Submission No.	001
Organisation Name or Name of Submitter	Albert College Residents Association (ACRA) and Ballymun Road North Residents

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MetroLink Submission: On behalf of ACRA and Ballymun Road North Residents (Barry Conway ACRA Deputy Chair & Jim Deignan)				
1	Context	6	While broadly supportive of the MetroLink Scheme, the respondent believes that the station is in the wrong location... because This section of Ballymun Road is an already heavily utilized area and one of the busiest throughfares to and from Dublin City Centre. An alternative location was proposed in Albert College Park.	TII appreciates the submission and the sharing of concerns/observations related to the Collins Avenue Station. We have reviewed the submission and provided response for the observations/concerns raised in detail below. As outlined in EIAR Chapter 7, Consideration of Alternative, section 7.7.10.7, the assessment undertaken for the Emerging Preferred Route (EPR) identified a preferred route option including the proposed station location in front of Our Lady of Victories (OLV) Church. This location for the station provides a number of advantages when compared to other location options, including Albert College Park: (1) It allows the Project to achieve a core project objective of providing public transport that is integrated in the existing and future proposed transport network, providing for interchange between bus routes both on Collins Avenue and on Glasnevin Road. A station location further south at the northern section of Albert College Park would not provide a good level of interchange as there would be over 500m separating potential bus stop locations on Collins Avenue and the MetroLink station. (2) The proposed Collins Avenue Station will have a significant catchment area, noting the analysis undertaken at the Emerging Preferred Route (EPR) stage identified this route option had the highest potential passenger numbers when compared with other route options. (3) During the construction phase, the location of a station within the frontage to Our Lady of Victories means that traffic disruption to Dublin would be reduced when compared to the location of a station within the road corridor (partially or fully). Further transport assessment during preliminary design development indicated that DCU remains a large contributor to the station usage with the station location as proposed by the church.
2	Context	7	**Positioning of the Collins Avenue Station**: the proposed selected area for the station is more complex, more disruptive, more expensive, more dangerous than the original Metro North station. Furthermore, the latter would be better placed to service DCU.	Please refer to response (1) above.
3	Context	7	**Highly Sensitive Receptors:** High Proportion of elderly and special needs residents as well as primary school children will be unfairly impacted by placing the station at the proposed location for a period of 10 to 12 years.	It is acknowledged that in the absence of effective mitigation measures, there is potential for impacts on sensitive receptors at this location. As outlined in Table 11.60 of EIAR Chapter 11, Population & Land Use sensitive locations here includes facilities which are delivering education, health, religious, community and medical services to the local communities in Ballymun, Santry and North Glasnevin. However, measures to mitigate and monitor impacts as a result of construction activity are detailed in relevant EIAR technical chapters, in the Construction Environmental Management Plan (CEMP) and summarised in Chapter 31. Mitigation measures and commitments of relevance to the local population here will be used to ensure that any impacts here are not significant. These measures include the following: Full implementation of the range of dust minimisation measures detailed in the mitigation section of Chapter 16 (Air Quality); Full implementation of the range of noise minimisation measures detailed in mitigation section of Chapter 13 (Airborne Noise & Vibration) and Chapter 14 (Ground borne Noise & Vibration); Ensure all construction activities are appropriately located so as to limit impacts and reduce the footprint of construction activities where possible to avoid and/or minimise impacts; All construction areas will be suitably fenced, screened and monitored so that access to the sites will be limited to authorised personnel in the interest of public health and safety; Full implementation of the range of mobility and traffic management measures including Scheme Traffic Management Plan as detailed in mitigation section of Chapter 9 (Traffic & Transport); Alternative access arrangements (or diversions) will be put in place at the relevant locations and appropriate temporary signage will be put in place on roads, footpaths or cycleways that will be temporarily affected by the construction works. This signage will be monitored to ensure that it guides local residents, commercial activities and visitors to the temporary access arrangements in place that facilitate access to homes and businesses; Provide for safe pedestrian and cyclist access, egress and movement at points of entry and exit of construction vehicles at all sites. Tactile and audible signals for those with visual impairments should be integrated to ensure equitable access for all users;

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				Implement and monitor safe working practices, in accordance with the relevant legislation during construction to protect the workers and visitors to the construction sites; The contractor(s) will inform stakeholders of the general construction process/phasing in line with the TII Community Engagement Strategy to ensure local residents and businesses are fully informed on the nature and duration of construction works taking place in the vicinity. Where possible crime prevention through environmental design principles (e.g., adequate lighting in all areas, active and passive surveillance) should be incorporated given the duration of the Construction Phase; Advance notice will be given to the owners of all residential, commercial and community properties (including social infrastructure) before construction starts and in advance of any major planned disruptions of services or localised traffic management measures noting in particular residents and businesses affected by temporary construction works crossing roads and those located within 250m of the construction works; Community Relations Officers (CRO's) will be employed during the construction of the proposed Project and contact details will be provided on the proposed Project website so that stakeholders and communities can make contact as required. The CRO's will be responsible for maintaining open, transparent and positive relationship with members of the public, local businesses, groups and organisations affected by the works. Specifically, the CRO's will work closely with Transport Infrastructure Ireland and the appointed contractors to ensure that all effort to address public concerns are made, and to ensure that information on the nature and duration of all works is provided; and Reinstatement of all land as quickly as possible following construction so as to expedite any local disruption and return to existing surface land uses that can be used by the surrounding residents, businesses and communities. See EIAR Chapter 11, Population and Land Use, section 11.6.1.2 detailing construction activity mitigations for the population in general.
