Submission No.	100
Organisation Name or Name of Submitter	Geraldine Ann Cusack and Geraldine O'Connell Cusack (7 and 7A Dartmouth Square West)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022 Case Reference Number NA29N. 314724				
1	Letter introduction	1	Firstly, in general, I am in favour of the broad aim of the Metrolink project to connect Dublin's city centre to our national airport. However, as a resident living in the Dartmouth/Charlemont area, I wish to set out several observations for the Board regarding the proposal to locate the Terminus station at Charlemont-Dartmouth.	Thank you for taking the time to make a submission and your overall endorsement of the MetroLink Project generally. We have reviewed your submission and responded to the observations made below.
2	Letter introduction	1	Both my home and my mother's home backs directly onto where the Terminus station is proposed to be located. Our homes on the western side of Dartmouth Square are covered by zoning Objective Z2 To protect and/or improve the amenities of residential conservation areas; the lands to the rear are covered by zoning Objective Z1 To protect, provide, and improve residential amenities. Currently, there is controlled parking on either side of Dartmouth Square West. Dartmouth Square is also covered by the Dartmouth Square ACA.	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 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 will not compromise the land use objective for the lands overhead. The majority of the proposed Station and all above ground elements are located within the lands zoned Z6 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. MetroLink will not impact the controlled parking on either side of Dartmouth Square West. TII recognise the importance of Dartmouth Square and its designated status as an Architectural Conservation Area (ACA). Mitigation measures for Architectural Heritage can be found in Table 26.66 of EIAR chapter 26 (Architectural Heritage). The only potential for direct impacts on the Architectural Heritage Areas (ACA) is related to the diversion of utilities on Dartmouth Square West. To minimise the impact on protected structures in Dartmouth Square such as historic granite steps, kerbing and lamp standards, works within the Dartmouth Square ACA will be overseen by the Project Conservation Architect (PCA) and carried out in accordance with a method statement prepared by PCA. The impact on Architectural Heritage in Dartmouth Square has been assessed to decrease to slight following mitigation. Additionally, Dublin City Development Plan 2022-2028 supports the Metrolink station at Charlemont in policy SMT22.
3	Letter introduction	2	The proposed link between St. Stephens Green and Charlemont cannot be justified in planning terms. Furthermore, it undermines the business case for the entire project and this 'Terminus at Charlemont' element should effectively be refused for the MANY reasons we outline below including: Construction Impacts - Noise and Vibration - Settlement & Subsidence - Hydrogeology - Phasing & Programme - Hours of Operation - Construction Compound - Traffic and Transport - Impact on Utilities - Human Health - Interactions of Effects Operational Impacts - Noise and Vibration - Hours of Operation - Traffic and Transport - Impact upon Amenities Conservation area property issues and wider residential community losses - Compulsory Purchase Order - Rear Lane - Properties - Devaluation of Properties - Temporary Relocation - Required Purchase at Market Value - Costs	TII have reviewed your submission and responded to each of the observations raised in connection with these items listed.

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4	Point 1	3	1. **Charlemont is the incorrect strategic location for a Terminus hub and spoke s**ystem as it is too far out along the Luas Green Line spoke and would prejudice future options for integration of networks and services. St. Stephens Green is the most appropriate location as it provides for interchange with bus, Luas, and future DART underground.	TII do not agree that Charlemont is the incorrect location for an interchange with the Luas Green Line or that it prejudices future options for integration with the wider transport network for the reasons set out below. 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 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 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 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 any of 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 alternative interchange at St Stephen's Green Station. Passengers wishing to interchange between Luas and metro at an alternative St Stephen's Green terminus would face a 500m-walk along a route either through St Stephen's Green park or along the footpath north of the park, which adds significantly to the time for interchange and therefore the overall journey time for passengers and a less positive customer experience for all interchange users. This passenger experience would be reduced further for those with mobility or visual impairments as well as those travelling to/from the airport with luggage. The detailed analysis done for the Railway Order application 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. The location of the interchange at Charlemont does not preclude onward extension south. An interchange at Charlemont is supported by policy including the Dublin City Development Plan 2022 - 2028 and the Transport Strategy for the Greater Dublin Area. 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).

