Submission No.			105			
Organisation Name or Name of Submitter			Godfrey Gillett			
Item No.	Section Ref.	Page No.	Observation Statement	TII Response		
e: Railway	(Metrolink-Est	uary to Ch	arlemont via Dublin Airport) Order 2022 Case Refernece Number NA29N.314724	16 January 2023		
1	Letter	1	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 a number of observations for the Board regarding the proposal to locate the terminus station at Charlemont-Dartmouth. My family home abuts the site of the proposed location of the Terminus station.	Thank you for taking the time to make a submission and your overall endorsement of the MetroLink Project. We have reviewed your submission and responded to the observations made below.		
2	Letter	1	1. Charlemont is the incorrect strategic location for a Terminus hub and spoke system as it is too far out along the Luas Green Line spoke and would prejudice future options for integration of networks and services.	Ill 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 of fiers 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 on as to provide an integrate public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and 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 deci		
				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 thoverall benefits of the scheme and the effect of these benefits outweigh the additional costs that are associated with the delivery and operat of the section from St Stephen's Green to Charlemont station. Further information is available in Chapter 7: Consideration of the Alternative 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 poincluding the Dublin City Development Plan 2022 - 2028 and the Transport Strategy for the Greater Dublin Area. As noted by the GDA Transport Strategy 2022-2042, 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."  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		

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3	Letter	1	St. Stephens Green is the most appropriate location as it provides for interchange with bus, Luas and future DART underground. The project incorrectly dismisses St. Stephens Green West as an appropriate terminal station. It only considers St. Stephens Green East and Charlemont. Furthermore, no comprehensive study or investigation has been completed by NTA/TII as part of the entire Metrolink project on the optimal location for a city-centre terminus.	Till do not agree that St Stephen's Green is the most appropriate interchange location for the reasons set out by response (2) 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 (EPP). These route options included potential station locations on St. Stephen's Green West. A station on St. Stephen's Green West is not preferred for several reasons:  If a station was placed on St Stephen's Green Rest, 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 Metrotink Fire Strategy. Additional out the station of the intervention shaft located somewhere between these stations to comply with the Metrotink Fire Strategy. Additional out by the GDA Transport Strategy 2022 – 2042. Should a station and interchange with the Luas Green Line at Charlemont, as set out by the GDA Transport Strategy 2022 – 2042. Should a station be placed on St Stephen's Green West, the alignment between a station located here and the proposed Charlemont Station would also result in an undesirable horizontal reverse curve and an alignment that is greater than 100m long, and would thus again require an intervention shaft is mile rot the proposed Albert College Park Intervention shaft to be provided. This would be expected to result in significant demolition and redevelopment in an existing built-up area.  In both cases, compared to the proposed allignment that runs much more directly between Tara, St Stephen's Green and Charlemont, the additional length of tunnel and the addition of two intervention shafts generated by locating a station on St Stephen's Green West is successful as the station of the station of the park that has greater amenity valu		

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				The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus (train sideways, carparking etc) take place. At this location the high capacity public transport offering terminates and the public transport offering transfers to a completely different mode, i.e. Bus or car. The environmental effect of the Metrolink terminus are accordingly assessed in the EIAR. Charlemont Station does not have the associated infrastructure and services associated with a terminus location and in fact has more in common with a "system turn back location". Charlemont Station is located within an area of high public transport accessibility, linking with the Luas Green Line which offers reasonably similar levels of services and frequency for journeys to and from the south of Dublin. As such, public transport service offering is not considered to terminate, but transfers onto the similar service offered by the Luas Green Line, forming part of a transport corridor running from Cherrywood to Estuary. The associated environmental impacts for the turnback and station at Charlemont have been fully assessed in the EIAR.  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, as detailed in response item (2) above. 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 i				
4	Letter		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 €650M 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 has received all necessary 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 event, Till 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.  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 / 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 fortecast 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 ad				

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5	Letter	1	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.	
6	Letter	1	4. The 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, sited above the proposed box.  The implications of this new alignment has significant impact on our wider community as it will involve top-down construction that will only be possible when several 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. In 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 Fanbling Works were constructed to enable the Charlemont Development to proceed whist simultaneously ensuring there was an option available to construct a station at Charlemont that avoided unnecessary demolition, took advantage of an available size, provided infrastructure that is integrated with planned development rather than establishing the control 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. It implies that the counterfactual would have ha	

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7	Letter	2	5. The Environmental Impact Assessment is 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.	Till do not agree that the Environmental Impact Assessment is deficient, inadequate or missing information. 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. Till 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 a detailed analysis of transport and traffic effects, and EIAR Chapters 13 Airborne 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.		
8	Letter		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 infrastructural (11) Airborne 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.  Loss of amenity 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 router reducing impacts to not significant.  Loss of amenity during operation:  No significant residual negative impacts a		

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9	Letter		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) - 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 luggage for onward destination to the airport. The is no space for a bus terminus or taxi rank. 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 Til actively discourage people from doing so other than the Park & Ride station at Estuary. Till 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 wehicle 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 subport	
10	Letter	2	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.	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.  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.	

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				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.  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	
11	Letter	2	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, operational noise and signals, 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 residential neighbourhood into a noisy, busy, congested major transport hub. Houses along Dartmouth Square West (including our own) will lose access to the lane at the rear of our properties, abutting the site.	Response (8) 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. Till 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.  Regards devaluation, 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 doorstep. 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.  Access to the laneway to the rear of Dartmouth Square West will be maintained, apart for a 33m section of the lane to the rear of N0 11- 15 which will be occupied by the contractor for a period of 6 months to facilate construction of part of the station box.	

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12	Letter	2	Accordingly, we are requesting the following amendments of An Bord Pleanála:  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 which would effectively 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.		