

Submission No.			081		
Organisation Name or Name of Submitter			Edward Kelly and Joyce MacRedmond		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: Railway METRO - Charlemont/Dartmouth Square Terminus. Case NO NA 29N.314724					
1	Letter	1	We the undersigned support the submission being made by McCabe Durney Barnes on behalf of the Charlemont / Dartmouth Square community and respectfully ask you to consider as follows:	TII have reviewed your submission and responded to the observations raised below. TII can also confirm they have responded to all other submissions received from An Bord Pleanála.	
2	1. A Misplaced Terminus	1	If you were building a cross city Metro and were asked to find a centre-city location for a Terminus, would you not want to actually put it in the city centre? How about in the middle of a historical residential suburb away from the city centre with little or no access to other transport services? Welcome to Charlemont.	<b>TII Rationale for the Proposed Charlemont Station</b> TII have carefully considered where the best location is for a southern interchange with MetroLink, and for the reasons set out below, the preferred location is a station 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 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."  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 Charlemon 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 current Transport Strategy 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 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.  The detailed analysis carried out for the Railway Order further confirms that 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. Further information is available in Chapter 7: Consideration of the Alternatives, section 7.7.8 MetroLink Southern Terminus Location.  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.  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).	

Submission No.			081		
Organisation Name or Name of Submitter			Edward Kelly and Joyce MacRedmond		
Item No.	Section Ref.	Page No.	Observation Statement		TII Response
Re: Railway METRO - Charlemont/Dartmouth Square Terminus. Case NO NA 29N.314724					
3	2. €650m for a 1km tunnel	1	Having determined that a centre-city Terminus would actually be better placed in the city centre, such as St Stephens Green or O'Connell Street, how would you feel about spending €650m of tax payer's money on a 1k tunnel to a suburb that already had a fully functioning train station and train line? Does that not appear like duplication? Welcome to Charlemont.		<p>The Board is not responsible for any decisions in relation to the funding the Project. It is solely responsible for assessing whether the Project is consistent with proper planning and sustainable development and that its effects on the environment are acceptable.</p> <p>The responsibility for funding the Project lies with the NTA, the Government and ultimately the Oireachtas. It has received all necessary approvals, including under the Public Spending Code for the making of a Railway Order. It will undergo further scrutiny and approvals, including under the Public Spending Code, before it is funded. It is not appropriate for the Board to make findings in relation to value-for-money that are outside its statutory functions and would cut across those arrangements. Members of the public are entitled to make representations to their TDs in relation to the value-for-money of any element of the Project.</p> <p>In any event, TII do not agree with this statement for the reasons set out by response (2) above, noting 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.</p> <p>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</p> <p>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).</p> <p>Further, to ensure that public investment delivers value for money, the Public Spending Code sets out requirements for the evaluation, planning and management of public investment. The preparation of a Business Case is a key element of meeting these requirements. The Public Spending Code requires that both the Preliminary Business Case and Final Business Case for public investment projects are published.</p> <p>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.</p>
4	3. Planning permission for the Terminus box?	1	Following the correct procedure, was the rail order to build the Metro infrastructure already in place when Hines built the Terminus' foundations at Charlemont for NTA? Eh, no. Was there a proper environmental impact study conducted before they proceded? Eh, no. Was there a comparative study of alternative Terminus locations? Eh, No. Welcome to Charlemont.		<p>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.</p> <p>It is not correct to say that alternative end of line transport interchange locations were not considered. A number of route options were considered in the process of identifying the Emerging Preferred Route (EPR).</p> <p>The station box location was not 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.</p> <p>It is also important to recognise that the station location at Charlemont is influenced by available vacant land and thus avoids unnecessary demolition.</p> <p>Responses (2) and (3) above explain the reasons a station at Charlemont is proposed and that there is no plan to replace the existing Luas Green Line infrastructure.</p>

Submission No.			081		
Organisation Name or Name of Submitter			Edward Kelly and Joyce MacRedmond		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: Railway METRO - Charlemont/Dartmouth Square Terminus. Case NO NA 29N.314724					
5	Letter	2	The adverse effects on the local area; traffic, noise, closure of Dartmouth Road for 8 1/2 years, disturbance from a 24/7 station in a quiet residential suburb, car/taxis dropping off people day and night with no where to park or drop off, well that's just something we'll have to deal with. Before all that happens, though, our request is this;	<p>TII have assessed the impacts of traffic and noise, both for the construction and operational phase, summarised below. TII would also note that construction will generally not take place 24/7, with the exception of some limited below ground sprayed concrete tunnelling works. The proposed working hours for the construction phase of the proposed Project (as per Section 5.2.4 of Chapter 5 of the EIAR) will be for all above ground works to progress Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 13:00. There will be a limited period of 24/7 working below ground to enable the construction of the sprayed concrete lined tunnel, with the associated above ground support activities enclosed within a sound insulated acoustic enclosure as discussed in Section 13.6.1.2.4 of the EIAR.</p> <p><b>Traffic</b> The MetroLink is designed to form part of an integrated public transport network with Charlemont selected as the preferred interchange location in order to maximise the potential interchange with the existing Luas Green Line. In overall terms, 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.</p> <p><b>Traffic - Construction Phase:</b> 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:</p> <ul style="list-style-type: none"><li>• 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);</li><li>• Increase in driver delays at junctions;</li><li>• Changes in traffic flows on surrounding streets; and,</li><li>• Additional distance travelled due to diversions.</li></ul> <p>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.</p> <p>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.</p> <p><b>Traffic - Operational Phase:</b> A microsimulation VisWalk model has been developed for the immediate area surrounding Charlemont Station during the operational phase. The model covers the full extent of the publicly accessible station area, including the immediate vicinity of the station entrance at street level, the Luas stop and nearby junctions at Charlemont Bridge. In order to accommodate the forecast demand from the proposed Charlemont Station, a new staircase with 2.4m stair width is proposed at the south east corner of Charlemont Luas stop. An elevator will also be provided at this location. Both are sized for MetroLink to Luas, and Luas to MetroLink passenger numbers. Please refer to Chapter 9: Traffic &amp; Transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, section 6.1.3. Pedestrian Impact Assessment.</p> <p>In addition, it is proposed that the pedestrian crossing on R111 Grand Parade will be repositioned to the front of the building being developed by Hines. With this infrastructure in place, the model indicates that the R111 Grand Parade will have an acceptable level of service overall, with some reductions in service seen at the pedestrian crossing where pedestrians are required to wait for a green phase at the signals. Overall, it is considered that the model displays an acceptable level of network performance. Chapter 9: Traffic &amp; Transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, section 6.1.3. Pedestrian Impact Assessment refers.</p> <p>The proposed pedestrian crossing on Grand Parade will have minimal impact on the traffic flow along Grand Parade and can be programmed to operate in sync with the existing signalised junction at Grand Parade /Charlemont Street to maintain the flow of traffic movements. 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. Chapter 9: Traffic &amp; transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, Section 6.1.2. refers.</p>	

