Submission No.	252
Organisation Name or Name of Submitter	Paul Cusack (on behalf of residents of 153 Ballymun Road)

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Letter Re: Collins Avenue Metro Station				
1	Summary	1	We submit based on considerations of service provision, community and environmental impact, both in the operational and construction phases, that relocation of the proposed DCU stop (also known as Collins Avenue Station as illustrated in diagram no. 14 below) to a location of ultimately small visible footprint along the western periphery of Albert College Park is a more suitable option. This community strongly believes this would be a superior solution to the current design proposal to locate the station on the forecourt of our Lady of Victories Church on Ballymun Road.	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 a location at the western periphery of Albert College Park: (1) It allows the Project to achieve a core 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 on the R08 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). As stated in section 7.7.10.7 of EIAR Chapter 7 (Consideration of Alternatives), the placement of a station within Albert College Park, including on the periphery, would also require the provision of an intervention shaft between that location and Ballymun station in an area where there is very limited space for such a shaft in the absence of demolition. 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 and the resultant improvements in the environment, with reduced noise and air quality pollution.

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2	Summary	1	We further submit that such relocation would avoid or significantly reduce many of the adverse disturbance effects. The most prominent concern is the disruption and obstruction of current access routes for schoolchildren and their parents to our Lady of Victories School campus which will be caused by the major scale of the construction and the associated continuously ongoing rolling road closures. This disruption includes and is not limited to, the complete removal of already limited, scarce parking spaces available to parents dropping and collecting children. Also of significant concern is the expected noise, vibration and air quality issue during an anticipated construction period of between 7-10 years.	Please refer to response item (1) above in relation to the rationale for the proposed location of a station at Collins Avenue. TII acknowledge that there is potential for 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 and the resultant improvements in the environment, with reduced noise and air quality pollution. Specifically with regard to the points raised: School Campus access routes School access will be maintained at all times, as presented in EIAR Appendix A9.5 Scheme Traffic Management Plan. 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. 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. The temporary traffic management measures have been designed in line with the road user hierarchy of the Transport Strategy for the GDA, which prioritises pedestrian/cyclist, public transport and commercial needs provision over private vehicles. As stated in section 7.4.6.3.6 of EIAR Appendix A9.5 Scheme Traffic Management Plan, 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. There are no footway or cycle lane closures that would require users to significantly divert from the existing routing, therefore maintaining access to the schools and surrounding area for people who walk or cycle. Therefore, provisions will be maintained for parents to park in the surrounding area and walk with the children to and from the schools. Due to the constrained lane capacity on the R108 during the works, and the relocation of bus stops, informal bus lane parking on the R108 used as a 'drop-off' will be restricted. However, as stated above, the pedestrian crossing will be maintained and therefore parking on the southbound side of the R108 will still facilitate safe access to/from the school. There will 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. This diversion is presented in section 7.4.6.3.2 of EIAR Appendix A9.5 Scheme Traffic Management Plan. 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. 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 (2) continued.	Noise and vibration impact: As outlined in EIAR Chapter 14, section 14.4.1, Table 14.29 groundborne noise and vibration at Our Lady of Victories Girl's School 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. Single events or short-term durations could include blasting, or the 2-week duration of the TBM passage. Regarding the possible noise and vibration impact on Our Lady of Victories National School (girls, Boys and Infants) and 153 Ballymun Road during construction phase: The EIAR Appendix 13.7 Airborne Noise Construction Phase Modelling presents predicted airborne noise levels, following mitigation, to construct Collins Avenue Station. Receptor 65 represents 153/155 Ballymun Road and receptors 69 represents the School Campus. Predicted construction noise levels are below the construction noise threshold levels at both locations during all working phases, indicating no significant adverse impacts. As presented, the threshold for significance is 45 LAmax,s dB, however the noise at Our Lady of Victories Girl's School will be below this at 43 LAmax,s dB. As stated above, 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. Single events or short-term durations could include blasting, or the 2-week duration of the TBM passage. In the EIAR Appendix 14.5 Groundborne Noise and Vibration Blasting Modelling Results, the predicted noise and vibration levels during TBM Passage, Mechanical Excavation and Blasting are presented. The results demonstrate that there is no significant impacts on the buildings or occupants at 153 Ballymun Road. Predicted VDV (Vibration Dose Value) during TBM Passage at 153 Ballymun Road has a value of 0.191 m/s-1.75 and for Mechanical Excavation, 0.001 m/s-1.75, which are below the VDV Threshold Levels for this building of 1.0 m/s-1.75 and 0.8 m/s-1.7 respectively. Therefore, there will not be significant levels of vibration on the building and its occupants. During Blasting a vibration level of 2.1mm/s PPV (Peak Particle Velocity) is predicted, compared to the Threshold Level for this building of 3mm/s resulting in a not significant impact. The Air Overpressure Level during blasting at 153 Ballymun Road is 103.3 AOpdB, below the Threshold Level for this building of 125 AOpdB, resulting in a not significant impact. Predicted groundborne noise values LAmax,s at 153 Ballymun Road are 44 dB for TBM Passage and 31 dB for Mechanical Excavation, lower than the Threshold Levels for this building of 45 dB for TBM Passage and 40 dB for Mechanical Excavation. Therefore, there will not be significant levels of noise at this location. The results demonstrate that there is no significant impacts on the buildings or occupants at Our Lady of Victories Girls Primary School (School Campus) Predicted VDV (Vibration Dose Value) during TBM Passage at Our lady of Victories Girls Primary School has a value of 0.179 m/s-1.75 and for Mechanical Excavation, 0.001 m/s-1.75, which are below the VDV Threshold Levels for this building of 1.0 m/s-1.75 and 0.8 m/s-1.7 respectively. There, there will not be significant levels of vibration on the building and its occupants. During Blasting a vibration level of 1.2mm/s PPV (Peak Particle Velocity) is predicted, compared to the Threshold Level for this building of 3mm/s resulting in a not significant impact. The Air Overpressure Level during blasting at Our Lady of Victories Girls Primary School is 99.6 AOpdB, below the Threshold Level for this building of 125 AOpdB, resulting in a not significant impact.

