

Paul Cusack
153 Ballymun Road
Glasnevin
Dublin 9
D09FX79

Date: 04 January 2023

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.

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

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Metrolink

Submission

On behalf of residents of 153 Ballymun Road

Re: Collins Avenue Metro Station

We live on the main Ballymun Road corridor on the opposite side of the road to Our Lady of Victories Church and Albert College housing estate respectively. There are three primary schools, a church, two assisted living accommodation complexes as well as several hundred residential properties and family homes within this immediate catchment area.

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

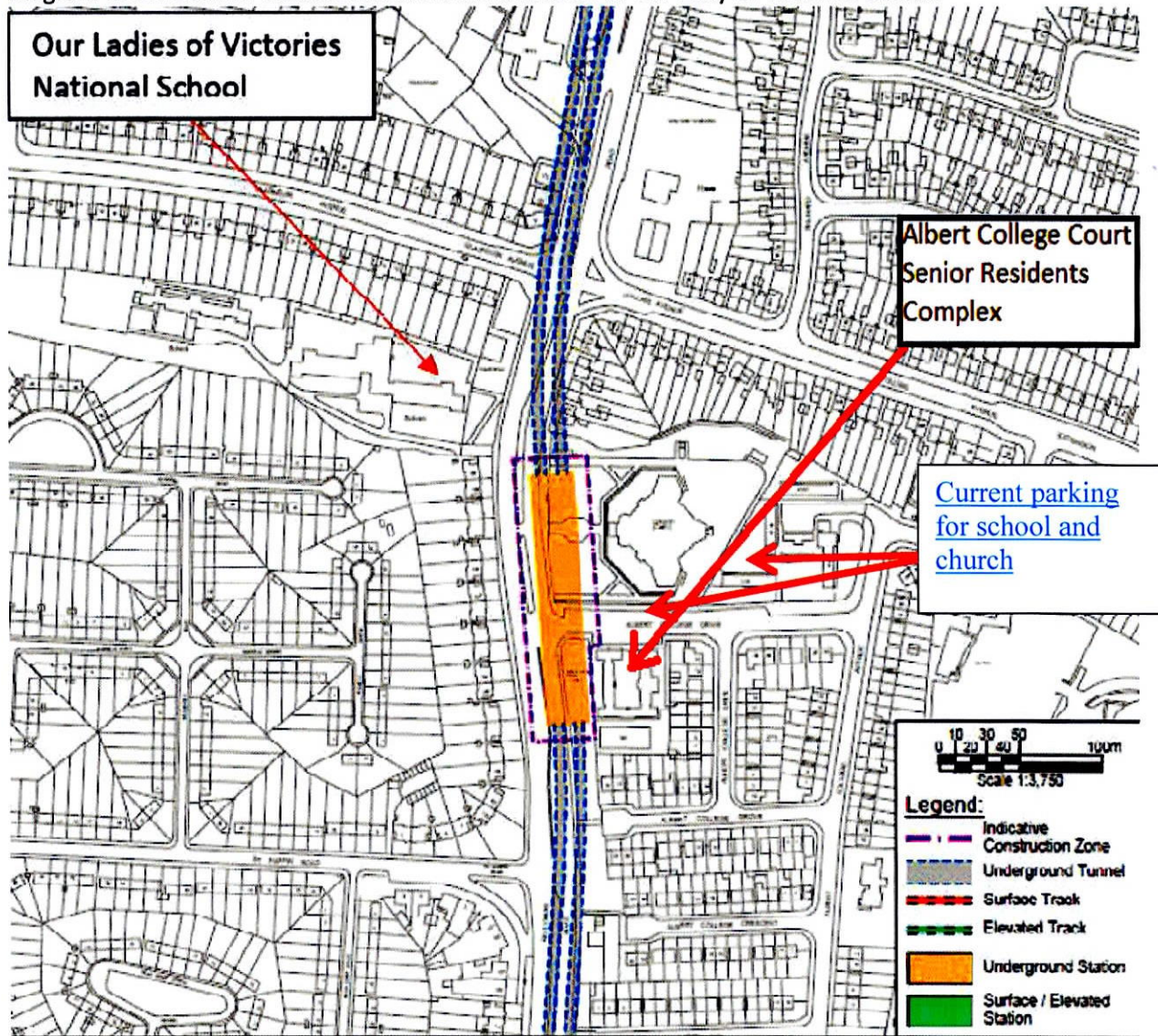
However, we submit that there is scope for adjustment and refinement of the current plans which would further optimize the functionality and quality of the Metrolink and the community that it serves. This submission we believe is based on what are in the best interests of local communities as a whole and has the public mandate of our respective associations, as well as the three school principals at Our Lady of Victories School Campus.

Summary

We submit based on considerations of service provision, community and environmental impact, both in the operational and construction phases, that relocation of the proposed DCU stop (also known as Collins Avenue Station as illustrated in diagram no.14 below) to a location of ultimately small visible footprint along the western periphery of Albert College Park is a more suitable option. This community strongly believes this would be a superior solution to the current design proposal to locate the station on the forecourt of our Lady of Victories Church on Ballymun Road.

