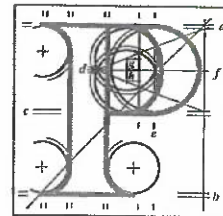


**Our Case Number:** ABP-314724-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

ACRA and Ballymun Road North Residents  
C/O Barry Conway  
4 Albert College Crescent  
Dublin 9  
D09 H681

**Date:** 07 December 2022

**Re:** Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]  
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to  
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaao Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



## **Metrolink Submission:**

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On behalf of

**Albert College Residents Association (ACRA)**

**&**

**Ballymun Road North Residents**

**Barry Conway**

(ACRA Deputy Chair & Main Contact)

4 Albert College Crescent

Dublin 9

D09 H681

**&**

Jim Deignan

157 Ballymun Road

Dublin 9

D09 X328

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## Re: Collins Avenue Metro Station

The above group represents the residents of the Albert College Estate and the residents who live along the main Ballymun Road corridor immediately opposite of the Our Lady of Victories Church.

Our views appear consistent with Our Lady of Victories Girls and Boys Primary Schools, Our Lady of Victories Church, two assisted living accommodation complexes, as well as several other resident associations and hundreds of family homes within this immediate catchment area.

We wish to confirm that we broadly welcome the provision of the proposed Metrolink and the benefits which it will ultimately bring to the area.

**However, this is the wrong location. We strongly object to the proposed positioning by TII of the Collins Avenue Station as we believe that there are serious and fundamental problems with the proposed location.**

**Despite our engagement and that of many other groups with TII, our concerns were essentially not listened to as part of the selection process. Furthermore, despite several requests by us and our independent engineers, we have seen no detailed rationale on why the proposed location was selected. There is a clear lack of evidence from TII on the basis as to why they made such a ridiculous decision.**

**After 2 years waiting the Jacobs IDOM Environmental Assessment report was finally released by TII on 17<sup>th</sup> November 2022. The report itself is dated 6<sup>th</sup> February 2020. The report clearly backs up our assertion that the station should be constructed in the park, and this is copied on page 30 below.**





**We also included a previously acceptable and viable alternative location for the station just 330 metres south that would provide scope for refinement of the current plans and address all the issues outlined.**

## Context

This section of Ballymun Road is an already heavily utilized area and is one of the busiest thoroughfares to and from Dublin City Centre. It is completely the wrong location for any significant construction let alone heavy civil engineering works that will take 10 years to build and involved shattering the lives of so many people both Young and Old.

Under normal (pre-Covid) circumstances according to the TII traffic data website, an average of 15,000 cars daily uses the R108/Ballymun Road northbound to access the M50. It is also one of the busiest arterial routes to the city centre for southbound traffic travelling from the M50 and M1 motorways.

There are three primary schools, a church, two assisted living complexes as well as several hundred residential properties and family homes within 50 meters of the proposed construction site of the station. Each of these groups share the same concerns about the negative impact that the proposed location will have on the community.

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 Millimetres in diameter, Mains Water Pipes 800 mm in diameter, Sewerage Pipes 450mm in diameter followed by electricity cables.

These are major structures, and this plan will result in an additional very large 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 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.

This initial disruption caused by the utilities relocation prior to station excavation will continue and will be further exacerbated during the station construction itself. 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 7 am and 7 pm Monday to Friday and on Saturdays between 7 am and 1 pm.

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 local area.

The immediate concerns can be summarised as:

1. **Positioning of the Collins Avenue Station:** the proposed selected area for the station is more complex, more disruptive, more expensive, more dangerous than the original Metro North station. Furthermore, the latter would be better placed to service DCU.
2. **Highly Sensitive Receptors:** High Proportion of elderly and special needs residents as well as primary school children will be unfairly impacted by placing the station at the proposed location for a period of 10 to 12 years.
3. **Unconvinced by the need for such a large station with associated architecture:** Preference is for a more low-key station similar to most cities like London, Paris, New York rather than a large brightly lit footprint attracting unwelcome attention and undesirable characters and anti-social behaviours.
4. **Albert College Residents** will have no or restricted access to Ballymun Road.

5. **Proposed use of the OLV church grounds as a car park** for school drops and the impact it will have on Albert College residents.
6. **Traffic Management:** Grave Concerns about the access on a temporary and permanent basis to the immediate area.
7. **Scepticism about the bus interchange being relevant:** one of the reasons given for the choice of this location is its relevance with the bus interchange. In our view there is no material difference between modes of transport based on station location. TII have provided no evidence at all of this being a material factor.
8. **Bus Connects Project** propose reducing existing north bound three lanes of traffic to two lanes, one of which will be a bus lane thereby putting further pressure under existing road network. There appears to be no joined up thinking between TII and the NTA regarding Metrolink and Bus Connects.

A very wide cohort of the local and wider community will be negatively impacted by the construction of proposed station location including:

- Our Lady of Victories Boy and Girls primary Schools
- Senior Citizens living in Albert College Court
- Our Lady of Victories Church
- Residents in the immediate vicinity of the station location
- Thousands of daily Motorists and Commuters to and from Dublin City

Some of the fundamental issues resulting from these concerns include:

- Safety of access to and from the schools
- Potential Permanent eviction of elderly residents living in Albert College Court
- Albert College Estate access or Cul De Sac creation
- Diversion of Utilities adding at least 2 additional years to the build
- Traffic Chaos making accessibility to the immediate community impossible
- Station Excavation and Construction creating an unliveable environment for all in the immediate vicinity of the proposed station
- Air Quality will be significantly impacted during construction
- Construction Dust, Noise, Vibration
- Operational Noise, Security, Vibration
- Flooding\Water Table exposures



## Albert College Estate

The Albert College Residents Association represent the interests of the 177 houses of the Albert College Estate and approx. 100 homes in the two assisted resident's homes in both Hampstead Court and Albert College Court.

During Covid restrictions we carried out a difficult task to inform our residents of the current Metrolink plans and the severe impacts it will have for a prolonged period of up to 10 years on our residents, the Church, the three Schools and the elderly residents in Albert College Court & Hampstead Court. Having given the details to our residents we asked them to vote on their preferred station location.

Church Location 9.6%

**Park Location 90.4%**

The majority of our residents are clearly in favour of the Park Station location.

As it is exiting the estate is extremely difficult in the mornings with very high levels of traffic on both Collins Avenue and Ballymun Road. It has become worse recently with the changes at Griffith Avenue, traffic can be at a standstill at numerous random times during the day and every day of the week. Further lane reduction will have an extremely negative effect on the ability of residents to access their property. Therefore, should the station location not be moved, we would insist that TII examine alternative options along with the residents of the Albert College Estate for a temporary 'resident-only' exit of the estate onto the Ballymun Road and ask that the Inspector includes this as a Condition of the Railway Order.