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			Response (2) continued.	Mitigation will be implemented to reduce impacts on schools, church users and residents as detailed in Appendix A5.1 Outline CEMP section 6.2, that will include: •The provision of a noise barrier (4m) on the east, south and northern boundaries of the construction site; •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 the 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 for the construction phase; •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 unmitigated exceedance of Construction Noise Thresholds (CNTs) and the identification of the 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, no residual health effects are predicted. Air Quality As presented in the EIAR Chapter 10, Human Health and detailed in the EIAR Chapter 16, Air Quality, the Construction Phase of the Air Quality assessment identifies a generally negligible or slight negative impact on air quality in the vicinity of the proposed project during the Construction Phase post mitigation. No exceedances of air quality standards are predicted, therefore, no significant adverse human health impacts are predicted. As detailed in Chapter 16 (Air Quality) section 16.6.1.1, in order to ensure that no dust nuisance occurs, a series of measures will be implemented, these have been detailed in Appendix A16.4. In summary, the measures which will be implemented will include: * Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods; * Any blasting will be completed by specialised contractors with a specific blasting dust management plan; * Liaison with local authorities and community groups; * Hoarding will be provided around the construction compounds; and * It is anticipated that methods of collecting rainwater and recycling for general site use, will be adopted where practical. Requirements for dewatering installations at deep station and tunnel portals can also provide a valuable source of water for general site use. Strict dust prevention will be in place at all times, to minimise any potential emissions and these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations. Consistent implementation of good dust minimisation practices will ensure that the impact from construction dust is Long-Term, Localised, Reversible and not significant when considered with respect to the EPA description of effects (EPA 2022).

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3	Our Lady Of Victories School Campus	2 and 3	Construction of an open cast underground Metro station at this location will result in severely compromised safe access to Our Lady of Victories National Schools. The proposal to locate the station along with the sizeable construction site compound in this location will remove the available parking spaces as both the Church car park and on-street parking on Ballymun Road/Albert College Drive will no longer be available. Parking in this area during school access times is already at a premium and the almost total removal of existing parking space will pose a significant risk to the safety of these children and their parents as they try to access the school. There is no practical alternative parking space available in the area due to the built-up urbanised nature of the surrounding landscape. There will also be several hundred construction personnel involved in this project, some of whom presumably will also be competing for the very limited remaining parking spaces. This situation is acknowledged in the Bus Connects document titled 'Ballymun to City Centre Draft Preferred Route Options Report' drafted in November 2020. It clearly states that the 200 metre section of Ballymun Road on the opposite side to the OLV church is already prone to congestion. The following is an excerpt from the Bus Connects Document: 'South of Collins Avenue junction there is parking and stopping activity at various times on the western side of the road associated with Our Lady of Victories National School on the western side, across the road from the church of the same name. There is no vehicular drop-off zone at the school which gives rise to disorganised on-street parking at school collection times, (shown as a dashed yellow line on the aerial photograph below'). This blocks the northbound cycle lane over a length of 200m or so, as well as partially encroaching into the bus lane as shown in the following photographs. (photographs are not included) As it stands residents along this stretch frequently have their access blocked by parents parking across entrances during drop off and collection times, and this will be greatly exacerbated for 5 -7 years during construction.	Safe access will not be compromised. Please refer to response (2) regarding the access to the Our Lady of Victories National Schools and the proposed mitigation measures to ensure safe access. Response item (2) also details the impacts to informal bus lane parking/drop-off on the R108. As detailed, the pedestrian crossing will be maintained so that drop-offs can be facilitated from other locations. Therefore, there will not be any increased risk to children and parents as a result of the removal of available parking. As presented in the EIAR Appendix A9.5 Scheme Traffic Management Plan, the existing parking spaces on Albert College Drive will be removed as part of the station construction. This will result in the removal of 42 public parking spaces on this street, which equates to 42% of public parking spaces within a 200m area. The parking at this location is not residential permit parking and removal of the parking shouldn't directly impact on residential parking in the area. As detailed in the Scheme Traffic Management Plan (EIAR Appendix A9.5 section 2.1), a hierarchical approach to traffic management has been adopted in line with the Transport Strategy for the Greater Dublin Area 2022-2042, with pedestrians/cyclists, public transport and commercial needs provision taking preference over private car usage. EIAR Appendix A5.1 Outline Construction Environmental Management Plan notes that all construction 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 construction activity and for employees. The nominated contractor(s) may provide a transfer pick-up and drop-off service from suitable public transport hubs. A Construction Mobility Plan will be prepared for by the proposed Project by the contractor(s) to outline access arrangements to construction sites by sustainable travel modes. Further details on this can be found in section 5.15 of EIAR Appendix A5.1 Outline CEMP. Each site will need a specific plan for project personnel mobility. The following measures will need to be considered within the final Construction Mobility Plan: * The provision of showers/changing rooms for construction staff; * The provision of cycle parking for staff; * Ensuring safe and segregated pedestrian access to site; and, * Provision of site specific transportation (minibuses) where frequent movements are going to be occurring (e.g. between different work sites).