4	Context	7	**Unconvinced by the need for such a large station with associated architecture**: Preference is for a more low-key station similar to most cities like London, Paris, New York rather than a large brightly lit footprint attracting unwelcome attention and undesirable characters and anti-social behaviours.	Common architectural design principles have been developed for the proposed project across all locations in order to provide a robust and authentic design with a strong metropolitan identity, unique and sympathetic to Dublin. As outlined in EIAR Chapter 4, Description of the MetroLink Project, Section 4.17.4.2, the specific urban design principles for Collins Avenue Station are to: Integrate grilles and hatches required for the station with the planting proposals; Consider the relationship between the station and the entrance to Our Lady of Victories Infants School; Provide raised table junction and shared space, and Preserve the main axis of Our Lady of Victories Church. The landscape design will have future planting and swales to manage surface water sustainably, verge planting to direct pedestrians and cyclists, and a new plaza to integrate the street with the proposed Project and its architectural features as well as linking the church with the adjacent new transport infrastructure. The existing baseline, potential impacts on landscape quality and views, and mitigation proposals are described in Chapter 27 (Landscape & Visual). The design ensures the church will remain visible and identifiable from the road so that it can retain its local landmark tatus. Whilst the proposed built elements of the station will be evident, clear views to the church from the road and the residential properties beyond are maintained but softened by the proposed intervening planting. Views from the front of the church confirm the retention of the existing formality but within a more decorative contemporary garden. The improved quality of paving materials being employed accentuates that formal axis to the front of the church. Overall, the potential effects on the visual environment and on visual amenity during the Operational Phase will be moderate and positive.

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5	Context	7	**Albert College Residents** will have no or restricted access to Ballymun Road.	As noted in Chapter 09 (Traffic and Transport) and Appendix A9.5 Scheme Traffic Management Plan, during all phases of the Enabling Works, the existing right turn from Ballymun Road to Albert College Court will be banned. This will require the vehicles accessing this area to route via Collins Avenue and Albert College Park. While the exact diversion routing will vary depending on the vehicle origin/destination, the most direct version is approximately 750m and as a worst-case scenario (during the PM peak period) will result in a journey time increase of 5 minutes. The diversion is illustrated in Appendix A9.5 of the EIAR. During both Phase 1 and Phase 2 of the Main Works, the closure of the Ballymun Road and Albert College Court junction is necessary due to the construction of the site footprint. Alternative access for residents in Albert College Grove/Court/Avenue/Court and Lawn, will be provided from the existing Collins Avenue Extension to the north of the site. The diversion is illustrated in Appendix A9.5 of the EIAR. Prior to implementation, all traffic management measures will be agreed with Dublin City Council (DCC) and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. Where detour routes are required, these will be kept as short as possible and detour signage will be clear and easy to understand. (See EIAR Appendix A5.1. Outline CEMP section 1.3) A summary of Mitigation Measures for the Construction Phase are presented in Table 9.147 of the EIAR Chapter 9 (Traffic & Transport). The mitigation measure for Ballymun Road for traffic is to monitor if closure is required at all points, or if it can be reinstated temporarily throughout the works; and to coordinate spoil removal to minimize cumulative impact of HGV routing, Construction vehicles will be controlled in terms of the hours for operation (i.e. construction traffic may be prohibited during periods of very heavy traffic) to minimise disruption.
