage it will be possible to clearly identify private resident parking for residents 1-4. TII confirms their commitment to continued engagement with regard to the detail design and construction stages of the proposed Scheme. The proposed changes would result in the loss of a mature tree to parking, however this can be mitigated by additional planting. These changes have been reviewed and would not constitute a material change to the existing assessments.

Submission No.	44		
Submitted by	Mr Turlough Hamill & Mr Michael Cosgrove (Sudway & Company Limited Chartered Surveyors on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
1	2	<p>"In relation to the proposed scheme it would appear that TII propose to acquire lands as indicated on the attached map (appendix 2) with a reference number of D133CA14. This drawing only indicates the extent of the permanent and temporary acquisition and doesn't not provide any details of the road design or layout It is clear from the environmental Impact assessment that there is no detailed design drawing indicating how the property is to be accessed. The only drawing indicating any sort of road layout is contained in the landscaping section and the Alignment Details Book of the EIA. See appendix 3. As can be seen these sketches do not show am access to the subject property."</p>	<p>The property will be accessed by a new access road constructed through Jamestown Business Park. A 7.0m-wide road corridor is proposed through Jamestown Little Industrial Estate, designed to accommodate the necessary access requirements. The nature of this road will be similar to access routes within a car park, featuring a continuous paved surface with road markings, in keeping with the industrial setting. The RO Landscaping Drawings (Plan Numbers - D1-AL-33 1-2 and D1-AL C-D) detail that a new access road will be constructed through Jamestown Business Park, ensuring proper access to the property. Final details will be undertaken during the detailed design stage, ensuring compliance with a potential planning permission.</p> <p>It is incorrect to state that there are no details of road layout or access to the property. The RO Landscaping Drawings (Plan Numbers - D1-AL-33 1-2 and D1-AL C-D) explicitly show that a new entrance will be provided by the new access road constructed through Jamestown Business Park. This ensures that the property will have the necessary access as part of the proposed scheme.</p> <p>The land reference number mentioned in the correspondence is correct. The property in question is identified by the reference number D133CA14. This is accurately depicted in the RO Property Drawing (Plan Number - D1-P33 C-D), which shows the extent of land acquisition for the proposed scheme.</p> <p>A footpath is proposed between the new Luas tracks and the property boundary. Pedestrian access can be facilitated directly from St Margaret's Road to the retail unit in question.</p>
2	2	<p>"In the event that this proposed road is intended to provide access to the subject property there has been no traffic management study done to show how large vehicles will be able to use this road for deliveries nor is there any detail of how pedestrians will be accommodated in this layout. "</p>	<p>A swept-path analysis was conducted during the design development process to assess vehicle access and manoeuvrability for the existing properties. This analysis considered the volume and type of traffic movements required at existing properties. The proposed scheme will result in restricted access and the restricted ability to turn vehicles at this location.</p> <p>The swept-path analysis undertaken as part of the design development demonstrates that the proposed Scheme will facilitate the necessary vehicle movements while improving access conditions compared to the existing situation. This is similar to the existing situation where there is restricted ability to turn large vehicles.</p> <p>The new access road is a cul-de-sac with no through route for traffic onto St Margaret's Road. As such, the road should experience similar volumes of traffic to those currently accessing the impacted properties directly off St Margaret's Road. As outlined in Chapter 18 Traffic and Transport of the EIAR, TII's Traffic and Transport Assessment Guidelines (May 2014) define a threshold for assessment of 100 vehicles (combined 2-way flow) in the peak hours (Figure 18-30 of the EIAR). This threshold aligns with an approximate 1 vehicle per minute increase per direction on any given road. Where changes in traffic volumes as a result of the proposed Scheme are less than the 100-vehicle threshold (as is the case here), then the impacts are deemed to be "Not Significant", and a further traffic capacity analysis is not required as part of the EIA.</p> <p>A footpath is proposed between the new Luas tracks and the property boundary. Pedestrian access can be facilitated directly from St Margaret's Road to the retail unit in question.</p>
3	2	<p>"It is also our opinion that there is not enough space to create a road wide enough to comply with the proper standards."</p>	<p>Please refer to response in Item No.1 above.</p>