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4	Diversion of Utilities	3	Construction of a station in the proposed location will necessitate moving the existing services which lie on the east side of Ballymun Road to the opposite (school) side. According to TII this will be carried out over 8 construction phases and will progress for a period of 16 months minimum prior to station construction commencement. To put this into context, this will involve digging trenches on the west side of Ballymun Road to accommodate pipes and cables with dimensions as follows: Surface Water Pipes 1,350 Milimetres in diameter, mains Water Pipes 800mm in diameter, Sewerage Pipes 450mm in diameter follower by electricity cables. These are major structures and this plan will result in an additional major construction project being placed along this same section of road which is already heavily congested during peak times, for reasons outlined above, for up to two years, before the station build even starts. The rolling closures of different sections of the main road on both sides of the carriageway will result in serious access challenges not to mention safety concerns for parents and children who, with the already additional stresses caused by difficulty finding a parking space must now cope with running the gauntlet between heavy construction machinery as well as constantly changing obstructions and diversions along their route to the schools.	As stated in Chapter 22 (infrastructure and utilities) section 22.6.1, 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 any service disruption is limited. The potential for the proposed Project to impact or interrupt utility supply has been assessed. Utility services near the proposed Project have been identified using the methods detailed in Sections 22.3.3 and 22.4.4 and locations where the proposed alignment crosses existing infrastructure have been established. Consultations have been undertaken with all known service providers, as outlined in Table 22.3, and their requirements have been identified and incorporated into the design. Designs for utility diversions and/or protection of infrastructure have been agreed in principle with the relevant utility providers. Design refinement will be subject to further consultation with the utility providers and targeted excavation by slit trenching to expose services and validate their position and depth, in accordance with PAS 128:2014 Quality Level A. All impacted utilities will be reinstated in accordance with current standards and specifications for the relevant utility (as specified by the utility owner). In the case of older utilities, this means that the replacement section will be constructed with modern materials. There may be a localised positive environmental impact an associated with this, for example, the replacement of cast iron pipes with ductile iron or HDPE pipes, which are more durable and less prone to leakage, and the replacement of underground oil or fluid filled electricity cables with plastic insulated cables. The work on utilisties is incoprated into the Advanced Enabling Works programme, and therefore the temporary traffic management proposed also captures these works. As stated in EIAR Appendix A9.5 Scheme Traffic Management Plan section 7.4.5.3.5, footways at this location are either retained in their existing location, or realigned to a similar standard. There are no footway or footpath closures that would require users to significantly divert from the existing routing. Please refer to response (2) regarding the access to the Our Lady of Victories National Schools and the proposed mitigation measures to ensure safe access. 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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5	Station Excavation and construction	3	This initial disruption caused by the utilities relocation prior to station excavation will continue and will be further exacerbated during station construction. The station box excavation area has a very large footprint as shown on the illustration no.14 and is approximately 175 metre long x 45 metres wide x 25 metres deep. To put this into context, it is almost the length of Croke Park football pitch, half as wide and in terms of depth underground, is a mere 5 metres less than the height of the stands. The amount of spoil or earth to be excavated will be enormous and the plan is that this material will be removed from the site by convoys of trucks operating constantly between 7am and 7pm Monday to Friday and on Saturdays between 7am and 1pm. There will be road / lane closures on the Eastern carriageway, with removal of the central reservation and closure of the Albert College Drive/Ballymun Road junction. In short there will be resultant gridlock for both north and southbound traffic and residents in both Albert College Estate and along Ballymun Road, will experience severe access restrictions to and from their properties for a period of 7 -10 years. Spill over traffic will ultimately back up into all feeder and adjacent roads and housing estates thus exacerbating the traffic gridlock that already happens during peak times in the locale.	Please refer to response item (4) above in relation to impacts to utilities. As detailed in Chapter 5 (MetroLink Construction Phase) section 5.3.2, haul routes will be required for the transport of excavated material and movement of construction materials, equipment and plant to and from the Construction Compounds. The haul routes have been determined based on a review of all potential road crossings/access points for traffic to and from the construction sites/compounds and based on the identification of those road crossings/access points with the potential capacity to accept a large number of vehicle movements. The haul routes have been developed in line with the Dublin City Council (DCC) Heavy Goods Vehicles Management Strategy (DCC, 2007), which aims to enhance Dublin City Centre through banning 5+ axle vehicles during the hours of 07:00-19:00 sever days a week, unless a valid permit is obtained. Regional roads, primary roads and sections of the M50 Motorway will be used at every opportunity in order to reduce traffic impacts to local roads with reduced capacity. Prior to implementation, all traffic management measures will be agreed with the relevant local authority (FCC or DCC) and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. The temporary traffic management measures have been designed in line with the road user hierarchy of the Transport Strategy for the Greater Dublin Airea 2022-2042, which prioritises pedestrian/cyclist, public transport and commercial needs provision over private vehicles. This is detailed in EIAR Appendix A9.5 Scheme Traffic Management Plan section 2.1. Appendix A9.5 Scheme Traffic Management Plan section 7.4.5.3.1 presents an assessment of the impact of the Advanced Enabling Works on general traffic. As detailed, the temporary traffic management associated with these works will result in a slight impact on traffic volume and distribution of traffic on the local network. There is anticipated to be increases in traffic flow on local roads to west of the works location, mainly due to traffic routeing to avoid the Collins Avenue/Ballymun Road signalised junction. An increase in driver delay in the local area is primarily due to the reduction in capacity on Ballymun Road. This results in a moderate impact in the area, specifically on the approaches to the south and west arm of the Collins Avenue/Ballymun Road signalised junction where delays range between two to four minutes per vehicle. This level of impact is prevalent in both the AM and PM peak periods. Section 7.4.6.3.1 details the impact of the Main Works on general traffic. During Collins Avenue Station Main Works construction, it is determined that there will be a severe impact on local traffic. The reduction of capacity on Ballymun Road results in a severe impact on traffic volume increases in the area. While traffic in the local area does redistribute primarily to avoid the Collins Avenue/Ballymun Road junction, there are still some increases in traffic volume on the junction approach arms. The HGV routing profile for Collins Avenue Station, as well as the site traffic for Griffith Park Station, utilise Ballymun Road and route north to south, and vice versa, through the junction. Junction analysis indicates that the Collins Avenue/Ballymun Road junction will operate over capacity during the peak construction year. This will result in increases in driver delay during both peak periods, but specifically high delays of 96 seconds and queues of up to 188 PCUs during the AM peak period, along R103 southbound. Delays during the evening peak are most significant along Glasnevin Avenue and Ballymun Road with delays of 281 seconds and 422 seconds respectively. Detailed modelling results are presented in Appendix D of Appendix A9.5 Scheme Traffic Management Plan. As detailed in Appendix A9.5 Scheme Traffic Management Plan, the closure of Ballymun Road and Albert College Court junction is necessary due to the construction 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. Figure 7-15 in Appendix A9.5 illustrates the proposed access to Albert College Park, in which the estate becomes a cul-de-sac. This option removes the potential of 'rat-running' through the area, which may become worse when MetroLink works are in place. As outlined in EIAR Chapter 9, there will be additional traffic at Our Lady of Victories Schools during construction, however a Traffic Management Plan will be implemented to ensure that there are no significant impacts on students, parents and staff. All HGV movements will be managed in line with the measures with further details found in the Outline CEMP (Volume 5, Appendices, Chapter 5 (MetroLink Construction Phase) and Appendix A9.5, Section 2.5.2 to ensure that there are no accidents involving construction phase vehicles. These measures will include control of the movement of HGVs to and from the site during school drop off and pick up times. It should also be noted that during all phases of construction the pedestrian crossing between Our Lady of Victories church and the schools will be maintained to ensure safe access across the road. To minimise disruption, where practicable, construction work requiring short term disruption and road closures will be carried out when traffic volumes are lower, such as at night, at weekends and during school holidays (Section 9.7.1.2, EIAR Chapter 9).