### Access to Residential – Albert College Park

- Option 1 – New temporary access onto R108 Ballymun Road.
- Option 2 – Estate becomes Cul De Sac
- Option 1 : Pros – Second junction will allow residential to bypass queues at Collins Ave / Ballymun Road and Metrolink construction works
- Option 1 : Cons – Residents at end row will have small increase in movements.
- Option 2 : Pros – The removal of the rat running – which may get worse when Metrolink works are in place.
- Option 2 : Cons – Will experience additional delays at Collins Ave / Ballymun Road junction
- Option 2 – Better for non car drivers – for people walking/cycling within the estate and will reduce traffic volumes within estate. Accordingly Option 2 is preferred – but either is possible.

## Our Lady of Victories School

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 proposed site of the station will be installed directly outside the campus of these schools, with a combined enrolment of over 650 children. Both carriageways along this section of Ballymun Road and Our Lady of Victories Church car park are heavily used by parents to enable dropping and collecting children to and from these 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 or impractical to access.

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 in particular given the high volume of traffic already using this junction.

There will also be several hundred construction personnel involved in this project adding to the challenge as they presumably will also be competing for the very limited remaining parking spaces in the area.

TII have suggested that parents can enter the Albert College Estate (now a Cul De Sac) via Collins Ave, park at the rear of the church and walk via the safe pedestrian walkway at the side of the construction site.

These parents' vehicles would then have to exit the Albert College Estate onto Collins Ave along with all the estate residents and this is not acceptable and will only add to the significant negative impacts on the residents of the estate and their freedom of movement.

If this church location is to go ahead, the only practical alternative parking space available in the area for school drop off would be on the land beside Ballymun Library. This would leave the parents and kids within a 5-minute walk to the schools, and they would only have to cross one major junction, similar to the proposal of TII.

We ask that should the station go ahead at the church site that a condition of the RO be that the parking for the school is built next to Ballymun Library and that this walkway is not provided.

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”.***

The schools also rely on the car parking facilities at the back of Our Lady of Victories Church on Ballymun Road. The proposal will in reality cut off this access for parents who use it as a drop zone for children to a safe location. The removal of the left turn onto Ballymun Road from Albert College Drive will make the TII proposal to access this site unworkable and dangerous.

Given the width of the road and the proximity to the school entrance, the risk to the safety of nearly 1,000 people using the school site every day, student, parents and staff needs to be very carefully considered and cannot be underestimated.

All construction activities will need to be suspended between 8am – 9.30am and between 1pm – 3pm, Monday to Friday during school term. Traffic congestion is already a huge issue for the schools and already there are 3 crossing guards in place. The disruption to traffic flow due to the construction and the increase in trucks and heavy machinery will create further health and safety concerns for Parents, Pupils and Staff.

The increased levels of airborne dust generated by construction and excavation will be further exacerbated by the expected stagnation of bidirectional road traffic due to flow restrictions caused by lane closures, with an associated increase in traffic pollution caused by a buildup of exhaust fumes. There will also be a higher density of heavy construction traffic and machinery in the area adding to the level of pollutants.

Both these factors in such proximity to the schools will result in a significant deterioration in air quality. 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 deterioration in air quality.

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.

We believe that TII did not sufficiently contemplate the impact on the schools as part of the review process and it is clear that their proposed location for the station will create very devastating and serious quality of life issues for the school going population.

## Senior Citizens in Albert College Court Assisted Living Accommodation.

There is a very high proportion of elderly residents residing within close proximity to the construction site, most notably those within the Albert College Court housing complex many of whom have mobility and health challenges. The current plan for the station and associated construction compound location shown in the diagram below shows the station box wall to be in extremely close proximity to the western periphery of the housing complex.

The main concerns are threefold:

1. The major scale and the resultant noise and vibration caused by the excavation equipment that will be deployed to insert the station diaphragm walls which are in very close proximity to these houses.
2. The extreme proximity of the periphery of the construction site compound located at the main entrance of Albert Court on the church side of the complex. The current compliment of allocated street parking spaces for these residents will be subsumed into the construction site further increasing access issues for these residents.
3. The very close location of the site exit point where trucks carrying removed spoil from the excavation will leave (up to 20 per day) the site is again uncomfortably close to these housing units.

Please see the image below which provides an indication of the type of construction equipment in question that will literally be outside their front door.

It would therefore seem inevitable that due to these 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 as their lives would be unbearable given these challenges.

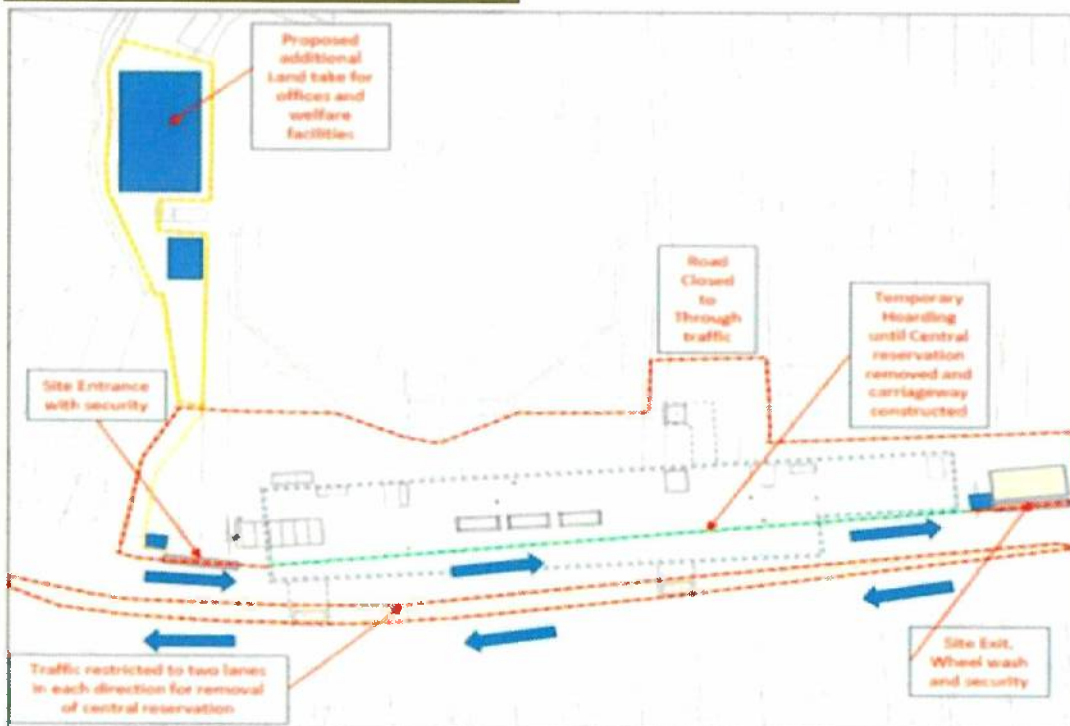
This would result in major stress and anxiety for all of these residents, many of whom are elderly and some who do not enjoy good health.

