Submission No.	043
Organisation Name or Name of Submitter	Ciaran Black and Leon McCarthy

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022 Case Reference Number NA29N.314724 - Residents of 33 Dartmouth Road - Submission to Metrolink Railway Order application				
1	Letter - opening statement	1	While we in favour of the broad aim of the Metrolink project to connect Dublin's city centre to our national airport, as a resident living in the Dartmouth/Charlemont area, we wish to set out a number of observations, for the Board's consideration, regarding the proposal to locate the Terminus station at Charlemont- Dartmouth. Our family home is in the midst of the community where the Terminus station at Charlemont is proposed to be located, and is dangerously close to the proposed very deep pile insertions and deep station box excavations. The impacts of the Metrolink proposal on our family home during both construction and operational phases is profound and will result in a fundamental loss of amenity, loss of property value and represents a profound 'interference with the right to the peaceful enjoyment of one's property'.	Thank you for taking the time to make a submission and your overall endorsement of the MetroLink Project with the exception of Charlemont Station. We have reviewed your submission and responded to the observations made, below. TII would like to assure you that at no time will the safety of this property and its occupants be placed at risk, noting that the construction of the station and tunnels will be monitored, including surrounding ground and building movements, with predetermined trigger levels aligned with action plans to ensure movements do not exceed acceptable levels. TII can also confirm that both construction and operational impacts have been carefully assessed. TII do understand your particular concerns regards the proximity of 33 Dartmouth Road to the construction of the proposed Charlemont Station, and while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option in line with the criteria identified in Appendix A14.6 Airborne Noise and Groundborne Noise Mitigation Policy. TII are available to discuss this option if that is something the property owner would like to explore and consider, noting that the southern boundary to the site will only be close to the property for the period of the full Dartmouth Road closure, estimated to be 30 months, and will then be stepped back to the other sider of the road when Dartmouth Road is reopened. TII would further note that there are no profound impacts predicted during the operational phase. With regards property value, TII are of the view that the proposed development will have a long term positive affect in terms of property value. There is strong evidence to suggest that property values will in fact increase in close proximity to public transport infrastructure and that local residents will greatly benefit from having a world class metro system providing access to the city centre, airport and north city at their door step.
2	Letter - opening statement	1	We are asking An Bord Pleanala to give very serious considerations to the important issues raised in this submission, and, in consequence, make fundamental changes to the Southern section of the route recognizing the inappropriate and strategically weak nature of the current proposal that places a major transport hub in a quiet Victorian residential by-road.	TII do not agree that the proposed Charlemont Station is in appropriate or strategically weak for the reasons explained by responses (4) and (5) below. Among other things, it would be a material contravention of the GDA Transport Strategy 2022-2042 for ABP to grant an RO for a MetroLink alignment that omits a station at Charlemont.
3	1.2. Companion Submissions by the Charlemont and Dartmouth Community Group	2	The Charlemont and Dartmouth Community Group (CDCG) has made three submissions (Submitted to An Bord Pleanala by Specialist Planning and Environmental Consultants MacCabe Durney Barnes Limited), which relate to different aspects concerning the MetroLink project. The submissions are as follows: • **Submission 1 (General) -** This subject submission relates to general policy and strategic matters and area wide concerns for the Charlemont-Dartmouth Community • **Submission 2 (Dartmouth Road) -** This associated submission relates to the concerns of the residents on Dartmouth Road relating to impacts during the construction and operational phases of the project. • **Submission 3 (Dartmouth Square West) -** This associated submission relates to the concerns of the residents on Dartmouth Square West relating to impacts during the construction and operational phases of the project. As owners of 33 Dartmouth Road we have been heavily involved in the development and preparation of all 3 Submissions and are fully in support of them. This submission should be viewed in conjunction with those submissions and provides some additional perspectives.	TII have reviewed and responded to all submissions received in response to the Railway Order application.

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4	1.3. Support for the Overall Metrolink Project but the South Terminus is Not Fit For Purpose		We are in support of the overall Metrolink project. However, we believe that it is not in the broad strategic interests or common good of Dublin to place the south Terminus of Metrolink at Charlemont. It is wholly inappropriate to place a terminus in such an inaccessible location for a minimum of 2 to 3 decades and permanently, if the replacement of the Luas Green Line does not occur. The Charlemont Station only provides a sub-optimal interchange with the Luas Green Line, is incapable of connecting with any future Luas Lines, is not capable of increased connection with road transport in terms of low emissions buses and cars and, outside of the Dart corridor, Charlemont and especially Dartmouth Road will become the main MetroLink access point for the southside. This is not sustainable in a such a residential and constrained location. The proposed south terminus at Charlemont is incapable of acting as a city centre hub and therefore is not fit for purpose. It is simply in the wrong location. Furthermore, the section of the Metrolink project between St. Stephen's Green and Charlemont is a €650m duplication of infrastructure that is not justified on many very important grounds.	TII disagree with the statement that “it is not in the broad strategic interests or common good of Dublin to place the south Terminus of MetroLink at Charlemont”. The Board is required to have regard to the likely consequences for proper planning and sustainable development in the area in which it is proposed to carry out railway works (section 43(1) of the 2001 Act) and as such the following matters are relevant. The connection from St Stephens Green to Charlemont / Ranelagh is supported by the previous Transport Strategy for Greater Dublin Area (2016-2035) and the current Transport Strategy for Greater Dublin Area (2022-2042). The latter considers a range of options for the onward extension of MetroLink to meet the demand for travel over the period of the strategy. This includes consideration of the need for the upgrade of the Luas Green Line to metro with a metro extension to Dublin south west, south or south east. Whilst the strategy envisages that further extensions will be delivered after 2042, MetroLink which terminates at Charlemont allows for the possible extension of the metro in all the above directions. . The Transport Strategies were was prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport and approved by the Minister for Transport. It notes in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise." The Transport Strategy is "a consideration material to the proper planning and sustainable development of the area or areas in question." Development Plans are required to be consistent with the Transport Strategy. The Dublin City Development Plan 2022-2028 envisages this station at Charlemont in policy SMT22 "To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained: … MetroLink from Charlemont to Swords". Accordingly, the location of the Charlemont station was a strategic decision made at the highest levels of transport and land use planning and such is fully consistent with the proper planning and sustainable development of the area. The choice of Charlemont as a station location and interchange point is based on robust analysis that has identified that this location provides significant passenger numbers for the proposed MetroLink. Passengers using MetroLink will arise from (1) The ability for an immediate interchange with Luas (which is one of the key project objectives), (2) passenger demand modelling which identified significant demand within the catchment served by this station, and (3) It should also be noted that the proposed station is within a 5-minute walk distance of the Bus Connects proposed A Spine and E Spine routes. The proximity of the metro to the Luas line at Charlemont provides for a positive customer experience for all users with short interchange distance and due to the proximity, clear wayfinding and high visibility of the interchange. The interchange arrangements at Charlemont provide for significantly better interchange arrangements compared to an interchange at St Stephen's Green Station. TII therefore do not agree that Charlemont provides a “sub-optimal interchange” and would further note that the MetroLink forms part of an integrated public transport network. The system is designed in an integrated manner so that people travelling from the area south of Dublin to access locations north of Charlemont, such as Dublin Airport, Mater, Swords etc. will utilise public transport to interchange with the MetroLink, or will walk or cycle to access their local station. The system is not designed to encourage people to drive to stations within the City and TII actively discourage people from doing so other than the Park & Ride station at Estuary. TII also do not agree that “Charlemont and especially Dartmouth Road will become the main MetroLink access point for the southside” as this is not borne out by our transport analysis. Furthermore, TII have deliberately designed the Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used as a terminus.

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			(4) continued	When the Project is operational, car mode share will decrease, with a reduction of up to approximately 830 car tips to and from the zones surrounding Charlemont Station over the 12hr period in 2065. In overall terms, the Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area. The section of MetroLink route between St Stephen's Green and Charlemont Stations contributes significantly to the overall benefits of the scheme. It serves a significant area of the south city of Dublin and offers enhanced access from the local area to the city centre and a direct connection to Dublin Airport. It serves key trip attractors including residential areas and offices / workplace locations, with high passenger boarding and alighting figures in the peak hours. During the morning peak, at Charlemont station the flows include 1,800 passengers alighting, 2,300 boarding and 1,229 passengers alighting, 2,276 boarding during the evening peak. The passenger numbers contribute significantly to the overall benefits of the scheme and the effect of these benefits outweigh the additional costs that are associated with the delivery and operation of the section from St Stephen's Green to Charlemont station. As a result the Charlemont Station interchange provides for increased passenger utilisation of the MetroLink system, thereby increasing the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ration (BCR). It should be noted that the Charlemont station is not proposed as a "city centre hub" as suggested. This station will function as an interchange with the Luas Green Line and a continuation of the through transport corridor rather than a terminus. TII would also note that that infrastructure is not being duplicated given the capacity of the Luas south from St. Stephen's Green is restricted due to on-street running. There is a limit to the potential of the Luas to provide additional capacity in the on-street non-segregated section of the Luas Green Line from Charlemont northwards through the city centre. The nature of this route and the fact that it currently crosses several road junctions (Adelaide Road, Harcourt Street / Hatch Street upper and Harcourt Street / St Stephen's Green south) limit the service to a maximum of 24 trams per hour per direction. The projected demand for this section would require a higher frequency of up to 30 trams per hour and this demand cannot be met with on-street systems (Luas / bus). The interchange between Luas and MetroLink proposed at Charlemont will provide the necessary capacity to address the demand on this corridor and reduce overall travel time for passengers As noted above, there is also high passenger demand forecast for a Metrolink station at Charlemont, including from the Ranelagh area, which would be lost if St. Stephen's Green was the MetroLink southern interchange station. The additional fare revenues collected by the Charlemont Station interchange increase the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ration (BCR). By extending MetroLink to Charlemont it provides for future proofing of the Green Line, bypassing the capacity constrained Luas on-street running section, and ensures potential future connectivity options are enabled, either to the Green Line or for extensions of the metro.