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5	Point 1	3	The project incorrectly dismisses St. Stephens Green West as an appropriate terminal station. It only considers St. Stephens Green East and Charlemont. Furthermore, no Study has been completed by NTA/TII as part of the entire Metrolink project on the optimal location for a city centre terminus.	TII do not agree that St Stephen's Green is the most appropriate interchange location for the reasons set out by response (4) above. It is not correct to say that the Project "only considers St. Stephens Green East and Charlemont." A number of route options were considered in the process of identifying the Emerging Preferred Route (EPR). These route options included potential station locations on St. Stephen's Green West. St. Stephen's Green West was ruled out as 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 a 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with the MetroLink Fire Strategy. Further, 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 Luas operational 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. 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. 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, 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. Additionally, there is a strong level of interchange offered throughout the corridor at locations such as Glasnevin, O'Connell Street, Tara Street and St Stephen's Green, where many journeys on the MetroLink will 'terminate'. The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus take place. 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. Operationally, the Station will see people moving quickly in and out of the area, noting that it will act as an interchange, and has been deliberately designed with minimum set down space or room for taxis so that it does not encourage the Station to be used as a terminus. All operational environmental impacts are mitigated so they are not significant, while the impact on amenity will be permanent and positive. The proposed route alignment from Estuary to Charlemont is consistent and compliant with the GDA Transport Strategy 2022-2042 (published in January 2023) in which states that the south city terminus at Charlemont offers the optimal location for 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.
6	Point 2	3	2. Expensive Duplication of Rail infrastructure - The inclusion of an expensive and costly section between St. Stephens Green and Charlemont is strategically weak and duplicates the existing Luas Green Line services. NTA's cost estimate for this 1km section at C650M is an expensive duplication and significant investment that deprives other parts of Dublin that are in immediate need of rail infrastructure to support housing and urban development.	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. 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. In any case, TII do not agree with this statement for the reasons set out by response (4) 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.

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			Response (6) continued.	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. 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). 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. 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.
7	Point 3	3	3. **The station box at Charlemont,** as constructed in 2021/22 by the Developer Hines, does not have the benefit of planning permission and has not been part of the EIA undertaken for this project. Processing the current Railway Order application, which is reliant on these preliminary and now constructed works, is legally unsafe and contravenes the provisions of the EIA Directive.	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.
8	Point 4	3	4. T**he station box at Charlemont** will result in only one possible future tie in with the Luas Green Line to the south, which would result in an option that was previously dismissed as part of the Tie- In study from March 2017. No alternatives to the station box at Charlemont were considered as it had been fixed through the design of the overhead Hines Grand Parade commercial development. The implication of this new alignment is very significant on our wider community as it will involve top-down construction that will only be possible when many houses on Manders Terrace, Oakley Road and Charleston Road are demolished	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 that the current proposal is based on an option that was previously dismissed as part of the March 2017 Green Line tie in study. 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. 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. It is also important to recognise that the station location at Charlemont is influenced by available vacant land and thus avoids unnecessary demolition. The submission seeks to portray the construction of the Metro Enabling Works as prejudicial to future decisions on proper planning and sustainable development of the area. It implies that the counterfactual would have had no effect on such decisions. That is not the case. There was a planning conflict between the EPR and the Grand Parade Development at the time the latter development was proposed. There was no resolution to that conflict that was free of implications for future decisions on the proper planning and sustainable development of the area. The Board could have refused permission for the Grand Parade Development, inevitably creating a underutilised and potentially vacant and idle site in a commercial hub location. The Board could have granted permission with no provision to facilitate a station at this location, resulting in a requirement for the railway order to provide for the demolition of a new office building. The Board's actual decision was reasonable and lawful in seeking to minimise the prejudice to an important office development and a critical piece of national infrastructure. It was also not particularly restrictive of future decisions in relation to the proper planning and sustainable development of the area. Of the three options open at the date of the Grand Parade planning application, two remain open: the Board can still require changes to the station design that require the demolition of the commercial building and it can grant an order that avoids demolition by using the Metro Enabling Works.

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				It is agreed that the short-term implications for local residents will be significant as the scheme progresses through the construction stage, however the EIAR assesses the environmental impacts of the construction phase and commits to the implementation of appropriate mitigation measures that reduce the environmental impacts to not significant. The same is true of the operations phase for the project. TII will work closely with local residents to ensure the required mitigation measures are put in place. 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. In designing an extension, the promoter will seek to reduce the requirement for demolition by looking for tunnel launch sites at the southern extent of the scheme and, if one can be identified, driving the Tunnel Boring Machine northwards ultimately connecting into the existing tunnel. In that case, even if the new alignment were under the properties identified in the submission, the tunnel underneath them would be constructed by the Tunnel Boring Machine without the need for above ground works.