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6	Senior Citizens In Albert College Court Assisted Living Accommodation	4	Our 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 such close proximity to these houses.	The EIAR Appendix 13.2 Airborne Noise Construction Phase Modelling presents predicted airborne noise levels, both before and following mitigation, to construct Collins Avenue Station. Receptor 39 represents Albert College Court. Predicted construction noise levels are below the construction noise threshold level of 75 dB at this location during all working phases, indicating no significant adverse impacts. As outlined in EIAR Chapter 14, section 14.4.1, groundborne noise and vibration at this location for the station construction will be below the threshold of significance for construction.
7	Senior Citizens In Albert College Court Assisted Living Accommodation	4	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.	Please refer to response item (3) in relation to the loss of parking at Albert College Court. Please note that it is pay and display parking spaces (not resident parking spaces) that are impacted, as indicated in Appendix A9.5 Scheme Traffic Management Plan section 7.4.6.3.5.

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8	Senior Citizens In Albert College Court Assisted Living Accommodation	4	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. It would therefore seem inevitable that due to the aforementioned access issues, coupled with extreme noise, vibration, airborne contamination from construction equipment and the resultant dust and mud that a large proportion of these residents would have to be relocated possibly permanently as their lives would be unbearable given the above challenges. This would result is major stress and anxiety for all of these residents, many of whom are elderly and some who do not enjoy good health. TII have not confirmed whether these residents face relocation. Nor to our knowledge has there been any meaningful communication from TII given the lack of availability of any spokesperson for these residents to inform them of the plight they face, which seems grossly unfair.	Please refer to responses (2), (3) and (5) in relation to the temporary traffic management measures proposed at this location. Noise and Vibration The EIAR Appendix 13.2 Airborne Noise Construction Phase Modelling presents predicted airborne noise levels, both before and following mitigation, to construct Collins Avenue Station. Receptor 39 represents Albert College Court. Predicted construction noise levels are below the construction noise threshold level of 75 dB at this location during all working phases, indicating no significant adverse impacts. 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. During the passage of the TBM there are exceedances of groundborne noise at all buildings within 75m of the tunnel centre for a period of up to two weeks. In the EIAR Appendix 14.5 Groundborne Noise and Vibration Blasting Modelling Results, the predicted noise and vibration levels during TBM Passage, Mechanical Excavation and Blasting are presented. The results demonstrate that there is no significant impacts on the buildings or occupants at Albert College Court. Predicted VDV (Vibration Dose Value) during TBM Passage at Albert College Court has a value of 0.242 m/s-1.75 and for Mechanical Excavation, 0.002 m/s-1.75, which are below the VDV Threshold Levels for this building of 1.0 m/s-1.75 and 0.8 m/s-1.7 respectively. Therefore, there will not be significant levels of vibration on the building and its occupants. During Blasting a vibration level of 4.3mm/s PPV (Peak Particle Velocity) is predicted, compared to the Threshold Level for this building of 8mm/s resulting in a not significant impact. The Air Overpressure Level during blasting at Albert College Court is 107.8 AOpdB, below the Threshold Level for this building of 125 AOpdB, resulting in a not significant impact. Dust and mud from the construction site, As presented in the EIAR Chapter 16, strict dust prevention will be in place at all times, to minimise any potential emissions and these procedures will be strictly monitored and assessed. 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 soiling of cars or windows in the vicinity, however, from a human health perspective would not be deemed to have a significant adverse health impact as the dust does not stay airborne and is not inhaled (Section 10.5.1.1 Chapter 10 of the EIAR). 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 reduce airborne dust. Further information on dust mitigation is outlined in Appendix A5.1 (CEMP Outline), A16.2 (Site Specific Potential for Construction Phase Dust Impacts) and Appendix A16.4 (Dust Management Plan) of the EIAR. Before commencing relevant works, an Air Quality Management Plan shall be prepared and submitted for approval to the relevant planning authority. The plan will be developed by the contractor and for each worksite shall include details of control measures, details of dust monitoring arrangements, including the location of sensitive receptors, monitoring locations, monitoring equipment to be used; and details of the air quality reporting requirements. Further details on this can be found in EIAR Chapter 16 (Air Quality) and EIAR Appendix A5.1 Outline CEMP. As detailed in Chapter 16 (Air Quality), section 16.6.1.4, HGV traffic leaving site will pass through a wheel wash; Public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary. If public roads are deemed to require additional cleaning where possible a suction device for road cleaning will be utilised which can access spaces around cars and other street furniture more effectively; and during movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions, mud or other construction particles. Residents relocation, No relocation of the residents in Albert College Court is deemed to be required as mitigations planned to be implemented will reduce the impacts. This conclusion has been reached as a result of the assessments set out above. If however, residual construction noise levels remained above the Noise Insulation or Temporary Rehousing trigger values, application of TII Airborne and Groundborne Noise Mitigation Policy will be implemented with further control measures introduced such as Noise Insulation (NI). Further details on this can be found in EIAR Appendix A14.6 TII Airborne and Groundborne Noise Mitigation Policy.

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			Response (8) continued.	The CNVMP(Construction Noise and Vibration Management Plan) will set out a detailed analysis of each construction compound relating to noise levels, durations and number of properties impacted and the planned approach for managing same, as indicated in EIAR Appendix A5.1 Outline CEMP. It is reiterated again that prior to any construction work commencing on any of the main work sites a detailed acoustic impact assessment will be undertaken which will involve a baseline noise study, model of the contractors final site layout, plant and equipment models, numbers and on-site location and the inclusion of all available on-site noise control measures. This is detailed in section 6.2 of EIAR Appendix A5.1 Outline CEMP. There are no statutory standards in Ireland relating to noise and vibration limit values for construction works. The contractor(s) will work within the noise and vibration significance threshold levels identified in the EIAR for both airborne and groundborne noise and vibration and the limits contained in the Railway Order approval. This is considered to be an approach in line with best practice. Lack of consultation TII disagree that meaningful communication has not taken place. TII have undertaken stakeholder and public consultation throughout the Project development. Consultation has included, but was not limited to, the Emerging Preferred Route consultation, Environmental Impact Assessment Scoping Consultation, Preferred Route Public Consultation and the Albert College Park Local Area Consultation. As detailed in Appendix A8.19 Meetings Register, five meetings were held with Albert College Residents Association, with eight meetings held with Ballymun Road Area Association (residents association), and one meeting with the Collins Avenue Residents Association.