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5	2.2. Lack of Justifiable Rationale for the Southern partial extension of the Metrolink Project		However, through several consultations it became clear that the megaproject was not a realistic prospect at this point in time..... At this point, the NTA/TII should have recognised the need to rethink the megaproject into a revised Metro North project that took in Tara Street in its new alignment, with a City Centre Hub that provided maximum interchange with all modes of transport and multiple options for future extensions to the south. Analysis of the optimal city centre hub should have been the top priority. The NTA/TII, however, never adapted its thinking and continued to design the megaproject but proposed, in the Preferred Route, that it would split the single project into two phases separated by 20 to 30 years. This approach would effectively lock-in the replacement of the Luas Green line as the only future southern option, despite the technical issues raised during two rounds of consultations. Understandably, the government has not accepted that the same project can have an interlude of several decades and instead approved a "public transport service between Swords, Dublin Airport and Dublin city centre" (Metrolink Non-Technical Summary p.3 of the EIAR; our emphasis). The NTA/TII has never undertaken a city centre terminus study with appropriate criteria and has persisted in proposing phase 1 of the megaproject in the current Rail Order Application. The NTA/TII approach makes a farce of the consultation process[1]. So determined is the NTA/TII to pursue the megaproject and lock-in the Luas Green Line Replacement for the future, that it arranged for the unauthorized development of the Charlemont Station Box to be constructed in advance of the Rail Order Application, i.e. without the required planning permission[2]. This fixes the alignment at Charlemont with profound implications for both the north and south of the built Station Box. It also significantly curtails the scope for An Bord Pleanala to consider alternatives both for the current Rail Order Application and for the future.	While the submission addresses these points on the merits below, these are matters of strategic planning policy that were settled by the NTA's GDA Transport Strategy 2022-2042. While the Board is not required to comply with the Transport Strategy, it is one of the most important policies in the planning hierarchy and entitled to very significant weight. It is important to recognise that MetroLink has not been designed intentionally with a city transport hub, but with key points of interchange including the Park & Ride at Estuary, Dublin Airport, Glasnevin and Tara Street with DART, and the Luas Green Line at Charlemont. As outlined in Chapter 3, the proposed Project is part of a wider integrated transport network that also includes for BusConnects and DART+ which are all included under Project Ireland 2040. Together, these projects will result in a reliable, sustainable, affordable, integrated public transport network that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2021 and make Dublin a more liveable and sustainable city. Whilst MetroLink is a standalone project that is not dependent on any other projects for its delivery or effective operation, it is nonetheless a critical part of the proposed integrated transport network for the Greater Dublin Area. The proposed Charlemont Station should be considered with that in mind. As a result of the significant disruption predicted during the construction phase of MetroLink along the Luas Green Line, NTA/TII identified an alternative solution, and thus adapted its thinking, to provide additional capacity to meet the predicted Luas demand. This was identified and consulted on as part of the non-statutory consultation on the Preferred Route in March 2019 and is reflected by the proposal for a station at Charlemont in the GDA Transport Strategy 2022-2042, the rationale for which is explained by response (4) above. It is not accurate to say “government has not accepted that the same project can have an interlude of several decades and instead approved a "public transport service between Swords, Dublin Airport and Dublin city centre". The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). The Transport Strategies were prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport and approved by the Minister for Transport. It notes in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise." TII therefore do not agree that the proposed Charlemont Station has “profound implications for both the north and south of the built Station Box” or that it “curtails the scope for An Bord Pleanála to consider alternatives both for the current Rail Order Application and for the future.” noting also that a proposed station at Charlemont is in accordance with government policy. Arising from the decision to postpone the future upgrade of the Green Line to metro services, it is being argued that Charlemont station effectively becomes a terminus station in the short to medium term. In this regard, it is true to say that the Metrolink trains will terminate and turn back at Charlemont station, however the public transport service offering for passengers does not terminate, it transfers from Metrolink to Luas as part of the integrated transport network. The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus (train sideways, backup control centre and maintenance facilities) take place. At this location the high capacity public transport offering terminates and the public transport offering transfers to a completely different mode, i.e. Bus. The environmental effect of the Metrolink terminus are accordingly assessed in the EIAR. Charlemont Station does not have the associated infrastructure and services associated with a terminus location and in fact has more in common with a “system turn back location”. Charlemont Station is located within an area of high public transport accessibility, linking with the Luas Green Line which offers reasonably similar levels of services and frequency for journeys to and from the south of Dublin. As such, public transport service offering is not considered to terminate, but transfers onto the similar service offered by the Luas Green Line, forming part of a transport corridor running from Cherrywood to Estuary. The associated environmental impacts for the turnback and station at Charlemont have been fully assessed in the EIAR, and TII would further note a number of route options were considered in the process of identifying the Emerging Preferred Route (EPR) before the MetroLink Preferred Route was selected. Charlemont station itself was chosen on the basis of its interchange potential with Luas, as well as local bus services, as outlined above. The section of the line between St Stephen's Green and Charlemont generates considerable benefits for the scheme in terms of increased patronage. The fact that the Charlemont Station is now being referred to and considered as a “terminus station” rather than an interchange station, does not increase the environmental impacts the station has on its local environment, in terms of passenger demand, airborne noise. vibration and other environmental effects.

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			(5) continued	The station box at Charlemont allows for a future tie into the Luas Green Line should it be determined in the future that through running metro services to Sandyford is the required solution to address the public transport needs to the south of the city. It is incorrect to say station box location was fixed by the Charlemont Development. The preferred route for MetroLink was published in March 2019 following a comprehensive route options study. The preferred route was based on the emerging preferred route for the scheme which included a station at Charlemont. The Charlemont Metro Enabling Works were constructed to enable the Charlemont Development to proceed whilst simultaneously ensuring there was an option available to construct a station at Charlemont that avoided unnecessary demolition, took advantage of an available site, provided infrastructure that is integrated with planned development rather than necessitating later changes and retrospective adjustments to a new development or even possible demolition of the new development, whilst providing protected provision for the future extension of the scheme south, if required. It is also important to recognise that the station location at Charlemont is influenced by available vacant land and thus avoids unnecessary demolition. All options remain open to the Board in relation to this location. The critical factor in favour of the station at this location are the policy decisions and supporting analysis outlined above and not the permitted enabling works. TII rejects the assertion that the inclusion of the MetroLink Enabling Works at Two Grand Parade has prejudiced the EIA process. There were no "neutral" alternatives available to ABP when it made a decision on the application for permission for Two Grand Parade. It had three options, all of which had significant consequences for proper planning and sustainable development and the environment: *grant permission without the roof slab, which would have required TII to demolish Two Grand Parade or another development in this area to deliver a Metro station in the location that was emerging from the contemporary optioneering reports; *refuse permission for Two Grand Parade, sterilising the site a frustrating the zoning objective for the site *grant permission with the roof slab, securing the zoning objective and leaving open the option of a station at this location. The Board opted for the third option having regard to submissions from the NTA and revised designs from the developer. That decisions was challenged by way of judicial review, but the judicial review was withdrawn. The objections now raised attack the validity of that decision, which is prohibited by Section 50 of the Planning and Development Act 2000. The MetroLink enabling works constructed as part of the Hines development was included in the planning application for the Hines Development and has the benefit of planning permission which was granted in April 2019. It is correct that the ""Preferred Route Public Consultation Feedback Report" was published after the dates for RO submissions" , however the report does not form part of the Railway Order Application documents and has been published to provide a gerneral overview of the submissions recieved during the non statutory public consulation phase with submittors free to refer to this document during at any evidence they are invited to make at the Railway Order Oral Hearing.

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6	2.3. The Option to Replace the Luas Green Line in the Future is Highly Uncertain	5	In the Rail Order Application, the NTA/TII argues in justification of the station at Charlemont that "a Green Line run-through connection will remain a likely option for the future" and that the decision to do so has been "deferred" (although this is stated without any required policy decision). Appendix A7.9 p31. This is not the case. No decision to replace the Luas Green Line has been made so it is not "deferred", and it cannot be viewed as the "likely" option for the future for the following reasons: a) It is not government policy (up to the period ending 2042) b) An above ground metro will segregate established communities and is highly problematic from a planning permission perspective c) It would close all services on the Luas Green Line for many years during replacement works causing very significant disruption to transport d) It does not provide any new rail infrastructure to other areas of Dublin especially to the south west e) It does not create a city centre hub capable of interconnecting with the multiple modes of transport that are part of the Draft Transport Strategy for the Greater Dublin Area up to 2042	Please refer to responses (5) and (6) above that explains the 2022-2042 GDA Strategy approach for possible future extensions of metro. The technical points noted by the observation would be addressed as part of any future project, but noting any future extension of the metro falls outside of the scope of the MetroLink project.
7	f) It cannibalises the existing Luas Green Line infrastructure and replaces it with a service that is inferior in many respects from what exists today:	6	If the Luas Green Line was to be replaced by a run through connection of the Metro, it would result in the degradation of certain very important aspects of the current Green Line service. The figure to the left shows the current Luas Green Line in green and the proposed Metro run through in red. Passengers originating south of Ranelagh will no longer have a direct rail access to the Grafton Street side of St Stephens Green, Dawson Street or Westmoreland Street but must use a 'double level' interchange with the Luas Green Line at Charlemont (coming from the metro below ground to street level and then up to the Luas stop elevated above the Canal) or walk from St Stephens Green East, Tara Street or O'Connell Street. From the south, this pulls the rail service east and away from the main centres of attraction, thereby diminishing the quality of the current service provided by the Luas Green Line.	There is no cannibalisation or replacement of the existing Luas Green Line. Responses (4) and (5) above explain the rationale for MetroLink extending to Charlemont, noting that the section of MetroLink route between St Stephen's Green and Charlemont Stations contributes significantly to the overall benefits of the scheme, and that the existing Luas Green Line capacity between St Stephen's Green and Charlemont is restricted due to on-street running.
8	g) It would also result in an unjustifiable over-development of rail infrastructure	6	g) It would also result in an unjustifiable over-development of rail infrastructure in very condensed and already well serviced area and perpetuate the high cost and strategic weaknesses already identified in the JASPERS and MPAG reports; see below. The figure to the left shows that if the Luas Green Line was to be replaced by Metro, it would result in the over-development of rail infrastructure within the 700m distance between the Canal and Ranelagh Village. So in a distance less than two lengths of St Stephen's Green, there would be: • 2 Underground Metro Stations and • 2 Elevated Luas Stops. Even with this further duplication between St Stephens Green and Ranelagh, there would be no good quality interchange at St. Stephens Green (which has the potential to be a 'single level' connection between the street level Luas and the mezzanine level of Metro). Instead, the NTA/TII proposes that the 'double level' interchange at Charlemont is the "optimal" possible from the entire spending on duplication of infrastructure in the area.	Response (4) above has addressed why MetroLink is not duplicating infrastructure and the benefits it delivers. Responses (4) and (5) have addressed why a MetroLink station is proposed at Charlemont. If the scheme were to terminate at St Stephen's Green, it would be inconsistent with the GDA Transport Strategy 2022-2042 to locate the terminus at Charlemont. It is acknowledged that passengers wishing to interchange between Luas and MetroLink at the St. Stephen's Green station will have a 500m-walk along a route either through St Stephen's Green Park or along the footpath north of the park. The interchange time is calculated at 7.58 minutes. However, the interchange arrangements at Charlemont provide for a significantly better connection with Luas compared to St. Stephens Green Station, where the interchange time is calculated at 2.9 minutes. Interchange times and routes are detailed in Appendix A7.9 (Terminus Station at Charlemont compared to St. Stephen's Green).

