

Date | 9 December 2024
Our ref | ABR 01430386
Your ref | ABP-314724-22

By Email

Eimear Reilly
Executive Officer
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Railway (Metrolink – Estuary to Charlemont Via Dublin airport) Order [2022] Metrolink. Estuary through Swords, Dublin airport, Ballymun, Glasnevin, City Centre to Charlemont, County Dublin
Our client: Transport Infrastructure Ireland (TII)

Dear An Bord Pleanála

- 1 We refer to the following correspondence:
 - 1.1 your two letters dated 18 October and 4 November 2024 respectively, enclosing 42 submissions by members of the public arising from the second statutory round of consultation for the above railway order application;
 - 1.2 your letter dated 11 November 2024, in which you invited a response to these submissions by 9 December;
 - 1.3 Our letter dated 4 December 2024 in which we confirmed that we would respond to those submissions in the manner and within the time requested and your response dated 6 December 2024.
- 2 We will address under separate cover your outstanding request for a response to the submission of Sabrina Joyce Kemper and Wild Ireland Defence in due course and, in any event, in advance of the deadline of 31 January 2025.
- 3 We enclose our client's response to the submissions made, in the form of a report titled "*TII Response to Submissions Received – Second Consultation*" (the **Report**) and Appendix A to the Report. The Report addresses the following as requested by you:
 - 3.1 Submissions made by new observers as follows:
 - 3.1.1 Berkeley Road Area Residents Association, in section **4.2.4.5**;
 - 3.1.2 Charlemont and Dartmouth Community Group (3-11 Cambridge Terrace) in section **4.2.4.9**;
 - 3.1.3 D. Holohan in section **4.3.5**; and
 - 3.1.4 NAMAI DAC in section **4.3.8**.

- 3.2 New issues raised in the submissions made by existing observers.
- 4 The Report provides a summary and analysis of the submissions received, and a detailed response to each submission, grouped first by type, then by location and then by theme. The Report clearly identifies the observer to which each thematic response refers.
- 5 The Report also refers to relevant documents and information that have been submitted to the Board as part of the railway order application, the oral hearing and the further information process.
- 6 Appendix A to the Report contains TII's analysis of which issues had been raised and addressed previously in the Railway Order process and which issues are new. Appendix A provides this analysis in a matrix which distinguishes the two issue types and provides cross-references to the Report or to the prior Railway Order application materials as appropriate. This analysis is provided entirely for the assistance of the Board and TII understands that the Board will reach its own conclusions on which issues are new and which have been previously addressed. We would also note that in the event of any discrepancy between information set out in the main body of the Response document and in Appendix A, the former shall take precedence.

We trust that this Report provides a concise and comprehensive response to the submissions made.

Yours faithfully

A handwritten signature in black ink that reads "A&L Goodbody LLP". The script is cursive and fluid, with the letters "A", "L", and "G" being particularly prominent.

A&L Goodbody LLP

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