

Submission No.			243/244/245/246	
Organisation Name or Name of Submitter			Our Lady of Victories GNS, BNS & JNS and Church	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Proposed locations on Ballymun Road, relative to the operation and long-term viability of the Our Lady of Victories Schools				
1	Alternatives at Albert College Park - Location	3	<p>The location of the proposed metro is not suitable due to its proximity to our campus. The original and alternative siting at Albert College Park for the station box, has not, in our view, been given the consideration it merits. The proposed location of the station 10 meters from our front door poses numerous safety and logistical issues. There is an obvious alternative possible in the swapping of the ventilation shaft proposed for Albert College Park with the station box at Our Lady of Victories Church. The significant excavation required for a station box would be immeasurably better suited if sited in Albert College Park, which would still provide ample access to DCU - the excavation of a ventilation shaft is very much a lesser of two evils in terms of disruption to the school campus. The government have already spent over €1,000,000 in the early 00’s securing a site for a Metro station via a CPO, that will now remain unused due to the relocation of the station in the updated plan.</p> <p>The green field site at Albert College Park would, by the admission of TII’s own engineers, be a cost neutral switch at this point- the enabling works etc. would be considerably less impactful on the school, church and residents of Albert College Drive and Grove. The specific reasons are laid out below, in no particular order.</p>	<p>TII acknowledge that there is potential for significant environmental effects on the surrounding area due to the proposed MetroLink station if not mitigated effectively. However as referred to in responses below and as detailed in relevant chapters of the EIAR, TII consider that it is possible to mitigate the potential impacts identified at this location during the construction period. In addition, once the construction phase is completed the location of a MetroLink station here 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. As outlined in section 7.7.10.7 of Chapter 7 of the EIAR 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 Church. This location for the station provides a number of advantages when compared to other options which are;</p> <p>(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, allowing as it does 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 allow for this interchange potential as there would be over 300m separating potential bus stop locations and the MetroLink station.</p> <p>(2) The proposed Collins Avenue station would have a significant catchment area and analysis undertaken leading to the Emerging Preferred Route (EPR) identified that this route option had the highest potential passenger numbers when compared with other route options.</p> <p>(3) During the construction phase, the location of a station within the frontage to Our Lady of Victories means that traffic disruption would be reduced, when compared to the location of a station within the road corridor (partially or fully).</p> <p>With regards to the cost neutrality of switching the location of the proposed Albert College Park Intervention Shaft and Collins Avenue Station, the reasons for why the location of Collins Avenue Station is preferred is explained by (1) and (2) above.</p>
2	Environmental Impact and human Health - AQ	3	<p>The air quality measurements taken in the Environmental Impact study were totally inaccurate as they were measured during the Covid pandemic and therefore took readings during the time period when there was a reduced volume of traffic and prior to the works that have happened on Mobhi Road and Griffith avenue. We feel strongly that we are already experiencing air quality that is in excess of the acceptable maximum levels of Nitrogen dioxide. We feel that these readings should be taken again. An accurate survey must-happen. We, as those who are caring for vulnerable children, should be entitled to evidence from real time environmental monitors as to the precise readings of pollution and particulate matter in the air.</p>	<p>Site-specific baseline monitoring study was undertaken from September 2018 to September 2019 as part of the air quality assessment for NO2, dust deposition, PM10 and PM2.5 for this assessment which was prior to the Covid-19 pandemic (EIAR Section 16.3.3.2 Chapter 16 Air Quality). In order to supplement this data, EPA data was also used to inform the baseline. It has been recorded by the EPA that the pandemic had an impact on Air Quality in many areas by reducing levels of pollutants, particularly those generated by traffic. However, as the baseline survey data used for the Air Quality chapter was collected before the effects of the Pandemic on traffic occurred, TII are satisfied that this data was suitable for determining the baseline in Section 16.8 of Chapter 16 Air Quality.</p>
3	Environmental Impact and human Health - Vermin	3	<p>We are hugely concerned by potential of displacement of vermin during the work and we must insist that this issue be addressed</p>	<p>Prior to start of construction, any disease/vermin protocols and biosecurity measures will be identified and the contractor will be required to comply with these to (1) protect and prevent the spread of pests and diseases (Table 6.12 - outline CEMP) and to (2) direct arrangements for regular disposal of food and material attractive to pests (Section 5.4 outline CEMP)</p>

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4	Traffic Management	3	The proposed realignment of Ballymun Road services and the associated enabling works have the potential to make the actual access to the school near impossible. The suggestion that a traffic management plan during the three years of enabling works will protect our school population on a day to day basis is unrealistic and the reality is that any further stress on this massively over used intersection outside our school will lead to a tragic accident.	Prior to the enabling works and the main construction phase a Traffic Management Plan will be developed (Refer to Appendix A9.5 of the EIAR). Contrary to the opinion offered, the use of a traffic management plan is critical to the management of construction phase traffic and vulnerable road users such as cyclists and pedestrians. The contractor will be legally required by the Railway Order to adhere to the requirements of the plan on a day by day basis and so any such measures will be implemented with a focus on managing traffic movements to ensure that there are no accidents. It should also be noted that as outlined in Table 9.64 in Chapter 9 of the EIAR, 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. Dedicated cycle lanes will also be provided during the construction phase. 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). Additionally, there will be controls at the entrance and exits of sites for construction vehicles in order to ensure the safety of other road users. The mitigation measures outlined in Chapter 9, Appendix A5.1 Outline CEMP and Appendix A9.5 STMP will reduce the risk of ant tragic accidents occurring as a result of enabling works in the area.
5		3	The unpredictable nature of these works means that there will be inevitable delays and confusion around access to the school. For the many children who travel alone to school by foot or by bike - any confusion or changes are extremely difficult to negotiate. Children do not adhere to signage well. They need huge levels of input to understand, process and negotiate change. Currently 84% of the children cross the 6 lane dual carriageway on a staggered pedestrian crossing. Our crossing guards regularly express huge concern for the safety of the children and we regularly address the issues around safe use of the road with the children and their parents. There are in fact 19 lanes of traffic within 15 meters of the entrance to the school The already out of date infrastructure will be stressed to the level of breaking point when these works commence for both Metrolink and BusConnects. When we applied to DCC for pencil barriers to eliminate illegal parking (a common feature available and recommended to most schools) the assessor expressed huge concerns about the amount of illegal turns and blatant ignoring of the lights and the speed limits in our area. Although these barriers were agreed to in principle over 6 months ago- they have not been implemented and this shows you how, in real terms, we are continually fobbed off and our school community are not given the safety provisions they need. We have regular communication with Ballymun Garda station to request assistance with illegal parking. We believe that any further deterioration in traffic management will lead to a tragic event at the gates of our school as we know the reality of the promises that are made and how they fall short over and over again.	As outlined in EIAR Appendix A9.5, section 2.5.2, a number of remedial measures will be put in place to mitigate the impacts of the construction traffic. Alternative arrangements will be provided if road closures are unavoidable, i.e. diversions, signage strategies for access traffic and through traffic, as well as imposing reduced speed limits on roads adjacent to construction sites in order to ensure the safety of all road users. Additionally, at this location, the traffic management will reduce the R108 Ballymun Road in this section to 4 lanes - one general traffic lane in each direction, and one bus lane in each direction. TII acknowledge the fact that school age children will need to be provided with additional and ongoing information to ensure that there is a full understanding of the safe access and egress arrangements from the school during different phases of work. To this end, TII would like the opportunity to engage with the school authorities to agree an information campaign that can be used. Informal parking in the bus lane on the R108 will be restricted as part of the works.