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9	2.4. A City Centre Transport Hub Is Required	6	The case for the proposed replacement of the Luas Green Line to Metro Standard, however, is not clear. It was not successful in obtaining government approval and failed to get community support from two rounds of consultations. It cannibalises the existing Luas Green Line resulting in the closure of all services for several years during replacement works, the DART line already services communities in close proximity to the east of the alignment, it does not contribute to providing transport solutions to the south west and the segregation of established communities is hugely problematic. Put simply, for the next 2-3 decades, the solution for the north of Dublin is an underground metro spine to the city centre and to the south is multiple modes transport radiating out in spokes from a city centre hub. Such a hub has previously been identified in the approved Metro North project as St Stephens Green and a new study is required to establish if this is still the case. To future proof our transport policy, the current the focus must be on the creating a city centre hub that can connect with multiple modes of transport now and provide the maximum choice of options for the future. To extend down one spoke, decades in advance of a required decision, is not justified and puts at risk €650m of public money and limits future transport options. Not only was a City Centre Hub Terminus study never undertaken, the closest to it (the March 2017 Luas Tie-In Study) is now totally irrelevant from a tie-in perspective (none of the options were used or re-evaluated), and is also redundant from a policy perspective (no Luas Green Line replacement is part of the subject Rail Order Application). Furthermore, the alignment that has already been built is not justified or supported by any other analysis provided in the Rail Order Application. Clearly this leaves a fatal gap in the preparation and documentation of the Rail Order Application.	TII do not agree that there is a "fatal gap" in the Railway Order application. Responses (4) and (5) above explain the rationale and justification for a proposed station at Charlemont. Further TII would note: There is no MetroLink proposal to replace the Luas Green Line with metro, and there is no duplication of infrastructure (see response (4) above) As noted above, MetroLink has government approval, as reflected by the 2022-2042 GDA Strategy that includes consideration of possible future extension of metro to the south (see response (5) above). There is no proposed cannibalisation of the Luas Green Line (see response (7) above). The principle of a "city centre hub" is covered by response (5) above.
10	Concluding statement	7	In summary, it is the view of us as owners of 33 Dartmouth Road that An Bord Pleanála should not be granting permission for the Metrolink Railway Owner. Therefore we request the following amendments: I. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel II. Require the submission of a railway order for a section from Tara Street Station to St. Stephens Green which would effectively provide for a terminal hub station which can effectively integrate with the Luas Green Line and future DART underground.	The above responses to the observations made explain why TII do not consider it is correct or appropriate that the MetroLink alignment south of the proposed Tara Station should be omitted, and also demonstrates why the proposed Charlemont Station has been selected by TII as the preferred interchange with the Luas Green Line A scheme which terminates at Tara Street would not be consistent with the Transport Strategy for Greater Dublin Area (2022-2042). In addition any decision to terminate the scheme at Tara will significantly impact on the overall viability and benefits of scheme.
11	Compliance with Policy	7	It is not transport policy to extend metro to the south at any time prior to 2042. The section of the subject Rail Order Application between St. Stephen's Green and Charlemont represents the first section of such a southern extension and effectively locks-in the replacement of the Luas Green Line. Building south of St. Stephen's Green is premature and is a leftover from a now defunct concept of Metrolink as a Swords to Sandyford megaproject. The NTA/TII has failed to adapt the Rail Order Application to the reality that such a megaproject is not a policy objective at this point in time and it is premature to expensively lock-in decisions about Metro South 2-3 decades in advance of any requirement to do so.	As explained by response (5), the proposed Charlemont Station does not preclude future extension to the south west, south or south east of the city region should sufficient demand arise. Building south of St Stephen's Green is not premature, the reasons for proposing a station at Charlemont are explained by response (4), while response (5) explains how MetroLink has been designed to integrate with the wider transport network.

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12	Strategic Need and Business Case	8	The entire project business case is flawed when it is based on the proposed southern terminus that lies outside current transport policy. This fact is recognized in both the JASPERS independent review and the MPAG Review, which identifies the section of the project south of St. Stephen's Green as 'strategically weak' and that it duplicates other fixed rail services. Surprisingly, the final Business Case did not address these concerns. As this section is probably one of the most expensive parts of the project (1km of tunnel and 1 station for €650m), its removal from scheme is likely to substantially increase the probability of the project successfully getting through the next stages of the government approvals process. Furthermore, the JASPAR review concludes that the connection to Ranelagh could feasibly be deferred until there is clarity on the future of the Luas Green Line and this would bring the project back in line with current transport policy.	There is no duplication of infrastructure between St Stephen's Green to Charlemont for the reasons set out by response (4) above, noting that the section of MetroLink between St Stephen's Green and Charlemont makes a significant positive contribution to the Business Case, rather than a negative contribution as suggested by the observation. TII would also note that in July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a railway order application by TII to An Bord Pleanála in respect of the MetroLink project (Decision Gate 1). This approval was granted after the Preliminary Business Case (PBC) had undergone significant scrutiny and challenge by bodies that are independent of TII, including DoT and DPER review (including independent review by JASPERS and the Major Projects Advisory Group (MPAG)) of the PBC around timeline, costs and benefits that were updated to inform the Government decision. For the avoidance of doubt, An Bord Pleanála's functions relate only to the consistency of the project with proper planning and sustainable development and consideration of its impacts on the environment (including EIA and AA). They do not extend to considering the merits of the financial approvals or business case for the project.
13	City Centre Hub Location & Prejudicing Options for Expansion of the Transport Network	8	While a metro south extension is not part of current transport policy, even if it were to be considered at some stage in the future, the starting point for an extension should be St. Stephens Green and not Charlemont. The section of the Luas Green Line from St. Stephens Green to Charlemont is already one of the existing spokes radiating out from the hub of St. Stephens Green. Therefore, this duplicating section of the proposed MetroLink project represents an upfront payment of €650m towards a single future option, that is the replacement of the Luas Green Line. Once a metro section is built to Charlemont, it will deny other potential routes, such as to the south-west, the opportunity to build a successful business case as it forces increased costs of connecting from Charlemont and bypasses the opportunity of addressing unserved areas closer to the St Stephens Green Hub. This effectively "locks-in" the Green Line Replacement 2-3 decades in advance of any requirement. In addition, any future underground tunnelled solution (i.e. an option other than the Luas Green Line replacement) would start boring from the south and therefore there is no advantage tunnelling to Charlemont now (which the NTA/TII claims is an "appropriate" location for these other options). Such a new tunnel could be aligned all the way to St Stephen's Green; however, this would create a €650m stranded asset/ white elephant at Charlemont and would be a costly negative to overcome in any business case. Moreover, any overground rail or road solution on the south (other than the Luas Green Line replacement) could not interchange at Charlemont because its location is so constrained and incapable of further transport mode connections. Charlemont is in a residential area not a city centre location. It can only interchange with the Luas Green Line and has no scope for adequate connectivity with other modes of transport, such as other proposed light rail, bus services and road transport. It is simply not suitable as a Key Transport Interchange to serve Dublin city centre.	Responses (4) and (5) explain the rationale for a proposed station at Charlemont, why there is no duplication of infrastructure between St Stephen's Green and Charlemont, and a station at Charlemont does not preclude future extension to the south west, south or south east of the city region should sufficient demand arise. It is not correct to say Charlemont only enables an interchange with the Luas Green Line. The MetroLink system is designed, as borne out by our transport analysis, in an integrated manner so that people travelling from the area south of Dublin to access locations north of Charlemont, such as Dublin Airport, Mater, Swords etc. will utilise public transport to interchange with the MetroLink, or will walk or cycle to access their local station. It should also be noted that the proposed station is within a 5-minute walk distance of the Bus Connects proposed A Spine and E Spine routes. The system is not designed to encourage people to drive to stations and TII actively discourage people from doing so other than the Park & Ride station at Estuary.

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14	Flawed Assessment of Alternative South Terminii	8	The Rail Order Application contains a deeply flawed rationale in the consideration of alternative terminus locations to the south. The "decision... not to upgrade the Luas Green Line to Metro" should have resulted in NTA/TII demoting the importance of the "Charlemont (tie in with Luas Green Line)". The alignment choices "to determine the most appropriate termination location for the MetroLink project" should have investigated three options: St Stephen's Green West, St Stephen's Green East and Charlemont. St Stephen's Green West becomes a viable option once the NTA/TII's self-imposed constraint of forcing a connection to a Luas Green Line tie-in location is removed. Indeed, a carefully designed St Stephen's Green termination point (West or a more connected version of East or a hybrid) would provide a superior interchange with the Luas Green Line and maximise the scope for future southern extension routes (including the possible replacement of the Luas Green Line option). The fact that St Stephen's Green was never properly evaluated as a terminus option shows that the EIAR is deeply flawed and inadequate.	We address the substance of this submission below, but as a preliminary point these are all matters of strategic transport policy that have been settled by the NTA's GDA Transport Strategy 2022-2042. A number of route options were considered in the process of identifying the Emerging Preferred Route (EPR). While not anticipated to be the final station, these route options included potential station locations on St. Stephen's Green West. As outlined by EIAR Chapter 3 (Background to the MetroLink Project) one of the key objectives of the Project is the integration of it with the wider transport network that also includes for BusConnects and DART+ which are all included under Project Ireland 2040. Together, these projects will result in a reliable, sustainable, affordable, integrated public transport network that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2023 and make Dublin a more liveable and sustainable city. A station at Tara Street provides good interchange opportunities, serves important key trip attractors in the study area with high potential passenger trips. This option also takes a direct and short route through areas of high demand in the centre of the study area. A station on St Stephen's Green West is not preferred for several reasons: If a station was placed on St Stephen's Green West, the alignment between the proposed Tara Station and a station on St Stephen's Green West would result in an undesirable horizontal reverse curve and an alignment greater than 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with the MetroLink Fire Strategy. Additional construction would be required to provide such a facility, similar in size to the proposed Albert College Park Intervention shaft. This could feasibly be situated in the Trinity College Dublin sports grounds. TII note that it is Government policy to provide a station and interchange with the Luas Green Line at Charlemont, as set out by the GDA Transport Strategy 2022 – 2042. Should a station be placed on St Stephen's Green West, the alignment between a station located here and the proposed Charlemont Station would also result in an undesirable horizontal reverse curve and an alignment that is greater than 1000m long, and would thus again require an intervention shaft similar to the proposed Albert College Park Intervention shaft to be provided. This would be expected to result in significant demolition and redevelopment in an existing built-up area. In both cases, compared to the proposed alignment that runs much more directly between Tara, St Stephen's Green and Charlemont, the additional length of tunnel and the addition of two intervention shafts generated by locating a station on St Stephen's Green West is uneconomic in comparison. As a potential station location, St Stephen's Green West itself is a very constrained location due to the presence of buildings, Luas and St Stephen's Green Park. Maintaining the operation of the Luas during station construction would be complex and challenging with significant disruption expected, whilst the impacts on St Stephen's Green Park would be greater for a station in this location compared to the proposed location on St Stephen's Green East. This would be the result of; the likely need to place more of the station in the Park compared to the proposed station on St Stephen's Green East; it would impact an area of the Park that has greater amenity value than St Stephen's Green East due to the nearby Park entrance adjacent to the southern end of Grafton Street, and there would be a risk of impacting the existing Park lake. In summary, an alignment that links the proposed Tara, St Stephen's Green East and Charlemont stations is a more direct and economic alignment, does not require additional intervention infrastructure, avoids a complex engineering interface with the Luas Green Line, impacts the Park less and has less potential for disruption during the construction phase. It is acknowledged that passengers wishing to interchange between Luas and MetroLink at the St. Stephen's Green station will have a 500m-walk along a route either through St Stephen's Green Park or along the footpath north of the park. The interchange time is calculated at 7.58 minutes. However, the interchange arrangements at Charlemont provide for a significantly better connection with Luas compared to St. Stephens Green Station, where the interchange time is calculated at 2.9 minutes. Interchange times and routes are detailed in Appendix A7.9 (Terminus Station at Charlemont compared to St. Stephen's Green). Responses (4) and (5) explain the rationale for a proposed station at Charlemont, and does not support the observation "that the EIAR is deeply flawed and inadequate".