We further submit that such relocation would avoid or significantly reduce many of the adverse disturbance effects. The most prominent concern is the disruption and obstruction of current access routes for schoolchildren and their parents to our Lady of Victories School campus which will be caused by the major scale of the construction and the associated continuously ongoing rolling road closures. This disruption includes and is not limited to, the complete removal of already limited, scarce parking spaces available to parents dropping and collecting children. Also of significant concern is the expected noise, vibration and air quality issue during an anticipated construction period of between 7-10 years.

Diagram no.14 Collins Avenue Station on the forecourt of Our Lady of Victories Church



Context

This section of Ballymun Road is an already heavily utilized area. Under normal (pre-Covid) circumstances according to the TII traffic data website, an average of 15,000 cars daily use 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.

Our Lady Of Victories School Campus

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. There are 3 schools on this site with an enrolment of over 650 children. Both carriageways along this section of Ballymun Road and Our Lady of Victories Church carpark 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. Parking in this area during school access times is already at a premium and the almost total removal of existing parking space **will pose a significant risk to the safety of these children and their parents** as they try to access the school. There is no practical alternative parking space available in the area due to the built-up urbanised nature of the surrounding

landscape. There will also be several hundred construction personnel involved in this project, some of whom presumably will also be competing for the very limited remaining parking spaces.

This situation is acknowledged in the Bus Connects document titled 'Ballymun to City Centre Draft Preferred Route Options Report' drafted in November 2020. It clearly states that the 200 metre section of Ballymun Road on the opposite side to the OLV church is already prone to congestion. The following is an excerpt from the Bus Connects Document:

'South of Collins Avenue junction there is parking and stopping activity at various times on the western side of the road associated with Our Lady of Victories National School on the western side, across the road from the church of the same name. There is no vehicular drop-off zone at the school which gives rise to disorganised on-street parking at school collection times, (shown as a dashed yellow line on the aerial photograph below')

This blocks the northbound cycle lane over a length of 200m or so, as well as partially encroaching into the bus lane as shown in the following photographs. (photographs are not included)

As it stands residents along this stretch frequently have their access blocked by parents parking across entrances during drop off and collection times, and this will be greatly exacerbated for 5 -7 years during construction.

Diversion of Utilities

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 major construction project being placed along this same section of road which is already heavily congested during peak times, for reasons outlined above, for up to two years, before the station build even starts. The rolling closures of different sections of the main road on both sides of the carriageway will result in serious access challenges not to mention safety concerns for parents and children who, with the already additional stresses caused by difficulty finding a parking space must now cope with running the gauntlet between heavy construction machinery as well as constantly changing obstructions and diversions along their route to the schools.

Station Excavation and construction

This initial disruption caused by the utilities relocation prior to station excavation will continue and will be further exacerbated during station construction. The station box excavation area has a very large footprint as shown on the illustration no. 14 above and is approximately 175 Metres Long x 45 Metres Wide x 25 Metres Deep. To put this into context it is almost the length of Croke Park football pitch, half as wide and in terms of depth underground, is a mere 5 metres less than the height of the stands. The amount of spoil or earth to be excavated will be enormous and the plan is that this material will be removed from the site by convoys of trucks operating constantly between 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.

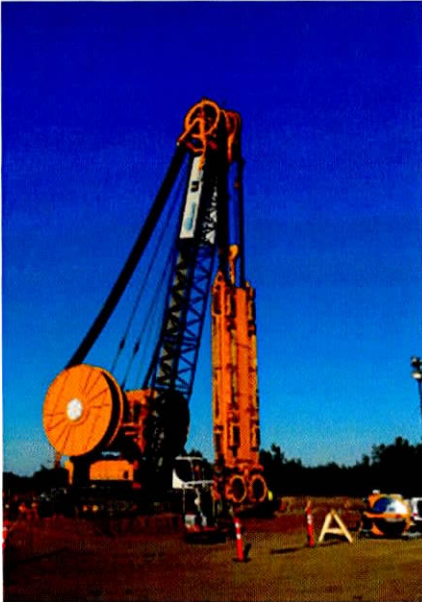
Spill over traffic will ultimately back up into all feeder and adjacent roads and housing estates thus exacerbating the traffic gridlock that already happens during peak times in the locale.

Senior Citizens in Albert College Court Assisted Living Accommodation.

There are 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. Our concerns are threefold:

1. The major scale and the resultant noise and vibration caused by the excavation equipment that will be deployed to insert the station diaphragm walls which are in such close proximity to these houses. Please see the image below which provides an indication of the type of construction equipment in question.