6		4	The access to the carpark at the rear of the OLV church via the Ballymun road will be impossible to use due to its proximity to the proposed hoarding/barrier to the site. The proposal is that traffic will be directed to this carpark via Collins Avenue. The pedestrian access to enable crossing of Ballymun Road to the schools is again, a significant challenge- there is no clear pedestrian route from the carpark to the school, nor is it clear if there is to be a road level pedestrian access route maintained during the realignment phase. The site hoarding will seal off the vehicular access to Albert College Drive, again preventing pedestrian or other access from the rear of the church to the school. The volume of traffic currently using Collins Avenue at school times is already at such a level as to cause significant congestion to traffic travelling east toward DCU from Glasnevin Avenue. The proposal to divert traffic into the rear of OLV church via Collins Avenue will cause serious delays to those parents who must bring children to school by car and raises significant accessibility issues for any pupils who may be wheelchair users, or indeed staff members in this cohort. We have very legitimate concerns that this will have an adverse effect on people's choices and whether they send their children to this school	As outlined in EIAR Appendix A9.5 section 7.4.5.3.2, the existing right turn from Ballymun Road to Albert College Court will be banned, requiring vehicles to access this area via Collins Avenue. While the exact diversion routing will vary depending on the vehicles origin/destination, the most direct diversion is approximately 750m and as a worst-case scenario (modelled during the PM peak period) would result in a journey time increase of 5 minutes. As outlined in EIAR Appendix A9.5 section 7.4.6.3.6, during both the Advanced Enabling Works and Main Works, the signalised pedestrian/toucan crossing outside of the front of the school will be retained during all works and will continue to allow safe access for pedestrians and vulnerable users. While there will be short term, slight negative impacts during the Construction Phase for pedestrians and vulnerable users in this area it is not envisaged that this should impact the decision for parent's sending their children to your school. As noted in Chapter 11, Section 11.5.3.4.2 The proposed Project will provide a frequent, high quality transport option along the route and improve accessibility within the area through a more accessible public transport network. Overall, the impact is considered to be a positive, moderate, permanent effect at the neighbourhood, local and regional level during operation of the proposed Project and will increase connectivity to your school.

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7	Accessibility and Health and Safety	4	The location of the site and excavation is approximately 30 from the main entrance of a primary school. During the construction phase, the volume of heavy plant and equipment that will traverse the main thoroughfare immediately outside the gates of the school will be in the hundreds of trips every day. This will make the access to and from the school impossible for children, parents and staff with the obvious increased risk profile to the pupils. 84% of our total student population (regardless of how they travel to school) use the pedestrian crossing and crossing guards directly outside the school at Our Lady of Victories Church to travel safely to and from school.	<p>As outlined in EIAR Appendix A9.5 section 7.4.4, vehicle movements associated with the works at Collins Avenue have been calculated to range between 40 and 80 movements per day, however, for the majority of the construction period, daily vehicle movements are lower than this range. The maximum number of daily movements is 118, and this occurs for 16 days out of the entire construction programme, and therefore is short-term in nature.</p> <p>As outlined in EIAR Appendix A9.5 Section 8 the current assessment, uses 2028 as the most impactful construction year, and therefore the impacts during other years will be less significant. As outlined in EIAR Appendix A9.5 section 7.4.6.3.6, during both the Advanced Enabling Works and Main Works, the signalised pedestrian/toucan crossing outside of the front of the school will be retained during all works and will continue to allow safe access for pedestrians and vulnerable users.</p>
8		4	This pedestrian crossing also offers us direct access to OLV Church. The relationship between OLV Schools and OLV Church dates back to 1965, prior to the construction of the church, when the school hall was used to celebrate parish Mass, Communion and Confirmation. The relationship continues to thrive to this day, with regular visits to Daily Mass and specific school celebrations- November Remembrance Ceremonies, Spring Services, Class Masses, Graduation Masses etc. Our children’s faith formation is now being put in jeopardy due to the proposed location of this station. What was once a safe three minute walk door-to-door for the past 55+ years, will turn into a precarious journey of varying routes over an 8 year period surrounded by large construction vehicles and significantly increased risk of traffic accidents. Our children are entitled to a safe passage to their place of worship.	As outlined in EIAR Appendix A9.5 section 7.4.6.3.6, during both the Advanced Enabling Works and Main Works, the signalised pedestrian/toucan crossing outside of the front of the school will be retained during all works and will continue to allow safe access for pedestrians and vulnerable users. As noted in Chapter 11, Table 11.61 access will be maintained to the church via Albert College Drive throughout the duration of the Construction Phase.