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15	No Studies to Support the Proposed Alignment to the South	8	A vital component of the Rail Order Application is the consideration of alternative alignments for the south end of the Metrolink line. The Applicant did undertake a detailed consideration of potential tie-ins with the Luas Green Line and a Preferred Option (Option 4 (b) was selected in the March 2017 study. However, as will be described below, NTA/TII has procured to complete the construction of an alternative design of the Charlemont Station Box which delivers a very significantly different alignment to that proposed in the Tie-in study and in the March 2019 "Preferred Route" consultation. Very importantly the implications of the built alignment are both to the north and south of Charlemont. Notably to the north the more easterly alignment has very strongly influenced the Applicant not to consider station options on St. Stephens Green West where the optimal interchange with the Luas Green Line would occur. The resulting alignment to the south of Charlemont shifts to the west and rules out the preferred "in- line" tie-in with the Luas Green Line and will cause significantly increased demolition of houses in the Ranelagh area. Not only is the March 2017 Luas Tie-In Study now totally irrelevant from a tie-in perspective (none of the options were used or re-evaluated), it is also redundant from a policy perspective (no Luas Green Line replacement is part of the subject Rail Order Application). Furthermore, the alignment that has already been built is not justified or supported by any other analysis provided in the Rail Order Application. Clearly this leaves a fatal gap in the preparation and documentation of the Rail Order Application. The fundamental and essential study that should have replaced the Luas Tie-In Study is a city-centre terminus study that uses appropriate criteria (that are significantly different from those used in the Tie-in study). Such a study, however, was never undertaken by the Applicant. In fact, the Rail Order Application provides no studies to support the proposed (already built) alignment to the south. Obviously by building the alignment prior to making a Rail Order Application, NTA/TII has denied An Bord Pleanala the opportunity to consider alternatives through the planning process for the current Rail Order Application.	While TII addresses the substance of this point below, this is a strategic transport policy issues that has been settled by the NTA's GDA Transport Strategy 2022-2042. TII do not agree "NTA/TII has procured to complete the construction of an alternative design of the Charlemont Station Box which delivers a very significantly different alignment to that proposed in the Tie-in study and in the March 2019 "Preferred Route" consultation". The station design is in affect a modification to the preferred Green Line Tie Option 4B which was modified as result of the postponement of the upgrade of the Green Line to metro standard. Further TII do not agree that the proposed location of Charlemont Station has significant impacts north and south. Response (14) above explains why a station on St Stephen's Green West is not proposed noting that this is not determined by the proposed location of Charlemont Station. Regards south of the Charlemont, as previously noted, Charlemont does not preclude future extension of the metro to the south, south-east or south-west should sufficient demand arise. There is also no basis to suggest there will be an increased demolition of houses, if in the future, the metro was extended south, this does not mean that inevitably open cut construction will be required or demolition of property will be necessary. It is possible that in the event of a tunnel being constructed to connect to Charlemont Station that this would be undertaken from a site further south, as noted elsewhere in the submission. The observation that "no Luas Green Line replacement is part of the subject Rail Order Application" is correct, and as previously noted, the proposed Charlemont Station is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). The Transport Strategies were prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport and approved by the Minister for Transport. Responses (4) and (5) explain the reasons for a proposed station at Charlemont. TII would note that the Charlemont Metro Enabling Works were constructed to enable the Charlemont Development to proceed whilst simultaneously ensuring there was an option available to construct a station at Charlemont that avoided unnecessary demolition, took advantage of an available site, provided infrastructure that is integrated with planned development rather than necessitating later changes and retrospective adjustments to a new development or even possible demolition of the new development, whilst providing protected provision for the future extension of the scheme south, if required. However while it was appropriate and sensible to make provision for MetroLink for the reasons stated, it is for An Bord Pleanála to consider the Railway Order application, and TII do not assume that simply because permission was granted for these MetroLink Enabling Works, that it means an Enforceable Railway Order will be granted.

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16	Charlemont Station Box work are not described in the Rail Order Application (EIA Project Splitting)	9	The enabling works and construction of the station box at Charlemont, which have already been undertaken, are not described in the Application as forming part of the subject Rail Order. Under the EIA Directive, an EIA must consider the direct, indirect and cumulative effects of all aspects of the development. On this point alone, the entirety of the Rail Order Application is legally unsafe.	The MetroLink enabling works constructed as part of the Hines development was included in the planning application for the Hines Development and has the benefit of planning permission which was granted in April 2019. There is no inconsistency with the EIA Directive. All options remain open to the Board in relation to this location. The critical factor in favour of the station at this location are the policy decisions and supporting analysis outlined above and not the permitted enabling works. TII rejects the assertion that the inclusion of the MetroLink Enabling Works at Two Grand Parade has prejudiced the EIA process. There were no "neutral" alternatives available to ABP when it made a decision on the application for permission for Two Grand Parade. It had three options, all of which had significant consequences for proper planning and sustainable development and the environment: *grant permission without the roof slab, which would have required TII to demolish Two Grand Parade or another development in this area to deliver a Metro station in the location that was emerging from the contemporary optioneering reports; *refuse permission for Two Grand Parade, sterilising the site a frustrating the zoning objective for the site *grant permission with the roof slab, securing the zoning objective and leaving open the option of a station at this location. The Board opted for the third option having regard to submissions from the NTA and revised designs from the developer. That decisions was challenged by way of judicial review, but the judicial review was withdrawn. The objections now raised attack the validity of that decision, which is prohibited by Section 50 of the Planning and Development Act 2000. The Hines (Grand Parade Property Trading Co. development) and Metrolink construction works required for Charlemont Station are presented in Appendix A5.3 Construction Sequence Report. As presented in EIAR Chapter 30 the cumulative potential of the Charlemont works has been assessed.
17	Charlemont Station Box Not Permitted/ Unauthorised Development	9	The current Railway Order and associated EIAR acknowledges that the enabling works including the construction of the Station Box at Charlemont has already occurred. TII appear to suggest that these works were permitted under the planning permission for the Office building at 2 Grand Parade. That commercial office development required normal planning permission to be obtained under the Planning and Development Act 2000. However, the Metro Station Box works are "railway works" and cannot be granted permission under that Act. Instead, they require a separate application for, and grant of, a Railway Order under the Transport (Railway Infrastructure) Act 2001. No Railway Order was obtained for the Charlemont Metro Station Box and therefore these railway works were not authorised and could not be lawfully undertaken. Moreover, the Charlemont Station Box is an unauthorised development that also required an EIA and as such, under legislation, the Board is compelled to refuse to consider any application for its retention. Clearly Charlemont Station is an integral part of the Metrolink proposal and the subject Rail Order Application. The Board, therefore, cannot grant the current Rail Order as to do so would a) facilitate the circumvention of the EIA Directive by the splitting of projects and b) amount to a retention permission which it is compelled to refuse. Effectively, Charlemont Station cannot be considered as usable for the Metrolink project because it will remain legally unsafe.	The MetroLink enabling works constructed as part of the Hines development was included in the planning application for the Hines Development and has the benefit of planning permission which was granted in April 2019. The observer is mistaken in submitting that railway works can only be authorised by railway order. The definition of "railway works" in the Transport (Railway Infrastructure) Act 2001 is broad and intended to facilitate comprehensive applications for consent for railways. They are defined as any works required for the purposes of a railway or any part of a railway, including works ancillary to the purposes aforesaid such as parking by buses or by persons using vehicles who intend to complete their journey by railway, and relocation of utilities, and in this definition “works” includes any act or operation of construction, excavation, tunnelling, demolition, extension, alteration, reinstatement, reconstruction, making good, repair or renewal. If the observer's submission were true, Irish Rail and TII would have apply for a railway order to provide for basic development like provision of parking for their railways and developers of land in proximity to railways would have to apply for a railway order to include in their designs elements of the development to protect the integrity of the developers works and the railway. The 2001 Act does state "The construction of railway works, the subject of an application for a railway order under this Part, shall not be undertaken unless the Board has granted an order under section 43." This narrow prohibition allows the baseline to be fixed at the date of the railway undertakings application for consent without the wider undesirable consequences outlined above.

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18	Implications of the Locked-in Alignment of the Charlemont Station Box	9	In the March 2019 consultation on the "Preferred Route", the proposed alignment for the Luas Green Line "Tie-in" was to be an "in-line" connection. This consultation allowed the public to understand and comment on the implications of the proposal. Since that consultation, NTA/TII reached an agreement (in private) with the developer of the new office building at 2 Grand Parade for a design of the Charlemont Station Box. Construction of this Station Box commenced, without a Rail Order, in April 2021 and was completed in the first quarter of 2022. This design and alignment of this station box is very significantly different to the proposal in the Preferred Route consultation. No notice was made to the public of the proposed changes and there was no opportunity for affected parties to make comment. In the event of a future Luas tie-in, which the NTA/TII says "will remain a likely option for the future", the implications of the now locked-in (built) station alignment are profound. It will result in the demolition of houses on Mander's Terrace, Charleston Road and will require the demolition of 11 houses and 24 apartments on Oakley Road. None of these houses and apartments would be demolished under the earlier design that was presented in the Preferred Route Consultation. Not only was no notice given to affected parties, but the implications of the new alignment are now known to the Applicant and yet it is not presented in the EIAR of the Rail Order Application. Case law has clearly established that an EIAR must "...take account, as far as practically possible, of potential later phases...". The EIAR is again inadequate and disingenuous in not presenting the known facts.	Please refer to response (15) above in relation to the design and location of Charlemont Station.
19	Inadequacy of the Rail Order Application and Scheme Detail	10	Overall, we consider the detail of the Railway Order Application to be inadequate. These inadequacies are considered throughout this submission and in the other two CDCG submissions (especially in relation to issues such as Vehicular Traffic and Parking, Proposed Traffic Measures, Pedestrian Traffic, Drop-off, Noise, Disturbance, and Impact upon Amenities in the Vicinity of Charlemont Station). The lack of detail is in no small part due to the procurement method adopted by the Applicant, which is a 'design and build'. The first component is 'design' which should be undertaken prior to submission for a Railway Order consent. By following a 'design and build' approach NTA/TII is failing to provide the required level of detail under which a Rail Order could be granted by An Bord Pleanala (ABP).	TII do not agree the EIAR is inadequate and have responded to the individual observations made in this submission, as well as all other submissions received. The assessment undertaken in the EIAR is undertaken in line with best practice and is in line with all relevant guidelines and policy requirements. Neither this submission nor the other submissions referred to have identified any guidelines or best practice that have been overlooked in the assessment. It should be noted that a full and very detailed assessment of traffic is provided in Chapter 9 of the EIAR and the associated appendices where potential effects on traffic, pedestrian movements, cycling, public transport and parking is presented for both the construction and operational phases. In terms of potential noise impacts there are two chapters (Chapter 13 and 14) presenting a detailed analysis of airborne and groundborne noise effects on sensitive receptors respectively for the construction and operational phases. The effects on "amenity" are assessed for the construction phase are assessed in a number of chapters (including Chapter 10 Human Health, Chapter 11 Population and Land Use, Chapters 13 & 14 (Noise and Vibration) and Chapter 27 Landscape. There is no connection between the selected procurement method and the level of design for the Railway Order application. The level of design undertaken is appropriate for a Railway Order application, noting that the design to inform the Railway Order application has been developed to Preliminary Design level. This Preliminary Design provides the required level of detail to inform the EIAR, and the level of design presented and used to inform the EIAR is consistent with previous successful Railway Order applications and best practice guidelines.
20	Summary statement	10	In summary, it is the view of us as owners of 33 Dartmouth Road that An Bord Pleanála should not be granting permission for the Metrolink Railway Owner. Therefore we request the following amendments: I. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel ii. Require the submission of a railway order for a section from Tara Street Station to St. Stephen's Green which would effectively provide for a terminal hub station which can effectively integrate with the Luas Green Line and future DART underground.	Please refer to response (10) above.