TII have neither confirmed or denied whether these residents face relocation. Nor to our knowledge has there been any meaningful communication from TII with any spokesperson for these residents to inform them of the plight they face, which seems grossly unfair.

Therefore, these elderly residents are essentially being asked to sacrifice their lives and their homes for the period of the 10-year build. It is safe to say the many may never get the chance to return to their homes.



A Bauer BC 50 cutter which is the type of equipment used to excavate and install the station diaphragm walls as detailed in a TII presentation on station construction methodology at OLV church and direction beside the residents of Albert College Court.





## Our Lady of Victories Church

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 was 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.

This church was established in 1969 and is one of the most prominent buildings in the vicinity. The permanent land take because of the construction of the station will change the access and perspective of the building forever.

There are also serious concerns relating to potential structural damage to OLV church caused as a result of heavy drilling, rock breaking and rock-blasting.

Access by parishioners to Our Lady of Victories Church will also be severely compromised for several years during construction for all of the reasons outlined above.

The community attending funeral, wedding, baptism, communion and confirmation services will face major difficulties due to the severely restricted access and the reduction in parking spaces as a result of the impounding of the church forecourt, the car parks and the on street parking on Albert College Drive.

This will result in an irreversible decline in church attendance as parishioners will once again be placed in a situation where access to the church building will undoubtedly be hindered due to route closures and lack of parking spaces.

You would question if a decision will be made by the Diocese to permanently close the church.



## Residents on Upper Ballymun Road

There are approximately 20 houses located both along the 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 shattered for the duration of the construction which could take up to 8 years and include an additional 2 years in advance for moving utilities from one side of Ballymun Road to the other.

The reality is that many of the residents in the immediate vicinity of the station will have to be rehoused during construction as it seems impossible to imagine how life could continue as normal given the enormity of the disturbance outside their front door.

Residents will also need to be compensated for the impact of the Station works on their homes including the exposure to all structural problems and ongoing cleaning of windows, driveways and cars.

Given the location of the construction site in such proximity to many properties, it will be necessary that TII must develop a Property Protection Scheme which would involve detailed condition surveys off all properties within a predefined zone and those owners would get a pre-agreed guarantee of protection from any damage.

The proposal to locate the station along with the sizeable construction site compound in this location will impact on the ability of residents along this stretch of Ballymun Road/Albert College Estate to access their properties.

There are already significant traffic management issues in the immediate vicinity of the proposed location, and it is one of the busiest routes to and from Dublin City. Grave concerns exist about the impact on traffic during construction. TII have not given any comfort on how this will be managed and how residents can comfortably continue to go to and from their properties. There are also concerns relating to structural damage to the nearby residential properties caused because of heavy drilling, rock breaking and rock-blasting.

The increased levels of airborne dust generated by construction and excavation will be further exacerbated by the expected stagnation of bidirectional road traffic due to flow restrictions caused by lane closures, with an associated increase in traffic pollution caused by a buildup of

exhaust fumes There will also be a higher density of heavy construction traffic and machinery in the area adding to the level of pollutants.

This added to excessive construction noise and vibrations will seriously impact the residents living anything close a normal life.

Flooding is also a major issue in the area and this is most likely as a result of the River Wad, which is located underground to the rear of houses and near the schools on the Ballymun Road, being no longer able to take the run-off of surface water following any heavy rain downfalls / deluges.

We have real concerns that that the extremely high water-table coupled with a dig of at least 23m in depth in close proximity to the underground River Wad would cause a change in water flow direction thereof further undermining house foundations.

We do not believe that this flooding situation has received any proper consideration in the choice of station location. Water table considerations must be studied to understand the possibility to have flooding events, the quality of the water during the use of construction materials and the settlement induced by the changing water levels both during and after the works. A surface and groundwater monitoring plan must be developed and approved in order to check the hydrological factors in real time for both the construction phase and longer-term during operations.

It is necessary to evaluate the changing of the water table levels and the possibility of surface flooding.

Furthermore, even post construction due to the scale and design of the proposed station, there are further concerns attracting unwelcome attention and undesirable characters and anti-social behaviours. These residents are only a few meters from the station and will undoubtedly face significant post construction noise and disturbance late into the night as passengers and indeed revellers enter and leave the station.

## Commuters to and from Dublin City

This section of Ballymun Road is an already heavily utilized area and is one of the busiest thoroughfares to and from Dublin City Centre.

Under normal (pre-Covid) circumstances according to the TII traffic data website, an average of 15,000 cars daily uses the R108/Ballymun Road northbound to access the M50. It is also one of the busiest arterial routes to the city centre for southbound traffic travelling from the M50 and M1 motorways.

Grave concerns exist about the impact on traffic during construction. TII have not given any comfort on how this will be managed and how commuters can comfortably use this route to go about their business.

Furthermore, under the Bus Connects project, the NTA propose to facilitate parking on Ballymun by reducing the Northbound Road from the existing 2 lanes for traffic plus a bus lane to 1 lane for traffic plus a bus lane.

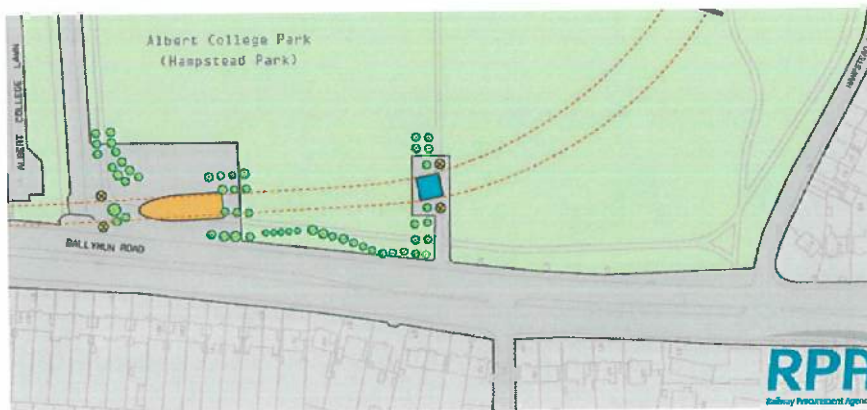
In light of the issue outlined above there seems to be no common sense to this proposal, and it will only further exacerbate the issues with Metrolink.