9	Point 5	3	5. The Environmental Impact Assessment is wholly inadequate in relation the description of development, alternatives, transport assessment, noise, and the cumulative effects of the development on the Charlemont-Dartmouth Community. For a project of this size, scale, investment to date, it is inadequate to propose a Railway Order with so many important studies and analysis missing.	TII do not agree that the Environmental Impact Assessment is inadequate. The Railway Order application comprises a very detailed environmental impact assessment that has identified and assessed the potential environmental impacts of MetroLink and proposed mitigations for these impacts where necessary. TII would also draw attention to the detailed project description, construction phase description and operational phase description provided in EIAR Chapters 4 and 5 and 6, and EIAR Chapter 7 and associated appendices that present details of alternatives considered. EIAR Chapter 9 and appendices provides a detailed analysis of transport and traffic effects, and EIAR Chapters 13 Airborne Noise & Vibration, and 14 Groundborne Noise & Vibration provide a detailed assessment of potential noise and vibration effects, while Chapter 29 outlines the assessment of interactions between various environmental aspects, and Chapter 30 covers the cumulative impacts with other projects. This assessment is carried out for the full length of the alignment including relative to potential significant effects on the Charlemont-Dartmouth Community.
10	Point 6	4	6. The development would result in noise and disturbance during the construction and operational phases and would result in a loss of amenities for the area.	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. **Noise and disturbance during construction:** No profound impacts have been identified for residents 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. **Noise and disturbance during operation:** 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. **Loss of amenity during construction:** EIAR Chapter 11, Population & Land Use provides an assessment of effects on community amenity during construction and operation, which relates to the interaction of impacts on air quality; visual amenity; traffic and transport; and noise and vibration. At this location during construction as outlined in Section 11.5.2 of Chapter 11, no impacts are identified on the retail sector or community and social infrastructure (e.g. schools or hospitals). Any severance/disruption to transport will be limited by site mitigation measures such as alternative routes reducing impacts to not significant.

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				Loss of amenity during operation: No significant residual negative impacts are anticipated on the Population and Land 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. 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 will not compromise the land use objective for the lands overhead. The majority of the proposed Charlemont Station and all above ground elements are located within the lands zoned Z6 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.
11	Point 6	4	The Traffic Study for the local Charlemont area is wholly inadequate as it omitted the modelling of the impact of Airport users coming to the only Dublin South Metrolink station at Charlemont. The Traffic Study uses a strategic, generalised regional model that does not take local factors into account. Extract from observation 7) below - The EIA did not properly assess the impact of additional local traffic volumes, rather they used a generalised regional model that does not take local factors into account. A key local factor at a Terminus station in Charlemont that runs to the Airport is the huge volume of anticipated airport users from Dublin South and greater Dublin/Leinster that will come to Charlemont via car or taxi with baggage for onward destination to the airport. Grand Parade and the residential area around Charlemont-Dartmouth cannot sustain the significant additional traffic volumes associated with this development	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 therefore do not agree with the observation that there will be a "huge volume of anticipated airport users from Dublin South and greater Dublin/Leinster that will come to Charlemont via car or taxi with luggage for onward destination to the airport" as this is not borne out by our transport analysis. The Transport Assessment for MetroLink includes for people travelling to/from Dublin Airport from all areas within the extents of the GDA area, therefore it is incorrect to say "The Traffic Study for the local Charlemont area is wholly inadequate as it omitted the modelling of the impact of Airport users coming to the only Dublin South Metrolink station at Charlemont". The NTA's Eastern regional Model (ERM) incorporates a wide range of data sources, including demographic data, land use data, transportation network data, and travel survey data. The system is designed to model a variety of transportation modes, including private vehicles, public transit, walking, and cycling, and to simulate the interactions between these modes. The ERM model has been validated and calibrated using a range of localised data sources to ensure that the model can accurately represent the transport network, these include public transport and vehicle counts from the canal cordon counts. The outputs from the model have been combined with local survey data to undertake the more localised modelling, such as the pedestrian impact assessments, or the local traffic signals. This does not support the observations made "The Traffic Study uses a strategic, generalised regional model that does not take local factors into account." or "The EIA did not properly assess the impact of additional local traffic volumes, rather they used a generalised regional model that does not take local factors into account." Regards the observation there will be a "huge volume of anticipated airport users from Dublin South and greater Dublin/Leinster that will come to Charlemont via car or taxi with luggage for onward destination to the airport. Grand Parade and the residential area around Charlemont-Dartmouth cannot sustain the significant additional traffic volumes associated with this development", this is covered by response (12) below.