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

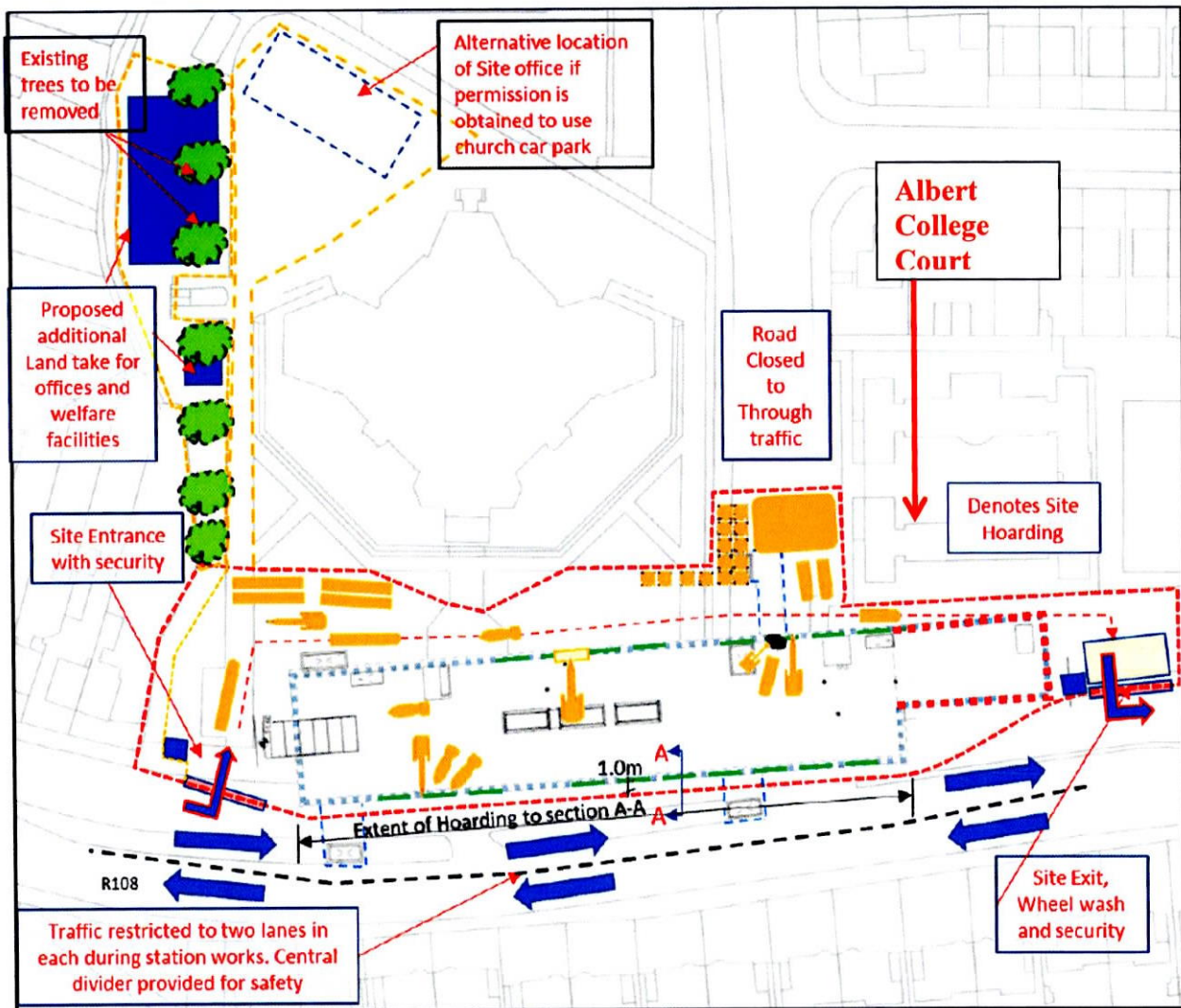
2. The extreme proximity of the periphery of the construction site compound located at the main entrance of Albert Court on the church side of the complex. The current compliment of allocated street parking spaces for these residents will be subsumed into the construction site further increasing access 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.

It would therefore seem inevitable that due to the aforementioned access issues, coupled with extreme noise, vibration, airborne contamination from construction equipment and the resultant dust and mud that a large proportion of these residents would have to be relocated **possibly permanently** as their lives would be unbearable given the above challenges.

This would result 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 not confirmed whether these residents face relocation. Nor to our knowledge has there been any meaningful communication from TII given the lack of availability of any spokesperson for these residents to inform them of the plight they face, which seems grossly unfair.

Proposed station construction zone and site compound layout is detailed in the following diagram



Our Lady of Victories Church

Access by parishioners to Our Lady of Victories Church, many of whom are elderly with mobility issues will also be severely compromised for a number of years for all of the above reasons. Grieving families attending funeral services will face additional difficulties due to severely restricted access as well as the gross reduction in parking spaces as a result of the church forecourt, car parks and on street parking on Albert College Drive being impounded.

This will result in an irreversible decline in church attendance as parishioners who have already had to forego face to face spiritual fulfilment in the face of Covid restrictions for almost two years will once again be placed in a similar situation as access to the church building will undoubtedly be hindered due to route closures and lack of parking spaces.

In excess of 900 signatures were received against the plan to locate the station at Our Lady of Victories Church on a church gate petition. According to TII documentation, this number is second only to the number of objections submitted by stakeholders in the Mobhi Road /Na Fianna area against the previous plan to build a station on/under Na Fianna playing pitches.

Environmental Impacts summarised

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 close proximity to schools and residences will result in a significant deterioration in air quality which currently is regarded as 'fair' as monitored by local weather app. The heightened awareness of the importance of effective schoolroom ventilation in reducing the spread of airborne infection

is now well acknowledged. It is difficult to understand how classroom windows can be opened to facilitate this extra ventilation, particularly during warmer weather given the aforementioned deterioration in air quality. 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.