## Alternative Location

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.

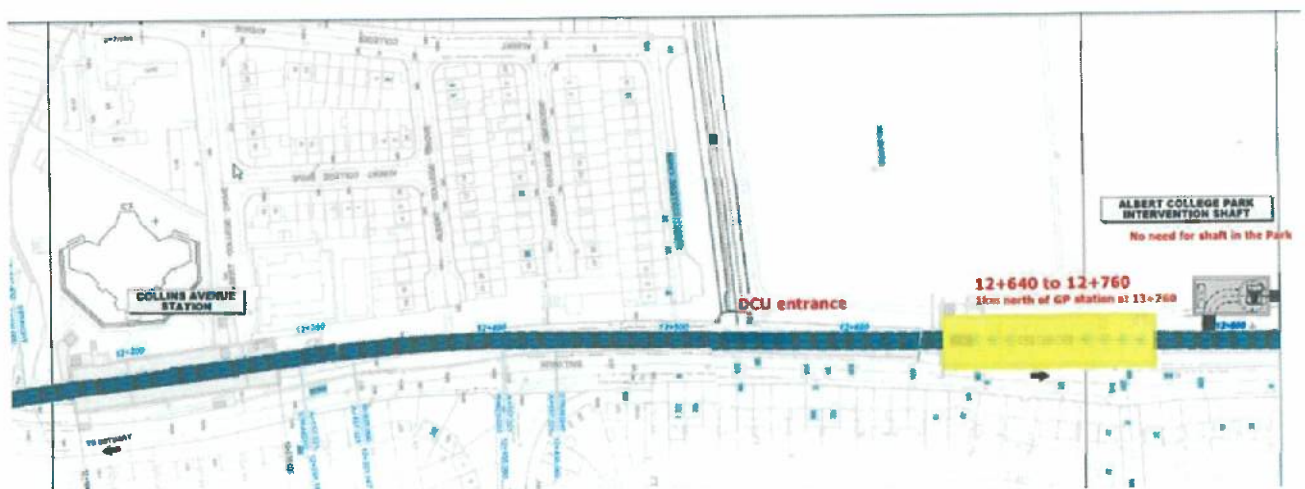
During the previous Metro North proposal in 2007 the RPA at that time suggested a number of possible station locations including two park-based options. We are strongly of the opinion that there is merit in examining and considering a variation on what in 2007 the RPA proposed as Option 4 'Underground station at the North-West corner of Albert College Park as outlined in the following image.



We fully understand that the North-West corner would be more than the 1 km distance from the Griffith Park Station and therefore the proposed location of a park station would be situated at 12+640 to 12+760, just north of the middle park entrance and 1km north of Griffith Park station.

Please see ML1-JAI-RTA-ROUT\_XX-DR-Y-01017.

ALIGNMENT PLAN ALIGNMENT PLAN SHEET 17

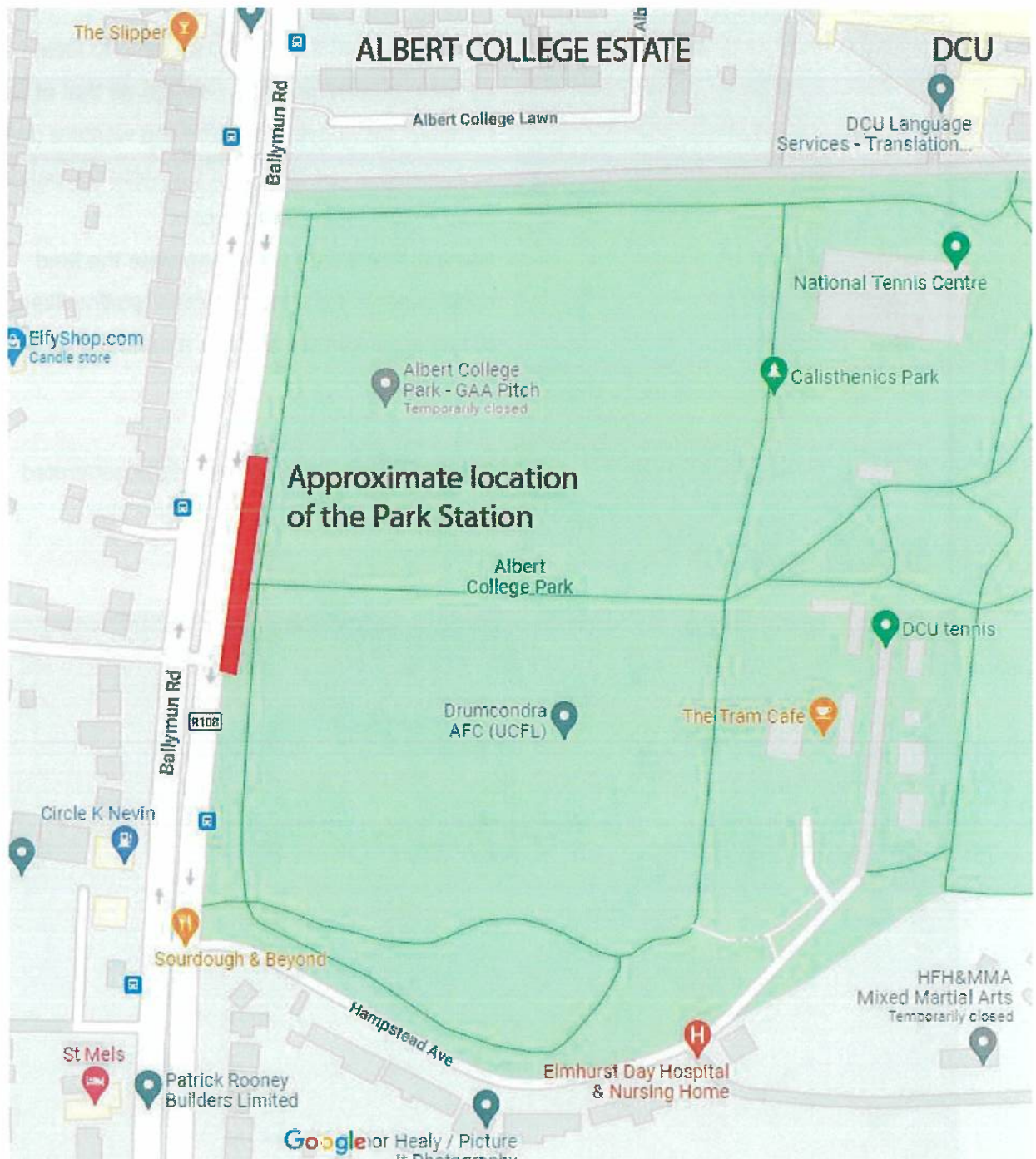








Proposed Park Location on the Western Boundary. Similarly designed as the Griffith Park Station and minimising the impact on the park with far less permanent land take than the proposed ventilation shaft.