6	Context	8	**Proposed use of the OLV church grounds as a car park** for school drops and the impact it will have on Albert College residents.	MetroLink has no specific proposals to provide school drop off parking at Our Lady of Victories church during either the construction or operational phase.
7	Context	8	**Traffic Management:** Grave Concerns about the access on a temporary and permanent basis to the immediate area.	Please refer to response (5) above having regard to the construction phase. Chapter 9 Traffic and Transport and the associated appendices presents a comprehensive overview of the potential effects of the proposed project during the construction and operational phase. Table 9.141 of the EIAR identifies that based on traffic modelling undertaken there will not be long term significant impact on the road network at this location up to 2065. In the worst case scenario, there is predicted to be a small increase in traffic up to 2065 (maximum of 500 AADT).
8	Context	8	**Scepticism about the bus interchange being relevant:** one of the reasons given for the choice of this location is its relevance with the bus interchange. In our view there is no material difference between modes of transport based on station location. TII have provided no evidence at all of this being a material factor.	As outlined in EIAR Chapter 7, Consideration of Alternative, section 7.7.10.7, the assessment undertaken for the Emerging Preferred Route (EPR) identified a preferred route option including the proposed station location in front of Our Lady of Victories (OLV) Church. This location for the station provides a number of advantages when compared to other location options, including Albert College Park as outlined EIAR Chapter 7, Consideration of Alternative, section 7.7.10.7. It allows the Project to achieve a core project objective of providing public transport that is integrated in the existing and future proposed transport network, providing for interchange between bus routes both on Collins Avenue and on Glasnevin Road. Such bus routes include the N4 (Point Village to Blanchardstown Shopping Centre) bus route, the 104 (Clontarf to DCU) and 220 (Lady's Well Road to DCU) bus routes. A station location further south at the northern section of Albert College Park would not provide a good level of interchange as there would be over 500m separating potential bus stop locations on Collins Avenue and the MetroLink station which would reduce the number of passengers willing to interchange with bus routes. Appendix A9.2-C Collins Avenue station outlines the predicted number of passengers for this station including details of the estimated number of public transport Interchange The proposed Collins Avenue Station will have a significant catchment area, noting the analysis undertaken at the Emerging Preferred Route (EPR) stage identified this route option had the highest potential passenger numbers when compared with other route options.

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9	Context	8	**Bus Connects Project** propose reducing existing north bound three lanes of traffic to two lanes, one of which will be a bus lane thereby putting further pressure under existing road network. There appears to be no joined up thinking between TII and the NTA regarding Metrolink and Bus Connects.	As outlined above in response to Item 7, there is not predicted to be significant impacts on traffic at this location in any of the scenarios assessed up to 2065. The future street level layout at Collins Avenue includes a realignment of the current road layout with a reduction from two lanes to one northbound lane for vehicular traffic on the R108 Ballymun Road to the immediate west of the station. Southbound, the existing road layout of two vehicular traffic lanes, will be maintained. It is critical to understand that the scenarios assessed in Chapter 9 Traffic and Transport of the EIAR include for alterations to the road network to accommodate Bus Connects. The key driver behind both of these projects is to offer commuters and others high quality alternatives to the use of cars, thereby reducing the level of traffic congestion overall.
