Submission No.	249
Organisation Name or Name of Submitter	Councillor Patricia Roe

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Letter Re: MetroLink Submission Railway Order (RO), ABP Ref: NC06F.302010				
1	First and second paragraph	1	I do not consider the current proposal for a station in the grounds of OLV church and the positioning of a ventilation shaft and car park within the current area of Albert College Park to be the optimum option. A much better long-term option would be to situate the station in the park, which would have a smaller footprint, post construction, and would allow for ease of access by the public and, in particular those accessing Dublin City University. An underground station would have far less lasting negative impact on the park and would fulfil the current Z9 zoning of the park lands. I do not think that the repositioning of the station from the church lands to the park would have an adverse impact on passenger use and access to current and future bus routes. Albert College Residents Association (ACRA) including Ballymun Road North Residents have suggested an alternative location for the station in the Park which would entail one minute walk to main entrance to DCU (the main driver of passenger use at this location) and seven minute walk to Collins Avenue, to east/west bus connections.	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). 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 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 (EIAR Chapter 9, section 9.8.2.2) and the resultant improvements in the environment, with reduced noise (EIAR Chapter 13, section 13.5.3.1) and air quality (EIAR Chapter 16, section 16.5.3.2) pollution. EIAR Chapter 7, section 7.7.11.1 also covers the environmental impact assessment undertaken considering the possible locations for the intervention shaft, and why Albert College Park was determined as the optimum location for reasons of; it is no more than 1000m from either Collins Avenue or Griffith Park stations; it is adjacent to the tunnel on the west side of the park in order to reduce the length of connecting tunnel; the park area is the only "open space" on the MetroLink route between the two stations and as a result the location of the intervention shaft here avoids the requirement for any demolition; and the tunnel intervention shaft can be accessed easily by emergency vehicles with enough area for safely congregating passengers in an emergency.
2	Third and fourth paragraph	1	If the station were relocated to Albert College Park, as outlined above, the ventilation shaft could be located at a vacant site adjacent to Ballymun Library directly along the Metrolink route. Residents in the area, in particular the representative Resident Associations, have actively engaged with every stage of the consultation and feel very strongly that alternative locations for the station and ventilation shaft have not been adequately considered. While work on the station, if located in the park, will put several playing pitches out of commission for the duration of the build, and will cause disruption to park users and its wildlife, the location of a shaft, proposed carpark and access for emergency vehicles will also cause disruption whereas a similarly designed station as the Griffith Park Station would minimise the impact on the park with far less permanent land take than the proposed ventilation shaft.	Please refer to response (1) that explains the rationale for the proposed location of Collins Avenue Station and thus the intervention shaft.

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3	Fifth paragraph	1	Works at the church will permanently impact access/egress to Albert College estate, will have a negative impact on residents in the two adjoining Assisted Living complex, the Church and particularly, OLV primary school located opposite the proposed station site. Works at the OLV site would also have a more negative impact on traffic flows for the duration of the pre-and build stage, preventing access to/from Albert College Estate, and onto Collins Avenue and due to the proximity to the major junction at Collins Ave / Ballymun Road and the drop off/collect parking requirements at OLV Primary schools.	TII would first of all like to confirm that there will be no permanent impact on access/egress to Albert College estate. Local access will be impacted, as indicated in section 7.4.5.3.2 of Appendix A9.5 Scheme Traffic Management Plan, however a diversion has been proposed in order to maintain access/egress. The restriction is also a temporary impact, as opposed to permanent, as it will not be required following the completion of the construction phase. The proposed Collins Avenue Station location allows construction to be undertaken mostly clear of the R108 and hence minimises traffic disruption. Other construction impacts on nearby receptors have been assessed and mitigation proposed as documented by the EIAR and summarised in EIAR Chapter 31. <u>Traffic Management and Access</u> 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. 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. The design of traffic management measures and highways works is based on achieving the key objective of maintaining continual access to all properties during the works. Where necessary, a safe alternative route will be provided for pedestrians and vulnerable road users, such as children, and persons with restricted mobility, to maintain pedestrian access to premises. Where detour routes are required, these will be kept as short as possible and detour signage will be clear and easy to understand. All construction sites will be designed to be as unobtrusive as possible. Measures will be implemented in order to maintain access to the Church during the construction of MetroLink. There are no footway, footpath or cycle lane closures that would require users to significantly divert from the existing routing, therefore maintaining access to the Church and surrounding area for people who walk or cycle. There will also be a temporary footpath constructed to the rear of the Church in order to maintain access from Albert College Court. Vehicles accessing the Church car park will be required to use a diversion via Albert College Court, maintaining access during all project stages. (EIAR Chapter 11, Table 11.61) 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 lane 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 OLV Schools if not mitigated. For those who walk to the premises, the signalised pedestrian/toucan crossing outside the front of the school will be retained during all works and will continue to allow safe access for pedestrians and vulnerable users. Furthermore, as outlined in EIAR Appendix A9.5 Section 2.5.2.2, construction vehicles will be controlled in terms of the hours of operation (i.e. construction traffic will be prohibited during periods of very heavy traffic and during school drop off and pick up periods). In addition, there will be controls at the entrance and exit of sites for construction vehicles in order to ensure the safety of other road users.

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			Response (3) continued.	Noise and Vibration Mitigation will be implemented to reduce impacts on church users and residents, that will include: •The provision of a noise barrier (4m) on the east, south and northern boundaries; •The Contractor undertaking 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 selection of plant items will be required to comply with European Communities Noise Emissions by Equipment for Use Outdoors (Amendment) Regulations 2006 (S.I. No 241/2006); •The outline Construction Environmental Management Plan (CEMP) contained in EIAR Appendix A5.1 includes a Construction Noise and Vibration Management Plan (CNVMP) that will be developed further for the construction phase and will be used by all contractors based on the application of the mitigation measures outlined in EIAR Chapters 13 (Airborne Noise & Vibration), and 14 (Groundborne Noise & Vibration); •The CNVMP will take account of detailed assessment of potential noise and vibration impacts associated with each construction compound. The assessment will identify through modelling and calculation, predicted construction noise levels, identification of potential exceedance of Construction Noise Thresholds (CNTs), identification of required noise mitigation measures specific to each work area to minimise noise and vibration impacts so far as is reasonably practicable; and •As part of the CNVMP a baseline noise study will be undertaken prior to the commencement of construction works to characterise the prevailing noise environment at impacted Noise Sensitive Locations (NSLs). These measures will effectively reduce noise levels from construction to below the CNT. As outlined in EIAR Chapter 10 (Human Health) Table 10.14, following mitigation, construction may cause annoyance to users, but no residual health effects are predicted. 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. 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.
4	Conclusion	2	I agree with and wish to support submissions from local resident associations: GADRA and ARCA(&Ballymun Road North Residents). The relocation of the station to Albert College Park and the ventilation shaft to empty land beside Ballymun library is a positive option from both short term and long term objectives. Short term advantages: Less adverse impact on traffic on surrounding roads Less adverse impact on OLV Schools Removes risk of Seniors having to vacate homes at Albert College Court and Hampstead Court Long Term advantages: Smaller station footprint with less adverse impact on surrounding area Less land take from Albert College Park More convenient for those accessing DCU (largest driver of passenger movement at this stop) Less risk of impeding/changing flow of underground river Wad = less risk of flooding for Ballymun Road residents Retains OLV church frontage and architectural appearance	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. TII would also like to confirm that the environmental impact assessment undertaken does not indicate a risk of Seniors having to vacate homes at Albert College Court and Hampstead Court as suggested.