Safety Concerns

The safety of the most vulnerable groups of stakeholders in the area – namely primary school children and their parents and our elderly neighbours in Albert College Court is of prime concern

Residents on upper Ballymun Road

There are approximately 20 houses located both along the eastern and western section of the main road opposite the OLV church and closely bordering the proposed station entrance on the church side between the church and Collins Avenue junction. The lives of these residents will be severely impacted for all the above reasons for the duration of the utility relocation and station construction phases. Those residences on the east side of the road to the north of the church are in very close proximity to the planned station entrance. These residents will undoubtedly face significant construction noise and vibration as well as noise due to anti-social behaviour and disturbance late into the night as passengers and indeed revellers enter and leave the station. A number of these residents have young families and this would place an intolerable burden on these families.

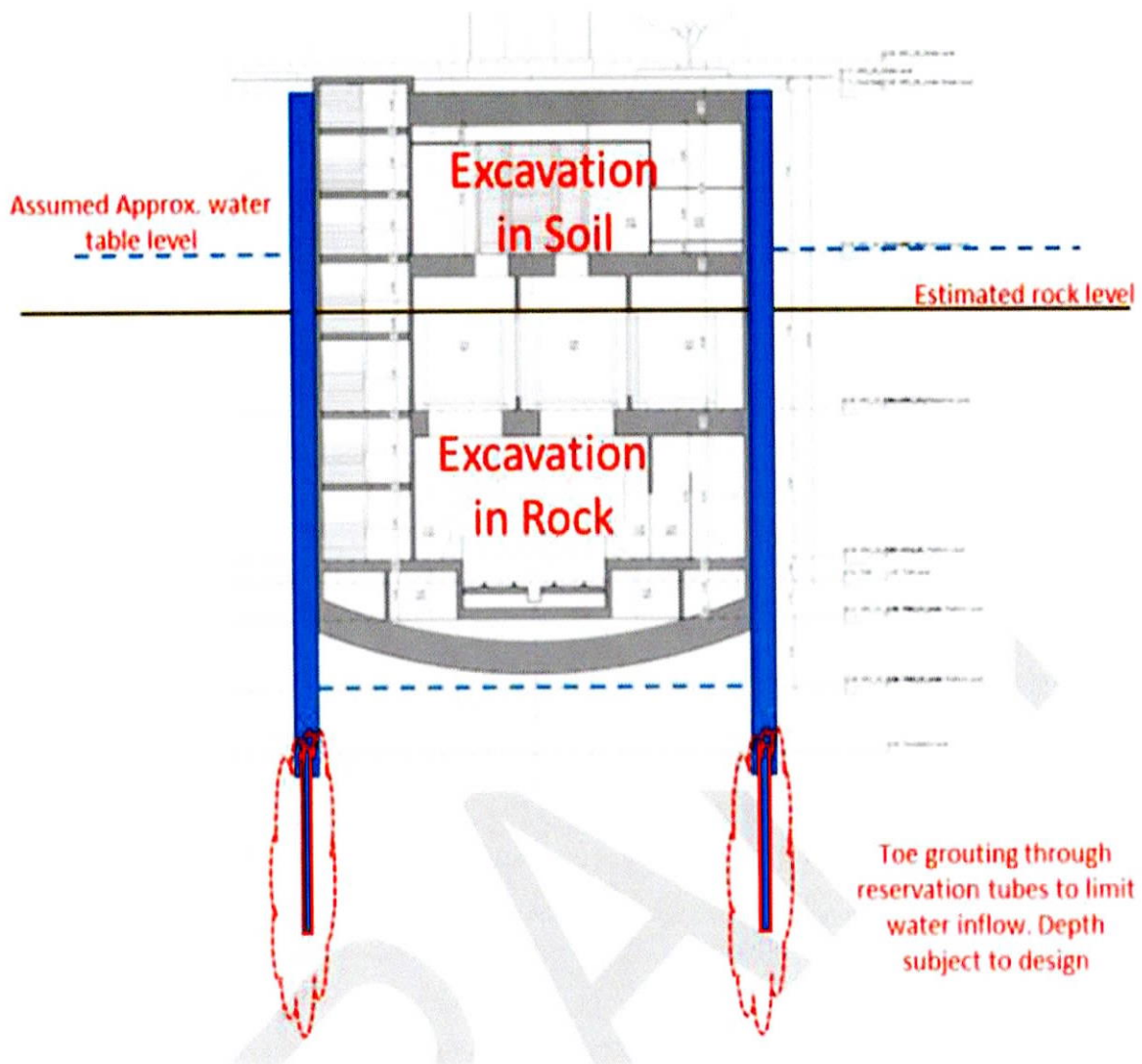
Structural Damage

There are also concerns relating to structural damage to OLV church and these nearby residential properties caused as a result of heavy drilling, rock breaking and rock-blasting. The following text and images are excerpts from the TII station plan presentation.

The reference to controlled blasting through 5 metres of rock in such close proximity to schools and nearby houses does little to dispel the sense of alarm felt by stakeholders in the area.