4	2	<p>"The impact of the amount of traffic that would have to be accommodated on this new road has not been analysed as part of the EIA."</p>	<p>The new access road is a cul-de-sac with no through route for traffic onto St. Margaret's Road. As such, the road should experience similar volumes of traffic to those currently accessing the impacted properties directly off St Margaret's Road. As outlined in Chapter 18 Traffic and Transport of the EIAR, TII's Traffic and Transport Assessment Guidelines (May 2014) define a threshold for assessment of 100 vehicles (combined 2-way flow) in the peak hours (Figure 18-30 of the EIAR). This threshold aligns with an approximate 1 vehicle per minute increase per direction on any given road. Where changes in traffic volumes as a result of the proposed Scheme are less than the 100-vehicle threshold (as is the case here), then the impacts are deemed to be "Not Significant" and a further traffic capacity analysis is not required as part of the EIA.</p>

Submission No.	44		
Submitted by	Mr Turlough Hamill & Mr Michael Cosgrove (Sudway & Company Limited Chartered Surveyors on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
5	3	<p>"TII have indicated that their scheme is aligned with the Jamestown Master plan, see appendix 4. This is clearly in correct as can be seen in the extract from the adopted Jamestown plan appendix 5. This clearly indicates that there would be no access road through the adjacent site and that there would be access from St. Margarets Court. I would point out that TII were consulted throughout the adoption of Jamestown Development plan by TII, and we fail to see why they would now wish to alter what had previously been agreed."</p>	<p>Chapter 2 Section 2.2.5.1 of the EIAR sets out the overarching strategic approach of the Dublin City Council Development Plan 2022-2028 which is 'to develop a low carbon, sustainable, climate resilient city'. The Plan identifies that key strategic transport projects, including Luas line extensions, will 'continue the expansion of an integrated public transport system for the Dublin region and have the potential for a transformative impact on travel modes over the coming years.'</p> <p>Chapter 2 Section 2.2.5.1 of the EIAR further confirms that the extension of Luas to Finglas is supported directly under Policy SMT22 and that the design of Luas Finglas will inform the master planning of the Jamestown Lands, the urban structure of which will include a strategic pedestrian/cycle amenity link crossing the Adrez lands aligned with key desire lines to the proposed Luas extension forming part of the green infrastructure network, providing a key link between proposed open spaces. It is further added that future development ratios, densities and height will be formed in this area to avail of this proposed public transport infrastructure and the development of a sustainable and compact urban form.</p> <p>Chapter 2 Section 2.2.5.1 of the EIAR acknowledges that in February 2024, Dublin City Council adopted Variation No. 4 of the Dublin City Development Plan 2022-2028. This variation related to SDRA 3 Finglas Village Environs and Jamestown Lands and incorporated the Jamestown Masterplan 2023 into the Development Plan by way of a new appendix. The 'Adrez' lands are identified in the Jamestown Masterplan 2023 for future 'residential led mixed use' having regard to their location along the Luas corridor.</p> <p>As set out in Chapter 2 Section 2.2.5.1 of the EIAR, Luas Finglas is fully consistent with the Jamestown Masterplan. The manner in which the proposed access roads at the Adrez lands raised in this submission are aligned with the Jamestown Masterplan is explained in more detail immediately below.</p> <p>Chapter 2 of the Masterplan establishes the urban structure for the future development of the Jamestown area. Figure 2.1 of the Masterplan establishes the 'private vehicle access & movement strategy' for the area. As illustrated, Luas Finglas complies with the adopted movement strategy and will deliver a local street consistent with the Masterplan framework (refer to plan no. D1-GA 33 1-2).</p> <p>Furthermore, Chapter 6 of the Jamestown Masterplan identifies that the Adrez lands are situated in the Phase 2 development area, with the following key infrastructure requirement: "Luas Finglas either under construction or operational before the granting of planning permissions for residential developments".</p> <p>It follows that the future redevelopment of this site for residential use as envisaged in the Masterplan will only be considered once Luas Finglas is under construction or operational.</p> <p>The Masterplan also includes measures to support existing uses while facilitating envisaged masterplan change in the area.</p> <p>The Adrez lands are located in area B with the following measures identified: "Access to Polonez and Finglas Auto Parts to be provided from the north, aligned with the urban structure set out, if Luas Finglas operations prevent the continuation of access from St Margaret's Road".