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9		5	<p>It is extremely worrying to the Boards that TII have failed to take account of the proximity of a massive construction site to a school premises - in particular a primary school that is catering for children from the ages of 4 to 12 - it is quite extraordinary that no common sense has been applied here. There are likely to be accidents involving children and these plant movements, be they in traffic on Ballymun Road, or through incursion onto the site. In either circumstance it is obvious who will come off worst, and in the event of such an appalling outcome -let the record show that this was highlighted by the Boards of Management and parent body as an accident waiting to happen.</p>	<p>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 set out in Appendix A5.1 Outline CEMP, 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). TII regret that you feel as though common sense has not been applied as there has been extensive work and analysis that has been carried out as part of the EIAR in relation to impacts on the school.</p> <p>Appropriate traffic management and health and safety best practice will be strictly adhered to during construction with public safety in mind. These measures will cater to all vulnerable users including children. There will be a construction management team on-site for the duration of the Construction Phase who will ensure mitigation measures are implemented, and that construction impacts and nuisance are minimised. All construction work in connection with the proposed Project will be carried out in accordance with relevant health and safety legislation and best practice, with particular regard to:</p> <ul style="list-style-type: none">• Safety, Health and Welfare at Work Act, 2005;• Safety, Health and Welfare at Work (Construction) Regulations 2013; and• Other relevant Irish and EU safety legislation. <p>As required by the Regulations, a Health and Safety Plan will be formulated which will address health and safety issues from the design stages through to completion of the construction and maintenance phases. The plan will be reviewed as the development progresses. A Project Supervisor Construction Stage will be appointed by TII and a Safety File prepared for the Construction Phase (EIAR Section 5.11, Chapter 5 (MetroLink Construction Phase)).</p> <p>Vulnerable road users such as pedestrians and cyclists will be prioritised for protection in the Scheme Traffic Management Plan. Temporary pathways will be installed where appropriate and provisions will be made to ensure access for the mobility impaired is maintained. As noted in thr paragraph above, the signalised pedestrian/toucan crossing outside of the front of the school will be retained during all works and will continue to allow safe access for vulnerable users. (EIAR Section 9.6.1.2.4.3, Chapter 9 (Traffic & Transport)).</p>
10		5	<p>The Boards of Management of the three schools do not consider that the current proposed location of the station is at all suitable in terms of the construction phase or its long term operation, despite many representations during the consultation phase. The size, scale and impact of the project in the area immediately across the road from the entrance to our premises is totally at odds with the safe operation of a school campus as is highlighted in the paragraphs that follow.</p>	<p>Please refer to Response 1</p>

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11	Provision and access to services - Health and Safety	5	<p>There has been an estimated 2-3 year timeline given to the realignment of Ballymun road and associated enabling works directly outside our schools. The Boards of Management have serious concerns regarding the impending unplanned school closures that will inevitably occur during this three year period, thus interrupting the education of the most vulnerable children in the education system.</p> <p>In order to be fully open and accessible to students and staff, schools by law must have heating, light and water. Whilst it is currently not a legal requirement, schools now also need a functioning internet to operate at any kind of basic level.</p>	<p>As outlined in EIAR Chapter 9 Section 9.6.1.2.4.3, during construction Our Lady of Victories Schools will remain safely accessible for all users including vulnerable users who may have decreased mobility. An Outline Construction Environment Management Plan (CEMP) and Temporary Traffic Management Plans will be used to manage traffic during construction (Chapter 9 Section 9.7.1.2). TII do not envisage that any school closures will take place as a result of the works in the area.</p> <p>Disruption to utility services will occur as planned service disruptions will be required to facilitate the connection of existing services to newly diverted services. In such cases, the unique requirements of individual premises served by the utility will be taken into account in determining the type, duration and phasing of the planned disruption. In most cases the duration of disruption should be no more than a number of hours (EIAR Appendix A5.1 Table 6.14) and could potentially be arranged out of hours. There will be agreements in place between TII and the utility providers that guarantee continuation of service during utility works, with the exception of the agreed outages. TII will endeavour to ensure that no outages to services will occur however we cannot guarantee that this will be the case as unforeseeable circumstances may arise which may mean that outages occur. The risk is low and TII are committed to using best practice in every regard to avoid such outages.</p>
12		5	<p>With all due respect to the planning guidelines and agencies involved, if the planned works get the approval of An Bord Pleanála, what guarantees can we be given that there won’t be serious disruption to our pupil’s education for prolonged periods of time, due to one or more service outages? Even the shortest break in routine can cause serious disruption to the education of children with SEN and those coming from disadvantaged backgrounds, who already-display-school-refusal, punctuality-and attendance issues.</p> <p>What guarantees can we be given that our properties won’t be damaged due to service outages- fire alarm, security alarms both depend on 24/7 electricity supply. Flooding of our properties is also a real concern following water outages.</p> <p>What guarantees can An Bord Pleanála stand by, that during this three year period of service realignment, our campus will be accessible at all times to emergency response vehicles in the event of a life or death situation?</p> <p>The fact of the matter is that we can’t be given any guarantees on any of the above.</p>	<p>In relation to utility outages please refer to Response 12.</p> <p>As noted previously, as outlined in Table 9.64 in Chapter 9 of the EIAR, 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 along with measures to retain pedestrian access. Emergency vehicular access will not be prevented at any time.</p>
13		5	<p>It is therefore the Boards belief that by granting permission for the Bus Connects and Metrolink plans to proceed, An Bord Pleanála are jeopardizing the education of some of the most vulnerable children in the country, but more significantly An Bord Pleanála are risking the lives of all staff and pupils on the campus.</p> <p>Again let it be noted, that the Boards of Management and parent body are stating on record that this is an accident waiting to happen, in fact there is a significant risk of loss of life.</p>	<p>The safety and security of children, parents and staff is of paramount importance to TII and will not be jeopardised. TII do not accept that there is a significant risk to life. Table 11.70 Residual Impacts in EIAR Chapter 11 outlines that there is potential for negative, moderate, medium term impacts on the schools during the construction phase. So, while TII acknowledge that there will be disruption associated with the construction of such a major project, the project certainly will not jeopardise the education of children attending the schools. The construction works will be managed in line with the requirements of the Outline CEMP (EIAR Volume 5, Appendices, Chapter 5 (MetroLink Construction Phase) and a Traffic Management Plan (Refer to Appendix A9.5, Section 2.5.2 of the EIAR) to minimise the nuisance to the schools. TII are keen to work closely with the schools to minimise any potential effects on the operation of the school and to implement further measures if required at the school i.e. additional facilities for vulnerable students such as those with Autism Spectrum Disorder (ASD).</p>
14	Preservation and Enhancement of Outdoor Learning and Habitats on our School Grounds	6	<p>An alternative entrance to the school must be explored, should Bus Connects proceed as our Outdoor Classroom has been created commencing from the perimeter wall flanking the dual carriageway.</p> <p>The three schools on the campus have a reputation for being educationally progressive and have embraced and actively promote Outdoor Learning as core to our values, as is evidenced from the entrance of the campus to the far boundary hemmed by several mature towering Carpinus botulus trees, the leaves of which are being raked and composted this month.</p>	<p>This query is in relation to the BusConnects project and therefore we cannot comment.</p>