9	Our Lady of Victories Church	5	Access by parishioners to Our Lady of Victories Church, many of whom are elderly with mobility issues will also be severely compromised for a number of years for all of the above reasons. Grieving families attending funeral services will face additional difficulties due to severely restricted access as well as the gross reduction in parking spaces as a result of the church forecourt, car parks and on street parking on Albert College Drive being impounded. This will result in an irreversible decline in church attendance as parishioners who have already had to forego face to face spiritual fulfilment in the face of Covid restrictions for almost two years will once again be placed in a similar situation as access to the church building will undoubtedly be hindered due to route closures and lack of parking spaces. In excess of 900 signatures were received against the plan to locate the station at Our Lady of Victories Church on a church gate petition. According to TII documentation, this number is second only to the number of objections submitted by stakeholders in the Mobhi Road /Na Fianna area against the previous plan to build a station on/under Na Fianna playing pitches.	TII understand that Our Lady of Victories Church is an invaluable asset to the community and is used by groups with varied levels of mobility. Measures will be implemented in order to maintain access to the church during construction and operation of MetroLink. Please refer to response (2) in relation to temporary traffic management measures proposed at this location. There will 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. This diversion is presented in section 7.4.6.3.2 of EIAR Appendix A9.5 Scheme Traffic Management Plan. Members of the community who use public transport to travel to the church will not be impacted during construction of the Collins Avenue Station. The existing bus lane on Collins Avenue will be maintained in both directions, with journey times for public transport unlikely to be significantly impacted. Only one bus stop, 115, will be temporarily relocated via a temporary path to the east of the church. During the construction of Collins Avenue Station, footways will either be retained in their existing location or realigned to a similar standard. The assessment of impacts on all modes can be found in section 7.4 of EIAR Appendix A9.5 Scheme Traffic Management Plan. 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 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. Access to the church will be maintained at all stages of the Project as vehicles accessing the church car park at the rear of the church will be facilitated by a diversion via Albert College Court. Further details of construction impacts on transport are found in Section 9.6.1.2.4.1. and Section 9.6.1.2.4.3 of Chapter 9 (Traffic and Transport). Existing access to the church for the public will be fully reinstated during operation, with the design of street furniture to ensure acceptable pedestrian comfort levels (Section 9.6.2, Chapter 9). In addition, TII are keen to point out that once the construction phase is completed the location of a MetroLink station at this location will provide significant positive benefits to the local community in terms of enhanced public transport provision, reduced traffic and the resultant improvements in the environment, with reduced noise and air pollution. TII acknowledge that there are impacts associated with these works, however please refer to response item (1) in relation to the reasons why this is identified as the preferred station location.

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10	Environmental Impacts summarised	5 and 6	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 build-up 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. Both these factors in such close proximity to schools and residences will result in a significant deterioration in air quality which currently is regarded as 'fair 1' as monitored by local weather app. The heightened awareness of the importance of effective schoolroom ventilation in reducing the spread of airborne infection is now well acknowledged. It is difficult to understand how classroom windows can be opened to facilitate this extra ventilation, particularly during warmer weather given the aforementioned deterioration in air quality.	Please refer to responses (2) and (8) in relation to predicted impacts on air quality during the construction phase. As detailed, no exceedances of air quality standards are predicted, therefore, no significant adverse human health impacts are predicted. 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 HGV holding sites; * 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 proposed Project and stations as per Chapter 9 (Traffic & Transport); * Efficient scheduling of deliveries to minimise number of deliveries required, and in turn their emissions; and * Construction vehicles should conform to the current EU emissions standards and where reasonably practicable, their emissions should meet upcoming standards prior to the legal requirement date for the new standard. This will ensure emissions on haul routes are minimised. Mitigation measures are required for the control of dust with respect of HGV moments on site and deliveries to/from the site: * HGV traffic leaving site will pass through a wheel wash; * Public roads outside the site will be regularly inspected for cleanliness and cleaned as necessary. If public roads are deemed to require additional cleaning where possible a suction device for road cleaning will be utilised which can access spaces around cars and other street furniture more effectively; and * During movement of materials both on and off-site, trucks will be stringently covered with tarpaulin at all times. Before entrance onto public roads, trucks will be adequately inspected to ensure no potential for dust emissions.
11	Environmental Impacts summarised	6	This added to excessive construction noise and vibration will seriously impact the ability of teachers to effectively deliver teaching in the 3 schools due to constant distractions caused by this noise and vibration.	The works will not seriously impact on teachers ability to teach. As outlined in the EIAR and above in response item (2), 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. Single events or short-term durations could include blasting, or the 2-week duration of the TBM passage.
12	Safety Concerns	6	The safety of the most vulnerable groups of stakeholders in the area - namely primary school children and their parents and our elderly neighbours In Albert College Court is of prime concern.	The safety and security of all is a priority for MetroLink both during construction and once operational. Please refer to responses (2, 3 and 10) above in relation to the predicted construction impacts at this location and the proposed mitigation measures to ensure the safety of vulnerable groups in this area.

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13	Residents on upper Ballymun Road	6	There are approximately 20 houses located both along the eastern and western section of the main road opposite the OLV church and closely bordering the proposed station entrance on the church side between the church and Collins Avenue junction. The lives of these residents will be severely impacted for all the above reasons for the duration of the utility relocation and station construction phases. Those residences on the east side of the road to the north of the church are in very close proximity to the planned station entrance. These residents will undoubtedly face significant construction noise and vibration as well as noise due to anti-social behaviour and disturbance late into the night as passengers and indeed revellers enter and leave the station. A number of these residents have young families and this would place an intolerable burden on these families.	EIAR Chapter 13 presents the assessment of impacts arising from Airborne Noise and Vibration, with EIAR Chapter 14 detailing the assessment of impacts on Groundborne Noise and Vibration. As presented above in response item (2) generally no significant impacts are predicted for the construction of the station. Impact on some of the properties opposite the Our Lady of Victories Church will arise from the noise from the TBM Passage where the noise from TBM will be above the threshold value of 45 dB resulting in a significant impact. In terms of vibration, the threshold of 3PPV is not predicted to be exceeded at Our Lady of Victories Church, however the predicted level of 2.7PPV is close to the threshold (Chapter 14, Ground-borne Noise and Vibration). The results from the noise and vibration modelling can be found in Appendix A13.7 and 14.5 of the EIAR. As the church is a sensitive building, mitigation from blasting will be implemented and vibration monitors are to be provided in the church in the vicinity of the works with alarms to identify any vibration that exceeds acceptable levels. In the event of the alarms being triggered works are to cease until the cause of the vibration is identified and systems modified to prevent recurrence. Further details can be found in section 26.7.1 of Chapter 26 (Architectural Heritage). 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 (CEMP). 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 noise insulation and temporary rehousing measures to be implemented where required. Please refer to responses (2), (8) and (11) in relation to impacts to air quality. Response (2) also details the temporary traffic management measures at this location and the associated proposed mitigation measures. Regarding anti-social behaviour, as presented in the EIAR Chapter 6,MetroLink Operations and Maintenance, one of the outcomes of the architectural and urban realm design is to discourage anti-social behaviour, for example through the attractive setting, use of public lighting, open sight-lines, and avoidance of areas where individuals and groups of people can hide. Subject to data protection impact assessment and compliance with the General Data Protection Regulation (GDPR) anti-social behaviour on the trains and within the stations will be observed through CCTV (Closed Circuit Television) and if required staff sent to manage the situation. The ACID (Access control and intrusion detection) system will also identify intruders trying to enter locations where unauthorised access is prohibited.