Construction of Collins Avenue Station Bulk Excavation of the Station Box

- Excavation of the station will be Brown Boulder Clay for the top 12m.
- The next 12m is the transition from softer clay to Limestone rock.
- The final 5m of the station is in Limestone rock.
- Boulders may be encountered in the Clay.
- Large boulders will need to be broken mechanically.
- In the transition zone excavators with mechanical breakers will be used.
- Localised drilling and controlled blasting may also be required.
- Controlled blasting is anticipated in the final 5m in Limestone



Excavation of rock by controlled blasting

- Controlled Blasting is a sophisticated technical process.
- Stringent restrictions are put in place and must be adhered to regarding the storage, transportation, use and disposal of explosives.
- Restrictions also include limits on noise and vibration, blasting times, fumes and fly-rock.
- Each blast is designed to limit vibration (ppv) and air over pressure (AOP) to recognised limits assigned by Structural Engineers at the closest sensitive receiver.
- Each blast is monitored to verify ppv and AOP. Initial blasts are conservatively designed.



Figure 5-12 Typical drill rig

Public Mandate

The key stakeholder groups in the area are as follows:

Our Lady of Victories Schools
Our Lady of Victories Church
Albert College (Estate) Residents Association
Albert College Court Residents
Ballymun Road North Residents Association
Griffith Avenue and District Residents Association

The overwhelming majority of members of the above groups are strongly opposed to the current plans to locate the station at OLV Church forecourt

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 publicised. The reason given for locating the station in this area was, according to the then CEO of TII, Mr. Michael Nolan, 'to avoid the impact on housing and businesses in the area'

The sense of public outrage elicited by the proposal to locate the Griffith Park station site so close to the schools adjoining Na Fianna and the temporary loss of such a valuable sporting amenity and nationally 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 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.

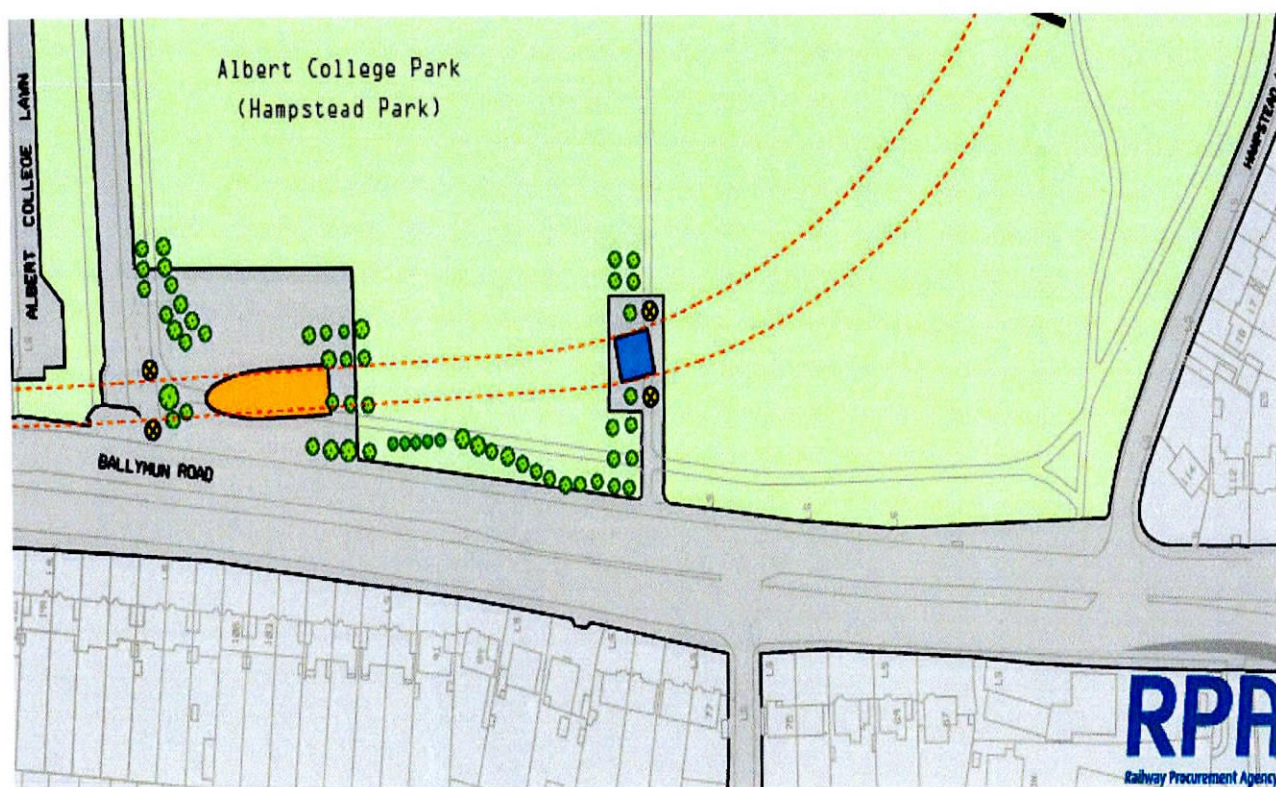
We are appealing for fairness, parity and equality. It is obvious that the initial location of Griffith Park station was seen as severely flawed and was overturned due to a 'who can shout loudest' campaign. Our groups clearly do not have the same critical mass or political influence as was the case in 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.