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21	3.2. Main Issues raised in the CDCG Dartmouth Road Submission 2 Policy and Procedure	11	• Specifically the Charlemont station should not form part of the rail order as it will severely and demonstrably adversely affect the residential amenities of the Dartmouth Road residents both during the construction phase and the operational phase.	The above responses to the observations made explain why TII do not consider it is correct or appropriate that the MetroLink alignment south of the proposed Tara Station should be omitted, and also demonstrates why the proposed Charlemont Station has been selected by TII as the preferred interchange with the Luas Green Line. TII understand your particular concerns regards the proximity of 33 Dartmouth Road to the construction of the proposed Charlemont Station, and while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. During the operational phase, no significant residual negative impacts are anticipated on the Population and Land or from noise, vibration or other emissions and nuisances considered as part of the assessment of impacts on Population. Use from the operation of the proposed Project, following the incorporation of the mitigation measures into the design of the proposed Project and implementation on an ongoing basis throughout the lifecycle. The residual effects that will arise during operation will be permanent and positive as detailed in EIAR Chapter 11, section 11.1.1.
22	3.2. Main Issues raised in the CDCG Dartmouth Road Submission 2 Policy and Procedure	11	• The reliance on an element of the railway works in the form of the station box previously constructed as part of the office development fundamentally prejudices the entire process and is non-compliant with the EIA Directive. • As is described in detail in the CDCG General Area Submission, the Charlemont Station Box is an unauthorised development that also required an EIA. Clearly Charlemont Station is an integral part of the Metrolink proposal and the subject Rail Order Application. The Board, therefore, cannot grant the current Rail Order as to do so would a) facilitate the circumvention of the EIA Directive by the splitting of projects and b) amount to a retention permission which it is compelled to refuse. Effectively, Charlemont Station cannot be considered as usable for the Metrolink project because it will remain legally unsafe.	Please refer to responses (5), (15), (16) and (17).
23	3.2. Main Issues raised in the CDCG Dartmouth Road Submission 2 Policy and Procedure	11	The documentation and in particular the drawings submitted are misleading and do not illustrate the relationship between the proposed station works and the houses on the southern side of Dartmouth Road. The deep construction required immediately adjacent to residential houses is wholly inappropriate and will result in a very severe loss of amenity and devaluation of property.	TII disagree that the documentation and drawings submitted are misleading and do not illustrate the relationship between the proposed station works and the houses on the southern side of Dartmouth Road. Drawing ML1-JAI-SRD-ROUT_XX-DR-Z-02090 (Structures Details Book 2 of 3) shows the outline of the underground station, property Drawing ML-P 307 0-A (Property Details, Book 2 of 2) also shows the footprint of the station in relation to surrounding property, as does Alignment drawing ML1-JAI-ARD-ROUT_XX-DR-Y-03096 (Alignment Details Book 2 of 2). Regards drawing ML1-JAI-SRD-ROUT_XX-DR-Y-02096, the relationship of the section shown to Dartmouth Road is a function of where the long section has been taken and is therefore correct. Neither do TII agree that deep construction adjacent to the residential houses is inappropriate and would also note the environmental impacts have been carefully considered. TII would also note that while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option for Dartmouth Road residents immediately adjacent to the construction site during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. Regards loss of amenity during construction, Dartmouth Road will be closed between Dartmouth Place and Dartmouth Square West during the enabling works and main works but diversions will be put in place for local access, including deliveries, emergency services, bin collection, and pedestrian access maintained to property. The impacts on parking will be monitored during construction to reinstate any disrupted areas as soon as practicable. On completion of construction, parking will be reinstated. TII are of the view that the proposed development will have a long term positive affect in terms of property value. There is evidence to suggest that property values will in fact increase in close proximity to public transport infrastructure and that local residents will greatly benefit from having a world class metro system providing access to the city centre, airport and north city at their door step.

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24	3.2. Main Issues raised in the CDCG Dartmouth Road Submission 2 Policy and Procedure	11	• The lack of detail in the Rail Order documentation is in no small part due to the procurement method adopted by the Applicant, which is a 'design and build'. The first component is 'design' which should be undertaken prior to submission for a Railway Order consent. By following a 'design and build' approach NTA/TII is failing to provide the required level of detail under which a) affected residents can adequately understand the implications of the proposals and b) a Rail Order could be granted by An Bord Pleanála (ABP).	Please refer to response (19) above.

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25	Inadequate EIAR	11	• Noise and vibration impact assessment have been deferred until after consent is issued. • The impacts of construction noise and vibrations on internal dwelling environments has not been assessed. • There has been no night-time impact assessment of construction noise. • The blasting impacts of tunnelling directly under the houses on Dartmouth Road has not been assessed in terms of amenities, noise, vibration and human health.	• Noise and vibration assessments have not been deferred until after an enforceable railway order is granted. The EIAR presents a comprehensive and detailed assessment of both groundborne and airborne noise and vibration in Chapter 13 and 14 of the EIAR based upon the best available information at this stage of the project. The assessments includes for predictive modelling in order to identify the potential impacts on sensitive receptors during both the construction phase and the operational phase. Where necessary, mitigation measures are proposed to reduce any identified effects. Section 13.2.5.1.3 simply identifies that further assessment will be required as the project develops, and allowing for any amendments to the design, to ensure that the proposed construction and operation of the proposed Project is in line with that presented in the EIAR and any requirements of an enforceable Railway Order. It is also of note that environmental monitoring will be undertaken that will demonstrate that works are being undertaken within environmental limits. • The assessment undertaken in EIAR is in line with best practice and with all relevant guidelines and policy requirements as laid out in EIAR Chapter 13 Airborne Noise and Vibration, section 13.2.2. The assessment of noise levels at building facades is normal for this type of analysis as the assessment criteria generated from best practice guidance all refers to noise levels at building facades. • Night-time noise has been assessed. The Proposed Working Hours are outlined in EIAR Chapter 5, MetroLink Construction Phase, section 5.2.4. Standard working hours will generally be the norm for all above ground works i.e Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 13:00. Only tunnelling and other works underground will be undertaken 24 hours a day. The only exception to this is the requirement for work above ground outside standard working hours for exceptional events such as concrete pours, and abnormal deliveries. In the exceptional event these are necessary, the contractor will engage with the local community and local authority before such works are undertaken. All planned night-time work activities will have to be undertaken, controlled and mitigated under the detailed Construction Environmental Management Plan to maintain impacts below the agreed construction noise thresholds. Examples of mitigation measures that can be used to reduce impact are detailed within Chapter 13, section 13.6, including the use of enclosure structures for planned activities outside of the standard working hours. The rationale for 24/7 working on activities such as Mechanical Electrical Power (MEP) installation, TBM strip out, and tunnel clean and track laying, is that they can be managed underground without causing disturbance at night. While activities below ground are progressed on a 24/7 basis, site level activities such as deliveries etc will be limited to standard working hours (Chapter 5, Section 5.5.17.3 refers). Owing to the nature of the sprayed concrete intervention tunnel construction and to ensure a safe and stable method of excavation, the sprayed concrete intervention tunnel construction will be undertaken 24 hours per day, seven days per week. The groundborne noise and vibration arising from mechanical excavation of the tunnel will not exceed threshold limits. During night-time support works at the surface, an acoustically clad steel framed building will be used within the compound to control airborne noise breakout to surrounding sensitive properties. All concrete to support the sprayed concrete tunnel lining operation will be batched on site within the acoustic enclosure and will not require night-time delivery. The predicted level of groundborne noise during TBM passage is 49 dB LASmax at 33 Dartmouth Road which is above the 45 dB LASmax threshold, resulting in a significant impact on the occupants of this address for the relatively short 2-week duration of the TBM passage. Unfortunately there are no effective methods available to reduce groundborne noise from TBMs at source and therefore the principal mitigation measure is advance consultation and engagement to inform residents of the timing of the TBM passing to allow building occupants to prepare for the temporary elevated noise levels. Therefore with the exception of some temporary disturbance (c. 2 weeks) resulting from the TBM passing. All other activities are not predicted to cause significant impact at night. As outlined in Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy (Appendix A14.6) there is a process in place whereby further mitigation measures can be implemented at individual properties should this be merited. • TII confirm that the intervention tunnel will not be constructed using drill and blast.

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26	Inadequate EIAR	11	• A traffic impact assessment of local junctions has not been undertaken.	This statement is incorrect. As presented in Appendix A9.5 Scheme Traffic Management Plan, analysis has been undertaken to assess the impact of the traffic management measures on the local road network surrounding Charlemont Station, following a 2-stage assessment process as identified in section 2.4. At the local level the following parameters have been used to assess impacts on general traffic and on pedestrians: * Increase in walking distance/quality of service for pedestrians (through removal of footpath, reduction of quality of service, removal of a pedestrian crossing or relocation of crossing by more than 100m); * Increase in driver delays at junctions; * Changes in traffic flows on surrounding streets; and, * Additional distance travelled due to diversions. Local traffic impacts have been assessed against key performance indicators, including the removal of one or more lanes of traffic, increase in traffic flow of +10% (PCUs), where there is predicted to be a permanent increase in journey length of 500m, or a new signalised junction. Local modelling undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The largest increase in driver delay of 12 seconds is registered on the westbound approach on Grand Parade to the Ranelagh Road signalised junction.
27	Inadequate EIAR	11	• The EIAR fails to properly assess the settlement impacts of the tunnelling upon the houses on Dartmouth Road and there may be settlement of between 35mm and 45 mm which would severely affect these protected buildings.	The EIAR has assessed the impact of settlement on the houses on Dartmouth Road. EIAR Appendix 5.17 refers. The settlement predicted for the buildings directly over the tunnel are of up to 45mm as stated. The Phase 2 assessment of the damage for these buildings is "Slight" - please refer building B151 (32 Dartmouth Road) in table 5-2 of that appendix. The protected nature of a building does not alter the classification of damage from slight to moderate as stated. The protected buildings along Dartmouth Road, within the zone of influence of the works, will be subject to a further Stage 3 refined assessment (despite the impact only being assessed as 'slight') to take account of final design and construction methodology details, most likely utilising advanced numerical modelling techniques and further surveys of the building. The results of this refined assessment typically show that earlier assessments are conservative and overestimate the likely impact of construction generated ground movements.
28	Inadequate EIAR	11	• The hydrogeological impact assessment is inadequate as it has not been based upon local bore hole logs and no local impact assessment has been undertaken around the Charlemont station.	TII have undertaken localised and specific groundwater modelling, and TII can also confirm that hydrogeological information along the line of the underground elements has been collected. Please refer to Figure 19.6 of the EIAR which identifies the location of a boreholes at Charlemont. Pump tests were undertaken here and groundwater samples were taken (from 3 boreholes here) and analysed in order to inform the baseline conditions presented in the EIAR. Furthermore calculations were undertaken to estimate the effects of excavations on the groundwater for every station including Charlemont (refer to Table 19.35 Table 19.41 and Charlemont subsection under section 19.5.3.6.