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14	Structural Damage	6	There are also concerns relating to structural damage to OLV church and these nearby residential properties caused as a result of heavy drilling, rock breaking and rock-blasting. The following text and images are excerpts from the TII station plan presentation. The reference to controlled blasting through 5 metres of roach in such close proximity to schools and nearby houses does little to dispel the sense of alarm felt by stakeholders in the area. Construction of Collins Avenue Station Bulk Excavation of the Station Box * Excavation of the station will be Brown Boulder Clay for the top 12m * The next 12m is the transition from softer clay to Limestone rock. * The final 5m of the station is in Limestone rock. * Boulders may be encountered in the Clay. * large boulders will need to be broken mechanically. * In the transition zone excavators with mechanical breakers will be used. * Localised drilling and controlled blasting may also be required. * Controlled blasting is anticipated in the final 5m in Limestone. Excavation of rock by controlled blasting * Controlled Blasting is a sophisticated technical process. * Stringent restrictions are put in place and must be adhered to regarding the storage, transportation, use and disposal of explosives. * Restrictions also include limits on noise and vibration, blasting times, fumes and fly-rock. * Each blast is designed to limit vibration(ppv) and air overpressure (AOP) to recognised limits assigned by Structural Engineers at the closes sensitive receiver. * Each blast is monitored to verify ppv and AOP Initial blasts are conservatively designed.	Our Lady of Victories Church is recognised as an important architectural heritage asset in Dublin and is included in the National Inventory of Architectural Heritage (NIAH) (reference 50130121). Measures will be implemented during construction to ensure the church is not damaged. The method of construction will take into account the sensitivity of the church, in particular the stained glass windows. Further details on the impacts at this location can be found in Chapter 26 (Architectural Heritage). Mitigations for Our Lady of Victories Church are detailed in section 26.7.1 of Chapter 26 (Architectural Heritage). As per the Cultural Heritage Strategy, the stained glass windows will remain in situ during construction. Detailed mitigation measures to protect the church during construction can be found in Table 26.66 of the EIAR Chapter 26 (Architectural Heritage). In terms of vibration, the threshold of 3PPV is not predicted to be exceeded at Our Lady of Victories Church, however the predicted level of 2.7PPV is close to the threshold (Chapter 14, Ground-borne Noise and Vibration). As the church is a sensitive building, mitigation from blasting will be implemented and vibration monitors are to be provided in the church in the vicinity of the works with alarms to identify any vibration that exceeds acceptable levels. In the event of the alarms being triggered works are to cease until the cause of the vibration is identified and systems modified to prevent recurrence. Further details can be found in section 26.7.1 of Chapter 26 (Architectural Heritage). There are no significant vibration impacts to other residential properties causing structural damage, as detailed in response item (2) above which considers the impacts to properties in proximity to the station location. Further details on this assessment can be found in Appendix A5.17 Building Damage Report. There will be no significant effects on the church with regard to ground-borne noise and vibration during the operational phase (Section 14.6.2.1, Chapter 14, Ground-borne Noise and Vibration). The EIAR has considered the impacts of blasting, as identified in Chapter 14 (Groundborne Noise and Vibration). Mitigation measures to reduce the impact of blasting entail the following: * Prepare a correct blast design based on a survey of the rock face profile prior to design; * Minimisation of the explosive charge per delay. This could involve the following: - Reducing the drilling diameter of the hole for explosives. - Shortening the length of the holes for explosives; - Initiating charges at different times; and - Using the maximum number of detonators possible. * Choose an effective delay time between holes and rows which would avoid wave interaction and give good rock displacement; * Set the explosive initiation sequence in a way that it progresses away from the structures to be protected; * Use an adequate powder factor (weight of explosives per volume of excavated material). When the powder factor is lower than what is needed, the increase in charge confinement leads to an increase in intensity of vibrations. Excessive consumption will create an unnecessary overload, accompanied by great disturbing effects; * Create shields or discontinuities between the structures to be protected and the blasting; * Monitoring of blasting and re-optimising the blast design considering the results, changing conditions and experience should be carried out as standard; * Increase confinement of the explosive charges with a long stemming height (more than 25 times the hole diameter, but not excessive) and use adequate, inert material; *Place barriers between blasting area and sensitive receptors if required; * Cover the blasting area carefully with a blast mat or similar; and * Cover the voids and use acoustic sheds, if required.

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			Response (14) continued.	It should be noted that the impact of air overpressure as an effect of blasting accompanying ground vibration is strongly dependent on the degree of confinement of the blast. In the assessment carried out, "total confinement" as defined in the IEEE Blaster's Handbook 18th edition has been assumed, and that represents the maximum available mitigation for air overpressure. Notwithstanding the implementation of the above measures, potential significant impacts have been identified at six receptors where preconstruction condition surveys will be undertaken, and any required pre-construction repair work identified and undertaken. The receptors identified in Section 14.4 are listed and include Our Lady Queen of Heaven Church. Should the above-mentioned mitigation measures not result in a significantly reduced noise and vibration levels such that they are still above the criteria set, then alternative non-explosive excavation methods will be used such as the following: * Use of non-explosive blasting techniques, such as expanding grout or rock sawing; and * Use of mechanical excavation instead of blasting. However, avoidance of blasting would mean extended periods of groundborne noise and vibration impact as alternatives such as mechanical excavation would result in protracted effects throughout the working times over a long period. However, the use of expanding grout and sawing as a means of rock breaking may mitigate the effect at the expense of a protracted programme.