			A very wide cohort of the local and wider community will be negatively impacted by the construction of proposed station location including: • Our Lady of Victories Boy and Girls primary Schools • Senior Citizens living in Albert College Court • Our Lady of Victories Church • Residents in the immediate vicinity of the station location • Thousands of daily Motorists and Commuters to and from Dublin City Some of the fundamental issues resulting from these concerns include: • Safety of access to and from the schools • Potential Permanent eviction of elderly residents living in Albert College Court • Albert College Estate access or Cui De Sac creation • Diversion of Utilities adding at least 2 additional years to the build • Traffic Chaos making accessibility to the immediate community impossible • Station Excavation and Construction creating an unliveable environment for all in the immediate vicinity of the proposed station • Air Quality will be significantly impacted during construction • Construction Dust, Noise, Vibration • Operational Noise, Security, Vibration • Flooding Water Table exposures	**Safety of Access** EIAR Appendix A9.5 Scheme Traffic Management Plan outlines an assessment of potential impacts on traffic, pedestrian movements, cycle networks and public transport. Section 7.4 of the STMP deal directly with Collins Avenue Station with Tables 7.35 and 7.41 outlining the potential impacts on vulnerable road users including pedestrians and cyclists with no significant impacts predicted for any stage of the works. This is because foot path and cycleway routes will be maintained with a signal controlled junction to allow safe access across the roadway at this location. Prior to the implementation of traffic management measures, these will be agreed with DCC, and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken to ensure the safety of users. All proposed traffic management plans will be finalised by the appointed contractor, and an updated Scheme Traffic Management Plan will be prepared. (See EIAR Appendix A5.1. Outline CEMP section 1.3) **Potential Permanent eviction of elderly residents living in Albert College Court** Information regarding relocation and financial compensation related to the proposed Project is provided in Chapter 11 (Population & Land Use) and Chapter 21 (Land Take) of the EIAR. TII do not foresee any requirement to "evict" elderly residents in the Albert College Court complex for the following reasons: (1) Vehicular and pedestrian access to these properties will be retained at all times during the construction phase with diversions in place (Refer to Table 9.90 and Table 9.91 of Chapter 9 of the EIAR). (2) As outlined in Section 10.5.1.2 of Chapter 10 of the EIAR, airborne noise levels at Albert College Court will be below significance criteria once noise barriers are put in place. (3) As outlined in Table 10.14 of Chapter 10, there will be moderate to significant impacts during the progression of the TBM resulting from ground borne noise and vibration. However this impact will be for such a short duration that it will not require residents to move out permanently (eviction). No other ground borne noise and vibration impacts are predicted during the construction phase. From an air quality perspective as outlined in Table 16.46 there is no potential for significant health impacts arising from dust emissions during the construction phase. **Albert College Estate access or Cul De Sac creation and Traffic Chaos making accessibility to the immediate community impossible.** Please refer to response (5) above which responds to access arrangements to Albert College Estate during the construction phase. Chapter 11 of the EIAR **Diversion of Utilities adding at least 2 additional years to the build** Chapter 22 of the EIAR assesses the impact of the proposed Project on Infrastructure and Utilities during the construction phase, with mitigation measures proposed where required. Construction works required to divert utilities have been detailed in Chapter 5 (MetroLink Construction Phase) and Appendix A5.2 Construction Programme including Tunnel Elements. Where there is interaction between the proposed Project and existing infrastructure, the locations of the interactions have been identified and planned for, and therefore the potential for service disruption is limited. Utility diversions and any required strengthening works will most likely be undertaken as part of the Enabling Works, prior to commencement of the Main Civil Works and are included in the construction programme (Refer to Section 5.2.2 of Chapter 5). In some cases, planned service disruptions will be required to facilitate the connection of existing services to the newly diverted services. In such cases, consultation with and cognisance of the requirements of those premises served by the utility will be taken in determining the type, duration and phasing of the planned disruption. The duration of service interruption will be agreed with the relevant utility provider, in accordance with their service level/business requirements, however in most cases the duration of disruption should be no more than a number of hours. A typical construction methodology for the diversion of utilities is provided in Section 5.4.10 of EIAR Chapter 5, MetroLink Construction Phase.

