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Organisation Name or Name of Submitter			Frances Maguire (37 Clonmel Road, Wadelai, Glasnevin North)		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Letter Re: Ra	ailway Order A	pplication	- Metro North: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and	d City Centre to Charlemont, Co. Dublin	
1	5. Grounds	4	I wish to object to the proposed site in front of Our Lady of Victories Church (OLV) being used as a location for the Collins Avenue Station a I feel there is a better alternative site which would have the benefit of providing a modern transport link but with far less adverse impacts on the people living/working in the proposed area and the young children attending OLV schools. I fully accept the benefits of having a metro station but there is a need to properly evaluate the impact on the large number of people who would be affected if this location is used.	As outlined in EIAR Chapter 7 (Consideration of Alternatives), 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).  TII acknowledge that there is potential for significant environmental effects on the surrounding area to the proposed MetroLink station if not mitigated effectively. However, as detailed in relevant chapters of the EIAR, TII's assessment shows that it is possible to mitigate the majority of potential impacts identified at this location during the construction period. Once the construction phase is completed, the location of a MetroLink station at OLV Church will provide significant positive benefits to the local community in terms of enhanced public transport provision, reduced traffic and the resultant improvement	
2	5. Grounds		The main reasons for my objection are listed below:  1) The proposed site for Collins Avenue Station is unsuitable because its construction which may take 7-10 years when the enabling works are taken into consideration would have a devastating impact on the operation of the 3 schools who share an entrance which is within 100 metres of the construction site for the station. The combined total of children and teachers needing daily access to the schools is close to 700. These users will be in this location for an average 5 hours a day for students and longer for teachers and admin staff. This is roughly 3,500 daily hours of school occupation affected by construction at the proposed OLV site. There will be additional traffic and disruption from the construction workers coming into the area as well as the usual traffic and these effects will continue through out the school day, increased risk of traffic accidents, traffic diversions will be needed and removal of existing parking will all impact access to the school. Heavy lorries moving tons of earth coming and going throughout the day will lead to greater pollution which will have a negative effect on the children's health and wellbeing and the associated noise will further erode their quality of life. This is a health and safety matter and when this number is multiplied by the weeks and years of construction the final impact on their young lives is significant and this measurement of impact needs be taken into account.  2) Furthermore, when the parents who are obliged to drop off and collect such young children are factored into the equation, the number of affected people is well in excess of a 1,000. All of them will be adversely impacted on a daily basis. This is an unacceptable Impact, and that is only part of the problem.		

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				As outlined by EIAR Chapter 9, Traffic and Transport, Table 9.64, enabling works in this area will be undertaken such that one lane of general traffic and one bus Iane in each direction will remain open, as well as dedicated cycle lanes being provided. Section 9.6.1.2.4.3 also confirms that during the enabling works, footways will either be retained in their existing location or realigned to a similar standard. During the main works, there will be a temporary footpath constructed to the rear of OLV Church to maintain access from Albert College Estate.  The Enabling Works and Main Works will have an impact on accessing the QLV Schools if not mitigated. For those who walk to the premises, the signalised pedestrian/locuac norsing outside the front of the school will be retained during all work and will continue to allow safe access for pedestrians and vulnerable users. As presented in Appendix A9.5 Scheme Traffic Management Plan, there will be a restriction on parking in the bus lane on the western side of the R108 and other locations.  In relation to health and safety, as outlined in EIAR Appendix A9.5 Scheme Traffic Management Plan Section 2.5.2.2 construction exhibits will be controlled in terms of the hours of operation (i.e. construction straffic will be prohibited during genoted of very heavy straffic, and during school drop off and pick up periods to nesure the safety of children, in addition, there will be controls at the entrance and exit of sites for construction vehicles in order to ensure the health and safety of other road users. These details are also presented in Appendix A5.1 Outline CEMP, all staff and workforce will be encouraged to make their way to site and home from site by public transport, by project specific transport (e.g. minibuses), by bicycle or on foot. Limited parking spaces will be provided for vehicles required for the required to take specific noise abatement measures to the extent required and comply with the recommendations of 85 S228–1 (85 2014a):  **The contractor undertaking t	