The following is the TII drawing of the revised Griffith Park Station location situated at the edge of Home Farm pitches and just below Na Fianna pitches which sit above Home Farm pitches in the diagram.

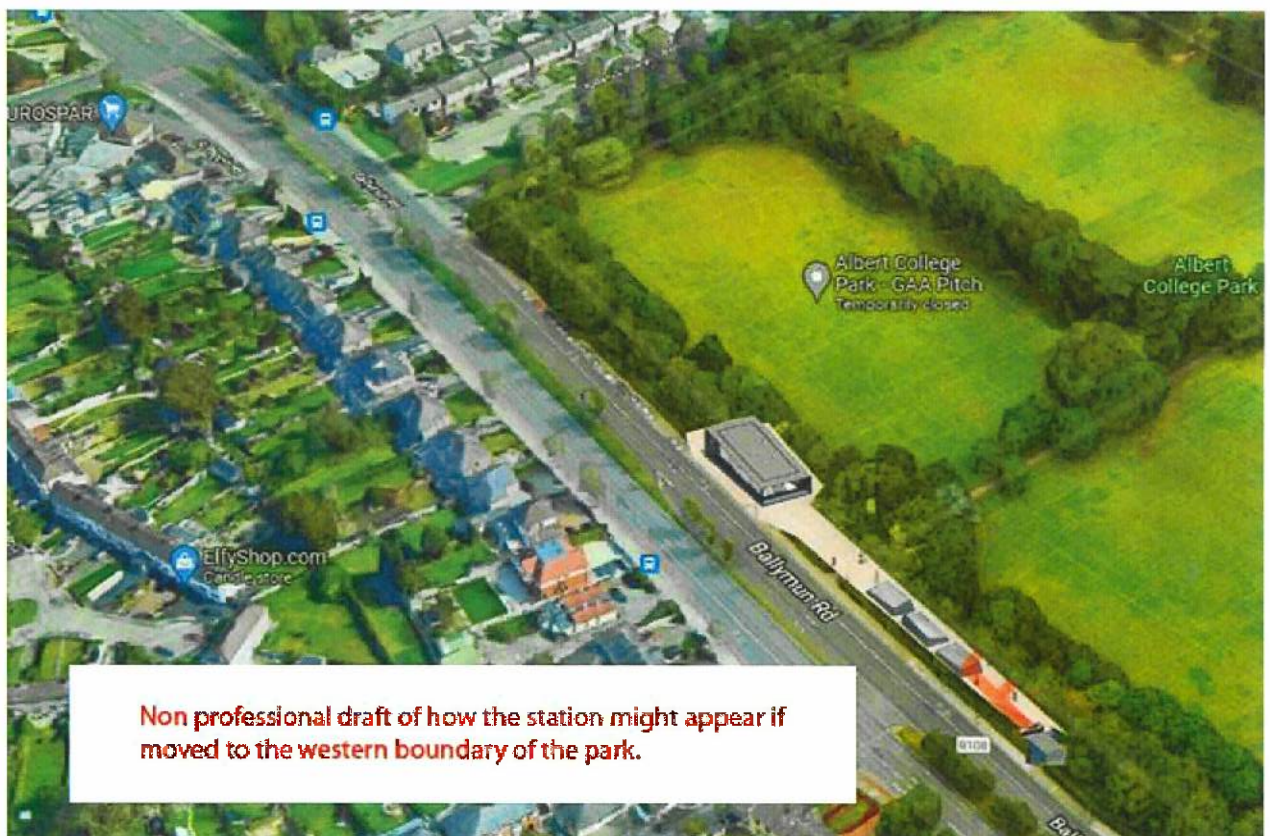
Griffith Park Station



We submit that it would be feasible to locate and construct a similar station design as that at Griffith Park station above alongside the western periphery of Albert College Park and reinstate the parkland overhead post construction.

We ask that TII do not exaggerate the land requirements for a western park station like the RPA did when asked to consider a park station during Metro North.

See the below non-professionally generated impression.





Proposed Park Station Location, 1 km north of the Griffith Park station.



## Advantages of the Park Location

- It is far enough from the OLV schools to avoid the issues with parent & child access.
- The Church is not surrounded by a construction site with limited access.
- It will provide excellent access to the DCU Campus (which is scheduled for much further developments) and the developments on the Marlets and Eustace lands
- Albert College Estate residents do not lose their access onto Ballymun Road.
- Albert College Court residents will not have to be rehoused during construction.
- Hampstead Residents will not have a ventilation shaft but a station next to them.
- The ultimate park land take is reduced if a design such as that proposed for Griffith Park Station was to be adopted.
- The traffic impacts would be significantly reduced by moving construction impacts much further away from the junction
- It would no longer be a requirement to have a ventilation/intervention shaft in the park and this could be placed north of Collins Avenue on the free land beside the Ballymun Library.
- The station design, if similar to the Griffith Park Station, would remove the station plaza design at the church location and reduce possibility of unwanted anti-social behaviour and again reduce the permanent land take footprint on our park.

## A Tale of Two Stations - Griffith Park Station and Collins Avenue Station

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 documented. 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 recognized 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/education 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

## Comparison between the proposed Collins Avenue Station and the previous Griffith\_Park Station designs

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 kilometer further up the road.***



## Comparison of Options

### Community criteria

The table below 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.