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10	Context	8	(10) continued	**Station Excavation and Construction** As detailed in EIAR Chapter 5, MetroLink Construction Phase, the programme for the construction of the proposed Project has been optimised to minimise the duration of the Construction Phase in order to lessen the duration of potential environment impacts, while ensuring that the areas surrounding the work sites remain operational and functional. Work will run concurrently at all MetroLink site locations to ensure the Project is delivered in an effective and timely manner. Potential impacts associated with the construction phase activities of the proposed Project on the residences and businesses are addressed in Chapter 11 (Population & Land Use) of the EIAR, with mitigation measures proposed where required. The main Collins Avenue Station construction site will be on the east side of R108 Ballymun Road. This will give rise to inconveniences and disturbances affecting activities and services at a localised level and Ballymun Road in particular. This includes potential noise and vibration impacts from construction activities as detailed in Chapter 13 (Airborne Noise & Vibration) and Chapter 14 (Ground borne Noise & Vibration), disturbances to the local road network as detailed in Chapter 9 (Traffic & Transport), and dust risk as detailed in Chapter 16 (Air Quality). Measures to mitigate and monitor these impacts as a result of construction activity across the proposed Project are detailed in the relevant EIAR chapters and summarised in Chapter 31 (Summaries of the Route Wide Mitigation & Monitoring Proposed). Additionally, the appointed contractor will prepare detailed design and construction methodologies in the form of a detailed Construction Environmental Management Plan (CEMP) to ensure all environmental impacts are managed and mitigated. A draft CEMP is included in Appendix A5.1 of the EIAR that will be developed further by the appointed contractors and updated to reflect the conditions of the Railway Order, where an Enforceable Railway Order is granted. This detailed CEMP will be provided to DCC for consultation and approval in advance of any construction works on site. Monitoring instrumentation will also be used throughout the works to monitor potential environmental impacts, including those discussed above to ensure that acceptable limits are not breached. **Air Quality** EIAR Chapter 16, Air Quality, assesses the likely effects of the Project on Air Quality during the construction phase with mitigation measures proposed where required. Air Quality during the construction phase will be impacted by traffic and dust emissions resulting from construction activities at the Collins Avenue Station site from Earthworks, Construction and Trackout (Maximum Daily HGV Movements). Once mitigation measures are implemented as outlined in Chapter 16 Air Quality, Section 16.6.1 Construction Phase fugitive emissions of dust are not predicted to be significant and pose no nuisance, human health. The air dispersion modelling assessment for the Construction Phase identifies a generally negligible or beneficial effect on air quality in the vicinity of the proposed Project. Therefore, overall, it is considered that the residual effects are Neutral, Not Significant and Medium-Term. Before commencing relevant works, an Air Quality Management Plan will be prepared and submitted for approval to the relevant local authority, in this case DCC. The plan will include all appropriate dust and emissions mitigation measures applicable to the circumstances of the relevant site as outlined in the Appendix 16.4 Dust Management Plan. A specific plan will be developed by the contractor for each worksite, including Collins Avenue Station.

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			(10) continued	**Construction Noise and Vibration** Potential impacts associated with airborne noise and vibration during the construction and operational phase of MetroLink are addressed in EIAR Chapter 13, Airborne Noise & Vibration, with mitigation measures proposed where required. EIAR Chapter 14, Ground-borne Noise and Vibration includes the specific control measures proposed across the Project to control vibration sources with the potential to result in disturbance to building occupants or building damage. The assessment of airborne noise and vibration during the construction of Collins Avenue Station includes the consideration of a number of receptors on Ballymun Road including Our Lady of Victories Church, schools and residential properties. Section 13.7.1.1.4 outlines the residual impacts once mitigation measures outlined in 13.6.1 of the chapter are implemented. This section outlines that impacts at all stages of the works except piling works will not be significant (following mitigation). Moderate to significant impacts are predicted at the adjacent church during piling works. This would impact the church only if occupied. The standard working daytime hours are planned for this compound with no evening or Sunday construction activities during which the majority of mass services would be held. Furthermore, TII will work with the church in order to ensure that any planned church activities are not disturbed by excessive noise during this period. Further details of management measures to control airborne noise, are set out in the Construction Environmental Management Plan (CEMP), a draft of which is included in EIAR Appendix A5.1. Should an Enforceable Railway Order be granted, prior to the commencement of any construction works, the CEMP will be updated to include conditions arising from a granted railway order. There is no published statutory Irish guidance relating to the maximum permissible noise level that may be generated during the Construction Phase of a project, however the works will be required to take specific noise abatement measures to the extent required and comply with the recommendations of BS 5228-1 (BSI 2014a). The specific noise mitigation measures (as outlined in Section 13.6.1 of the EIAR) will include the selection of quiet plant, the use of noise control measures at