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29	Inadequate EIAR	11	• The impact of ventilation systems has not been assessed.	EIAR Chapter 13, Airborne Noise and Vibration, section 13.5.3.2 of the EIAR discusses noise from fixed plant, such as extract fans and ventilation systems. All plant associated with ventilation are housed within back of house plant rooms below ground level within the stations and hence will not generate any measurable airborne noise emissions at ground level. The key potential noise source relates to breakout noise from ventilation shafts and grilles at surface level. The assessment shows that without mitigation there are potential significant noise impacts from surface grills. As detailed in Chapter 13 (Airborne Noise and Vibration), the specific noise level from ventilation systems will be calculated as part of the further design development. Specifically, the operational noise level from each shaft and surface grill will be calculated to the nearest sensitive areas to each and specific attenuation designed for each system to not exceed the relevant design criteria for each location. As part of the design development of the station plant and ventilation systems, the background noise level at the nearest and most exposed NSLs to each fixed item of plant will be determined for day and night-time periods. This data will be used to establish the magnitude above which the operational plants items operate above in accordance with the methodology described in 13.2.5.2.4. All baseline noise values will be confirmed prior to the selection and design of the operational plant items through updated baseline noise surveys. The final airborne noise impact at sensitive receptors is very sensitive to small changes in the final construction and design of the ventilation systems. As a result, modelled impacts and mitigation will have to be updated in parallel with the detailed design. Section 13.6.2.3 outlines the detailed considerations that will be included in the design to ensure that the ventilation systems do not exceed limits as per BS 4142, including: • Reduction of induct flow rates; • Reduction of elements in the airflow; • In duct attenuators; • Orientation of grilles and louvres away from sensitive receptors; • Acoustic louvres; and • Anti-vibration mountings and couplings will be incorporated into the design to control vibration. Once the project moves into the next phase of design development then the detailed design of each shaft and surface grill will include measurements of background and ambient noise at the closest noise sensitive receptors to each of these fixed items of plant, this data will be used to establish a noise threshold level in accordance with BS 4142 and BS 5228, that each item of plant must be below, with bespoke noise mitigation at each location.
30	Inadequate EIAR	11	• The ground borne vibration/noise impacts of the train operations upon the houses of Dartmouth Road have not been assessed.	This statement is incorrect. EIAR Appendix A14.5, Groundborne Noise and Vibration and Blasting Modelling Results, Section 14.4 AZ4 Northwood to Charlemont, presents the predicted vibration levels during railway operation for sensitive receptors. The predicted groundborne noise at 33 Dartmouth Road is 28 dB LASmax, which is below the threshold level of 40 dB LASmax, indicating no significant impact during railway operation. The predicted VDV (Vibration Dose Value is a parameter that combines the magnitude of vibration and the time for which it occurs) during railway operation is 0.005 ms-1.75 (VDV day) and 0.003ms-1.75 (VDV night). Both of these values are well below the VDV Threshold Levels of 0.8ms-1.75 (VDV day) and 0.4ms-1.75 (VDV night) indicating no significant impact for the building or for residents of this address.

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31	Construction Phase	11	• The construction noise impact assessment is wholly inadequate as it fails to consider the internal noise impact over a 9 year period, defers assessments to the design and construction stage, fails to properly assess night time impacts, incorrectly categorises impacts as very significant as opposed profound.	The assessments presented in Chapter 13 and Chapter 14 of the EIAR are undertaken in line with best practice and all relevant guidelines and policy requirements as laid out in Section 13.2.2 of the EIAR. The assessment has not been deferred until the detailed design stage and the observer has not identified any aspect of best practice or any relevant guidelines or policy which has not been applied in the assessment. The assessment of noise levels at building facades is normal for this type of analysis as the assessment criteria generated from best practice guidance all refers to noise levels at building facades. EIAR Chapter 2, Methodology used in Preparation of the EIAR provides the details of the durations of effect utilised in the analysis throughout the EIAR. The assessment in EIAR Chapter 13 has noise and vibration impacts over shorter durations to reflect the duration of the actual activity i.e. excessive noise effects resulting from the construction will not last 9 years, but will last as long as the "noisy activity" lasts. In EIAR Chapter 5, MetroLink Construction Phase, Table 5.5, the proposed working hours for this site are outlined. The assessments presented in Chapters 13 and 14 are based on these proposed working hours with no works proposed above ground occurring during the night time. As outlined in Table 5.5 of the EIAR, there will be underground works during the night time period and these have been assessed in both Chapter 13 and 14. Chapter 13 assesses potential impacts associated with the operation of plant above ground only i.e. ventilation fans at the surface to facilitate this work, while Chapter 14 covers the potential impacts associated with underground works. TII do not agree that impacts are incorrectly categorised as very significant rather than profound. EIAR Chapter 13, section 13.2.6 outlines the appraisal methodology and along with Tables 13.12, 13.13 and 13.14 shows 'very significant' rather than 'profound' is the correct categorisation.
32	Construction Phase	11	• Construction vibration impact assessment fails to assess the evacuation tunnel. This element of the project is likely to have a significant effect upon the Dartmouth Road residents. It will not be possible to meet airborne noise condition limits that may be reasonably set by An Bord Pleanala. • Construction of the Intervention tunnel will give rise to significant noise and disturbance, 24/7 during the period of its construction.	An assessment of the mechanical excavation of the evacuation tunnel and intervention tunnel has been carried out, and is included within Chapter 14 of the EIAR. The assessment of groundborne noise and vibration from mechanical excavation for a number of representative receptors is presented in Table 14.31 and Table 14.33, with predictions for a greater number of receptors in the area presented in Appendix 14.5 Groundborne Noise and Vibration Blasting Modelling Results. Owing to the nature of the tunnelling works and to ensure a safe and stable method of excavation, the sprayed concrete tunnel construction will be undertaken 24 hours per day, seven days per week. As noted in Chapter 5 (MetroLink Construction Phase), where reasonably practicable, material will be stockpiled within the relevant main construction compound for removal during standard working hours. If activities require work outside the hours set out in Table 5.4, an approval will be sought from the relevant Local Authority for these on a case-by-case basis. It is proposed that during night-time support works, an acoustically clad steel framed building will be used within the compound to control airborne noise breakout to surrounding sensitive properties. The reference to Drill and Blasting of the intervention tunnel is included in section 14.11 is in-correct. It should refer to mechanical excavation as the principal form of excavation, which as identified in Chapter 14 of the EIAR will not have a significant impact on overlying properties.

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33	Construction Phase	12	• The construction phase on Dartmouth Road, assuming no delays, will last 8.5 years (102 months). This is a medium- term effect which has not been properly considered in the EIAR. This may be termed "medium-term" from a broad community perspective, but in the lives of the residents of Dartmouth Road the impact is profound. Especially when the cumulative effect of the ongoing construction of the Office Building at 2 Grand Parade that will last for 4-5 years is considered. The residents of Dartmouth Road will have to endure almost a decade and a half of major scale construction within metres of their houses in an area zoned as residential.	As outlined in EIAR Appendix A5.2 Construction Programme Including Tunnel Elements, the proposed construction period will progress at this site for 8.5 years, with some minor advance works prior to that as part of the development at Two Grand Parade, as noted in Chapter 4 (Description of the MetroLink Project). TII are of the view, as demonstrated by the detailed EIAR submitted that the environmental impacts have been carefully assessed and mitigation measures proposed where necessary. As detailed in the relevant environmental chapters and the Outline Construction Environmental Management Plan (CEMP) in Appendix A5.1, a significant suite of mitigation measures and monitoring has been proposed to mitigate the effects of this construction period so far as possible. As noted in Chapter 5 (MetroLink Construction Phase), the activities described and impacts anticipated are intended to represent the likely most significant environmental impacts for the construction work to be undertaken along the alignment (i.e. a reasonable worst case scenario). Therefore, it is possible that there will be durations of the programme where impacts will be less than those described. Additionally, the total duration of construction at this location will not consist entirely of 'major scale construction'. This overall construction duration of 102 months consists of access (1 month), enabling works (13 months), civils (71 months) and fit out, T&C and restoration (9 months). TII would also note that while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option for Dartmouth Road residents immediately adjacent to the construction site during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider.
34	Construction Phase	12	• The hours of construction proposed include 12 hour working days and significant element of 24 hour working during certain periods of the contract.	Proposed Working Hours are outlined in Section 5.2.4 of Chapter 5 of the EIAR. Standard working hours will generally be the norm for all above ground works i.e. Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 13:00. Only tunnelling (please see response (25) above) and other works underground will be undertaken 24 hours a day. The assessments presented in Chapters 13 and 14 are based on these proposed working hours with no works proposed above ground occurring during the night time. As outlined in Table 5.5 of the EIAR, there will be underground works during the night time period and these have been assessed in both Chapter 13 and 14. Chapter 13 assesses potential impacts associated with the operation of plant above ground only i.e. ventilation fans at the surface to facilitate this work, while Chapter 14 covers the potential impacts associated with underground works. The only exception to this is the requirement for other noisy work above ground outside standard working hours for events such as concrete pours, abnormal deliveries etc. TII and their Contractor will engage with the local community and local authority to advise of any such upcoming events such as this, and will do there best to minimise any such occurrence so far as practicable.
35	Construction Phase	12	• The alternative construction compound has not been properly assessed and given the impacts of that proposed, it is incumbent upon TII to properly assess this and propose it as a mitigating measure.	As noted in Chapter 5 (MetroLink Construction Phase), there is only one construction site proposed for Charlemont Station, and that encompasses the construction footprint of the proposed Charlemont Station. In so far as there are any constraints at this location, they are due to the construction of the principal development at Two Grand Parade, not the incorporation of a roof slab to facilitate the construction of a station. The incorporation of a roof slab reduces constraints in this area, promoting the objectives of the EIA Directive. The only alternative with fewer constraints would have been if ABP had refused permission for Two Grand Parade, sterilising the site and frustrating the achievement of the zoning objective (which is set out in a Development Plan that had been subject to SEA).

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36	Construction Phase	12	• Additional traffic will be generated during construction and the rediverting of traffic will have an adverse effect upon the local road network. HGV traffic on quiet residential roads will have a severe impact upon amenities.	Appendix A9.5 Scheme Traffic Management Plan details the proposed HGV routing associated with the construction works at Charlemont Station. Routing from the site is mainly via the R111 and R110, and routing to the site is via the R810 and R110. Alternative routing options via the R110/Kildare Road and the R110/R811 are also considered, all of which are part of the regional road network. Only when the full closure on Dartmouth Road is in place will construction traffic route via Dartmouth Road. Local modelling undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The longest delay occurs eastbound on Dartmouth Road during the AM peak of 14 seconds. Model outputs indicate that there will be a moderate increase in HGV movements during construction at this location. The most significant increase, of just over 2%, will be in both directions along Ranelagh Road/Charlemont Street, which is part of the regional road network. Elsewhere in the area, including local residential streets, increases are significantly lower.
37	Construction Phase	12	• No local traffic modelling has been undertaken as part of the assessment and the impact upon pedestrians has not been properly assessed.	This statement is incorrect, both local traffic modelling and the impact upon pedestrians has been assessed. EIAR Appendix A9.5 Scheme Traffic Management Plan presents the analysis undertaken to assess the impact of the traffic management measures on the local road network surrounding the proposed Charlemont Station during the construction phase. At the local level the following parameters have been used to assess impacts on general traffic and on pedestrians: • Increase in walking distance/quality of service for pedestrians (through removal of footpath, reduction of quality of service, removal of a pedestrian crossing or relocation of crossing by more than 100m); • Increase in driver delays at junctions; • Changes in traffic flows on surrounding streets; and, • Additional distance travelled due to diversions. The analysis undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The largest increase in driver delay of 12 seconds is registered on the westbound approach on Grand Parade to the Ranelagh Road signalised junction. During the construction phase, pedestrians will experience a reduction in quality of pedestrian infrastructure and space. The construction site boundary will encroach upon footways in the local area, including the northern side of Dartmouth Road, and the southern side of Grand Parade. However, a temporary signalised crossing will be provided west of the Luas to maintain pedestrian access to and from the Stop. Whilst there are partial closures on Dartmouth Road and Grand Parade, pedestrian movements will be maintained on appropriately sized footways through the area.
38	Construction Phase	12	There will be a severe impact upon human health which has not been properly assessed.	It is not correct to say "There will a severe impact upon human health which has not been properly assessed." EIAR Chapter 10, Human Health has identified that there may some residual effects after mitigation measures due to the noise and vibration arising from mechanical excavation, TBM advancement and proposed blasting resulting in "annoyance to users, but no health effects".