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. There are plans in place to construct a major intervention shaft and ancillary buildings on this location and this plan could be revised to upgrade the shaft to a functioning station serving DCU campus.

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



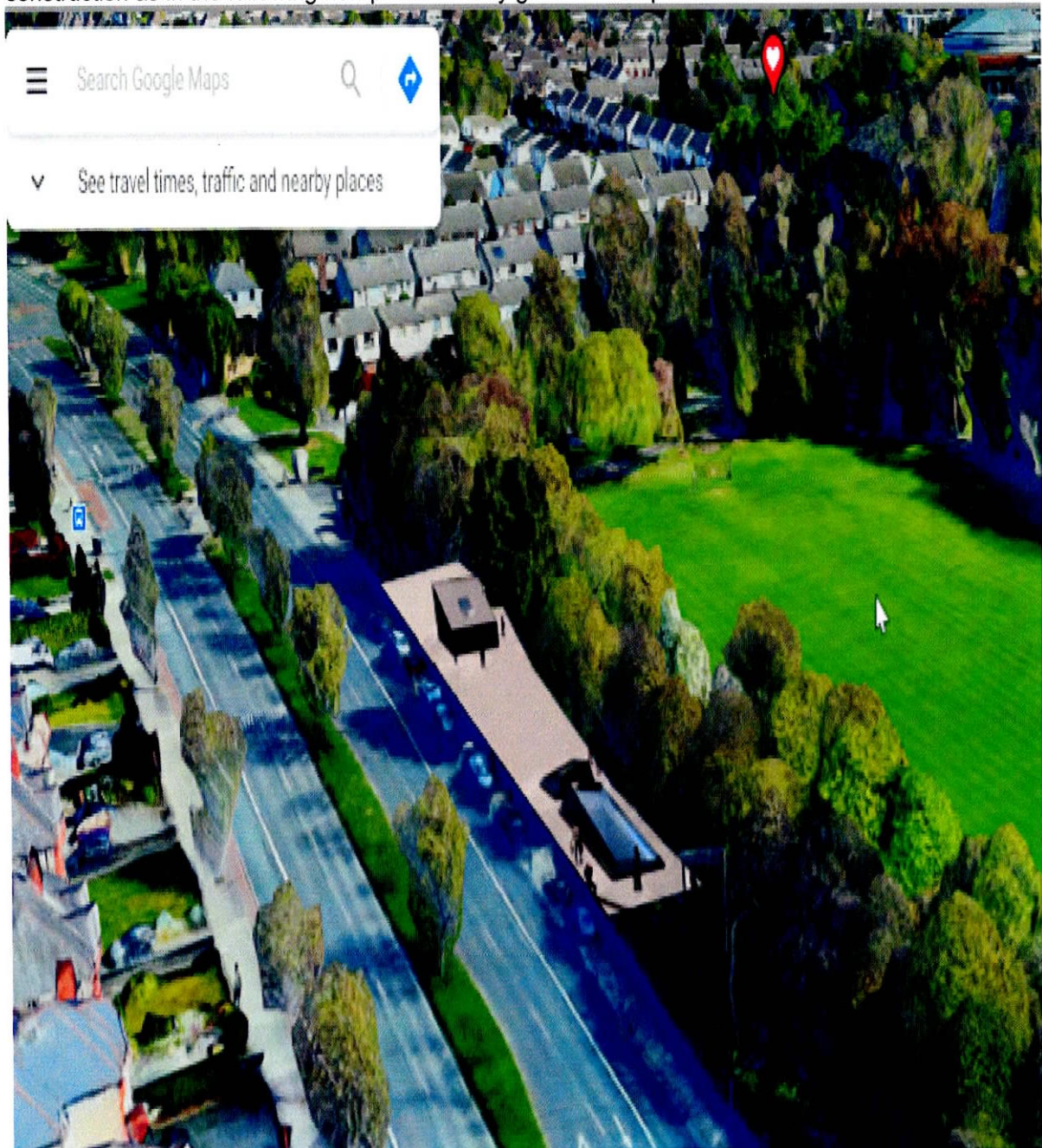
Metro North summary and why a station in the park for Metrolink should not be ruled out on the previous premise used in Metro North. Please see appendix 1