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				As outlined in EIAR Chapter 14, section 14.4.1, groundborne noise and vibration at this location will be below the threshold of significance for construction. Vibration will only be perceptible to school occupants for single events or short-term durations and therefore will be tolerable as assessed and documented by EIAR Chapter 10, Human Health, section 10.5.1.2.  Chapter 10 (Human Health) recognises that locations such as schools are considered 'highly sensitive' due to the presence of young people. However, at Collins Avenue, whilst there may be limited noise impacts predicted near these receptors, there are no significant adverse effects to human health.  Air Quality  Construction dust tends to be quite large in size (greater than 30 microns in diameter) and falls to the ground relatively quickly. This gives the potential for the soiling of cars or windows in the vicinity. As explained by EIAR Chapter 10, Human Health, section 10.5.1.1, this would not be deemed to have a significant adverse health impact as the dust does not stay airborne and is not inhaled. As outlined in EIAR Appendix A16.4 Section 6.3, a Dust Minimisation Plan (DMP) will be submitted for approval to the relevant planning authority to minimise airborne dust. Further information on dust mitigation is outlined in EIAR Appendices; A5.1 Outline CEMP, A16.2 Site Specific Potential for Construction Phase Dust Impacts, and A16.4 Dust Management Plan.  The modelling of road traffic for impacts on human and ecological receptors has found no significant impacts that require mitigation measures with respect to the modelling of emissions. However, some mitigation measures can be put in place to minimise emissions:  **Implement a policy which prevents idling of vehicles both on and off-site including HeV holdingsites;  **Construction Phase traffic should be monitored to ensure construction vehicles are using the designated haul routes;  **Additional vehicular traffic will be managed through the CEMP and Temporary Traffic Management Plans for the propo		
3	5. Grounds	5	3) Continuing on the subject of small children, I note RINA referred to a Creche located at the Junction of St Pappins Rd and Ballymun Road. If this was influencing the fact that the building of a station in the northern end of Albert College Park was considered unsuitable, I feel a judicial review is called for. After all the creche is operating on the site of the old parochial house, a building which was purchased at public expense to facilitate the earlier Metro North plans which were later shelved. The original CPO was granted to take possession of the old presbytery in order to remove any impediments to the building of a station in this general area and any current temporary use should not be factored into the score ratings for impacts. Especially not to the disadvantage of those who have their family homes in the area.	. Please refer to response (1) above related to the location chosen for Collins Avenue Station. The creche referenced in the query was not a factor in the identification of the preferred station location.		

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4	5. Grounds	5 and 6	4) The next issue is the Church users who will be adversely affected by building in this location. This parish is well established and caters for many weddings, funerals, holy communions and confirmations etc. for the local congregation throughout the year. Naturally the parishioners need access to the front of the building, nobody wants their deceased family members entering the church from a crowded car park instead of the nicely landscaped front gardens which have a special area to park hearses or wedding cars etc. The landscaped area was an integral part of the original design of the church grounds. Also, the current proposal would deny Brides the use of the church steps for their wedding photos. The church is a parish amenity supported by community funding and both its use and the enjoyment of its grounds should remain available to all the parishioners.	Please refer to response item (1) above in relation to the selection of the proposed location of Collins Avenue Station. Please refer to response item (2) in relation to the predicted impacts associated with the construction works.  As outlined in the 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;  * Consideration of the relationship between the station and the entrance to Our Lady of Victories Infants School;  * Raised table junction and shared space, and  * Preserve the main axis of Our Lady of Victories Church.  The landscape design in the operational phase 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 status. 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 formal axis to the front of the church. TII consider that this high quality landscape design for the area in front of the church having full regard to the location and function of the church will ensure that the church will be able to function fully for all church users including those attending communions, weddings and funerals.	
5	5. Grounds		5) The Credit Union is another very important community facility, an integral part of community services and another stakeholder likely to be adversely affected by disruption and restricted access for its members if Metrolink is allowed to proceed at this site.	Please refer to response item (1) above in relation to the selection of the proposed location of Collins Avenue Station. Please refer to response item (2) in relation to the predicted impacts associated with the construction works. As indicated in Appendix A9.5 Scheme Traffic Management Plan, there will be no impact to the parking available for the Credit Union, with access maintained to the premises. Therefore, the operation and customer access to the Credit Union will not be disrupted.	
6	5. Grounds	6	6) The proposal to build the Collins Avenue Station on the lands in front of Our Lady of Victories Church is much too close to the private homes located on the eastern side of Ballymun Road, there are approx. 8 family homes which would be subjected to intolerable disruption, that's in addition to numerous homes in Albert College Estate which would also be affected. The fact that the proposed development abuts the garden wall of number 158 Ballymun Road, a family home, is totally unacceptable. There would be far less private homes affected to the same extent, or with that level of proximity to the building site if the Collins Avenue Station was relocated to Albert College Park which could use the same design just a bit further down the road and I feel this should be considered.	Please refer to response item (1) above in relation to the selection of the proposed location of Collins Avenue Station. Response item (2) details the predicted impacts associated with the construction works and mitigation measures that will help reduce impacts on all sensitive properties in the area.  The EIAR has assessed the impact on 158 Ballymun Road, and provides for appropriate mitigations, as outlined below, to reduce the impacts to below significant:  Construction Phase – Airborne Noise and Vibration  EIAR Chapter 13 Airborne Noise and Vibration, Table 13.59 summarises the potential significant construction noise impacts from the construction of the proposed Collins Avenue Station, which includes receptor 1 for 158 Ballymun Road. The predicted impact without additional noise mitigation is Moderate to Significant during some of the work phases. Noise mitigation measures are detailed in section 13.6.1 and include for a proposed 4m high acoustic noise screen along the north, east and southern boundaries of the Collins Avenue construction compound. Surface activities to support sprayed concrete tunnel construction will be enclosed within an acoustically clad steel framed building to control airborne noise breakout to surrounding receptors. With these mitigations the construction impacts are reduced to below significant.  Construction Phase – Groundborne Noise and Vibration  EIAR Chapter 14 Groundborne Noise and Vibration, Appendix 14.5 presents the predicted groundborne noise and vibration levels during the construction phase of the project for 158 Ballymun Road:	