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15		6	The proposed addition of thousands of tonnes of concrete into the area so close to the school will mean that the water table will be affected (due to this project happening so close to the culvert of the river Wad) . This will cause flooding and destroy our approximately 100 mature trees on the campus. The flooding will , without a doubt, affect health and safety on the campus.	<p>As outlined in EIAR Appendix A18.5 Flood Risk Assessment (FRA), a new drainage scheme will be required to facilitate the construction and operation of the proposed Collins Avenue Station (Section 6.3.10).</p> <p>As noted in Chapter 18, Section 18.5.3.3, during construction temporary pumping of groundwater will be undertaken to permit construction of underground scheme elements. It also notes that the predicted impact from dewatering is considered temporary, imperceptible to not significant based on proximity to the Wad River culvert. Historical flooding of the River Wad was caused by a blockage of the Wad Bridge and insufficient capacity of the surface water drainage system of Ballymun Road (Table 4.2 Appendix A18.5). Both of those occurrences will be mitigated against. The discharge of any groundwater to surface water receptors will be subject to consent and controlled to ensure no adverse impact on flood risk. The elevation of the proposed overground infrastructure across the scheme and nature of surface strata as impermeable clay, means the above ground emergence of groundwater is highly unlikely. There are also no reports of groundwater flooding across the proposed Project . The risk of groundwater flooding to the scheme is therefore considered to be low and therefore there is no impact predicted on the trees in your campus. (Section 5.7 Appendix A18.5).</p>
16		6	<p>Year on year, we have won several awards based on outdoor initiatives- Global Action Plan Environmental Awards in addition to RTE appearance for All Ireland G.I.Y (Grow it Yourself) winners and we are proud to have an exceptional 7-year-old pupil recently selected on the 35 pupil strong assembly on the Children and Young People’s Assembly on Biodiversity Loss (D.C.U., U.C.C., Terre des Hommes). In addition, our school was invited to partner with the National Botanic Gardens Educational Garden and we have close ties with D.C.C and have won Tidy Town awards etc.</p> <p>Outdoor Inquiry based learning in science, and education for sustainability are key active areas in our plans, guided by Dr Sandra Austin, M.I.E. (Austin, S (2021) Education about, through and for the environment: a scientific approach). We are trialing several outdoor inquiry - based initiatives across the campus for STEAM/Science Week 2022. Outdoor Inquiry Based Learning has been identified in our newly written 2022-2025 DEIS plans which are open to inspectorate assessment.</p> <p>The exemplary and pioneering work that Our Lady of Victories Schools carry out in this area is to be celebrated and recognised and more importantly protected. Colleges of Education are linking in with our school community for research purposes; it is imperative that we maintain and improve the opportunities for children on our school grounds, without compromise or any impingement vis-a-vis any potential adverse risk of construction nearby- noise, pollution, dust, access, visiting the local park for STEAM activities etc. which is embedded in our current practice on a very regular basis.</p> <p>Our schools’ values support The United Nations Committee on the Rights of the Child where consideration that play should involve children having both space and opportunity to play outdoors unaccompanied in a diverse and challenging physical environment; opportunities to experience, interact with and play in natural environments and the animal world; and opportunities to explore, understand and shape the cultural and artistic heritage of their community (Committee on the Rights of the Child, 2013). Moreover, the child’s education must be directed to, amongst others, ‘the development of respect for the natural environment’ (art 29(1)), rights which are instrumental to the conservation of natural heritage.</p>	<p>TII commends the pro-active approach that the school takes to outdoor based learning and specifically in the areas of sustainability and biodiversity. While the local concerns on the construction phase are fully acknowledged, it should be noted that the proposed MetroLink project is a project of national importance in driving sustainable development. It will allow for sustainable and compact development by providing a high quality and high frequency alternative to car based transport. This will have a long term positive benefit to the school by reducing both noise and air quality emissions in the vicinity of the school (Please refer to section 3.4 of Chapter 3 of the EIAR for more details). As outlined in responses to items (19), (21),(22),(23) and (24), undertaking major construction works in urban areas is manageable and the mitigation measures proposed in each of the relevant chapters will ensure that potential for effects on the activities at the schools including outdoor based work will be minimised. Furthermore, TII are keen to work closely with the schools to minimise any potential effects on the operation of the school and to implement further measures if required at the school i.e. Noise barriers specific to the outdoor working areas to reduce noise levels at these sensitive locations further.</p>
17	Availability of Expert Advice- not what was indicated.	7	In summary, the prospect of any pejorative impact on our outdoor campus by virtue of major external construction is of a source of highly significant concern to our collective school community, especially voiced by our Children’s Wellbeing Committee (Pupils); it is imperative that we listen to the children’s voices.	Please refer to response (16) above and responses to subject specific queries to items (19),(21),(22),(23) and (24) below.

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18		7	The School was told on several occasions that expert advice would be provided to the Boards around environmental impact and traffic surveys etc. This did not happen and is a clear indication of the poor planning and execution of the consultation process as run by TII	TII regret that this incorrect statement was made to you. The IE services are only available for residents groups.
19		7	The three Boards of Management are deeply concerned that the vibration, dust and vermin which will be disrupted as result of the excavation so close to the school grounds will potentially render the campus uninhabitable for the duration of the build. It is inevitable as the ground works commence that mice and, of more concern rats will be displaced from sewer movements. Our school is in the direct line of fire for this issue. The estimated volume of earth to be extracted from the station box at OLV Church is approximately the same as that of the Crake Park Stadium.	<p>As outlined in EIAR Chapter 14 Section 14.4.1, Table 14.31 during excavation, groundborne noise and vibration will be below the threshold of significance at this location. 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 (EIAR Section 10.5.1.1 Chapter 10). 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 (Outline CEMP), A16.2 (Site Specific Potential for Construction Phase Dust Impacts) and Appendix A16.4 (Dust Management Plan) of the EIAR. Implementation of mitigation measures will ensure that the campus will not be uninhabitable for the duration of works.</p> <p>As outlined in Appendix A5.1 Outline CEMP, effective prevention of infestation from pests and vermin will be implemented at all construction sites, including arrangements for regular disposal of food and material attractive to pests.</p> <p>The estimated volume of soil to be extracted at the proposed Collins Avenue Station is significant at c80,000m3 (EIAR Appendix A24.1 Section 3.3 Table 3.2). However, Croke Park Stadium is significantly larger. (A rough estimate of the volume of Croke Park based off length,width and height of the stadium is 204m*248m*44m = 2,226,048m3) this is approx. 27 times the volume of Collins Avenue Station)</p>
20		7	This earth and rock will be extracted via drilling, piling and will require the use of heavy plant and equipment all day, every day from early morning throughout the entire school day- for the duration of some children’s ENTIRE school life.	<p>Please refer to response to Item 10 in relation to noise and vibration impacts. In addition, it is important to note that as outlined in EIAR Chapter 5 Table 5.15, the estimated construction duration anticipated for the principal construction elements at Collins Avenue Station Compound / Deep Station is 99 months which equates to 8.25 years. However, the duration of major civil engineering work that would generate noise and dust would be approx. 36 months (up until roof slab is on which will significantly reduce emissions). In addition, as stated in a number of responses here, while there is potential for effects during the construction phase, impacts will be minimised through the implementation of the Construction Environmental Management Plan (CEMP) (EIAR Appendix A5.1 Diagram 2.1). A Stakeholder Communications Plan will also be put in place by the contractor, which will detail the estimated duration of each phase of works and the working hours. This plan will provide a two-way mechanism for members of the public to communicate with a designated member of the contractor(s)’s staff and for the contractor(s) to communicate important information on various aspects of the proposed Project to the general public (EIAR Appendix A5.1 Section 3.3.1).</p>
21		7	The vibration and noise that will result at such close quarters will have significant negative effects on a cohort of children who have sensory processing issues.	Limits have been set for noise and vibration in Chapter 13 and Chapter 14 of the EIAR to protect sensitive receptors all along the alignment during both the construction and operational phases which will go a long way to protect those sensitive students with ASD. However, in line with the principles of TIIs Airborne Noise and Groundborne Noise Policy (Appendix A14.6 of the EIAR), TII are available to work closely with the schools to minimise any potential effects on students with sensory processing issues.