Comparison of aggregate impacts on local community		
Effect	Option 1: OLV Church Ballymun Rd	Option 2: Underground A.C. Park
User Accessibility	Worst	Best
Operational Noise	Worst	Best
Passenger noise	Worst	Best
Light Pollution	Worst	Best
Vibration	Worst	Best
Safety Concerns	Worst	Best
Traffic Disruption	Worst	Best
Parking Disruption	Worst	Best
Anti - Social Behavior	Worst	Best
Proportionate loss of green space amenity during construction	Best	Worst
Proportionate loss of green space amenity during operation	Worst	Best
Visual effect	Mid Range	Mid Range
Safety Concerns	Worst	Best
Construction logistics	Worst	Best
Construction noise	Worst	Best
Construction dirt/dust	Worst	Best
Worst Impact		
Similar Impact		
Best Impact		

## Requirement for an Intervention Shaft

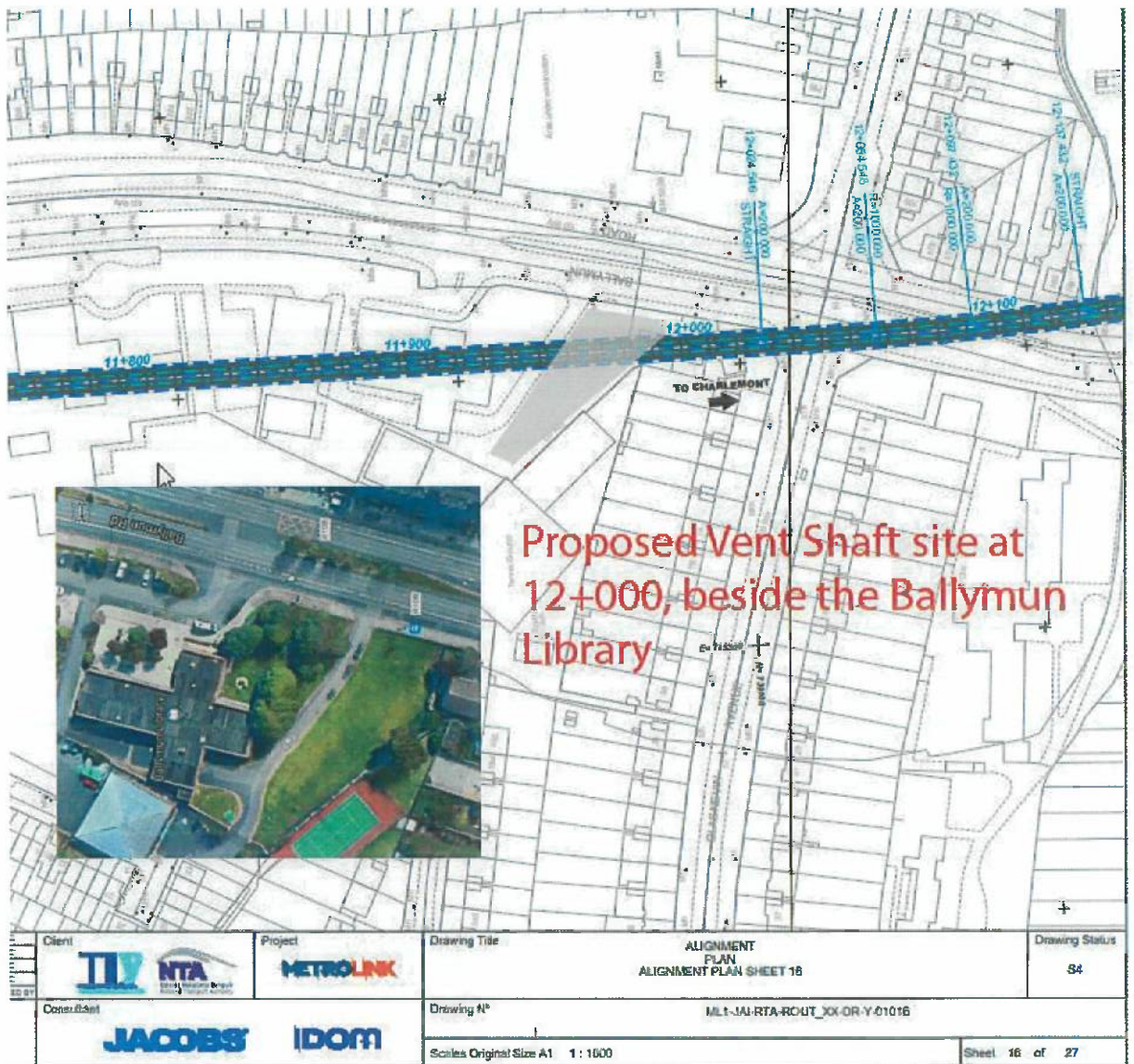
We understand that relocation of a station to Albert College Park which would lie approximately 1 km north of Griffith Park Station will result in the need for a ventilation shaft between the Albert College Park Station and the Ballymun Station.

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 a larger area than that which would be occupied by a properly designed 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 should be moved north of the Collins Ave junction, between the Dentist and Ballymun Library, see below graphics. This will not only reduce the traffic impacts south of Collins Ave but will also greatly reduce the severe negative impacts 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 (12+000) and it perfectly aligns with the route alignment.







## Recommendation

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.

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.

We further submit that such relocation would avoid or significantly reduce many of the adverse disturbance effects.

The overwhelming majority of members of the local resident groups are strongly opposed to the current plans to locate the station at OLV Church forecourt and we find it unacceptable that TII have not adequately explored the alternative of placing the station in the park.

We appeal to the Inspector to make it a condition of the RO that TII repositions the Collins Ave station to the more appropriate location in the park as outlined below.

We also appeal to the Inspector that it is extremely important to position the ventilation shaft north of Collins Avenue on the vacant land beside Ballymun Library (12+000). Any suggestion that this could be placed in the grounds of Our Lady of Victories Church brings all of the same unworkable issues and negative impacts as referred to above.

## Conclusion

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.

TII have indicated that additional cost would be a reason to not construct a station in the park, we are proposing a movement of the station and not another stop on the line.

We must however again emphasize that we do not want a ventilation shaft on the church grounds instead of a station as this will not resolve the listed negative impacts that the church location would have. It is essential that the shaft be located north of Collins Ave.

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. **However, in our proposal, changes to park usage will be temporary and the required land take with proper design would be less than the proposed ventilation shaft therefore the disruption to the quality of thousands of lives during construction would be minimized.**

We submit that accommodation of everybody's interests can and should be achieved by a well-designed park-based solution which allows the most judicious and economic use of the parkland. We feel this will serve both the interests of those patrons of OLV Schools and Church, Local Residents and indeed commuters from outside the area, who could all potentially suffer a significant loss in their quality of life and their enjoyment of their properties if the wrong decision is taken.

**Signed on behalf of**

Barry Conway

**Albert College Residents Association**

Jim Deignan

**Ballymun Road North Residents**

## APPENDIX

[https://www.metrolink.ie/media/j4ajajib/ml1-jai-egn-ms09\\_xx-rp-z-00001\\_for-information-only.pdf](https://www.metrolink.ie/media/j4ajajib/ml1-jai-egn-ms09_xx-rp-z-00001_for-information-only.pdf)

### JACOBS IDOM: Metro Link Collins Avenue Station: Environmental Assessment Report of the Options

ML1-JAI-EGN-MS09\_XX-RP-Z-00001 | P01 2020/02/06

- i. Option 3: Metro North - DCU Ballymun Road (South Option) This option would be located further south along the R108, at the edge of Albert College Park, as shown in Figure 3-3.