15	Public Mandate	8	The key stakeholder groups in the area are as follows: Our Lady of Victories Schools; Our Lady of Victories Church; Albert College (Estate) Residents Association Albert College Court Residents; Ballymun Road North Residents Association; Griffith Avenue and District Residents Association. The overwhelming majority of members of the above groups are strongly opposed to the current plans to locate the station at OLV Church forecourt.	Please refer to response (1) in relation to the rationale for the proposed location of Collins Avenue station. As noted in response (8), TII have undertaken stakeholder and public consultation throughout the Project development. Consultation has included, but was not limited to, the Emerging Preferred Route consultation, Environmental Impact Assessment Scoping Consultation, Preferred Route Public Consultation and the Albert College Park Local Area Consultation. As detailed in Appendix A8.19 Meetings Register, five meetings were held with Albert College Residents Association, eight meetings held with Ballymun Road Area Association (residents association), and one meeting with the Collins Avenue Residents Association.
16	A Tale of Two Stations - Griffith Park Station and Collins Avenue Station	8	The initial proposal to locate the Griffith Park station and the tunnel boring machine launch site on the Na Fianna sports complex, in close proximity to three schools has been well publicised. The reason given for locating the station in this area was, according to the then CEO of TII, Mr Michael Nolan, to avoid the impact on housing and businesses in the area' The sense of public outrage elicited by the proposal to locate the Griffith Park station site so close to the schools adjoining Na Fianna and the temporary loss of such a valuable sporting amenity and nationally recognised football club led to widespread public resistance. This public opposition campaign also gained uncompromising political support at the highest level in government. It is well acknowledged that the sitting Taoiseach and the Minister for Finance of the day both resided within the catchment area and were also strongly opposed to this plan leading to its ultimate rejection. In the face of this strong opposition, during early 2019 TII were obliged to revise the existing plan as follows: * The station location was moved slightly south from Na Fianna grounds to the western periphery of Home Farm Football pitches adjoining the main Mobhi Road * The station footprint was reduced in size to facilitate this relocation * The construction timeframe was reduced from 5-7 years to 3 years maximum * The proposal to locate the tunnel boring machine launch site in this area was reversed * The Home Farm playing fields are to be fully reinstated overhead and returned to full use when the underground station is constructed * home Farm were granted a sum of €5 million to allow them to lease alternative facilities during the construction phase.	Section 7.7.10.8 of Chapter 7 (Consideration of Alternatives) details the selection of a station location at Griffith Park, including the environmental assessment of alternative locations. As indicated, the preferred route option (as proposed in the Railway Order) was considered to be preferrable over the previous option in the Emerging Preferred Route assessment from an environmental perspective. *** Population:** The construction of a station underneath the GLG Na Fianna playing pitches would have potential for a significant impact on the operation of an important community-based organisation. The alternative location for the proposed construction of a station underneath the Home Farm FC playing pitches would also result in potential for a significant disruption to the operations of this club, but they would be significantly less than those at GLG Na Fianna because Home Farm have their main playing pitches further east of this location. Construction of any of the station location options assessed would have potential to impact on the local schools in the absence of sufficient mitigation measures due to potential for short term increases in traffic congestion, increased noise levels and dust generation. *** Noise & Vibration:** Both proposed station location options would have potential to impact on local sensitive receptors during the Construction Phase due to the generation of noise and vibration, if not sufficiently mitigated. *** Hydrology/Biodiversity:** In the absence of mitigation measures there is potential for uncontrolled discharges to the Tolka River that would cause environmental effects on the water quality and biodiversity. As the proposed station location at Home Farm FC grounds is in closer proximity to the Tolka, the potential impacts are slightly higher for this proposed station location. However, there is an historic culverted river channel progressing underneath the GLG Na Fianna site which would have potential to be impacted. Both proposed station locations have potential impacts on biodiversity due to the requirement for vegetation clearance and tree felling. There may also be potential for impacts on winter birds (House Sparrow, Herring Gull and Swift) identified within 30m of this area. *** Architectural Heritage:** The proposed station location at the Home Farm site would be in closer proximity to Whitehall College which is on the DCC Record of Protected Structures (RPS 7746), however both station location options have potential to impact on the curtilage of this protected site.

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17	Comparison between the proposed Collins Avenue Station and the previous Griffith Park Station designs	8 and 9	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. We are appealing for fairness, parity and equality. It is obvious that the initial location of Griffith Park station was seen as severely flawed and was overturned due to a 'who can shout loudest' campaign. Our groups clearly do not have the same critical mass or political influence as was the case in the aforementioned situation, but we nevertheless believe that our request for a revised station location should be afforded the same consideration. 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.	TII consider all stakeholders to be of equal importance and does not discriminate. All station locations were chosen following a multi-disciplinary analysis taking full consideration of all environmental disciplines as presented in detail in the EIAR Chapter 7, Consideration of Alternatives. Please refer to response (8) in relation to the consultation and engagement that has been undertaken with the residents and stakeholders at this location throughout the Project. Section 7.7.10.8 of Chapter 7 (Consideration of Alternatives) details the selection of a station location at Griffith Park, including the environmental assessment of alternative locations. As indicated, the preferred route option (as proposed in the Railway Order) was considered to be preferrable over the previous option in the Emerging Preferred Route assessment from an environmental perspective. Please refer to response (1) in relation to the rational for the proposed location of Collins Avenue Station.