source, restriction of working hours and the use of a 4m high noise screening barrier on the North, East and southern boundaries of the works site. Furthermore, the Transport Infrastructure Ireland (TII) Airborne Noise and Ground-borne Noise Mitigation Policy (Appendix A14.6 of EIAR Chapter 14) sets out a procedure for identifying construction noise insulation and temporary rehousing measures to be implemented, if required. **Ground borne Noise and Vibration** During TBM passage at Collins Avenue Station, there is a predicted noise value of LASmax slightly below 50dB. Receptors within 65m of the tunnel centreline will experience significant ground borne noise for a period of up to two weeks as the TBM passes. A summary of the residual impacts from tunnel boring is presented in table 14.49 (EIAR chapter 14), which predicts significant temporary residual impacts for noise and vibration at Scoil and tSeachtar, Our Lady of Victories and Albert College Court during tunnel boring. Unfortunately, there are no effective methods available to reduce ground borne noise or vibration from the TBM at source, but noting that the duration of this impact will be temporary and of the order of up to two-weeks as the TBM passes. TII will undertake advanced consultation and stakeholder engagement to prepare people for the passing of the TBM. **Flooding** The main construction site at Collins Avenue Station is located 1,700m from the Tolka River. Table 18.16 of EIAR Chapter 18, Hydrology, presents the construction and contractor compound sites and bulk fuel storage with subsoil storage involved in the proposed Project. Furthermore, the table provides a summary of the construction and compound sites along the full route together with the planned discharge point (surface water/storm sewer) and the estimated daily rate of discharge to that receiving feature. None of the planned construction or compound sites are located immediately within areas which have potential for fluvial or coastal flooding. Although there is a risk of pluvial flooding all along the proposed route due to insufficient capacity in the existing surface water network. However, it should be noted that the proposed MetroLink station has been designed to incorporate SuDS in the design which means that there will be no increase in runoff due to the proposed project. (Refer to Appendix A18.5 Flood Risk Assessment).
11	Albert College Estate	9	Approximately 90% of residents voted for a station location in Albert College Park, with the remainder in favour of a location at the Church.	Please refer to response 1 above.

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12	Albert College Estate	9	Exiting the estate is extremely difficult in the mornings with very high levels of traffic on both Collins Avenue and Ballymun Road. It has become worse recently with the changes at Griffith Avenue, traffic can be at a standstill at numerous random times during the day and every day of the week. Further lane reduction will have an extremely negative effect on the ability of residents to access their property. Therefore, should the station location not be moved, we would insist that TII examine alternative options along with the residents of the Albert College Estate for a temporary 'resident-only' exit of the estate onto the Ballymun Road and ask that the Inspector includes this as a Condition of the Railway Order.	Please see response to Item 9 above with regard to predicted long term impacts on local traffic during the operational phase. The outputs of the traffic modelling undertaken to inform the EIAR does not support the assertion that further lane reductions will have an extremely negative effect on traffic. (See EIAR Appendix A9.2 Overall Traffic and Transport Assessment). It is important to note that the implementation of both MetroLink and Bus Connects will provide an alternative to the use of cars and therefore result in a reduction in car usage along the alignment. Nonetheless, TII are keen to explore with residents all opportunities to mitigate potential impacts on Albert College Estate (in dialogue with DCC).
13	Our Lady of Victories School	10	**Alternative car park proposal**: If this church location is to go ahead, the only practical alternative parking space available in the area for school drop off would be on the land beside Ballymun Library. This would leave the parents and kids within a 5-minute walk to the schools, and they would only have to cross one major junction, similar to the proposal of TII.	It is acknowledged that parking for school drop offs will be more restricted in the immediate vicinity of the schools during the construction phase. However it is important to state that although parents and students may need to walk a little further, there will be no additional safety risk in place and all road crossings will be fully signalised as currently is the case.
14	Our Lady of Victories School	12	We believe that TII did not sufficiently contemplate the impact (Air Quality, Dust, Noise & Vibration, Traffic etc) on the schools as part of the review process and it is clear that their proposed location for the station will create very devastating and serious quality of life issues for the school going population.	Please refer to responses 3,5, 7 and 10 above.
15	Senior Citizens in Albert College Court Assisted Living Accommodation	13	The main concerns are threefold: 1. The major scale and the resultant noise and vibration caused by the excavation equipment that will be deployed to insert the station diaphragm walls which are in very close proximity to these houses. 2. The extreme proximity of the periphery of the construction site compound located at the main entrance of Albert Court on the church side of the complex. The current compliment of allocated street parking spaces for these residents will be subsumed into the construction site further increasing access issues for these residents. 3. The very close location of the site exit point where trucks carrying removed spoil from the excavation will leave (up to 20 per day) the site is again uncomfortably close to these housing units.	Please refer to responses 3, 5, 7 and 10 above.