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22		7	<p>Another major concern to the boards is the air quality in the area for the duration of the build as a result of the excavation and piling etc. This is in addition to the use of thousands of tonnes of concrete dust through the mixing and grinding operations on site. TII have undertaken to have some flagging/ monitoring mechanism in place to monitor air quality. The practicalities around potentially having to close a school at short notice due to some such event breaching an established norm begs the question as to how this will work. All working parents will need to be available at a moments notice to collect their child from a potentially hazardous situation. What independent oversight of this would be provided to ensure that appropriate actions would be taken?</p> <p>It is the Boards view that there is a grave risk to the long-term safety and workability of the schools windows would likely have to remain sealed to prevent ingress of harmful dust particles. This will make the school uninhabitable in the circumstance where public health guidelines mandate open-windows, such as recently witnessed as part of the management of the Covid pandemic. No thought has been given to this that we can see, and it cannot be ignored as it is a significant risk that cannot be mitigated - dust will rise and travel.</p>	<p>There are stringent rules in place to control construction emissions as much to ensure the health and safety of the operatives on site in very close proximity to the source let alone to outside parties. Construction works are common in built up areas and these risks are manageable. Chapter 16, Table 16.46 notes that dust health impact risk is negligible to low once mitigation measures have been implemented at this location. Therefore it is unlikely that windows will have to remain sealed during the construction works.</p> <p>In relation to Independent Oversight, in the first instance the appointed Contractor will have to comply with the provisions of a number of health and safety legislations such as the Safety, Health and Welfare at Work Act, 2005, the Safety, Health and Welfare at Work (Construction) Regulations 2013, the Safety, Health and Welfare at Work (Construction) (Amendment) Regulations 2021 as is best practice. This will also involve having a weekly site safety meetings which will include environmental issues such as monitoring, incidents and complaints. In the second instance, the appointed Contractor will also be subject to inspections from the Health and Safety Authority. TII will also appoint a Public Liaison Officer. Their role will be to provide a two-way mechanism for members of the public to communicate with a designated member of the contractor(s)'s staff and for the contractor(s) to communicate important information on various aspects of the proposed Project.</p>
23		7	<p>At its closest, the tunnel bore route will pass approximately 10 linear meters from the foundation perimeter of the school on the south-eastern corner of the original infant school building. The vibrational transfer from the TBM will likely render this end of the building entirely unusable due to noise and vibration. The wider geological and structural impacts on the school are unknown at this point, however this is another significant and grave concern.</p>	<p>Predictions of groundborne noise and vibration have been made for the passage of the TBM at the closest sensitive receptors to the tunnel route.</p> <p>In EIAR Chapter 14.4.1.8 AZ4 – Groundborne Noise during Construction, Table 14.29, are presented the predicted groundborne noise levels during TBM Passage compared to the threshold values for noise for various sensitive receptors (including Our Lady of Victories School).</p> <p>The predicted LAm_{a,s} for TBM Passage at Our Lady of Victories School has a value of 43 dB while the Threshold Level for this building is 45 dB, resulting a not-significant impact on the buildings operation during TBM passage. The Table 14.32, presents the predicted vibration levels during TBM Passage compared to the threshold values for vibration for various sensitive receptors (including Our Lady of Victories School).</p> <p>According to the calculations in Table 14.32 the VDV (Vibration Dose Value) for TBM Passage at Our Lady of Victories School has a value of 0.179 m/s-1.75 which is much lower than the VDV Threshold Level for this building of 1.6 m/s-1.75, resulting a not significant impact on the buildings operation.</p> <p>The duration of TBM passage past a given location is anticipated to be for a 2-week period, and TII will advise the timing of this passage in advance once the program is finalised.</p> <p>The geological and structural impacts are known. The tunnel is located on the other side of the Ballymun Road and your buildings are set back from the road meaning there is some distance between the tunnel and your buildings and hence no structural impacts are predicted due to the tunnelling. In fact, the residential properties located opposite, and in far closer proximity to the tunnel, will similarly not suffer any structural impacts. These impacts have been assessed and presented in the EIAR Appendix 5.17.</p>

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24		7	The School Boards and Principals, charged as we are with looking after the best interests of the children in our care implore An Bord Pleanála to consider these matters, in the context of those children who have issues such as Autism Spectrum Disorder, where noise, vibration and other such external inputs have the potential to be hugely distressing to the individual and how they can manage to regulate their condition. While we acknowledge the long term benefits of the overall MetroLink project, the siting of the station box does not work.	Please see Response 21.
25	Potential Impact on Numbers	8	The volume of traffic and disruption to school routine has the potential to erode the viability of the campus where the site becomes so inaccessible to vehicular and pedestrian traffic. The access to the school has the potential to become such a factor so as to render the schools a “white elephant”- a school that cannot attract a quorum of students to guarantee its viability will fail and along with it the heart of a mature community. These schools have formed part of Glasnevin north since the mid 1960s, and have contributed immensely to the social fabric of the surrounding areas of Ballymun and Santry also. With rising population numbers in the district, if this eventuality were to play out, this would put untold pressure on other schools in the area who are currently all oversubscribed.	As outlined in Response Item 5, the traffic management at this location will reduce the R108 Ballymun Road in this section to 4 lanes - one general traffic lane in each direction, and one bus lane in each direction, maintaining general traffic access. Additionally, the signalised pedestrian/toucan crossing outside of the front of the school will be retained during all works and will continue to allow safe access for pedestrians and vulnerable users. This will not impact the viability of schools during the Construction Phase and will be a positive addition once the proposed Project is operational.
26	Potential for “stranger danger”	8	On completion of the proposed Metrolink station, there is proposed to be a highly active public transport hub. Our school population includes children from 2nd-6th class who travel back and forth to school unaccompanied. The location of a station so close to the school is questionable. Again the safety of our students is taking a back seat to improved infrastructure, when there is a very clear option to move the station back to the original site of Albert College, thus removing this element of danger.	Please refer to responses to items 1 and 4 for the location rationale. TII do not agree that safety of students is taking a back seat in favour of the proposed Project. CCTV will be provided at stations.