</p> <p>Plan no. D1-GA 33 C-D illustrates that the Luas Finglas scheme will make provision for a new access alignment south of Finglas Auto Parts. This access is existing, and whilst it is not shown on the Jamestown Masterplan, it is required under the Luas Finglas scheme to ensure continuous access to existing properties at this location.</p> <p>In this regard, TII notes that Section 6 the Jamestown Masterplan does not restrict the provision of such an access to service established businesses: "Any proposed expansion of existing business operations or the provision of on-site movement requirements that differ from those set out in the Masterplan will not be restricted, as long as they relate to the current established businesses and uses on site".</p> <p>Having regard to the above, the Luas Finglas scheme is fully aligned with the Jamestown Masterplan. TII notes that also the submission made by Dublin City Council that confirms that regenerative mixed use development proposals along the proposed route at, inter alia, Jamestown, "have / are being developed to ensure compatibility with the project delivery and future operation" of the Luas.</p>

Submission No.	44		
Submitted by	Mr Turlough Hamill & Mr Michael Cosgrove (Sudway & Company Limited Chartered Surveyors on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
6	3	"In the absence have a detailed analysis of the impacts the on the property in EIA it would in our opinion be premature for the board to grant approval for this scheme as currently proposed as the EIA is in effect deficit in its assessment."	<p>The Environmental Impact Assessment (EIA) has been prepared in full compliance with the EU EIA Directive, EPA Guidelines 2022, and the Planning and Development Act 2000, as amended, ensuring a thorough and structured evaluation of the potential environmental effects of the proposed scheme.</p> <p>While the EIA provides a comprehensive analysis of the expected impacts, it is important to note that detailed property-specific matters are typically addressed at later stages through mechanisms such as the detailed design phase, mitigation plans, and direct engagement with affected parties. Approval of the proposed Scheme does not preclude further refinements to minimise and mitigate potential impacts on individual properties.</p> <p>The purpose of the EIA process is not to resolve every minor detail at this stage, but rather to assess the overall environmental implications of the project and outline appropriate mitigation strategies. The Board also has the authority to impose conditions requiring further assessments where necessary before construction begins.</p> <p>As an example, as demonstrated in Table 12-11 of Chapter 12, before mitigation, the significance of effects on this property was considered "Significant". However, specific mitigation measures have been proposed, including:</p> <ul style="list-style-type: none"> Provision of a new road access from the rear; Development of a cycle track and cycleway; and Construction of a new boundary wall <p>These measures substantially reduce the significance of residual impacts to a Slight level. Therefore, the claim that the EIA is deficient or that granting approval would be premature is unfounded. The assessment has been conducted in line with legal requirements, and processes are in place to ensure that any outstanding site-specific concerns are addressed appropriately as the project progresses.</p>
7	3	"the scheme as proposed is not fully designed..."	<p>The level of design provided is intended to facilitate the planning process and inform the EIAR. While it does not represent a detailed design, it has been developed to a degree that is appropriate for the planning stage, ensuring it meets the necessary requirements for assessment and decision-making. The detailed design phase will follow planning approval, during which the proposed Scheme will be fully developed.</p> <p>While TII is currently at the preliminary design stage, the provided design is sufficiently detailed to inform the impacts of the proposed Scheme. The RO Landscaping Drawings (Plan Numbers - D1-AL-33 1-2 and D1-AL C-D) detail that a new access road will be constructed through Jamestown Business Park, ensuring proper access to the property. Final details will be undertaken during the detailed design stage, ensuring compliance with a potential planning permission.</p>

Submission No.	44		
Submitted by	Mr Turlough Hamill & Mr Michael Cosgrove (Sudway & Company Limited Chartered Surveyors on their behalf)		
Item No.	Page No.	Observation Statement	TII Response