16	Our Lady of Victories Church	15	Potential for structural damage to church.	Buildings and Infrastructure - A comprehensive Settlement Assessment has been undertaken to determine the potential impacts that construction of the proposed Project will have on sensitive receptors such as buildings and infrastructure from the advance of the TBM. The ground movement predictions and the building damage assessment methodology adopted for MetroLink is based on the approach adopted in most tunnel projects around the world, including London Crossrail and High Speed 2 in England. This is described in EIAR Section 5.4.11 (Ground Settlement Monitoring and Mitigation Works). EIAR Appendix A 5.17 Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement on property. Table 5.2 of this report shows that Our Lady of Victories Church has been assessed as falling within the 'Slight' category. The building risk categories shown in Table 4.3 of the aforementioned report and the "slight damage" category is described as "Cracks easily filled. Redecorating probably required". EIAR Chapter 14, Ground borne Noise and Vibration, presents predicted vibration levels arising from mechanical excavation and blasting. In all cases vibration levels will be maintained within limits that do not cause damage to property.
17	Our Lady of Victories Church	15	Access to the church for various services. Concern raised that this might lead to a permanent church closure.	Please refer to responses (5, 6) above.

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18	Residents on Upper Ballymun Road	16	Given the location of the construction site in such proximity to many properties, it will be necessary that TII must develop a Property Protection Scheme which would involve detailed condition surveys off all properties within a predefined zone and those owners would get a pre-agreed guarantee of protection from any damage.	The Property Owner Protection Scheme (POPS), committed to by TII, allows residential property owners to register with TII if their residential property is within thirty (30) metres of the edge of the MetroLink alignment or fifty (50) metres of station structures. The POPS comprises condition surveys of residential properties along the route of the proposed Project. The purpose of the condition surveys is to ascertain the condition of the properties before, during (if deemed necessary), and after the completion of the proposed Project to determine whether there has been any deterioration of any of the properties surveyed and whether same may be attributable to the proposed Project, and subsequently to recommend repairs as appropriate. Condition survey data gathered pre and post construction, and possibly during construction, will be used to assist the property owner and TII in swift and accurate verification of any property damage claims which may be received from property owners. The POPS is designed to cater for / address repair work which may be necessary for any damage (attributable to the proposed Project) to a qualifying residential property up to a threshold of €45,000. The POPS will be introduced by TII through public consultation and will be formally advised to eligible property owners by the Public Relations Department. Further information on POPS is available in Chapter 11 (Population & Land Use). Useful information can also be found in the MetroLink Frequently Asked Questions document which can be found online at: https://www.metrolink.ie/en/your-property/property-owners-protection-scheme/ , and this is where useful updates will be made available as the proposed Project progresses.
19	Residents on Upper Ballymun Road	16	There are already significant traffic management issues in the immediate vicinity of the proposed location, and it is one of the busiest routes to and from Dublin City. Grave concerns exist about the impact on traffic during construction. TII have not given any comfort on how this will be managed and how residents can comfortably continue to go to and from their properties. There are also concerns relating to structural damage to the nearby residential properties caused because of heavy drilling, rock breaking and rock-blasting.	Please refer to responses 5, 7, 10, 12 and 16 above.
20	Residents on Upper Ballymun Road	16 and 17	The increased levels of airborne dust generated by construction and excavation will be further exacerbated by the expected stagnation of bidirectional road traffic due to flow restrictions caused by lane closures, with an associated increase in traffic pollution caused by a buildup of exhaust fumes There will also be a higher density of heavy construction traffic and machinery in the area adding to the level of pollutants. This added to excessive construction noise and vibrations will seriously impact the residents living anything close a normal life.	Please refer to responses (5, 10) above.
21	Residents on Upper Ballymun Road	17	Flooding is also a major issue in the area and this is most likely as a result of the River Wad, which is located underground to the rear of houses and near the schools on the Ballymun Road, being no longer able to take the run-off of surface water following any heavy rain downfalls/deluges. We have real concerns that that the extremely high water-table coupled with a dig of at least 23m in depth in close proximity to the underground River Wad would cause a change in water flow direction thereof further undermining house foundations. We do not believe that this flooding situation has received any proper consideration in the choice of station location. Water table considerations must be studied to understand the possibility to have flooding events, the quality of the water during the use of construction materials and the settlement induced by the changing water levels both during and after the works. A surface and groundwater monitoring plan must be developed and approved in order to check the hydrological factors in real time for both the construction phase and longer-term during operations. It is necessary to evaluate the changing of the water table levels and the possibility of surface flooding.	Please refer to response (10) above.