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12	Point 7	4	7. The development would have an adverse impact upon traffic during the construction and operational phase, and it has not been properly designed and there is poor integration with other modes of transport. Pedestrian movements in and around the station would be difficult. Grand parade is an already heavily congested orbital route.	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. Construction Phase: 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. Operational Phase: 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 & Transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, section 6.1.3. Pedestrian Impact Assessment. 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. 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. 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 for a significant volume of car or taxi trips.

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13	Point 8	4	8. The development will have an adverse impact upon property values, particularly during the construction phase. For many houses in the area there will be a long-term and permanent adverse impact upon property values from noise of the operating rail infrastructure, vents, Tanoy systems, escalators, and large traffic volumes - vehicular and pedestrian using the station 19 hours per day. The adverse impact also extends to the loss of amenity for the wider community changing a quiet residential neighbourhood into a noisy, busy, congested major transport hub.	Response (10) above outlines the predicted environmental impacts with regards to noise and vibration, and amenity, while responses (9) and (10) summarise the assessed traffic and pedestrian impacts. TII would note that as explained by response (10) above that in overall terms Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips. TII do not agree that the development will have a long term and permanent negative affect. In fact 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. The benefits of the project for all communities along the MetroLink route are described in Chapter 3: Background to the MetroLink Project, section 3.4 MetroLink Response to Challenges.
14	Re: this Railway Order as it stands	4	■ We are seeking the removal of the Tara Street to Charlemont section of the rail order. ■ 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 Square 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 have also addressed the concerns raised with regards to the impact on residential amenities during both the construction and operational phase and explained how these will be managed so that no significant impacts are experienced. 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.
15	Re: this Railway Order as it stands	4	■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.	It is not uncommon for deep excavations to occur during construction works in urban areas. The excavation will be secured by hoardings for safety and to mitigate noise. As noted by responses (16) to (23) below, TII have assessed the impact of the excavation on your property. TII would also 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. This will be further supported by a vast suite of mitigation measures implemented at the site (as outlined in the Construction Environmental Management Plan (CEMP) in Appendix A5.1 of the EIAR to minimise all other impacts on residents. Responses (10) and (13) above explain that no significant loss of amenity is predicted or long-term devaluation of property.
16	Re: Construction Phase	5	■ The construction noise impact assessment is wholly inadequate as it fails to consider the internal noise impact over a 9-year period. The assessment of the effects of upon residential amenities is different between the construction stage and the operational phase. In the construction stage, there is no assessment upon the internal noise levels. I work full-time. I work through a blended remote working model for four days a week in my 'home office'. How am I expected to be able to work my full-time employment role for 9+years with all the combined noise impacts affecting the quality of my working environment? How does this project justify the intolerable levels of interference through loss of sleep, general ongoing daily disturbance and psychological impacts resulting in a detriment to human health for me and my neighbours who are also full time employed and work from home?	TII do not agree that the construction noise impact assessment is inadequate. Table 2.3 of EIAR Chapter 2, Methodology Used in Preparation of the EIAR explains the durations of effect utilised in the analysis throughout the EIAR. Please also note that the assessment provided in EIAR Chapter 13 Airborne Noise and Vibration provides for noise and vibration impacts over shorter durations to reflect the duration of the actual activity i.e. noise effects resulting from the construction will not last 9 years, but will last as long as the "noisy activity" lasts. These durations are outlined in Chapter 13 of the EIAR. The assessment undertaken in EIAR Chapter 14 Groundborne Noise and Vibration is also undertaken in line with best practice and is in line with all relevant guidelines and policy requirements as laid out in Section 13.2.2 of the EIAR. 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. Please also refer to response (10) above that summarises the assessed noise impacts, noting no profound impacts have been identified for residents and mitigation measures proposed will be effective at reducing the impacts on properties.