8	3	"In relation to the CPO we are of the view that the scheme as proposed is not fully designed and that to allow the compulsory purchase of my clients interest in the lands would constitute a breach of their constitutional right to the quiet enjoyment of their property and should therefore be refused."	<p>Luas Finglas has been designed to such a level of detail (including at the location of the proposed compulsory acquisition of lands from Turlough Hamill and Michael Cosgrove) such that all the environmental impacts can be assessed in line with the requirements of the EIA Directive, as is evident for the contents of the EIAR. All lands proposed to be compulsorily acquired that are required for the construction and operation of Luas Finglas are identified in the draft RO. In relation to the proposed compulsory acquisition of the lands from Turlough Hamill and Michael Cosgrove:</p> <ul style="list-style-type: none"> There is a common good resulting from the acquisition of the lands in question, which lands are of central importance to the implementation of Luas Finglas. Luas Finglas, as part of an integrated transport solution will result in reliable, sustainable, affordable, integrated public transport that will support the economy, help Ireland meet its climate change targets in line with both the Climate Action Plan (CAP) 2024, and make Dublin a more liveable and sustainable area. Further detail in relation to the need for Luas Finglas is set out in Chapter 3 (Need for the proposed Scheme) of the EIAR. This need advances the common good which is to be met by the acquisition of the lands in question. As set out in Chapter 4 (Alternatives) of the EIAR, TII considered the reasonable alternatives to meet the community need, in accordance with the requirements of the EIA Directive. The proposed design of Luas Finglas (including the acquisition of land for that purpose) best advanced the objectives of the proposed Scheme. The compulsory acquisition of the lands from Turlough Hamill and Michael Cosgrove are necessary for the implementation of Luas Finglas. The lands proposed to be compulsorily acquired are required for the provision of the Luas line and associated footpath along St Margaret's Road plus the new access road. As explained by the Supreme Court in Reid v Industrial Development Agency, a CPO must be "carried out in such a way that the impairment of the individual's rights does not exceed that which is necessary to attain the legitimate object sought to be pursued". Indeed, it is axiomatic that the acquisition of land and rights over land will result in interference with the use of those lands by owners/lessees/occupiers. However, in this instance, such interference is entirely proportionate to the legitimate aim being pursued by Luas Finglas, in the interests of the common good. The proposed compulsory acquisitions in question are entirely proportionate, justified and are in the interests of the common good, and in such circumstances, there is no question of any breach of the constitutional rights of Turlough Hamill and Michael Cosgrove which would warrant the Board refusing to grant the RO for Luas Finglas.
9	3	"We would point out that the timing of the making of this order in November has meant that over the Christmas period, when most people are off work, a lot of the time allowed to consider this matter and to make the objections and submissions was lost to affected landowners..."	<p>The public display for the proposed Scheme was set from 22nd November 2024 to 20th January 2025, a period of 8 weeks. This time frame effectively accommodated the Christmas break and ensured that the statutory requirement for a 6-week consultation period was met, providing stakeholders ample opportunity to review the documents and make submissions to the Board.</p> <p>TII extended the consultation period to allow for the Christmas period, ensuring that affected parties had a sufficient window to engage with the process.</p>

Submission No.	45		
Submitted by	Uisce Éireann		
Item No.	Page No.	Observation Statement	TII Response
1	5	“The proposed development does not include any new connections to public infrastructure, however temporary connections to Uisce Éireann's water supply is proposed for the construction compounds. This can be addressed by way of a condition requiring connection agreements with Uisce Éireann prior to works commencing.”	TII acknowledges that temporary connections to Uisce Éireann's water supply are proposed for the construction compounds. As stated in Section 6.5.7.3 of the EIAR Chapter 6, water and wastewater connections will be organised by the appointed contractor via locally available connection points agreed by the contractor with service providers. TII is willing to engage with Uisce Éireann and to comply with the requirement for obtaining connection agreements prior to works beginning.