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		The predicted level of groundborne noise during TBM passage is 49 dB LASmax, which is above the 45 dB LASmax threshold resulting in a significant impact on the occupants of the building for the relatively short duration of TBM passage.  The predicted level of groundborne vibration during TBM passage is 0.266 ms-1.75 day and 0.224 ms-1.75 night, below the VDV (Vibration Dos Value is a parameter that combines the magnitude of vibration and the time for which it occurs) Threshold Level of 1.0 ms-1.75 day and 0.5 ms-1.75 night, resulting in a not significant impact on the building.  The predicted level of groundborne noise during mechanical excavation at Collins Avenue Station is 32 dB LASmax, which is below the 40 dB LASmax threshold resulting in a not significant impact on the occupants of the building.  The predicted level of groundborne vibration during mechanical excavation at Collins Avenue Station is 0.001 ms-1.75 day and 0.001 ms-1.75 night, well below the VDV Threshold Level of 0.8 ms-1.75 day and 0.4 ms-1.75 night, resulting in a not significant impact on the building.  The predicted level of vibration during blasting at Collins Avenue Station is 2.6mm/s PPV (Peak Particle Velocity), which is below the 8mm/s PPV threshold resulting in a not significant impact on the building.  The predicted level of air overpressure during blasting at Collins Avenue Station is 104.6dB, below the Threshold Level of 125dB, resulting in a not significant impact on the building.  Unfortunately, there are no effective methods available to reduce groundborne noise or vibration from the TBM at source but noting that the duration of this impact will be temporary and of the order of up to two-weeks as the TBM passes. Thi will undertake advanced consultation and stakeholder engagement to prepare people for the passing of the TBM and ensure the timing of these impacts are known.  This contractor(s) will prepare a Construction Noise and Vibration Management Plan (CEMP). The CNVMP will be a live document and will include a full unoni	

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7	5. Grounds	6	7) Albert College Court provides accommodation for senior citizens/ incapacitated/vulnerable people. Occupancy of these units would be untenable during the construction phase. Given that we are in a housing crisis it makes no sense to build on the land at the front of OLV Church thereby removing much needed specialised housing units from use for the duration of the build.	Please refer to response (1) above related to the location chosen for Collins Avenue Station. Please refer to response item (2) in relation to the predicted impacts associated with the construction works.  As detailed in Chapter 11 (Population and Land Use), during the construction of the Collins Avenue station there will be localised disturbance and inconvenience, particusarly impacting residents at Albert College Court assisted living/senior citizens accommodation.  The EIAR has assessed the impact on Albert College Court, and provides for appropriate mitigations, as outlined below, to reduce the impacts to below significant:  Construction Phase – Airborne Noise and Vibration  EIAR Chapter 13 Airborne Noise and Vibration, Table 13.95 summarises the potential significant construction noise impacts from the construction of the proposed Collins Avenue Station, which includes receptor 39 for Albert College Court. The predicted impact without additional noise mitigation is Significant to Very Significant during some of the work phases. Noise mitigation measures are detailed in section 13.6. 13 and include for a proposed 4m high acoustion roise screen along the north, east and southern bounders of the Collins Avenue Construction compound. Surface activities to support sprayed concrete tunnel construction will be enclosed within an acoustically called steel framed building to control airborne noise breakout to surrounding receptors. With these mitigations the construction impacts are reduced to below significant.  Construction Phase – Groundborne Noise and Vibration  EIAR Chapter 14 Groundborne Noise and Vibration and the proposed 4m high acoust consist of the proposed 4m	