22	Residents on Upper Ballymun Road	17	(Post Construction) there are further concerns attracting unwelcome attention and undesirable characters and anti-social behaviours. These residents are only a few meters from the station and will undoubtedly face significant post construction noise and disturbance late into the night as passengers and indeed revellers enter and leave the station.	One of the outcomes of the high quality architectural and urban realm design is to discourage anti-social behaviour. The station and the area surrounding the station has been designed to provide an attractive and well lit urban environment with open sight-lines, and avoidance of areas where individuals and groups of people can hide. Any vandalism or anti-social behaviour in and around the stations will be observed through a comprehensive CCTV (Closed Circuit Television) system which is controlled from the Operational Control Centre (OCC). On the rare occasion that anti-social activity occurs, security staff and/or Gardai will be quickly notified so as to allow for a speedy response. The provision of CCTV systems will also act as a significant deterrent to any anti-social behaviour as any incidents will be recorded and this evidence will be issued to An Garda Siochana. See EIAR Ch 4 Section 4.6.3.7 & also 4.9.1 on safety processes

Submission No.	001
Organisation Name or Name of Submitter	Albert College Residents Association (ACRA) and Ballymun Road North Residents

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
MetroLink Submission: On behalf of ACRA and Ballymun Road North Residents (Barry Conway ACRA Deputy Chair & Jim Deignan)				
23	Commuters to and from Dublin City	18	Grave concerns exist about the impact on traffic during construction. TII have not given any comfort on how this will be managed and how commuters can comfortably use this route to go about their business. Furthermore, under the Bus Connects project, the NTA propose to facilitate parking on Ballymun by reducing the Northbound Road from the existing 2 lanes for traffic plus a bus lane to 1 lane for traffic plus a bus lane. In light of the issue outlined above there seems to be no common sense to this proposal, and it will only further exacerbate the issues with Metrolink.	Please refer to responses (5, 9, and 10) above.
24	Alternative Location	19	During the previous Metro North proposal in 2007 the RPA at that time suggested a number of possible station locations including two park-based options. We are strongly of the opinion that there is merit in examining and considering a variation on what in 2007 the RPA proposed as Option 4 'Underground station at the North-West corner of Albert College Park.	Please refer to response (1) above.
25	Comparison between the proposed Collins Ave Station and the previous Griffiths Park Station designs	26	There are a number of common denominators between the two locations. Both are sensitive receptors due to the presence of (three) schools at each location as well as having an impact on sporting /green amenities. In addition, Collins Avenue station has the added negative effect on those groups mentioned previously. We believe that stakeholders in our catchment area, particularly children and parents at OLV schools, senior residents at Albert College Court, churchgoers, Ballymun Road and Albert College Estate residents are no less deserving of the same considerations which were largely based on concerns relating to safety and environmental impacts, as was afforded to stakeholders in the Griffith Park station catchment area. Station relocation was clearly seen as the correct and only action to take at Griffith Park and we believe that given the similarities between the two sites, the same actions are justified at the Collins Avenue station which is after all just one kilometre further up the road.	Please refer to responses (1) above.
26	Requirement for an Intervention Shaft:	28	If Albert College Park is the revised location of the station an alternative location for the ventilation shaft is also proposed. We propose that the new location for this ventilation shaft should be moved north of the Collins Ave junction, between the Dentist and Ballymun Library.	An alternative location for an intervention/ventilation shaft north of Collins Avenue is not included for in the RO Application.
27	Conclusion	31	We submit that accommodation of everybody's interests can and should be achieved by a well-designed park-based solution which allows the most judicious and economic use of the parkland. We feel this will serve both the interests of those patrons of OLV Schools and Church, Local Residents and indeed commuters from outside the area, who could all potentially suffer a significant loss in their quality of life and their enjoyment of their properties if the wrong decision is taken.	TII have set out in the above responses the rationale for the proposed location of Collins Avenue Station and hence the need for an intervention shaft south of the proposed Collins Avenue Station, including the preferred location for this shaft in Albert College Park, and the environmental mitigation measures that will be employed to mitigate temporary environmental impacts, including traffic management and access, noise and vibration and air quality.
28	Appendix	32	Reference is made to RFI 6 from RINA to TII dated 8 February 2022.	Noted.