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39	Amenity Impacts	12	• The operation of the trains and associated ventilation systems has the potential to adversely affect the amenities of the residents and has not been properly assessed	TII have assessed the impact of the trains and ventilation system and do not predict that amenity will be significantly impacted. With regards to the noise of operating rail infrastructure, EIAR Chapters 13 and 14 present a comprehensive and detailed assessment of operational airborne and groundborne noise and vibration. No residual noise impacts are identified at this location during operation. The calculated rail noise levels across the proposed Project are not significant in terms of any widespread community disturbance and result in a not significant to slight impact when added to the prevailing noise environment. EIAR Chapter 13, sections 13.2.3.2 and 13.5.3.2.3 recognise that ventilation systems if not designed and mitigated effectively are potential noise sources. Section 13.6.2.3 outlines the detailed considerations that will be included in the design to ensure that the ventilation systems do not exceed limits as per BS 4142, including: • Reduction of induct flow rates; • Reduction of elements in the airflow; • In duct attenuators; • Orientation of grilles and louvres away from sensitive receptors; • Acoustic louvres; and • Anti-vibration mountings and couplings will be incorporated into the design to control vibration. Measures to mitigate noise from the use of public address systems is also detailed in Chapter 13 (sections 13.5.3.2.4 and 13.6.2.4). Best practice design principles will be employed to minimise noise breakout at the surface from these systems via escalators, lift shafts and stairwells. Mechanical elements associated with escalators are housed below ground and are fully enclosed. The operation of escalators will not generate any notable noise sources during operation and will not be audible above the prevailing noise environment. As noted above, with regards to stations entrances, these are transient areas for passengers entering and exiting the station. These activities are not the source of significant noise generation and form part of the existing soundscape in the existing prevailing environment. It is acknowledged footfall numbers will increase in the vicinity of the station entrance, however this activity does not translate to significant noise impacts. Finally, noise levels arising from the station during the operational phase will be required to adhere to limits to ensure that there are no significant effects.
40	Amenity Impacts	12	• The post completion permanent arrangement will result in significant rat running between Ranelagh Road and Grand Parade to the detriment of the residents on Dartmouth Road.	As presented in EIAR Chapter 4, Description of the MetroLink Project, the internal street between Grand Parade and Dartmouth Road will have barriered and controlled access, be speed restricted and traffic calmed, and be treated as a shared vehicular pedestrian space. This will prevent it from being used as a "rat-run". It is also of note that the modelling data shows there will be significant growth in public transport usage in trips to and from the city centre area, resulting in an increase of up to 43,000 public transport trips over the 12hr day. There will be a corresponding reduction of over 14,000 car trips along the alignment from Northwood to Charlemont, reducing demand on the road network. The provided interchange with the Luas Green Line at this location is also anticipated to reduce vehicle demand from the south of the city (via Ranelagh). During the operational phase, Dartmouth Road will have a new pedestrian crossing, one of which is located towards Ranelagh Road. The provision of this crossing will also act as a traffic calming measure on Dartmouth Road, deterring its use as a rat run.

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41	Amenity Impacts	12	• The overall impact of the both the construction and operational phases of the project, in terms of noise, vibration, visual impacts, traffic, HGV movement, construction activity, operational emissions, anti-social behaviour and general activity around the station will be such as to severely and permanently adversely affect the residential amenities of the residents listed in this submission. The impacts will be so severe as to evidently be in material contravention of the Dublin City Development Plan zoning objective for the area, which is Z2: "to protect and/or improve the amenities of residential conservation areas."	The impacts of the proposed project, both during the construction and operational phase have been assessed in the EIAR that accompanies the Railway Order, with mitigation measures proposed where necessary and practicable, to ensure impacts are within acceptable limits, noting that there will be a temporary groundborne noise significant impact when the TBM passes for approximately 2 weeks. While TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option for Dartmouth Road residents immediately adjacent to the construction site during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. As noted in Chapter 5 (MetroLink Construction Phase), the activities described and impacts anticipated are intended to represent the likely most significant environmental impacts for the construction work to be undertaken along the alignment (i.e. a reasonable worst case scenario). Therefore, it is possible that there will be durations of the programme where impacts will be less than those described. Additionally, the total duration of construction at this location will not consist entirely of 'major scale construction', as suggested in observation item (33). This overall construction duration of 102 months consists of access (1 month), enabling works (13 months), civils (71 months) and fit out, T&C and restoration (9 months). The above responses have also addressed in summary the impacts raised by this observation with the exception of anti-social behaviour. In this regard, the interchange will certainly increase the number of people passing through the area, however it is important to note that people will be using MetroLink, similar to Luas as a transport hub, moving quickly in and out of the area. The station will not be a destination attracting people to remain in the area. Further, TII have deliberately designed the Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used as a terminus. Regards the reference to the Z2 zoning objective. The zoning under the Dublin City Development Plan 2022 - 2027 for the residential properties in question is "Z2 Residential Neighbourhoods (Conservation Areas)" with an objective to "protect them from unsuitable new developments or works that would have a negative impact on the amenity or architectural quality of the area (See Table 3.11 of the submitted Planning Report). As outlined in Section 4.5.18.6 of the Planning Report, the element of the Project within the Z2 zoning area will affect a below ground area only and as such, with the proposed mitigation, will not have the kinds of negative impacts that the zoning objective seeks to protected against. The majority of the proposed Charlemont Station and all above ground elements are located within the lands zoned Z5 with the objective “To provide for the creation and protection of enterprise and facilitate opportunities for employment creation”. The Station has been designed so that it is integrated with the proposed redevelopment of this site by a third party development, and as such, demonstrates that the proposed Project is consistent with the zoning objective. The MetroLink station design does not result in any segregation of the area, with no surface barriers or walls proposed.
42	Property Issues	12	• Houses 32-35 are the subject of sub-stratum CPO • The development will inevitably impact upon the value of retained land/property • There will be a significant devaluation in property and the Board must refuse this element of the railway order. • Owners' costs of engaging in the process should be borne by TII	TII can confirm sub-stratum acquisition of land is sought below properties 32-35. Compensation for severance is not a matter to be taken into account in the grant of the RO, but is a matter for negotiation between TII and the affected landowners or, in default of agreement, reference to the Property Arbitrator.
43	Concluding statement	12	In summary, it is the view of us as owners of 33 Dartmouth Road that An Bord Pleanála should not be granting permission for the Metrolink Railway Owner. Therefore we request the following amendments: I. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel ii. Require the submission of a railway order for a section from Tara Street Station to St. Stephen's Green which would effectively provide for a terminal hub station which can effectively integrate with the Luas Green Line and future DART underground.	Please refer to responses (4) and (10) above.

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44	4. Cumulative Impact of Metrolink proposal on Residents of 33 Dartmouth Road Construction phase impacts, issues and planning remediation Construction phase impacts, issues and planning remediation	13	The diagram below is a visual manifestation of the Construction phase proposal sought by the Applicant, NTA/TII. This phase of the project is proposed to run for 102 months or ~9 years and with usual expected project delays will reach in over 10 years. We find such a proposal both inhumane and oppressive. To expect residents to have to endure living in a Construction compound for over 10 years with the associated noise, dirt, vibrations, disturbance, risk to property foundations, risk to personal safety and mental health is untenable. An Bord Pleanala has a responsibility to immediately reject such an absurd proposal.	TII would like to assure you that at no time will the safety of this property and its occupants be placed at risk, noting that the construction of the station will be monitored, including surrounding ground and building movements, with predetermined trigger levels aligned with action plans to ensure movements do not exceed acceptable levels. A 4m high hoarding will be in place for the duration of the works so that your property is segregated from the construction compound, noting that this hoarding will be moved back to the other side of Dartmouth Road upon the re-opening of Dartmouth Road after an estimated period of 30 months on completion of station piling and roof slab construction. As outlined in EIAR Appendix A5.2 Construction Programme Including Tunnel Elements, the proposed construction period will progress at this site for 8.5 years, with some minor advance works in advance of that. TII are of the view, as demonstrated by the detailed EIAR submitted that the environmental impacts have been carefully assessed and mitigation measures proposed where necessary. As detailed in the relevant environmental chapters and the Outline Construction Environmental Management Plan (CEMP) in Appendix A5.1, a significant suite of mitigation measures and monitoring has been proposed to mitigate the effects of this construction period so far as possible. TII would also note that while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option for Dartmouth Road residents immediately adjacent to the construction site during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. As noted in Chapter 5 (MetroLink Construction Phase), the activities described and impacts anticipated are intended to represent the likely most significant environmental impacts for the construction work to be undertaken along the alignment (i.e. a reasonable worst case scenario). Therefore, it is possible that there will be durations of the programme where impacts will be less than those described. Additionally, the total duration of construction at this location will not consist entirely of 'major scale construction', as suggested in observation item (33). This overall construction duration of 102 months consists of access (1 month), enabling works (13 months), civils (71 months) and fit out, T&C and restoration (9 months).
45	CONSTRUCTION PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	14	1. Dartmouth Road closure for 102 months ~9years	Dartmouth Road will not be closed for 9 years. The closure will take place in two stages, the total duration of which is 4 years, noting the first closure of 18 months will be partial . 1. Partial closure of Dartmouth Road to enable utilities to be diverted. Subject to Statutory Undertaker approvals (ESB, Eircom etc.) This process is estimated to take up to 18 months, while access is maintained along Dartmouth Road via a proposed single lane closure. 2. Full closure. Once the utilities have been diverted, the road is then shut to through traffic (pedestrian access is maintained) and is estimated to take up to 30 months to complete the piling, and roof slab of the station. The utilities and road will then be reinstated and the road reopened. Diversions will be put in place for local access, including deliveries, emergency services, bin collection, and pedestrian access maintained to all properties. The impacts on parking will be monitored during construction to reinstate any disrupted areas as soon as practicable. On completion of construction and reopening of Dartmouth Road, parking will be reinstated. During the closure of Dartmouth Road, approximately 30 on street parking spaces will be lost during the main works, however there will be no impact to on-street loading bays. EIAR Chapter 5, MetroLink Construction Phase specifies the 5 residential properties that will be impacted during the works. The closure will be monitored to determine if it is required at all points, or if the spaces can be temporarily reinstated temporarily throughout the works. Once the construction works are complete and Charlemont Station is operational, the remaining on-street spaces will be fully reinstated. As outlined in Appendix A5.1 Outline Construction Environmental Management Plan, the contractor(s) will be required to maintain emergency access routes throughout the construction phase. These will be developed in consultation with the emergency services and documented as part of the detailed CEMP(s). All required diversions will be appropriately signed, and a comprehensive publicity and information campaign will take place prior to the Commencement of works to minimise the severity of the impact.