27	Conclusion	8	There are severe and grave concerns around how the proposed construction and operation of this metrolink at Collins Avenue/ Ballymun Road will impact on the day to day management of our schools.	As outlined above, in the responses to numbers 3, 4, 5, 7, 9, 11, 12, 13, 15, 19, 21, 22 and 23, any potential impacts on the schools will be minimised by the adoption of mitigation measures as outlined in the relevant EIAR chapters and the Construction Environmental Management Plan (CEMP) (Appendix A5.1). As such management of the school should not vary significantly to that undertaken currently. Furthermore, there will be ongoing consultation between TII and the schools in order to address any concerns that arise during this phase of the project.
28		8	<p>The concerns range from the siting of the station through the consultation process and the engagement from TII which has been disappointing from our perspective. The latest disappointment being informed that the “independent expert” on traffic and construction etc would not be made available to “institutions” such as our schools. We are now going into this process with no expertise available to us to inform us of the potential risks around the following:</p> <p>A) Noise B) Dust particulates C) Water Table Disturbance D) Traffic and Access Management E) Structural Damage F) Risk Management</p> <p>We are completely hamstrung on this due to incorrect information provided on a number of public meeting calls during the C19 pandemic where we were advised that independent expertise would be provided. This is unfair at best, underhand at worst. This lack of expert advice has hampered our ability to bring the degree of professional presentation to our submission which we are hopeful that An Bord Pleanála members will take into account when making their assessment.</p>	TII regret that this incorrect statement was made to you. The IE services are only available for residents groups.

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29		8	The Boards of management of the three schools are obliged to highlight to An Bord Pleanála that we do not consider that any serious consideration has been given to how a primary school can operate with a long term, major infrastructural construction site so close. We draw particular attention to; The documentation shared after date of publication : “Collins Avenue Station: Environmental Assessment Report of the Options”	As outlined in the responses provided above, as part of the analysis presented in the EIAR, there has been significant analysis of the potential effects of the proposed development on these schools. Arising from this analysis TII have no evidence that the schools will not be in a position to continue to operate during the construction phase of the proposed project. Furthermore, TII are keen to work closely with the schools to minimise any potential effects on the operation of the school and to implement further measures if required at the school.
30	“4.2.2 Option 2: Metro North - DCU Ballymun Road opposite St. Pappin’s Road	9	This option is close to a number of sensitive residential receptors as well as facilities such as College Gate Dental Clinic which is located across Ballymun Road, all of which could experience access restriction during construction activities at this location. It would have a direct impact to a property operating as a pre-school/after-school club. There would also be temporary and permanent land take from the green space/verge immediately east of Ballymun Road and north of Albert College Park, which is assumed not to be in private ownership. Whilst the station box would be beneath the verge, the construction area may extend into the road, leading to traffic disruption” OLV SCHOOLS' COMMENT :: The impact on a dental clinic is considered, as is an afterschool club in this circumstance by way of justifying the site being ruled out. Why is our school not respectfully considered in a similar manner in the context of the preferred site?	For rationale of location, please see Responses 1 & 4. Upon finalisation of the Preferred Route, TII undertook a highly comprehensive EIA which continued to take the schools at this location into account. The schools have been fully considered throughout the preparation of the EIAR. Chapter 9 Traffic of the EIAR notes the importance of continued and safe access to the schools.
31	“4.2.3 Option 3: Metro North - DCU Ballymun Road within Albert College Park	9	This option would be within an existing park and would involve significant vegetation removal, hence there would be impacts on local biodiversity, landscape and visual amenity. The landscape impact of felling matured trees would have an effect until replanted vegetation matured. This location is also close to other sports grounds, hence construction work at this site may reduce the amenity and disrupt access for the users for these grounds. No properties are anticipated to be demolished for this option and impacts on traffic are also less-compared-to-other options-as-it is-not o-the-main-road. The number of sensitive receptors- close to this site is also less than the other options, hence the overall impact on the environment is less.” OLV SCHOOLS' COMMENT : This document calls out this location as less impactful- there is mention of trees and vegetation, but less “sensitive receptors”. This supports the position to move the station box to Albert College Park- yet TII refuse to countenance this still.	TII have to consider all factors. Interchange with other transport corridors is a key driver to the location of MetroLink stations. With the station location closer to the R108/Collins Avenue junction it provides the best location to meet the requirements of both transport strategy policy documents for the Dublin area and the overall project objective to support an ‘integrated and accessible public transport service’. Assessment during development of the Emerging Preferred Route indicated that Options with a station near Collins Avenue as opposed to a station further south in Albert College Park provided the best opportunity for integration whilst serving a large number of key trip attractors. Further transport assessment during preliminary design development indicated that DCU remains a large contributor to the station usage with the station location as proposed by the church.
32	“4.2.4 Option 4: Metro North -DCU Campus Collins Avenue	9	This location would be within the DCU campus and would involve the demolition of a multi- storey car park. A number of residential receptors are within close vicinity and could be exposed to construction noise, dust and visual impacts. Students and staff visiting the DCU campus would also be experiencing these impacts. There could be access restrictions in the adjacent local roads which would impact businesses nearby. Helix Theatre, an active venue within the DCU campus, is adjacent to the construction site, which could be affected by noise, vibration and disruption during construction. There is a historic watercourse beneath the site, which could be directly affected, thus flows would be likely to need to be diverted. There are no green space or sports ground likely to be impacted by this option.” OLV SCHOOLS' COMMENT : Students and Staff at DCU are called out as being potentially affected- again this is noted as a negative ground by way of pushing the argument against this alternative location. Why is the effect on OLV schools, staff and students not measured in the same manner as being a negative for the proposed site?	Impacts on the OLV schools have been measured in the same manner. In consideration of locations, please note that the key difference between these two options is the fact that the current station location avoids any demolition of property. While a location in DCU would result in the demolition of a major building on the campus. This can be seen in the Collins Avenue Station: Environmental Assessment Report of the Options Report by TII.