18	Alternative Location / Metro North summary and why a station in the park for Metrolink should not be ruled out on the previous premise used in Metro North	9 to 13	It is our firm belief that with the same level of public and political support and motivation, that TII could revise the current station location, design plan, and construction timeframe as was the case at Griffith Park. We see no reason why, with station relocation onto the western periphery of Albert College Park along the main Ballymun Road, that the parkland could not also be reinstated overhead as is happening in the revised plan at Griffith Park. There are plans in place to construct a major intervention shaft and ancillary buildings on this location and this plan could be revised to upgrade the shaft to a functioning station serving DCU campus. 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' as outlined in the following image (image from page 10 in the submission). We submit that it would seem feasible to locate and construct a similar station design as that above (Griffith Park Station) alongside the western periphery of Albert College Park and reinstate the parkland overhead post construction as in the following non-professionally generated impression - images from pages 12, 13, 14. Community criteria The table from page 15 summarizes our assessment of the comparative ratings, from a community perspective, of the two station options in terms of their impacts during the operational and constructional phases of the Metro project.	Please refer to response (1) above related to the rationale for the location of the proposed Collins Avenue Station, including an alternative station location at Albert College Park. As detailed in Chapter 7 (Consideration of Alternatives) section 7.7.10.7 presents details of the analysis that was undertaken to identify the preferred location, such as transport analysis of the interchange value of the preferred location, which supports the project objectives. Further details on each impact can be found at the following locations: * User Accessibility: Considered in Chapter 9 (Traffic and Transport); * Operational Noise: Chapter 13 (Airborne Noise and Vibration) & Chapter 14 (Ground Borne Noise and Vibration) * Passenger Nosie: Chapter 13 (Airborne Noise and Vibration) & Chapter 14 (Ground Borne Noise and Vibration) * Light Pollution: Chapter 5 (MetroLink Construction Phase) * Vibration: Chapter 13 (Airborne Noise and Vibration) & Chapter 14 (Ground Borne Noise and Vibration) * Safety Concerns: Chapter 5 (MetroLink Construction Phase), Appendix A5.1 Outline CEMP * Traffic Disruption: Chapter 9 (Traffic and Transport); * Parking Disruption: Chapter 9 (Traffic and Transport); * Anti-Social Behaviour: Chapter 6 (MetroLink Operations and Maintenance) *Proportionate loss of green space amenity: Chapter 27 (The Landscape) * Visual effect: Chapter 27 (The Landscape) * Safety Concerns: Chapter 5 (MetroLink Construction Phase), Appendix A5.1 Outline CEMP * Construction logistics: Chapter 5 (MetroLink Construction Phase), Appendix A5.1 Outline CEMP * Construction Noise: Chapter 13 (Airborne Noise and Vibration) & Chapter 14 (Ground Borne Noise and Vibration) * Construction dirt/dust: Chapter 16 (Air Quality)
19	Comparison of Options	14	Requirement for an Interventional shaft We understand that relocation of a station to Albert College Park which would lie approximately 1 km north of the Griffith Park Station will result in the need for a ventilation shaft between the Albert College Park/DCU Station and the Ballymun Station. The placement of a Park based station will remove the need for the currently proposed Ventilation Shaft in the park which has aroused widespread public dissatisfaction across all stakeholder groups. All groups view this as a needless and permanent land-take, in effect taking almost as large an area as that which would be occupied by a fully functioning station without offering any of the associated benefits which a station would provide. We propose that the new location for this ventilation shaft could be moved north of Collins Ave junction, between the Dentist and Ballymun Library. This will not only reduce the traffic impacts south of Collins Ave but will also greatly reduce the impact on residents, church goers and the schools. Given TII's stated dimensions of the current park ventilation shaft plan, there would appear to be adequate space at this newly proposed location.	Please refer to response (1) above related to the alternative station location at Albert College Park. 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 including; (1) it is no more than 1000m from either Collins Avenue or Griffith Park stations; (2) it is adjacent to the tunnel on the west side of the park in order to reduce the length of connecting tunnel; (3) 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 (4) the tunnel intervention shaft can be accessed easily by emergency vehicles with enough area for safely congregating passengers in an emergency.

Submission No.	252
Organisation Name or Name of Submitter	Paul Cusack (on behalf of residents of 153 Ballymun Road)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: Collins Avenue Metro Station				
20	Added value to DCU and TII	15	As part of the An Bord Pleanála Metro North Oral hearing, during 2009 the RPA prepared a document titled 'Proof of Evidence, Description of Scheme, System Concept and Route Alternatives' Paragraph 2.2.12 states: 'DCU Stop serves the 10,000 students and staff at Dublin City University and the 1,800 seat Helix Theatre, as well as serving the local residential areas'. We would respectfully suggest that DCU will be by far the greatest beneficiary of the stop and should the station be in even closer proximity to the College this presumably would be seen as a positive advantage. It is noteworthy that the original station was referred to as 'DCU stop' at that time, which seems a more appropriate title than 'Collins Avenue Station' as in essence it is intended for the most part, to serve DCU not Collins Avenue. The distance from the currently proposed station entrance to the north of OLV church to DCU Collins Avenue entrance is approximately 750 metres which may seem undesirable for some users. A park based station that is approximately 400 metres closer to DCU's Ballymun Road entrance than that proposed at OLV church would presumably bring a valuable enhancement in terms of improved and increased access to this important service for both TII and DCU passengers over the life of the project.	Please refer to response (1) above in relation to the rationale for the proposed location of a station at Collins Avenue, and why this is the preferred location over a location within Albert College Park. Please refer to response (19) in relation to the location of the Intervention Shaft within Albert College Park. As noted in these responses, various options were considered for a station at this location, and it was identified that a station located at Our Lady of Victories Church is the preferred option.
21	Towards Optimisation	15 and 16	In expressing a strong preference for a park based station location, we recognize that, as presented by TII to local communities, this option may evoke certain concerns. We also recognize that it is amenable to further improvement. As residents in the area we would empathize with the view that permanent - and indeed temporary - disturbance to the park should be minimized. We appreciate and enjoy the amenity value which the park provides and would not wish to advocate a solution that would diminish such an amenity in any substantial way. We submit that an accommodation of everybody's interests can and should be achieved by a well-designed park based solution which allows a most judicious and economic use of the parkland. This we hope would better serve the interests of DCU, TII, patrons of OLV Schools and church, residents in the immediate and wider area and indeed road users from outside the area who could all potentially suffer a significant loss in their quality of life if a less than optimum station location is chosen.	Please refer to response (1) above in relation to the rationale for the proposed location of a station at Collins Avenue, and why this is the preferred location over a location within Albert College Park. Please refer to response (19) in relation to the location of the Intervention Shaft within Albert College Park. As noted in these responses, various options were considered for a station at this location, and it was identified that a station located at Our Lady of Victories Church is the preferred option. Please note that a station compound within the park would impact a greater area (25-30% larger) during construction leading to a higher amenity impact. TII has sought to minimise the impacts on the Park as a result of the location of the intervention shaft, however, the proposed Project will result in loss of existing mature trees along the western boundary of the Albert College Park, contiguous with the land take for the construction site. The mature trees along the Hampstead Avenue boundary edge will not be affected. The existing hedge boundary along the outer edge of the Park will also remain intact, except for breaks created to facilitate the access roads. Further details on the impact to Albert College Park can be found in section 27.5.4.17 of Chapter 27 (The Landscape). Whilst the proposed Project includes for replacement tree planting around the intervention shaft facility there will be a time lag to their maturing, to match that of the existing trees.