2	5	“Uisce Éireann prioritises the protection of public drinking water sources. In this context the development proposals have been assessed for potential impacts to drinking water sources. Uisce Éireann has reviewed the EIAR submitted and notes that the proposed works are not within nor in close proximity to Uisce Éireann's abstraction points. That said, the applicants must be aware there can be no impacts arising to public drinking water sources waters used for the abstraction of drinking water or cause any deterioration in quality during the construction and operational phase of the proposed development.”	<p>As acknowledged in the submission, works associated with the proposed Scheme are not within nor in close proximity to Uisce Éireann's abstraction points. The Luas Team remains steadfast in our commitment to upholding the highest standards of environmental protection and will continue to engage closely with Uisce Éireann to address any concerns and ensure the safeguarding of public drinking water sources. All necessary precautions will be rigorously implemented to prevent any impacts on public drinking water sources and to ensure there is no deterioration in drinking water quality during both the construction and operational phases of the proposed Scheme.</p> <p>Mitigation measures will be put in place throughout construction so as to avoid any groundwater contamination. These measures are dealt with in - Surface Water Management Plan - Appendix A6.4 of the EIAR.</p>
3	5	"Chapter 17 of the EIAR submitted to support the application specifically pages 14 - 17, refers to an extensive list of proposed interactions with and potential diversions of Uisce Éireann's infrastructure. This includes sixty potential major water infrastructure diversions and seven potential wastewater infrastructure diversions. Uisce Éireann notes there are multiple diversions and protection measures of existing Uisce Éireann's assets required (documents in the Railway Order application suggest approximately 60 watermain diversions and 7 wastewater sewer diversions). The applicant had initially engaged with Uisce Éireann Diversion's team regarding the multiple proposed interactions. The focus of this engagement was to consider whether diversions/build overs and build near to Uisce Éireann assets are required to facilitate this project and whether the proposed diversions could be supported by Uisce Éireann.' Uisce Éireann's process requires applicants to agree outline designs with Uisce Éireann, then for the Uisce Éireann Diversion team to provide the applicant with a Confirmation of Diversion Feasibility letter. Uisce Éireann is of the opinion that the applicant has not provided sufficient information to Uisce Éireann throughout the Diversion Enquiry process."	<p>The RO design demonstrates that all Utility Service Providers assets have been fully assessed in relation to potential impact of the proposed Luas alignment. The utilities were assessed to see what potential mitigations can be put in place, be it full diversion or protective measures. All utility services are assessed against the alignment to investigate where there may be conflicts and clearance issues. Designs are then carried out on a like for like basis, giving assurances to the service providers that an in-depth assessment of their assets has been undertaken highlighting all assets potentially impacted. The design team then propose potential mitigations: Diversions of existing or protective measures.</p> <p>As records may not be precisely accurate, mitigation is considered for any assets within the influence of the alignment. Some of these assets may prove to be of adequate distance to not require diversion. Once the Rail Order process is completed, and the project incorporates any conditions placed on it, at detailed design stage further site investigation can be undertaken and utility assets fully designed out in compliance with their respective requirements insofar as it is practical within an urban environment. The detailed design is developed with as few derogations as possible, presenting a compliant, constructable, operational and maintainable network of services.</p> <p>TII agrees to engage with Uisce Éireann regarding approvals.</p> <p>Post Rail Order, once any prescribed conditions have been applied to the main infrastructure design, the utility design shall be developed further into detailed design incorporating all requirements where possible, and agree derogations and alternative options if needed, ensuring that Uisce Éireann's assets and services are uninterrupted in their operation and maintenance insofar as practicable. This phase also includes for utility services futureproofing to ensure that all service providers and asset owners have future resilience.</p> <p>The post Rail Order detailed design phase requires close liaison and engagement with Uisce Éireann and all service providers with frequent engagement and design submissions for comment and approval to ensure that the design is robust, constructable, maintainable and fully operational.</p>
4	6	"Uisce Éireann has made known and identified certain issues to the applicants where some of the proposed diversions would impact Uisce Éireann’s existing access and maintenance arrangements."	As noted above, TII agrees to engage with Uisce Éireann in relation to proposed diversions and the impact that they may have on access and maintenance. At this stage, the exact location of utility infrastructure will be identified and confirmed. Uisce Éireann requirements will be incorporated and, where possible, TII will ensure that Uisce Éireann's assets and services are uninterrupted in their operation and maintenance.