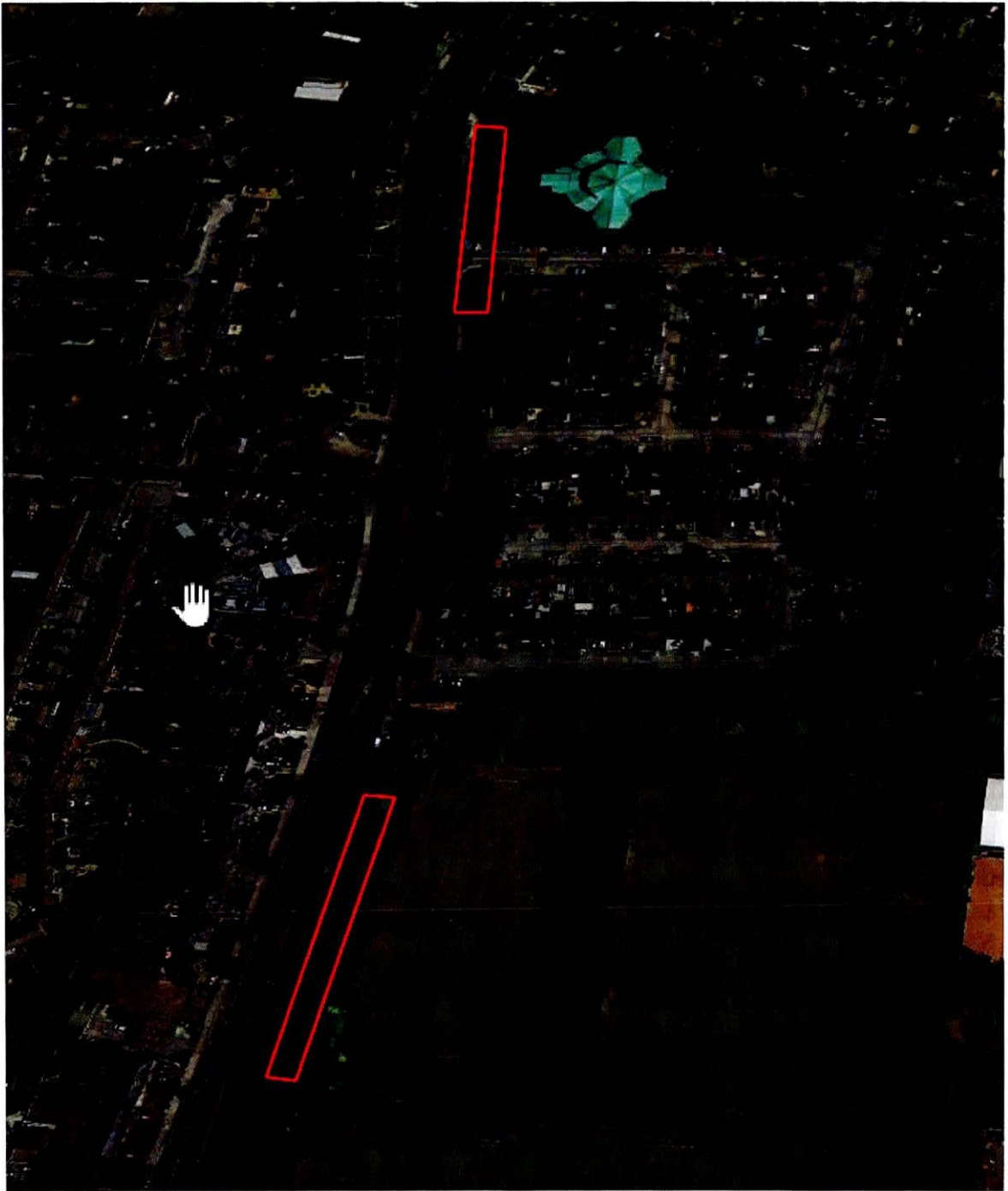
The following is the TII drawing of the revised Griffith Park Station location situated at the edge of Home Farm pitches and just below Na Fianna pitches which sit above Home Farm pitches in the diagram