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33	“ 4.2.5 Option 5: Metro North - DCU Collins Avenue Junction	9	Construction work in this location would have a significant impact on traffic and access to surrounding facilities, as it would be within the carriageway of the R108, at its junction with Collins Road. This would require significant traffic management arrangements to be in place during construction. Similar to the EPR/PR option, there are a number of sensitive receptors in close proximity which can be impacted from construction noise, dust, visual impacts and access restrictions. These include Our Lady of Victories Church, a number of schools, a library and residential properties. The northern end of the construction site would be very close to a historic watercourse, presumed now to be in culvert, which could be directly impacted. Three residential properties would require demolition for construction of a station at this location.” OLV SCHOOLS' COMMENT ; Here, in what is possibly the most breath-taking part of the report- the location is deemed unsuitable for a myriad of reasons including - "there are a number of sensitive receptors in the close proximity which can be impacted from construction noise, dust, visual impacts and access restrictions. These include Our Lady of Victories Church, a number of schools” This site is no further from the alternative site in question than our schools are from the preferred route.	As with the response to Item No. 32, TII were keen that wherever possible the demolition of property should be avoided. In addition, the provision of a station construction in the middle of this very busy junction would cause unavoidable traffic congestion for the duration of the works. Due to the location, there would be very little opportunity to mitigate these impacts. It is recognised by TII (as outlined in the EIAR) that the current proposed location for the station has potential for significant environmental effect. However it avoids the demolition of property and removes the construction area from the roadway, thereby allowing traffic management measures to be implemented that can safely manage access and egress to all properties at this location as well as maintain effective through traffic.
34	“10.5 Predicted impacts of the proposed Project.” - Human Health Chapter in EIAR	10	It is acknowledged that it is not possible to predict the full effects on an individual and it referred specifically to those with ASD. Our school must be categorised as ‘Very highly sensitive’ in Section 10 as we have a large number of children diagnosed with ASD whose entire primary school years will have the metro and associated works effectively preventing them from accessing their education.	<p>Please refer to responses (20), (24) and as outlined in the EIAR Chapter 10 Human Health the section 10.3.4.2 on sensitivity.</p> <p>The sensitivity of an area or building in this context refers to the vulnerability of the population. Reasons for this include inherent vulnerability such as is the case for the very young or old. Locations where there are higher numbers of vulnerable individuals such as hospitals and nursing homes are considered to be ‘very highly sensitive’ and require special consideration where potential effects are possible. Where it is clear however that very highly sensitive receptors have negligible effects, perhaps because of their distance from the line, these are scoped out. Residences, schools, workplaces, commercial areas and places of worship are considered ‘highly sensitive’. This is because these areas will include populations of elderly, young people and people with health conditions. However, the majority of the population in these locations are likely to be less vulnerable than those in the very highly sensitive locations.</p> <p>Areas where recreational activities are carried out are considered to be ‘sensitive’ as these locations are typically only occupied during the day, and not necessarily continually. They will be used by children and the elderly but usually only for limited periods of time. it is not envisaged that the works here will prevent those children from accessing their education.</p>
35		10	It is our position that this EIAR does not support the location selected and has taken a very “chequered” approach to the input factors on which the report is based- In some cases, the location of a school or college nearby is deemed a factor in rejecting an alternative site- yet for the “emerging preferred route” our school is roundly and manifestly ignored, despite many representations during the public consultation period.	Please refer to responses to Items (1), 33 and 34 above. As noted in the Collins Avenue Station: Environmental Assessment Report of the Options report, the educational facilities considered for rejecting an alternative site was in relation to demolition requirements. The preferred option means that no demolition on any buildings are required.
36		10	The issuance of updated EIAR documentation via the TII website in the days leading up to the statutory deadline for the submission of documents was less than helpful. This release of updates during October and November did not afford a reasonable opportunity to meaningfully reflect on, or even identify updated information.	Please note that the extension of the statutory consultation period provided an additional 6 weeks over and above the statutory consultation period, thereby giving significant additional time for submissions to be generated. The additional information provided at that stage was clearly identified on the Metrolinkro.ie website and had no effect on this location.

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37		11	There has been a manifest plain failure to engage on the part of TII regarding the potential damage possible to the day-to-day experience of going to school for a huge cohort of these pupils. During the course of the construction phase of the project 2024-2032, we estimate that 1300-1500 pupils will pass through our doors. Is An Bord Pleanála prepared to take responsibility for the potential damage that could be caused to the education of these children, and indeed to guarantee their physical safety across this 8 year period? There appears to be a blind push to get this into place regardless of issues raised. Children are entitled to be able to play and learn outside, go on a nature walk to nearby park, without having to wear ear defenders.	Please refer to item (13) and (16) above.
38		11	They are entitled to sit in a classroom where the windows do not need to be kept constantly closed; ventilation is currently mandatory! They are entitled to go to a classroom and yard where there is no need to have rat traps/ poison scattered as a matter of course to prevent infestation. They are entitled, as are their parents, to have a reasonable expectation of going to school and completing the day there without potentially being told “the air quality is below X level we have to close”. They are entitled to be able to leave the school and get home without being forced into significant detours, potentially placing them in harm’s way.	Please refer to responses (3), (5), (8), (9), (16) and (22) above.
39		11	Should ABP decide that this station site should go ahead in its current format, then that is to endorse the TII position that the above does not apply, and that our children are second class citizens, and not “as entitled” as those in other schools nearby where changes were made to locations. This will not go unchallenged, should this be the outcome These are not scaremongering statements or exaggeration. The issues raised above are highly likely outcomes affecting the school building and community- Safety, Noise. Dirty Air. Pest. There can be no equivocation on these matters and we do not accept that “mitigating” measures will allay these problems.	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 referred to in responses above and as detailed in relevant chapters of the EIAR, TII consider that it is possible to mitigate the potential impacts identified at this location during the construction period. In addition, TII are keen to point out that once the construction phase is completed the location of a MetroLink station here 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. TII regret that you feel that the mitigation measures will allay your problems but are keen to note that the mitigation measures outlined within the EIAR are derived from best practice and through specialist input. TII will endeavour to ensure that impact on the schools is reduced as far as practically possible.
40		11	The current siting of the main entrance of our schools is not compatible with a construction site and access compound.	Please refer to responses (4-9) above, which outline that full and safe access to the school will be maintained during the construction period. Furthermore, as identified above TII are keen to work closely with the schools to minimise any potential effects on the operation of the school and to implement further measures if required at the school.

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Our Lady of Victories Church - Re: Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022, specifically Collins Avenue Station – Submissions by The Parish Pastoral Council of Ballymun Road which is Our Lady of Victories Church, written by Fr. Frank Reburn & Ger Casey (Chairperson)				
1	Unhappy with Collins Avenue Station proposal	1	We acknowledge the benefit that such a development would bring to our city. However, we feel that the proposal re: Collins Avenue Station would impact greatly on the spirit and life of our church community.	TII welcome your acknowledgment of the benefits that the proposed Project will have as a whole. We will endeavour to alleviate your concerns throughout this submission.