Submission No.	45		
Submitted by	Uisce Éireann		
Item No.	Page No.	Observation Statement	TII Response
5	6	<p>"Of concern with the proposed designs is that in multiple locations the new LUAS infrastructure will be built above Uisce Éireann assets, at another location their proposals involve diverting a 600mm trunk watermain under the Royal Canal and the existing Dublin to Sligo Rail Line. Uisce Éireann assessment of the proposals indicates there is a risk that the existing red line boundary may not be wide enough at all locations to accommodate the measures required to divert, protect and maintain access to Uisce Éireann assets and that the current proposals cannot achieve the required separation distances as per Uisce Éireann standards and codes of practice"</p>	<p>The Code of Practice issued to the designers to work to, clearly states that it is for 350mm mains and smaller, though there is mention of clearances, and for a 600mm diameter main, the required clearance is 8m either side of the main to any structures. This was the assumption which was applied here, and one would assume would also apply to other adjacent utility services. A request was submitted that an updated Code of Practice be issued covering larger mains, so that TII could confirm and highlight the extent of derogations that would be sought on this 600mm main diversion, as it is the most significant diversion of all of the water diversions. Working on the assumption that 8m is the required clearance it should be noted that within an urban landscape (as opposed to green-field site developments), gaining such clearances would be impracticable to achieve. Therefore, with certain services where the required clearances would not be achievable, derogations would be sought.</p> <p>TII intends to progress derogation agreements at the detailed design phase when there is more certainty with the developed designs. This will allow for optimum clearances to be detailed and achieved.</p>

Submission No.	46		
Submitted by	Voice of Vision Impairment		
Item No.	Page No.	Observation Statement	TII Response
1	6 and 7	<p>"The team behind the Finglas Luas extension presented to us April 15th, 2024, and we met with David Weldon (of that team) once more on December 16th, 2024. And our observations are based, more than anything else, on the information we gleaned from those meetings. This is because accessible documentation was not presented to us until Wednesday, January 15th, 2025 - three working days before the deadline for observations; and even this documentation is far from comprehensive We first requested the accessible documentation On April 18th, 2024, and once again on December 18th, 2024. The documents provided on January 15th, 2025, which are supposed to be for screen reader-users (i.e., blind people), contain images which unnecessarily inflate the size of the Word documents, but more importantly, there is no description of those images."</p>	<p>An accessible version of the NTS was included in the RO application on 18/11/2024. Certain images within the document could not be adequately described by text however a description of the images was included in the title. A text only version of the document was available on demand.</p> <p>TII appreciates that accessible versions were requested at an earlier date; the documentation was not in a finalised state to share until the RO application was lodged on 18/11/2024. Prior to the EIAR being in a finalised state, progress updates were provided on the project in Luas User Group Meetings and in more detail with Luas Team members in direct Bilateral Meetings with VVI on 15/04/24, 22/04/24 and 16/12/24. Not all documentation within the EIAR is accessible as highlighted by VVI. However, the Luas Team raised and discussed the key interfaces in the Bilateral meetings. Following receipt of an email from a VVI member on 18/12/24, extracts from the EIAR (non-accessible body of the report) were included in an accessible format in the email response to further explain the issue.</p> <p>TII is committed to continuing positive engagement throughout the project, as further outlined below. Luas prides itself on being an accessible system, and TII rely on close collaboration and feedback from stakeholders such as VVI, on the existing operating network and on new planned schemes.</p> <p>TII will continue to engage in dialogue with DCC, FCC and relevant stakeholders including Voice of Vision Ireland, National Disability Authority and the Luas Users Group throughout all project phases.</p>
2	7	<p>"The pedestrian access ramp from the Broombridge Road rail and canal overbridge to the citybound Irish Rail platform will be removed. This will require passengers to access the citybound Irish Rail platform via the lift or pedestrian footbridge currently adjacent to Broombridge Luas stop. According to the lived experience of our members who have contributed, the lift at Broom bridge station it unreliable and out of action 50% of the time they use it."</p>	<p>The current access ramp to the Iarnród Éireann inbound platform is incompatible with the proposed new Luas alignment and bridge structure over the railway and canal at Broombridge as, due to spatial, geometric and track parameters there is insufficient headroom for the current ramped access to remain.</p> <p>Several alternatives were considered as part of the design development and assessed against a number of criteria including environmental topics and the results are included in the proposed Scheme submission see for reference Luas Finglas EIAR 2024 Chapter 4: Alternatives Considered - Section 4.10.2 Pedestrian Bridge over the Royal Canal.</p> <p>It is recognized that the success of the proposals relies entirely on the full operational use of the lifts, maintained to a high standard of service. TII and the Luas Operator are committed to ensuring these lifts are consistently well-maintained to provide the necessary linkage.</p>
3	7	<p>"Our members who have additional impairments, such as back complaints/injuries etc., as well as other mobility impaired passengers/pedestrians will find it unduly difficult, if not impossible, to change from the railway station to the Luas station at Broombridge if the ramp is removed, as is planned."</p>	<p>Please refer to response in Item No.2 above.</p>