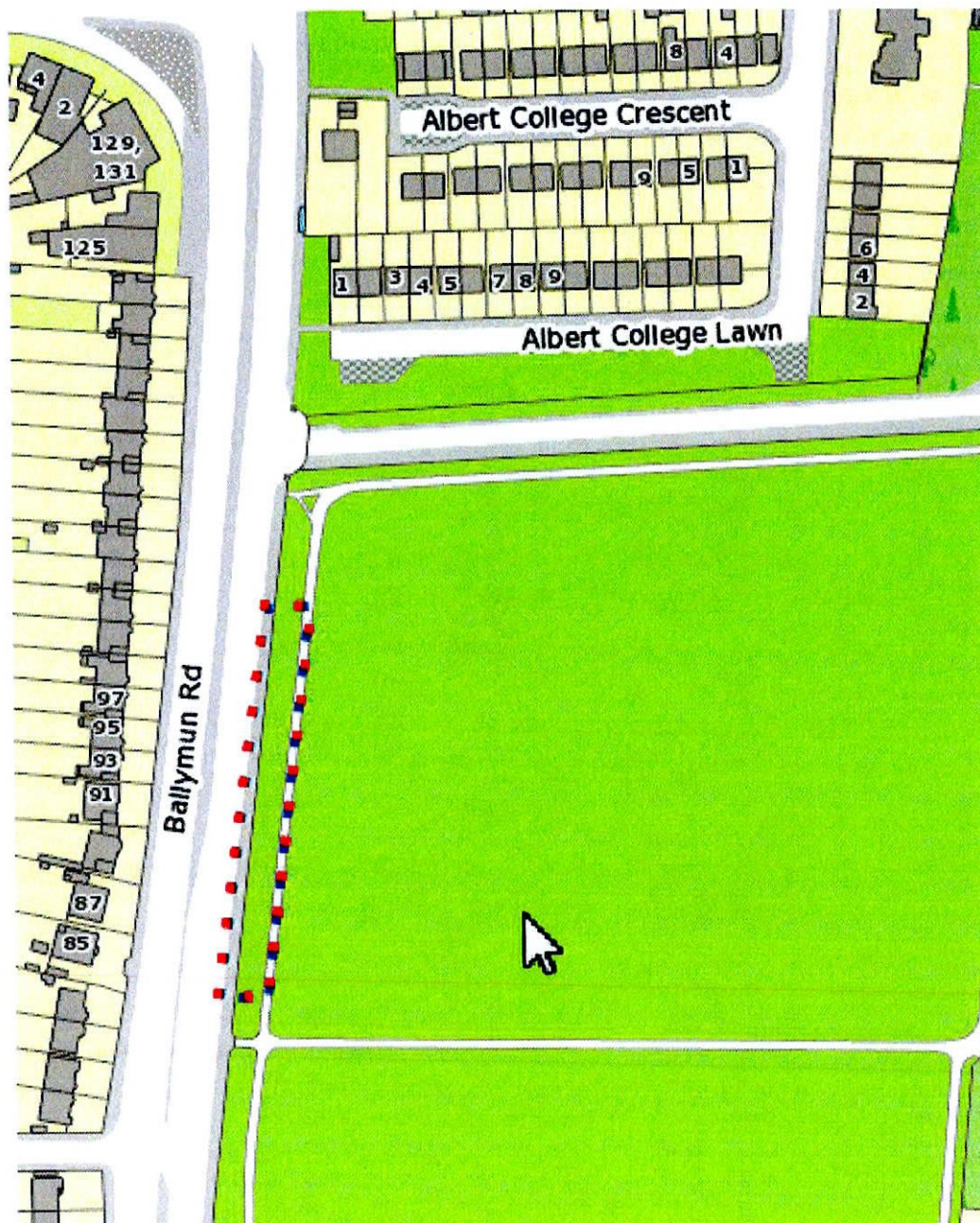
Griffith Park Station



We submit that it would seem feasible to locate and construct a similar station design as that above alongside the western periphery of Albert College Park and reinstate the parkland overhead post construction as in the following non-professionally generated impression.







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	Best	Worst
Visual effect	Mid Range	Mid Range
Safety Concerns	Worst	Best
Construction logistics	Worst	Best
Construction noise	Worst	Best
Construction dirt/dust	Worst	Best

Requirement for an Interventional shaft

We understand that relocation of a station to Albert College Park which would lie approximately 1 km north of the Griffith Park Station will result in the need for a ventilation shaft between the Albert College Park/DCU Station and the Ballymun Station. The placement of a Park based station will remove the need for the currently proposed Ventilation Shaft in the park which has aroused widespread public dissatisfaction across all stakeholder groups. All groups view this as a needless and permanent land-take, in effect taking almost as large an area as that which would be occupied by a fully functioning station without offering any of the associated benefits which a station would provide.

We propose that the new location for this ventilation shaft could be moved north of Collins Ave junction, between the Dentist and Ballymun Library. This will not only reduce the traffic impacts south of Collins Ave but will also greatly reduce the impact on residents, church goers and the schools. Given TII's stated dimensions of the current park ventilation shaft plan, there would appear to be adequate space at this newly proposed location.



Added value to DCU and TII

As part of the An Bord Pleanála Metro North Oral hearing, during 2009 The RPA prepared a document titled 'Proof of Evidence, Description of Scheme, System Concept and Route Alternatives'

Paragraph 2.2.12 states: 'DCU Stop serves the 10,000 students and staff at Dublin City University and the 1,800 seat Helix Theatre, as well as serving the local residential areas'.

We would respectfully suggest that DCU will be by far the greatest beneficiary of the stop and should the station be in even closer proximity to the College this presumably would be seen as a positive advantage.

It is noteworthy that the original station was referred to as 'DCU stop' at that time which seems a more appropriate title than 'Collins Avenue Station' as in essence it is intended for the most part, to serve DCU and not Collins Avenue

The distance from the currently proposed station entrance to the north of OLV church to DCU Collins Avenue entrance is approximately 750 metres which may seem undesirable for some users.

A park based station that is approximately 400 metres closer to DCU's Ballymun Road entrance than that proposed at OLV church would presumably bring a valuable enhancement in terms of improved and increased access to this important service for both TII and DCU passengers over the life of the project.

Towards Optimisation

In expressing a strong preference for a park based station location, we recognize that, as presented by TII to local communities, this option may evoke certain concerns. We also recognize that it is amenable to further improvement.

As residents in the area we would empathize with the view that permanent – and indeed temporary – disturbance to the park should be minimized. We appreciate and enjoy the amenity value which the park provides and would not wish to advocate a solution that would diminish such an amenity in any substantial way.

We submit that an accommodation of everybody's interests can and should be achieved by a well-designed park based solution which allows a most judicious and economic use of the parkland. This we hope would better serve the interests of DCU, TII, patrons of OLV Schools and church, residents in the immediate and wider area and indeed road users from outside the area who could all potentially suffer a significant loss in their quality of life if a less than optimum station location is chosen.

Submitted by:

Paul Cusack (homeowner) 153 Ballymun Road, Glasnevin D09FX79