2	CPO - Unhappy with Collins Avenue Station proposed to be on the grounds of the church	1	Our Lady of Victories parish is a vibrant community serving the pastoral needs of its parishioners. Our church is the centre of this vibrant community. We feel deep frustration and unease that our, and many past generations' spiritual faith family home for over 50 years, a place we hold precious at the deepest and dearest level, is under threat by the building of a station within our grounds. Arrangements for the CPO and use of the 'Plaza' area to the front of the church grounds are of concern. The CPO will deprive our community of this valuable space that has been used over the years for parish picnics and family days. Indeed, our very first Parish Priest, Fr Bernard Brady, was buried in the lawn in front of the church in 1987 (consult www.olv.ie/history). Trees have been planted, also, in the front lawn, marking special occasions in the history of the parish.	As noted in Chapter 11, Table 11.61 that access to Our Ladies of Victoryies church will remain accessible and operational via Albert College Drive during the construction phase of the project. Unfortunately it will not be possible to fully reinstate the green area in front of the church to their current state. The landscape proposal upon completion of the works is will better define the very public space from the more passive and tranquil garden to the rear of the area, which is clearly related to the church. The new proposed garden will continue to offer a degree of privacy for the church from the road and remains a social space into which mass and church events can spill out. It is TII's intention that that post completion the restored green area will continue to be available to our Ladies of victory Church for parish picnics and family days and TII will work closely with church represenatives to encouge and faciliate events of this nature TII will ensure that Fr Bradys grave is protected and undisturbed during all stages of the MetroLink Construction works.
3	Access	2	It would prove almost impossible to cope with the inaccessibility of our two major front entrances for/funerals, weddings, special occasions, necessary and important to-ing, and fro-ing of groups of children and their teachers from our schools to the church. A number of these children suffer from disabilities such as ADHD, Autism with sensory issues and Down Syndrome and are particularly fragile, vulnerable, and especially frightened by noise and disruption. Some of our parishioners who struggle with mobility issues to get here will have further difficulties to endure. Their health and safety are a key concern. Following on from Covid restrictions, all parishes are trying to encourage their congregations to return, and the proposed works will make attending less appealing and very difficult. Many of the congregation are elderly and further inconvenience is unhelpful. In our opinion, it is imperative that conditions be imposed to alleviate the disruption that this project will cause to our community, our school population and our parishioners.	We 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. As noted in Chapter 9, Section 9.8.1.5, 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 line on Collins Avenue will be maintained in both directions, with journey times for public transport unlikely to be significantly impacted. Chapter 9, Section 9.6.1.2.4.1 notes 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. Chapter 9, Section 9.8.1.3 notes 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. Vehicles accessing the church car park will be required to use a diversion via Albert College court, maintaining access during all project stages. Further details of construction impacts on transport are found in more detail in Section 9.6.1.2.4.1. and Section 9.6.1.2.4.3 of Chapter 9 (Traffic and Transport). Environmental impacts (e.g. noise, air quality) from construction activities are expected to negatively impact user amenity, however mitigation will be implemented to reduce impacts on church users. Limits have been set for noise and vibration in Chapter 13 and Chapter 14 of the EIAR to protect sensitive receptors all along the alignment during both the construction and operational phases which will go a long way to protect those sensitive students with disabilities. However, in line with the principles of TIIs Airborne Noise and Groundborne Noise Policy (Appendix A14.6 of the EIAR), TII are keen to work closely with the community and the local schools to minimise any potential effects on children with disabilities. Limited noise impacts are predicted to the church as construction activities will be timed to occur outside of service hours, as outlined in Chapter 13 (Airborne Noise & Vibration). Full access of the church to the public will be reinstated during operation, with further street furniture implemented to increase pedestrian comfort levels (Section 9.6.2, Chapter 9). Collins Avenue Station will create another means of travel to and from the church, opening it to the wider community.

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Organisation Name or Name of Submitter			Our Lady of Victories GNS, BNS & JNS and Church	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Proposed locations on Ballymun Road, relative to the operation and long-term viability of the Our Lady of Victories Schools				
4	Architectural heritage - concern over potential structural damage to the church	2	The church building is one of the finest churches of its age on the Northside of Dublin with considerable architectural merit and has many decorative stained-glass windows; the main stained-glass artist, Helen Moloney, created stained glass windows for only 11 churches in Ireland so our windows are precious and rare. We have major concerns in relation to potential structural damage during construction works.	<p>Our Lady of Victories Church is recognised as an important architectural heritage asset in Dublin and is included in the 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. 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 EIAR Chapter 26 (Architectural Heritage). Our Lady of Victories Church is recognised as a Noise Sensitive Location (NSL) and it is predicted that Construction Noise Levels (CNLs) will exceed Construction Noise Thresholds (CNTs) (65 to 75dB LAeq,T) during different phases of work (Table 13.59, EIAR Chapter 13 (Airborne Noise & Vibration)). In terms of vibration, the threshold of 3PPV during blasting at the nearby station box is not predicted to be exceeded at Our Lady of Victories Church, however the predicted level of 2.7PPV is close to the threshold (EIAR Chapter 14, Ground-borne Noise and Vibration). During TBM passage the predicted level of vibration is 0.206ms-1.75 VDV (Vibration Dose Value), which is below the threshold level of 1.6ms-1.75, indicating no significant impact on the building.</p> <p>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. As noted in Appendix A5.20 Blasting Strategy, prior to works an additional review from an Architectural Heritage Specialist takes place to determine if any additional mitigation measures are required before blasting activities take place. 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) as predicted levels of operational vibration are predicted to be 0.002ms-1.75 VDV, well below the 0.4ms-1.75 VDV threshold value for human response within the church, with thresholds for building damage being much higher than these.</p> <p>With regard to Settlement / Ground Movement an assessment of the effects of ground movements and potential impacts on existing buildings has been carried out. The approach to ground movement and building damage assessment follows the industry standard three-phased ground movement impact assessment process that is undertaken on tunnelling and underground projects around the world, that includes Channel Tunnel Rail Link (CTRL), Dublin Port Tunnel, Crossrail and High Speed 2. EIAR Appendix A 5.17, Building Damage Report, covers the assessed impacts of construction generated ground movements on properties. Table 5-2 outlines the results of the Phase 2a Building Damage Assessment conducted on your building. Table 5-2 shows that B-124 Old Lady of Victories Church has been assessed as falling within the "Slight damage" category. The description of this impact is cracks can be easily filled and redecoration could be required.</p>
5	Fear that concerns will be ignored	2	While recognising the value of this project and the work which has been done to date, we as the PPC of Our Lady of Victories parish fear that our very valid concerns will be ignored. In our option, it is imperative that conditions be imposed to alleviate the disruption that this project will cause to our community, our school population and our parishoners.	TII note your concerns and hope that you feel that we have adequately answered your concerns throughout this submission. TII feel that an exhaustive assessment of impacts on the community has been carried out and have developed mitigation measures to reduce the impact insofar as reasonably possible.