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				• The predicted level of air overpressure during blasting at Collins Avenue Station is 107.8dB, below the Threshold Level of 125dB, resulting in a not significant impact on the building.  Unfortunately, there are no effective methods available to reduce groundborne noise or vibration from the TBM at source but noting that the duration of this impact will be temporary and of the order of up to two-weeks as the TBM passes. TII will undertake advanced consultation and stakeholder engagement to prepare people for the passing of the TBM and ensure the timing of these impacts are known.  TII's contractor(s) will prepare a Construction Noise and Vibration Management Plan (CNVMP) for the proposed Project as referred to in EIAR Appendix A5.1, Outline Construction Environmental Management Plan (CENVP). The CNVMP will be a live document and will include a full monitoring and auditing programme which will be agreed with the Local Authorities prior to the commencement of the Construction Phase, including predetermined monitoring trigger levels to ensure noise and vibration limits are not breached, noting that it is not possible to mitigate TBM groundborne noise and vibration at source. Table 6.2: Noise and Vibration Measures of the Outline CEMP outlines the monitoring programme requirements.  The Transport Infrastructure Ireland (TII) Airborne Noise and Ground-borne Noise Mitigation Policy (Appendix A14.6 of EIAR Chapter 14) also sets out the construction Phase) and Appendix A5.1 Outline Construction Environmental Management Plan (CEMP) to describe environmental mipacts are managed and mitigated in accordance with the EIAR and Railway Order, assuming an Enforceable Railway Order is granted. This updated CCMP will be provided to Dc COr	
8	5. Grounds	6 and 7	having to find parking and walk the very junior pupils into the school before returning to their car. While the tempory extra traffic is inconvenient for some residents trying to go about their daily journeys it isn't a major problem at present. However, when Ballymun Road access is restricted and traffic lanes there are reduced, a lot more parents will have no choice but to divert to Clonmel Road, use of the	TII would like to point out that a detailed traffic and transport assesment to identify potential effects on traffic, pedestrian movements and public transport during the construction phase are presented for Collins Avenue station in Appendix A9.5 Scheme Traffic Management Plan of the EIAR where impacts on local traffic movements during the construction phase are predicted. However, Chapter 5 of the EIAR, MetroLink Construction Phase, explains that traffic management plans for the construction phase of the Project have been developed to minimise the impact on road users, and to maintain access to businesses and other premises. Prior to implementation, all traffic management measures will be agreed with the relevant local authority (DCC) and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. The design of traffic management measures and highways works is based on achieving the key objective of maintaining continual access to all properties during the works. Where necessary, a safe alternative route will be provided for pedestrians and vulnerable road users, such as children, and persons with restricted mobility, to maintain pedestrian access. These details are presented in both Appendix A9.5 Scheme Traffic Management Plan, and in Appendix A5.1 Outline CEMP.	

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				No temporary traffic management measures are proposed for Clonmel Road, as it is outside of the Project boundary. The pedestrian access route from Clonmel Road to Our Lady of Victories Schools will not be impacted by the construction of the Collins Avenue Station.  Please refer to response item (2) in relation to the maintenance of the pedestrian crossing on the R108 Ballymun Road to facilitate safe access to and from the schools and drop-off on the R108.	
9	5. Grounds	7 and 8	10) Most of the users of this station will be Students who attend DCU and who travel from all over the city. A far better location for the station would be further south along Ballymun Road in Albert College Park. This location is closer to the college entrance and would be more convenient for the students.  For all of the above reasons it is my view that the location of the proposed Collins Avenue Station is better suited to a linear site in Albert College Park adjacent to the Ballymun Road side where there is a lower density of family homes in the immediate vicinity. Statistically this alternative site has no private homes adjoining the Metrolink site and less private homes in close proximity, plus less school attendees wh would be impacted compared to the proposed OLV site. Furthermore, the numbers affected if the OLV site proceeds is way in excess of th number of park users who would be inconvenienced. Park users have the option using another gate into the park and availing of the remaining recreational areas or taking a walk in other public park and using other recreational facilities. Unfortunately, for the local residents adjacent to OLV Church it is their home, some are paying big mortgages and do not have an option to move, likewise, parishioners, school children and their parents do not have any other options. Most park users only spend a short time visiting the park, whether going for a leisurely stroll, sports training or playing football matches, a couple of hours at most, whereas the residents on upper Ballymun Road (referred to previously) would be permanently subjected to the inconveniences associated with living beside a building site 24/7. Surely the considerable effects on them and their lives should supersede occasional visitors to the park.	of strong rationale for the location chosen for Collins Avenue Station. As also identified in the responses above TII consider that the majority of signficant effects on the surrounding area during the construction phase can be managed through the implementation of mitigation measures. Furthermore, it is important to note that completion of the project the area will be left with a high quality transport link into the city centre and to Dublin airport and further north, allowing for reduction in traffic on Collins Avenue and on the R108.	