Submission No.			081		
Organisation Name or Name of Submitter			Edward Kelly and Joyce MacRedmond		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: Railway METRO - Charlemont/Dartmouth Square Terminus. Case NO NA 29N.314724					
			Response (5) continued	<p>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.</p> <p><b>Noise</b> The EIAR presents a comprehensive and detailed assessment of both groundborne and airborne noise and vibration in Chapter 13 and 14 of the EIAR. The assessments include for predictive modelling in order to identify the potential impacts on all sensitive receptors during both the construction phase and the operational phase.</p> <p><b>Noise and disturbance during construction:</b> No profound impacts have been identified for residents during construction of the station and mitigation measures proposed will be effective at reducing the impacts on these properties and in general terms impacts will be associated with the construction phase only. Significant mitigation is proposed to include 4m high noise barriers and further proposed mitigation in line with the Airborne and Groundborne Noise Mitigation Policy. On the implementation of these measures the residual impacts are predicted to be moderate. However, 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.</p> <p>Chapter 14 of the EIAR assesses groundborne noise and vibration, with EIAR Appendix A14.5 Groundborne Noise and Vibration and Blasting Modelling Results presenting predicted groundborne noise and vibration levels during below ground construction. During TBM passage the predicted level of groundborne noise will be above the 45 dB LASmax threshold for a number of receptors above the runnel alignment, resulting in a significant impact on the building occupants during the relatively short 2-week duration of the TBM passage at a given location. The predicted vibration levels for TBM passage are well below human response thresholds during both day and night-time periods.</p> <p>Unfortunately there are no effective methods are available to reduce groundborne noise from TBMs at source. The principal mitigation measures aimed at minimising impacts are to give advance notice to residents of the timing of the TBM passage.</p> <p>There will additionally be a period of 24/7 working below ground to enable the construction of the sprayed concrete lined turnback intervention tunnel south of the proposed Charlemont Station, with the associated above ground support activities enclosed within a sound insulated acoustic enclosure as discussed in Section 13.6.1.2.4 of the EIAR. During the construction of the intervention sprayed concrete lined tunnels, residents above the proposed tunnel may experience disturbance.</p> <p>As outlined in Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy (Appendix A14.6) there is a process proposed whereby further mitigation measures including temporary relocation can be implemented at individual properties should this be merited.</p> <p><b>Noise and disturbance during operation:</b> 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 results in a not significant to slight impact when added to the prevailing noise environment.</p>	
6	Letter	2	(a) Ask the NTA/TII to lay out the assumptions underpinning the last part of their Metro plan from Tara St to Charlemont. Reflect on whether this really is the best option for a centre-city Terminus (even though its not in the city-centre) and inquire further when they tell you that St Stephen's Green (which is in the city-centre or close to) won't work because according to the independent engineers there is 'no technical reason why they can't use St Stephen's Green' and further that 'it seems like the most obvious place to put it'.	As identified in response to item 2 above a detailed and robust assessment has already been undertaken that has identified Charlemont as the preferred terminus/interchange location.	

Submission No.			081		
Organisation Name or Name of Submitter			Edward Kelly and Joyce MacRedmond		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: Railway METRO - Charlemont/Dartmouth Square Terminus. Case NO NA 29N.314724					
7	Letter	2	(b) In addition, in the interests of due process, transparency and adherence to the normal planning procedures that we are subject too and assume others are as well, can you satisfy yourselves that Hines, acting on behalf of the NTA, had permission to build the foundations for a Metro station before NTA/TII had (a) permission from the minister for transport, (b) a budget from the department of transport and or (c) rail order approval? Is there, for instance, any worldview In which a Metro station, particularly one as important as a Metro Terminus, could not be considered part of a rail order that has yet to be approved?	As explained by response (4) above, 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, whilst noting that the proposed station box location was not fixed by the Charlemont Development.  TII confirm that funding for the MetroLink Enabling works at Charlemont was approved and provided by the National Transport Agency (NTA) who are the Approving Authority for the MetroLink project.	