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17	Re: Construction Phase	5	■ The EIAR fails to properly assess the building damages from settlement and potential subsidence impacts of the tunnelling upon the 'conservation protected' houses along Dartmouth Square West.	TII do not agree. The EIAR has assessed the impact of construction generated ground movements as set out by EIAR Appendix A 5.17 Building Damage Report. With particular regards to Protected Structures, these properties have been designated as "special" and hence a further Phase 3 refined assessment will be undertaken that will 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. Monitoring instrumentation will also be installed to monitor the performance of the works and potential environmental impacts, including those discussed above to ensure that acceptable limits are not breached. TII would also note the Property Owner Protection Scheme (POPS), committed to by TII, allows residential property owners to register with TII if their residential property is within thirty (30) metres of the edge of the MetroLink alignment or fifty (50) metres of station structures. The POPS comprises condition surveys of residential properties along the route of the proposed Project. The purpose of the condition surveys is to ascertain the condition of the properties before, during (if deemed necessary), and after the completion of the proposed Project to determine whether there has been any deterioration of any of the properties surveyed and whether same may be attributable to the proposed Project, and subsequently to recommend repairs as appropriate. Condition survey data gathered pre and post construction, and possibly during construction, will be used to assist the property owner and TII in swift and accurate verification of any property damage claims which may be received from property owners. The POPS is designed to cater for / address repair work which may be necessary for any damage (attributable to the proposed Project) to a qualifying residential property up to a threshold of €45,000. The POPS will be introduced by TII through public consultation and will be formally advised to eligible property owners by the Public Relations Department. Further information on POPS is available in Chapter 11 (Population & Land Use). Useful information can also be found in the MetroLink Frequently Asked Questions document which can be found online at: https://www.metrolink.ie/en/your-property/property-owners-protection-scheme/ , and this is where useful updates will be made available as the proposed Project progresses.
18	Re: Construction Phase	5	■The hydrogeological impact assessment is inadequate as it has not been based upon local bore hole logs.	This statement is incorrect, local bore hole logs have been used to inform the hydrogeological impact assessment. Please refer to EIAR Figure 19.6 which identifies the location of the borehole at Charlemont. Pump tests were undertaken here and groundwater samples were taken (from 3 boreholes at this location) 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 EIAR Chapter 19, Hydrogeology, tables 19.35 and 19.41 and Charlemont subsection under section 19.5.3.6).

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19	Re: Construction Phase	5	■ Construction of the intervention tunnel will give rise to significant noise and disturbance, 24/7 during the period of its construction.	TII have carefully assessed the impact of construction noise and vibration for all aspects of construction, including the construction of the intervention tunnel, which will be mechanically excavated. With the exception of the passage of the TBM which will operate on a 24/7 basis and take approximately 2-weeks to pass 1 Dartmouth Square, there are no predicted adverse residual impacts from any other activity once noise and vibration mitigation measures have been implemented. A summary of the predicted noise and vibration impacts is provided below. Construction Noise and Vibration Potential impacts identified due to airborne noise and vibration are presented in EIAR Chapter 13. Noise mitigation proposed for works at Charlemont Station are summarised in Section 13.6.1 of the EIAR and include for boundary hoarding around the working area, including a 4m high hoarding at the southern boundary, increasing to 7m high on the northern boundary. In addition, the above ground support works for sprayed concrete tunnelling works will be enclosed within an acoustically clad steel framed building to control noise breakout to surrounding receptors. With the proposed noise mitigation measures, the assessed residual impacts during the construction of Charlemont Station are set out in Table 13.90, indicating that noise impacts at 7 Dartmouth Square will be reduced to Moderate. EIAR Appendix A14.5, Groundborne Noise and Vibration and Blasting Modelling Results, 14.4 Section AZ4 Northwood to Charlemont presents the predicted groundborne noise and vibration levels during TBM passage for various sensitive receptors. The predicted level of groundborne noise during TBM passage at 7 Dartmouth Square West is 46 dB LASmax which is just above the 45 dB LASmax threshold level, 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. During mechanical excavation, groundborne noise is predicted to be 37 dB LASmax, which is below the 40 dB threshold for MEchanical excavation, indicating