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46	CONSTRUCTION PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	14	2. Hoarding placed 1M in front of our property at a height of 6.4M for ~9 years	TII confirm the proposed hoarding at the southern boundary of the site is 4m rather than 6.4m stated by the observation. This is presented in Chapter 13 (Airborne Noise and Vibration) section 13.6.1.2.4. Whilst Chapter 5 (MetroLink Construction Phase) does refer to an 'additional 4m tall noise screen' at select locations such as Charlemont, this is instead of the standard 2.4m hoarding, and not in addition to. The hoarding will only be there for the period of the full road closure, estimated to be 30 months, and will then be stepped back to the other sider of the road when Dartmouth Road is reopened. As previously noted, while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option for Dartmouth Road residents immediately adjacent to the construction site during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. As noted in Chapter 5 (MetroLink Construction Phase), the activities described and impacts anticipated are intended to represent the likely most significant environmental impacts for the construction work to be undertaken along the alignment (i.e. a reasonable worst case scenario). Therefore, it is possible that there will be durations of the programme where impacts will be less than those described. Additionally, the total duration of construction at this location will not consist entirely of 'major scale construction', as suggested in observation item (33). This overall construction duration of 102 months consists of access (1 month), enabling works (13 months), civils (71 months) and fit out, T&C and restoration (9 months).
47	CONSTRUCTION PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	14	3. Depth of excavations of Secant Piled walls 3M from our property	TII have assessed the impact of construction generated noise, vibration, and settlement. With mitigations in place there are no residual profound impacts, however as previously stated, relocation is an available option for Dartmouth Road residents immediately adjacent to the construction site during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. As noted in Chapter 5 (MetroLink Construction Phase), the activities described and impacts anticipated are intended to represent the likely most significant environmental impacts for the construction work to be undertaken along the alignment (i.e. a reasonable worst case scenario). Therefore, it is possible that there will be durations of the programme where impacts will be less than those described. Additionally, the total duration of construction at this location will not consist entirely of 'major scale construction', as suggested in observation item (33). This overall construction duration of 102 months consists of access (1 month), enabling works (13 months), civils (71 months) and fit out, T&C and restoration (9 months).
48	CONSTRUCTION PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	14	4. Depth of Construction compound 3M from our property for 9 years 5. 12 hour days with 24/7 working hours at times.	Please refer to response (47) above. TII would note that 33 Dartmouth Road is outside of the construction compound that will be bounded by a 4m high hoarding and that as noted by response (46) this will be in placed for an estimated 30 months before being set further back on the reopening of Dartmouth Road. Response (25) above outlines the approach to the limited night-time working proposed, noting that with the exception of the passing of the TBM for approximately 2 weeks no other significant impact is predicted.

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49	CONSTRUCTION PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	14	6. Traffic during Construction phase.	The EIAR has assessed the impact of construction traffic. TII modelling shows there will not be significant volumes of additional site traffic. Appendix A9.5 Scheme Traffic Management Plan details the proposed HGV routing associated with the construction works at Charlemont Station. Routing from the site is mainly via the R111 and R110, and routing to the site is via the R810 and R110. Alternative routing options via the R110/Kildare Road and the R110/R811 are also considered, all of which are part of the regional road network. Only when the full closure on Dartmouth Road is in place will construction traffic route via Dartmouth Road. Local modelling undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The longest delay occurs eastbound on Dartmouth Road during the AM peak of 14 seconds. Model outputs indicate that there will be a moderate increase in HGV movements during construction at this location. The most significant increase, of just over 2%, will be in both directions along Ranelagh Road/Charlemont Street, which is part of the regional road network. Elsewhere in the area, including local residential streets, increases are significantly lower. Please also refer to response (45) above.
50	CONSTRUCTION PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	14	7. Parking for residents of Dartmouth Road	TII can confirm parking will be removed for approximately 4 years for the reasons explained by response (45) above, rather than the 9 years stated by the observation.
51	CONSTRUCTION PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	14	The overall impact of the Construction phase of the project, in terms of noise, vibration, visual impacts, traffic, HGV movement, construction activity, around the Construction site will be such as to severely and permanently adversely affect the residential amenities of us the owners - residents of 33 Dartmouth Road. The impacts will be so severe as to evidently be in material contravention of the Dublin City Development Plan zoning objective for the area, which is Z2: "to protect and/or improve the amenities of residential conservation areas."	Please refer to response (41) above.
52	OPERATIONAL PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	15	1. Placing a major Station entrance opposite our house	TII do not agree that a profound impact will be experienced as a result of the location of the southern entrance. Stations entrances are transient areas for passengers entering and exiting the station. These activities are not the source of significant noise generation and form part of the existing soundscape in the existing prevailing environment. It is acknowledged footfall numbers will increase in the vicinity of the station entrance, however this activity does not translate to significant noise impacts. There will be no profound loss of amenity as a result of the proposed southern station entrance or the station, and as per the responses above, TII are of the view that the proposed development will have a long term positive affect in terms of property value. There is strong evidence to suggest that property values will in fact increase in close proximity to public transport infrastructure and that local residents will greatly benefit from having a world class metro system providing access to the city centre, airport and north city at their door step.

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53	OPERATIONAL PHASE PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	15	1. Traffic volumes given congested canal entrance will drive all traffic onto Dartmouth Road.	Transport modelling undertaken by TII does not show there will be a profound increase in traffic volumes. The MetroLink forms part of an integrated public transport network. The system is designed in an integrated manner so that people travelling from the area south of Dublin to access locations north of Charlemont, such as Dublin Airport, Mater, Swords etc. will utilise public transport to interchange with the MetroLink, or will walk or cycle to access their local station. The system is not designed to encourage people to drive to stations within the City and TII actively discourage people from doing so other than the Park & Ride station at Estuary. As presented in Appendix A9.2-B Traffic and Transportation Assessment Charlemont Station, when the Project is in place, there will be changes to mode share in the individual zones surrounding the Project. There is a reduction of approximately 830 car trips to and from the zones surrounding Charlemont Station (including Dartmouth Road) over the 12hr period in Scenario A 2065. In Scenario B 2065, there is a reduction of 410 car trips over 12hr period when the Project is in place. Car mode share will reduce by up to 5 percentage points in the zones surrounding Charlemont Station, including the Dartmouth Road area. In overall terms, the Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.
54	OPERATIONAL PHASE PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	15	2. Drop off-Pick up on Dartmouth Road especially to Airport from Dublin South population.	Please refer to response (53) above. Charlemont Station has been deliberately designed with no drop-off or pick-up on Dartmouth Road.
55	OPERATIONAL PHASE PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	15	3. Noise and light pollution from Metro entrance, tannoy.	Operational Noise and Vibration - please refer to response (39) above. Lighting Regards lighting during the operational phase, EIAR Chapter 4, Description of the MetroLink Project, section 4.12.8.3 explains the lighting class (and therefore the light level and uniformity targets) for each area to be lit, and has been selected using BS5489-1:2020 with account made for the local ambient lighting and environmental zones. All lighting within the station and at ground level will be designed to ensure that there is no significant light spill effecting nearby residential properties. Furthermore, as outlined in responses above, noise levels from the entrance canopy are not predicted to be significant. The following measures will be undertaken to ensure the quality of life of residents will not be effected by station lighting: • LED lights will be used instead of traditional lights to control light spill, in compliance with the Institute of Lighting Profession 'GN01 Guidance Notes for the Reduction of Obtrusive Light' document; • The use of luminaires will ensure that zero upward light is emitted; and • Lighting will be adjusted depending on a stations setting for example lighting columns on highways will be 12m high but lighting columns in or near residential areas will be 8m high.

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56	OPERATIONAL PHASE PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	15	4. Parking for residents on Dartmouth Road	There will not be a profound increase in parking requirements and alighting vehicles blocking residents for the reasons explained by responses (53) and (54) above.
57	OPERATIONAL PHASE PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	15	5. Anti social behaviour with 19 hrs per day 365 days a year major metro axis 10M from our family home.	The risk of anti-social behaviour has also been considered by the Project and is addressed by EIAR Chapter 6, MetroLink Operations and Maintenance. Section 6.6.5.8 specifically addresses how this will be managed, including how the architectural and urban realm design is designed to discourage anti-social behaviour, for example through the attractive setting, use of public lighting, open sight-lines, and avoidance of areas where individuals and groups of people can hide. As detailed in Chapter 4 (Description of MetroLink Project) at Charlemont, a landscape avenue of trees and low-level planting will segregate pedestrians from the road, creating a safer environment for pedestrian movement in this area. Additionally, the landscape design here consists of pockets of planting and strategically placed mature trees to integrate and soften the human experience within this zone. CCTV will also be installed throughout the MetroLink system, including at station entrances and the public realm to provide general security and surveillance of all the public areas subject to GDPR and Data Protection Impact Assessment. TII would also note Charlemont Station has been deliberately designed without drop-off (with the exception of a drop only for persons of restricted mobility on Grand Parade) and taxi pick-up areas. TII would also note that while the interchange will certainly increase the number of people passing through the area, it is important to note that people will be using MetroLink, similar to Luas as a transport hub, moving quickly in and out of the area. The station will not be a destination attracting people to remain in the area.
58	OPERATIONAL PHASE PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	15	The overall impact of the Operational phases of the project, in terms of noise, vibration, visual impacts, traffic, operational emissions, light pollution, anti-social behaviour and general activity around the station will be such as to severely and permanently adversely affect the residential amenities of us the owners - residents of 33 Dartmouth Road. The impacts will be so severe as to evidently be in material contravention of the Dublin City Development Plan zoning objective for the area, which is Z2: "to protect and/or improve the amenities of residential conservation areas."	Please refer to response (41) above.
59	OPERATIONAL PHASE PHASE IMPACTS ON OWNERS-RESIDENTS OF 33 DARTMOUTH ROAD	16	This submission supports the request made in the general area submission to omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel. In addition to the strategic planning reasons for the omission of this section of MetroLink, this submission clearly highlights that the EIAR fails to adequately assess impact of the development upon the houses on Dartmouth Road. The project would seriously affect the residential and other amenities of the residents of Dartmouth Road both during the construction and operational phases.	Please refer to response (10) above and response (60) below.

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60	5. Conclusion	16	The proposal to locate the City Centre terminus for a major transport interchange on a residential by-road off the heavily congested Canal is fundamentally flawed. The impact of such a proposal is a direct interference to our right to the peaceful enjoyment of our property at 33 Dartmouth Road and will result in a profound loss of amenity and property value during Construction and Operation phases. A proposal that subjects citizens to such profound loss of amenity by locking us into a Construction compound for a period of 10 years is inhumane. The Board has the responsibility to protect the integrity of planning in our City and to refuse strategically flawed projects that are wrong for the development of the City and also to safeguard residential zones and their associated amenities. The current Metrolink proposal in relation to the Charlemont Terminus is both strategically flawed and will profoundly damage our property and our residential community. We request to be given an opportunity to present to the Oral Hearing so that we can raise our concerns as listed in this Submission, and the CCG Dartmouth Road Submission and the CDCG General Community Submissions.	TII have responded to all the observations made by this submission and are of the view that the EIAR has correctly assessed the impacts of both the construction and operational phase, and proposed mitigation measures where necessary. TII do understand your particular concerns regards the proximity of 33 Dartmouth Road to the construction of the proposed Charlemont Station, and while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option during peak construction. As noted in Chapter 5 (MetroLink Construction Phase), the activities described and impacts anticipated are intended to represent the likely most significant environmental impacts for the construction work to be undertaken along the alignment (i.e. a reasonable worst case scenario). Therefore, it is possible that there will be durations of the programme where impacts will be less than those described. Additionally, the total duration of construction at this location will not consist entirely of 'major scale construction', as suggested in observation item (33). This overall construction duration of 102 months consists of access (1 month), enabling works (13 months), civils (71 months) and fit out, T&C and restoration (9 months). TII are available to discuss this option if that is something the property owner would like to explore and consider, noting that the southern boundary to the site will only be close to the property for the period of the full Dartmouth Road closure, estimated to be 30 months, and will then be stepped back to the other sider of the road when Dartmouth Road is reopened. TII would further note, as evidenced by TII's responses to the observations raised by this submission, that there will not be any profound impacts during the operational phase. TII do not agree that the location of Charlemont Station is fundamentally flawed, noting the rationale for the proposed Charlemont Station is explained by responses (4) and (5) above, and is in accordance with the strategic planning set out by the 2022-2042 GDA Strategy approved by the NTA and Minister for Transport. With regards property value, as noted above, TII are of the view that the proposed development will have a long term positive affect in terms of property value.