Figure 3-3: Metro North - DCU Ballymun Road (South Option) Location



The paragraph below taken directly from the Jacob IDOM Environmental Assessment Report cites the negative effect of the removal of vegetation etc. and the impact on the sports ground as the main drawback of the park option, yet with the construction of the Invention Shaft these negatives will occur in both options. The rationale for the proposed location at Collin's Avenue should be dismissed as it clearly states in this report that the park location if chosen would be much less disruptive on traffic, people and the overall environment.

#### "Option 3: Metro North – DCU Ballymun Road within Albert College Park

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 ground, 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 on the main road. The number of sensitive receptors close to this site is also less than the other options, hence the overall impact on environment is less. "



TII - Transport Infrastructure Ireland

Parkgate Business Centre, Parkgate  
Street,

Dublin 8

Attn.: John O'Connor

(john.o'connor@tii.ie) Michelle  
Lindsay  
(michelle.lindsay@tii.ie)

Genoa, 8th February 2022

Subject: Request for Information #6

Dear John and Michelle,

In relation to our activities related to IEE Services for the MetroLink project, in order to provide the appropriate response to the collated Stakeholder questions, ACRA - seeking to reduce overall impact on ACP, the Church and the schools interested if TII have or would consider the proposed location (drawings attached).

The residents have made the following points which seem to be appropriate for a response given the controversial nature of the intervention shaft in ACP, and the positioning of Collins Avenue Station.

In their concept they have stated:

*Having examined the drawings we have created the ideal outcome for OLV School, The Church and Residents of Ballymun Road opposite the church and the Albert College Estate residents.*

*Locating the Station box 12+640 to 12+760 would do away with the intervention shaft in the park and meet the required 1km distance north of the Griffith Park Station Box.  
The shaft ideally would be located at 11+950 site beside the Ballymun Library, north of the busy Collins Ave, Glasnevin Ave and Ballymun Road junction.*

*This we feel would take less permanent land from the park.  
Remove the need to turn Albert College Estate into a Cul de Sac.  
Remove the impact the construction will have on Church and elderly residents in Albert College Court.  
Be a lot safer and healthier for the children going to OLV school and the Scout Hall.*

We asked the following questions of ACRA:



*In your proposal, how far is Collins Avenue Station from Ballymun Station (platform ends)?*

- *Not fully sure, currently less than 1km, I think around 800 metres. Moving the Church Station to the Park will make the distance greater than the 1km and hence the need for a shaft and the library location is preferred as it is north of the busy junction of Collins Ave.*

✓ *In your concept, where would you see the entrance to the Park station being located?*

- *At the North end of the station box nearer DCU which will be the route of the major footfall but you could have a dual entrance station like proposed last time around and it might suit the Hampstead Residents and residents from Griffith Ave which might use this station instead of Griffith Park as it would be nearer.*
- *We would like a nice creative architectural entrance design without the need to create the Plaza from the current design and limiting the impact on the park.*

Several residents have asked specifically why this station proposal now only has 1 entrance as opposed to the 2 proposed in OMN, especially with the proposed growth of the DCU site and new residential estates surrounding it..

Yours sincerely,

**Luke Albanese** Metrolink  
IEE Team Deputy Project  
Manager

CLBEL/LYA:clbel





**TII - Transport Infrastructure Ireland**

Parkgate Business Centre,  
Parkgate Street,

Dublin 8

Attn.: John O'Connor

(john.o'connor@tii.ie)

Michelle Lindsay

(michelle.lindsay@tii.ie)

Genoa, 16th May 2022

**Subject: Request for Information #17 – Follow-up to RFI#6 – More Detailed Transport Demand Modelling**

Dear John and Michelle,

In relation to our activities related to IEE Services for the MetroLink project, you may recall that we presented the RFI#6, where we raised some points which had been raised by the Stakeholders and which seemed to be appropriate for a response given the controversial nature of the intervention shaft in ACP, and the positioning of Collins Avenue Station (especially in the light of the response to RFI#2).

Following the TII response, Albert College Residents Association and Ballymun Road (North) Area Association have expressed some significant doubts related to the transport modelling approach employed in the EPR stage by ARUP – in other words using a strategic approach to look at different alignments but extrapolating these results to the actual station demand, which was both not detailed enough for the purpose, likely gives a misleading result, is now probably outdated and does not accurately reflect the future passenger demands in the area, especially given the future educational and residential development plans for the area, which are substantial. The IEE agrees that this is a matter that should be better supported with demand forecasting analysis at the appropriate level of detail.

For these reasons, we would transfer to TII a request for a revision of the previous modelling be carried out to reflect not just current, but also future footfall demands at an appropriate and more detailed level of model zoning, which will provide a more balanced set of metrics on which to base such an important decision affecting the lives of so many stakeholders in the area.



We attach the residents actual response to this RFI.

Yours sincerely,

**Luke Albanese**  
Metrolink IEE Team  
Deputy Project Manager

CLBEL/LYA:clbel

RINA Consulting S.p.A. | Società soggetta a direzione e coordinamento amministrativo e finanziario del socio unico RINA S.p.A.

Via Cecchi, 6 - 16129 Genova | P. +39 010 31961 | [rinaconsulting@rina.org](mailto:rinaconsulting@rina.org) | [www.rina.org](http://www.rina.org)

C.F. / P. IVA / R.I. Genova N. 03476550102 | Cap. Soc. € 20.000.000,00 i.v.

## Re: Response to RFI Number 6

Dear XXXX

Thank you for your recent response to RFI6 relating to the Collins Avenue Station, and on behalf of Albert College Residents Association, and Ballymun Road (North) Area Associations, we are pleased to submit our response to same.

While the response is appreciated, it is very clear that a very significant weighting is being placed on the comparison between the estimated passenger footfall at the Collins Avenue Station Location and the Albert College Park Station locations, in justifying TII's stated preference to locate the station at Collins Avenue.

Given the importance of these metrics in justifying the station location, we are concerned that the modelling employed was generated much earlier in the EPR stage by ARUP - using a strategic modelling approach to look at different alignments, which is now outdated.

We are of the opinion that the strategic modelling employed does not accurately reflect the future passenger demands in the area. It shows an expected reduction in footfall from 17,250 passengers to 12,250 in a 24hr period if the station is moved 750 metres south of the proposed church location.