no significant impacts during this activity. The predicted VDV (Vibration Dose Value is a parameter that combines the magnitude of vibration and the time for which it occurs) during TBM Passage during the day and night at 7 Dartmouth Square West this is 0.22ms-1.75 (VDV day) and 0.185ms-1.75 (VDV night) respectively. Both of these values are lower than the VDV Threshold Levels of 1.0ms-1.75 (VDV day) and 0.5ms-1.75 (VDV night). Levels of vibration during mechanical excavation of Charlemont Station are predicted to be 0.002ms-1.75 for both day and night-time periods, which are also lower than the VDV Threshold Levels of 0.8 ms-1.75 daytime and 0.4 ms-1.75 night-time, resulting in a not significant impact on the building and its occupants. The threshold levels have been set in relation to human response to vibration, and thresholds for building damage are much higher. As the predicted levels of vibration from TBM passage and mechanical excavation are below these thresholds, no impact is predicted for either the building or for residents of this address. Predictions of vibration during blasting at Charlemont Station have also been made. For 7 Dartmouth Square West a vibration level of 5.6mm/s PPV (Peak Particle Velocity) is predicted compared to the threshold level for this building of 8mm/s resulting in no potential significant impact. The air over pressure is predicted to be 109.5 dB, which is also below the threshold level of 125 dB indicating no significant impact. Owing to the nature of the sprayed concrete intervention tunnel construction and to ensure a safe and stable method of excavation, and to minimise settlement impact, 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. As noted above, it is proposed that 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. 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.
20	Re: Construction Phase	5	■ The construction phase is a medium-term effect which has not been properly considered in the EIAR.	It is not correct to say that the construction phase has not been properly considered in the EIAR. Please refer to EIAR Chapter 2, Methodology Used In Preparation of the EIAR, Table 2.3 where the durations of effect utilised in the analysis throughout the EIAR are referenced. Please also note that the assessment in EIAR Chapter 13, Airborne Noise and Vibration has allowed for 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. These durations are outlined in EIAR Chapter 13.

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21	Re: Construction Phase	5	■ Intolerable traffic will be generated during construction with HGV traffic on quiet residential roads will have a severe impact upon amenities.	Responses (11) and (12) explain why "intolerable traffic" will not be generated by MetroLink. Further, EIAR Appendix A9.5 Scheme Traffic Management Plan details the anticipated HGV movements at each station. At Charlemont Station, it is anticipated that vehicle movements will generally range between 20 to 50 per day, however there are a number of weeks with daily vehicle movements lower than this range. The maximum number of daily movements is 210 for a duration of two days only. Associated traffic increases on Grand Parade and Northbrook Road as a result of closures and temporary signals will not translate to 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. HGV routing to and from Charlemont Station is predominantly via the regional road network (such as the R111, R110, R810 or R811), mitigating any impact to local roads. Localised construction traffic routing to and from the site accesses will require consideration of local traffic considerations. All traffic management plans and HGV routings will be agreed by the Contractor with DCC and relevant stakeholders prior to any works. Traffic noise has also been modelled and assessed in EIAR Chapter 13, Airborne Noise and Vibration as outlined in Table 13.72. Traffic noise during the peak of the construction period will increase by just 1.1dB (above the do minimum scenario).
22	Re: Construction Phase	5	■There will a severe impact upon human health which has not been properly assessed.	TII disagree that there will be "a severe impact upon human health which has not been properly assessed". The assessment undertaken in EIAR Chapter 10, Population and Human Health, has been undertaken in line with best practice and all relevant guidelines and policy requirements as outlined in section 10.3.2. The chapter identifies human beings as being sensitive due to their age, health status or for other reasons. The approach used in the assessment is to present residences, schools, workplaces and places of worship as "highly sensitive" as identified in section 10.3.4.2. The EIAR has taken full regard to the construction phasing with the health assessment based on the modelling and assessment outputs of a number of EIAR chapters (see Table 10.3), including Chapter 9 Traffic and Transport, Chapter 11 Population and Land Use, Chapter 12 Electromagnetic Compatibility and Stray Current, Chapter 13 Airborne Noise & Vibration, Chapter 14 Groundborne Noise & Vibration, Chapter 16 Air Quality , Chapter 18 Hydrology, Chapter 19 Hydrogeology and Chapter 20 Soils and Geology. Please refer to response (23) below for details of impacts anticipated on Dartmouth Square as a consequence of the Project and proposals for mitigation where required.