4	8	<p>"In the proposed scenario where the ramp is removed, a lift failure will render the Irish Rail citybound platform inaccessible, despite the Broombridge Road from both the Cabra and Dublin Industrial Estate sides as well as railway and canal overbridges remaining open, as before, to vehicular traffic and pedestrians."</p>	<p>Please refer to response in Item No.2 above.</p>
5	8	<p>"To provide clearance for overhead lines, we understand Irish Rail will be removing the bridge deck of the keystone bridge and/or lowering the track. In addition, we understand Hamilton Bridge over the Canal will not be modified due to a preservation order on it."</p>	<p>Irish Rail proposals for Dart + include installing a new deck at a higher level than existing to the current bridge above the railway line to accommodate electrification which further complicate the interface between the new Luas bridge and the pedestrian ramp and results in insufficient headroom for the ramp to remain on place.</p> <p>Refer also to response in Item No.2 above.</p>
6	8	<p>"With the new Luas bridge being east or before the railway and canal overbridges and sufficient clearance being required over the railway, we think it reasonable that consideration be given to maintaining the pedestrian access ramp from the Broom bridge Road down to the Irish Rail citybound platform."</p>	<p>Please refer to response in Item No.2 above.</p>
7	8 and 9	<p>"We understand that TII's preference is not to have these due to bicycles being tied to them and the hazard handlebars and pedals extending cause to passengers."</p> <p>"We understand from our discussion in December that there will be no perimeter railings or walls at the Luas extension to Finglas stations and that TII will be using a differential surface between the Luas platform and the adjoining area. We queried what type of differential surface will be used as we need to confirm that it is effective and works. We were told that will be included in the detailed design."</p>	<p>TII notes that railings present an issue for VVI, if bicycles are locked to railings. At detail design stage TII will design the Luas platforms to integrate with adjacent footways. In such instances, tactile guidance is provided through the provision of a dish channel which is identifiable by white cane users and also serves as necessary surface water drainage. Where the level difference is too great to be accommodated with universally accessible falls, a suitably designed planted strip will be used. Railings are used where other design interventions are not feasible. TII will consider the design of the perimeters of Luas platforms with visually impaired consultative groups at detail design stage.</p>
8	9	<p>"VVI is the author of the concept of (differential surfacing, and it is critical that we have a guarantee that it will be suitable and adequate (in close consultation and active involvement)."</p>	<p>TII is amenable to the concept of differential surfacing and will engage with VVI and other visually impaired consultative groups at detail design stage in relation to this and other aspects of the design.</p>

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9	9	"As things stand in the plan, Without a perimeter railing or wall, to the left of a Luas platform will be a large open space or effectively a plaza - which is extremely disorienting for independent visually impaired travellers. Also, With no boundary or perimeter between the Luas platform and the surrounding area, locating passenger help points will be a problem. For example, Currently in the case of Dawson Street, Marlboro Street and Westmoreland Street, it's impossible to locate passenger help points as they are in the middle of a footpath on a platform that is 55 or 60 metres long."	TII will further engage with VVI and other visually impaired consultative groups at the detail design phase of the project. Tactile guidance, use of channel guidance strips, or Luas stop furniture have all proven useful in other Luas schemes. The Help Point is always accommodated at the same position on the shelter to provide consistency and aid location of same by visually impaired. TII will also provide onsite guided wayfinding learning for visually and mobility impaired persons as well as persons with other impairments, prior to the opening of Luas Finglas.
10	9	"At the December meeting, reference was made to landscaping. We could get no confirmation that in the absence of a perimeter railing or wall that a raised bed or alternative will act as the boundary between the Luas station and the surrounding area."	The requirements of visually impaired persons will be taken into account in the detail design of planted areas. There are numerous ways to do this and TII will engage with VVI and other visually impaired consultative groups at detail design stage in relation to this and other aspects of the design.
11	10	"Research from University of London (2009, 2012), shows that guide dogs require a minimum kerb height of 60mm in order to differentiate between a carriageway and a footpath. We know from experience that these kerbs must be angled at 90 degrees, and not sloped, shamped or bevelled. Also, traditional front-facing upstanding kerbs of 100-125mm in height and at 90-degree angle are optimal for long cane users."	For a large proportion of the proposed Scheme, the footpath and cycle track will be separated by a landscaped strip. Where space does not permit this, bevelled kerbs with a 60mm upstand are being provided between footpath and cycle track in accordance with the Cycle Design Manual (2023). In balancing the needs of all vulnerable road users, there is an overall benefit in using bevelled kerbs: it is a forgiving edge for cyclists, wheelchair users and those using non-standard or adapted cycles who may not be able to dismount or lift their cycle onto the footway and also for other wheeling modes; it is less of a trip hazard for all pedestrians; less of a barrier to movement between cycle track and footpath; and is consistent with best current international practice. TII will continue to consider the safety of all users in the detail design of Luas Finglas and will further engage with VVI on the design of kerbs, footpaths and crossings through the detail design period.