We do not believe that the strategic aggregated modelling employed accurately reflects both the current and future demands which will occur due to planned further development of the DCU Campus, as well as the future planned major apartment blocks to be built on the Eustace lands adjoining the park. This model would appear to be already outdated and grossly underestimates the future footfall to be expected due to these future developments.

Furthermore, TII also state that one of the reasons the park option was not considered was the impact which a station construction would have on the environs of the park, yet it must also be noted that the impact on the environs which will result from the construction of the proposed ventilation shaft on the park will also be very significant.

“Furthermore, environmental impacts of constructing the station within the environs of the park and the proximity of the DCU Collins Avenue station to orbital bus routes operating along Collins Avenue were also differentiating factors between the two MSZs.”

Nor does it compare the current selected church station location to either the location option (option 3 Metro North) or our proposed Park station location.

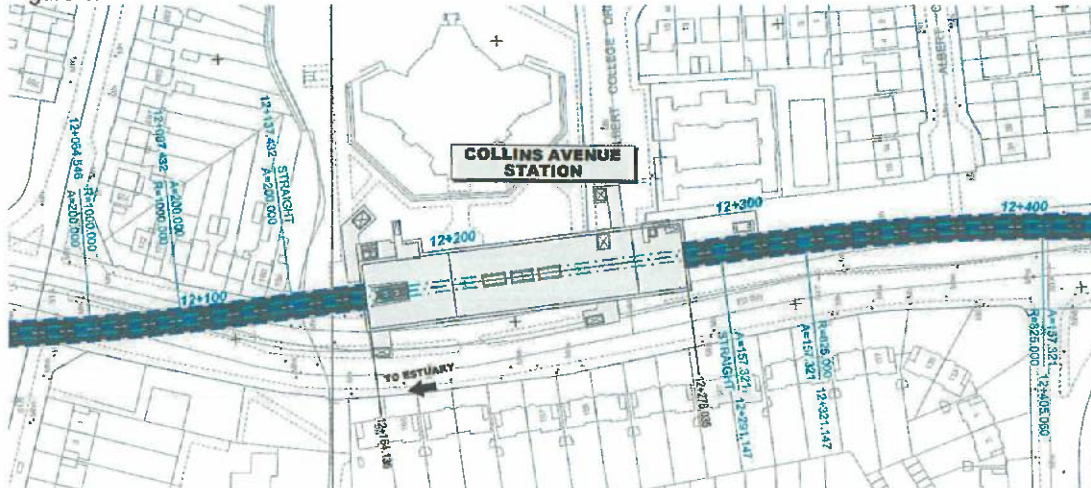
“While both station zones were not directly assessed against each other”

We wish for our proposed Park station option at 12+640 – 12+760 to be modelled against the current Collins Avenue Church location at 12+164 – 12+278 and an appropriate level of detail provided comparing the two. This we believe will show that the decision to locate the station at the church based purely on footfall may not be in the best interests of the Metrolink project or indeed for the wider area.

Our proposed Park Station would be approx. 550 metres south of Collins Ave at 12+640 and it would be only 100 metres south (1 minute walk) from the DCU main gate entrance and a 7minute walk north to Collins Ave.

TII's current proposed Church location at 12+164 is 125 metres south of Collins Ave (2 minute walk) and 360 metres north of the DCU main gate. Figure 1.

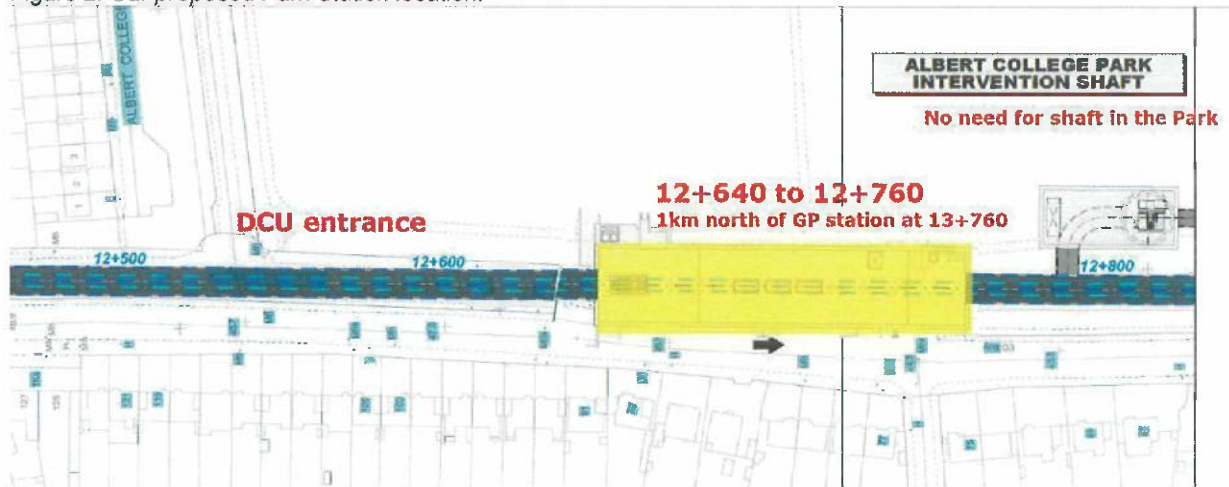
Figure 1.



The location of park option (Option 3 from Metro North) used in the modelling is 750m south of Collins Ave approx. 9 minute walk north to Collins Ave.

Whilst our proposed Park Station Figure 2 below would be a further 400 metres (5minute walk) south of the current Church station location we would question the premise that an extra 5 minute walk would reduce footfall to such a degree given the vast majority of users of the station would be from DCU and the future housing developments located nearby.

Figure 2. Our proposed Park Station location.



RINA have validated our position, as did GWP Consultants who were the previous Independent Expert appointed during the Metro North Project, that a station location based in Albert College Park, coupled with a ventilation shaft north of Collins Avenue at Ballymun Library is a far better option, given that the major footfall for this station will be to and from DCU and the proposed residential developments at the Eustace lands. This location will also greatly reduce the expected severe traffic impacts and the negative impacts on the church goers, the OLV school children and

*parents, local residents in close proximity to the Church including the elder residents of Albert College Court & Albert College Estate.*

*We would therefore respectfully request that a revision of the previous modelling be carried out to reflect not just current, but also future footfall demands, which will provide a more balanced set of metrics on which to base such an important decision affecting the lives of so many stakeholders in the area.*

*Submitted on behalf of:*

*Albert College Residents Association  
Ballymun Road (North) Area Association*