23	Re: Construction Phase	5	■ The proposed rail order does not mitigate the profound impact that the proposed scheme will have on residents of Dartmouth Square given the associated scale and time period of the proposed development	TII disagree and consider that the analysis presented in the EIAR does not support this statement. As noted by response (9) above, the Railway Order application comprises a very detailed environmental impact assessment that has identified and assessed the potential environmental impacts of MetroLink and proposed mitigations for these impacts where necessary. No profound impacts have been identified for the residents of Dartmouth Square 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, as summarised below: (1) EIAR Chapter 9 Traffic and Transport outlines that after mitigation measures have been implemented there will be a residual long term slight impact on pedestrians as there will be more pedestrians in the area. However the use of existing footpaths will be at "acceptable comfort levels". There will be no other residual impacts either in the construction or operational phase related to traffic or transport. Please also refer to response (12) above. (2) EIAR Chapter 10 has identified that from the Human Health perspective, there may be 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". These effects are also addressed in EIAR Chapter 13 Airborne Noise and Vibration where mitigation measures are proposed including 4m high noise barriers and further proposed mitigation in line with the Airborne and Ground borne Noise Mitigation Policy at No's 10 and 11 Dartmouth Square. On the implementation of these measures the residual impacts are predicted to be reduced to moderate.

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				(3) EIAR Chapter 13, Airborne Noise and Vibration outlines that mitigation measures proposed include 4m high noise barriers and further proposed mitigation in line with the Airborne and Ground borne Noise Mitigation Policy at 10 & 11 Dartmouth Square. On the implementation of these measures the residual impacts are predicted to be reduced to moderate. (4) Chapter 14 assesses groundborne noise and vibration and identifies a residual impact on Dartmouth Square West of significant during the advancement of the TBM. However, this will be for a limited duration (c.2 weeks and advance notice will be provided to assist with managing this impact). Residual effects from other construction phase activities are not considered significant following the implementation of mitigation measures. (5) Chapter 16 Air Quality identifies that there will be no significant effects once mitigation measures are implemented. (6) Chapter 21 Land Take has identified a significant effect on Dartmouth Square properties due to the requirement for temporary land take for construction and for the erection of noise barriers. However this land will be for a limited duration (not greater than 6 months) and fully reinstated following the completion of the construction phase. Please also refer to response (27) below. (7) Chapter 26 of the EIAR identifies the potential for impacts on Dartmouth Square ACA due to enabling works entailing the redirection of utilities. These works will be managed in accordance with a method statement prepared by the Project Conservation Architect in order to minimise any effects on the historical granite steps, kerbing and lamp standards. The impacts following the implementation of these mitigation measures is assessed to be slight. (8) Chapter 27 identifies potential landscape and visual effects after mitigation associated with the construction phase. These are moderate and negative for the effects on the landscape amenity and slight and negative for the visual effects.
24	Re: Operational Phase:	5	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.	EIAR Chapters 13 and 14 present a comprehensive and detailed assessment of groundborne and airborne noise and vibration. The assessments include for predictive modelling in order to identify the potential impacts on all sensitive receptors during the operational phase. 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. 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.
25	Re: Operational Phase:	6	Proposed design will result in significant rat-running between Ranelagh Road and Grand Parade to the detriment of the residents on Dartmouth Square West.	The assessed impacts on traffic are covered by response (12) above. It is assumed the observation's reference to "rat-running" is with regards the provision of the internal street between Grand Parade and Dartmouth Road. This will be treated as a shared vehicular pedestrian space, access to it will be barrier controlled, and it will be traffic calmed and speed restricted to make it unattractive as a rat-run. In addition, the modelling data shows that 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. As a result 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 two new pedestrian crossings, one of which is located towards Ranelagh Road. The provision of this crossing will also act as a traffic calming measure on Dartmouth Road, further deterring its use as a rat run.