12	10	"Since July 2023, when Advice Note No. 6 (of DMURS) recommended raised crossings and continuous footpaths, they have had a devastating effect on the independence of our members and hazardous to us - since VVI is led, run, directed and wholly membered by visually impaired people. The recommendation of Advice Note No. 6 was not disability proofed - neither through DPROs nor even through the National Disability Authority (NOA) which had been consulted for the 2019 DMURS main document. Furthermore, we think it possible that Section 19 of the Equal Status Act (2000), which is a requirement that all crossings be dished/dropped, is superior to the Advice Note's recommendation."	<p>The design intent is that all raised and continuous footpath crossings will have tactile paving to indicate to people with a visual impairment the presence of the crossing, as per standard practice. The benefits of raised and continuous footpath crossings to all pedestrians and especially the most vulnerable such as the young, the elderly and particularly those with disabilities, are considerable. Raised and continuous footpaths crossings provide a very clear message to drivers that pedestrians have priority and provide all pedestrians, including those with a visual impairment, with a less threatening street environment. The avoidance of a kerb upstand at crossings removes the risk of trips or falls and results in a transformative experience for wheelchair users and people with mobility-scooters. The core message of DMURS, which is a mandatory national standard, is to create streets for people and provide road infrastructure that places pedestrians at the top of road user hierarchy. Raised and continuous footpath crossings are a key component to creating streets that are more people-focused and less vehicle-focused. Provision of raised and continuous footpath crossings are currently an important facet in any street regeneration scheme involving reallocation of street space to vulnerable road users.</p> <p>All raised crossings and continuous footpath crossings on the proposed Scheme will have a segregated continuous cycle track running parallel to the footpath in a contrasting colour to the footpath which will provide a guide for people with a partial visual impairment. The standard 60mm splayed kerb separation between cycle track and footpath could be continued through the raised and continuous crossings to provide added guidance for people with sight loss, as per the Cycle Design Manual TL405.</p> <p>As currently intended, with continuous footpath crossings, the footpath is continuous: vehicular traffic must cross a raised footpath, and pedestrians are no longer crossing a road surface. Dishing of the path is therefore not required if the path level is not changing.</p> <p>TII welcomes further engagement at detailed design stage, noting that TII is actively exploring alternatives, but that these will need to be discussed with DCC and FCC, as well as VVI.</p>
13	10 and 11	"At December's meeting we were informed that one toucan crossing remains in the plan, but we do not know where this is. Toucan crossings are where cyclists and pedestrians are permitted to cross in the same place, with cyclists remaining on their bikes. Given that e-bikes can do up to 20kmph, and e-scooters much more, it is reckless planning to allow for shared space with vulnerable pedestrians (including visually impaired people, older people and children). Even if a cyclist is behaving impeccably, we cannot depend on their evasive action to compensate for a sudden move by a toddler or any other pedestrian who may be in front of them. Toucan crossings are tantamount to shared space, which is a dangerous concept, according to research in Ireland and the UK."	<p>A Toucan crossing is proposed on St. Helena's Road where the cycle track terminates to facilitate cyclists at the road crossing. The three mid-block signalised pedestrian crossings on St. Margaret's Road are also intended to be in the form of Toucan Crossings for access to and from the Aldi Centre, McKelvey Avenue estate and the Charlestown Luas platform. It is intended that all cycle track facilities on the proposed Scheme will be reassessed to provide greater segregation from pedestrians in line with the Cycle Design Manual, at Detailed Design Stage. Note that Toucan crossings will not be used on the proposed Scheme at signalised junctions: all signalised junctions will have segregation of cyclists and pedestrians and with no shared surfaces provided in accordance with the Cycle Design Manual.</p> <p>A combined cycle and pedestrian crossing with segregation is being used in RCBI and is designed to address VVI comments. TII will continue to consider the safety of all users in the detail design of Luas Finglas and will further engage with VVI on the design of kerbs, footpaths and crossings through the detail design period.</p>

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14	11	"Since vulnerable pedestrians are supposed to be top of the road-user hierarchy (according to DMURS), we see no reason why cyclists cannot dismount for the sake of while in pedestrian zones (which should be safe zones)."	Cyclists dismount signage can be used but is usually not very effective. A designed solution is preferable. Please refer to response to item No.14 above. TII will continue to engage with VVI and other key stakeholders in relation to this matter and other matters.