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26	Re: Operational Phase:	6	■ 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 and would 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 responses above address the subject matter raised by this observation with the exception of anti-social behaviour. The risk of anti-social behaviour has 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. Subject to data protection impact assessment and compliance with the General Data Protection Regulation (GDPR) 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. 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. TII do not agree that the Project is "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." for the reason explained by response (9) above. ALG: As noted by response (3), Dublin City Development Plan 2022-2028 supports the Charlemont interchange
27	Re: Property Issues	6	■ The permanent acquisition of part of the rear laneway will legally impede rights of access to the rear of properties. ■ The permanent loss of part of the laneway will inevitably impact upon the amenity and value of retained land/property.	TII can confirm there is no permanent acquisition of part of the rear laneway to the rear of properties. Access to the laneway to the rear of Dartmouth Square West will be maintained, apart for a 33m metre section of the lane to the rear of No.'s 11- 15 which will be occupied by the contractor for a period of 6 months to facilitate construction of part of the MetroLink station box. Accordingly 7 and 7A Dartmouth Square will not permanently lose access to the laneway. TII do not agree that the development will have a long term and permanent negative affect. In fact 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.
28	Re: Property Issues	6	■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	Please refer to response (27) above regards property value. Where a property owners interests is required either permanently or temporarily for the MetroLink Project, compensation will be paid in accordance with the compensation code. The compensation includes for all reasonable fees and costs properly incurred in consequence of the purchase from TII. Further details on the MetroLink Compulsory Purchase Order (CPO) Guideline can be found at: https://metrolink.ie/media/0jlpbyso/metrolink_cpoguideline_final_september-2022
29	Concluding observations	6	We request amendments in relation to the OMISSION of the section between Tara Street and Charlemont and the making of a separate railway order application for a section between Tara Street and St. Stephens Green. The EIAR is wholly inadequate and does not properly, coherently, and cohesively assess the combined and interacting impacts of the proposed development.	The above responses, including (4), (5), and (14) above, have addressed why TII are of the view that this Railway Order application should include the section of alignment between Tara and Charlemont. TII, for the reasons noted by responses (9) and (23) above, do not consider the EIAR is inadequate.
30	Concluding observations	6	My family's specific concerns for this proposed (and present construction/investigative activities already taking place) are being treated as inconsequential for our livelihoods. Our close-knit and very supportive community of families in this cultural heritage residential zone and catchment area of the Charlemont Luas station are being ignored in this Railway Order. We also have founded concerns that this major interchange station would attract anti-social behaviour for up to 19 hours a day. The law enforcement strategy is not equipped nor has the required resources allocated to such upheaval in a change on community circumstances. The potential for late night arrivals, taxi pick-ups, drop-offs and anti-social behaviour would destroy the present community amenities and alter the well managed present nature of the area.	TII do not consider your concerns are inconsequential, and TII do understand why you have these concerns. TII have undertaken a detailed environmental impact assessment, as evidenced by the responses above, to ensure the concerns and observations that you have raised, including those summarised by this observation, have been addressed so that no profound impacts result for the residents of Dartmouth Square.

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Re: Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022 Case Reference Number NA29N. 314724				
31	Concluding observations	7	We need to be heard and professional due diligence conducted on our behalf regarding this completely inappropriately proposed Terminus location at the Charlemont Luas station. How and why has this Charlemont location been so ineptly strategically located for a Terminus hub and spoke system in such an inappropriate and unreasonable location - this needs to be transparently identified and articulated by An Bord Pleanála.	Responses (4) and (5) explain the rationale for the proposed location of Charlemont Station.
32	Concluding observations	7	The Environmental Impact Assessment as assessed by professional Planning experts, McCabe Durney Barnes is wholly inadequate in relation the description of development, alternatives, transport assessment, noise, and the cumulative effects of the development on the Charlemont-Dartmouth Community. For a project of this size, scale, investment to date, it is inadequate to propose a Railway Order with so many important studies and analysis missing.	TII, for the reasons noted by responses (9) and (23) above, do not consider the EIAR is inadequate.
33	Concluding observations	7	As a direct result of the inadequacy of this EIA, Charlemont has gained an erroneous level of traction when St. Stephen's Green is a far superior location. St. Stephen's Green is predominantly a commercial area (Charlemont is predominantly residential.) notwithstanding the obvious advantages in terms of cost-effectiveness and accessibility.	Responses (4) and (5) explain the rationale for the proposed location of Charlemont Station, and response (6) explains the cost-benefit this section of the alignment delivers for the MetroLink project.
34	Requested amendment to An Bord Pleanála	7	We request the following amendments: 1. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel. 2. Require the submission of a railway order for a section from Tara Street Station to St. Stephens Green to provide for a terminal hub station that can integrate with the Luas Green Line, multiple bus routes 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.