

Submission No.			114	
Organisation Name or Name of Submitter			Helena Kelly	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022 Case Refernece Number NA29N.314724 13/01/2023				
1	Letter	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 a number of observations for the Board regarding the proposal to locate the terminus station at Charlemont-Dartmouth. My family home is in the midst of the community where the Terminus station is proposed to be located.	Thank you for taking the time to make a submission and your overall endorsement of the MetroLink Project with the exception of Charlemont Station. We have reviewed your submission and responded to the observations made below.
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.	<p>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.</p> <p>The connection from St Stephens Green to Charlemont / Ranelagh is supported by the previous Transport Strategy for Greater Dublin Area (2016-2035) and the current Transport Strategy for Greater Dublin Area (2022-2042). The latter considers a range of options for the onward extension of MetroLink to meet the demand for travel over the period of the strategy. This includes consideration of the need for the upgrade of the Luas Green Line to metro with a metro extension to Dublin south west, south or south east. Whilst the strategy envisages that further extensions will be delivered after 2042, MetroLink which terminates at Charlemont allows for the possible extension of the metro in all the above directions.</p> <p>The proximity of the metro to the Luas line at Charlemont provides for a positive customer experience for all users with short interchange distance and due to the proximity, clear wayfinding and high visibility of the interchange. The interchange arrangements at Charlemont provide for significantly better interchange arrangements compared to an interchange at St Stephen's Green Station.</p> <p>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.</p> <p>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. 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."</p> <p>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.</p> <p>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).</p>

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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.	<p>TII do not agree that St Stephen's Green is the most appropriate interchange location for the reasons set out by response (2) above.</p> <p>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. A station on St Stephen's Green West is not preferred for several reasons:</p> <p>If a station was placed on St Stephen's Green West, the alignment between the proposed Tara Station and a station on St Stephen's Green West would result in an undesirable horizontal reverse curve and an alignment greater than a 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with the MetroLink Fire Strategy. Additional construction would be required to provide such a facility, similar in size to the proposed Albert College Park Intervention shaft. This could feasibly be situated in the Trinity College Dublin sports grounds.</p> <p>TII note that it is Government policy to provide a station and interchange with the Luas Green Line at Charlemont, as set out by the GDA Transport Strategy 2022 – 2042. Should a station be placed on St Stephen's Green West, the alignment between a station located here and the proposed Charlemont Station would also result in an undesirable horizontal reverse curve and an alignment that is greater than 1000m long, and would thus again require an intervention shaft similar to the proposed Albert College Park Intervention shaft to be provided. This would be expected to result in significant demolition and redevelopment in an existing built-up area.</p> <p>In both cases, compared to the proposed alignment that runs much more directly between Tara, St Stephen's Green and Charlemont, the additional length of tunnel and the addition of two intervention shafts generated by locating a station on St Stephen's Green West is uneconomic in comparison.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Arising from the decision to postpone the future upgrade of the Green Line to metro services, it is being argued that Charlemont station effectively becomes a terminus station in the short to medium term. In this regard, it is true to say that the Metrolink trains will terminate and turn back at Charlemont station, however the public transport service offering for passengers does not terminate, it transfers from Metrolink to LUAS as part of the integrated transport network.</p>

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			Response (3) continued	<p>The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus take place. At this location the high capacity public transport offering terminates and the public transport offering transfers to a completely different mode, i.e. Bus . The environmental effect of the Metrolink terminus are accordingly assessed in the EIAR. Charlemont Station does not have the associated infrastructure and services associated with a terminus location and in fact has more in common with a “system turn back location”. Charlemont Station is located within an area of high public transport accessibility, linking with the Luas Green Line which offers reasonably similar levels of services and frequency for journeys to and from the south of Dublin. As such, public transport service offering is not considered to terminate, but transfers onto the similar service offered by the Luas Green Line, forming part of a transport corridor running from Cherrywood to Estuary. The associated environmental impacts for the turnback and station at Charlemont have been fully assessed in the EIAR.</p> <p>Charlemont station itself was chosen on the basis of its interchange potential with Luas, as well as local bus services, as outlined above. The section of the line between St Stephen's Green and Charlemont generates considerable benefits for the scheme in terms of increased patronage. The fact that the Charlemont Station is now being referred to and considered as a “terminus station” rather than an interchange station, does not increase the environmental impacts the station has on its local environment, in terms of passenger demand, airborne noise. vibration and other environmental effects.</p> <p>If the scheme were to terminate at St Stephen’s Green, it would be important to determine where the next station south of St Stephen’s Green would be located for a future extension as required in the Draft Transport Strategy for Greater Dublin Area (2022-2042). With single bore tunnel configuration, the maximum distance between stations is 1,000m. If the distance between stations extends beyond 1,000m there is a need for an intervention shaft or separate escape tunnel. Selecting a different station location other than Charlemont within a 1,000m arch south of St Stephen’s Green Station will be challenging given the limited space available for a station within this area and it is reasonable to assume that the Station may be located outside the 1km arch, thus requiring the construction of an intervention shaft similar to that currently proposed at Albert College Park between St Stephen’s Green and the proposed station location.</p> <p>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.</p>

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4	Letter	1	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 urgently required housing and urban development.	<p>TII do not agree with this statement for the reasons set out by response (2) above, noting that infrastructure is not being duplicated given the capacity of the Luas south from St. Stephen's Green is restricted due to on-street running.</p> <p>There is a limit to the potential of the Luas to provide additional capacity in the on-street non-segregated section of the Luas Green Line from Charlemont northwards through the city centre. The nature of this route and the fact that it currently crosses several road junctions (Adelaide Road, Harcourt Street / Hatch Street upper and Harcourt Street / St Stephen's Green south) limit the service to a maximum of 24 trams per hour per direction. The projected demand for this section would require a higher frequency of up to 30 trams per hour and this demand cannot be met with on-street systems (Luas / bus). The interchange between Luas and MetroLink proposed at Charlemont will provide the necessary capacity to address the demand on this corridor and reduce overall travel time for passengers</p> <p>There is also high passenger demand forecast for a Metrolink station at Charlemont, including from the Ranelagh area, which would be lost if St. Stephen's Green was the MetroLink southern interchange station. The additional fare revenues collected by the Charlemont Station interchange increase the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ration (BCR).</p> <p>Further, to ensure that public investment delivers value for money, the Public Spending Code sets out requirements for the evaluation, planning and management of public investment. The preparation of a Business Case is a key element of meeting these requirements. The Public Spending Code requires that both the Preliminary Business Case and Final Business Case for public investment projects are published.</p> <p>In July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a railway order application by TII to An Bord Pleanála in respect of the MetroLink project (Decision Gate 1). This approval was granted after the Preliminary Business Case (PBC) had undergone significant scrutiny and challenge by bodies that are independent of TII, including DoT and DPER review (including independent review by JASPERS and the Major Projects Advisory Group (MPAG)) of the PBC around timeline, costs and benefits that were updated to inform the Government decision.</p>
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.

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6	Letter	1	<p>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.</p> <p>The implications 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.</p>	<p>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.</p> <p>The station box location was not fixed by the Charlemont Development. The preferred route for MetroLink was published in March 2019 following a comprehensive route options study. The preferred route was based on the emerging preferred route for the scheme which included a station at Charlemont. The Charlemont Metro Enabling Works were constructed to enable the Charlemont Development to proceed whilst simultaneously ensuring there was an option available to construct a station at Charlemont that avoided unnecessary demolition, took advantage of an available site, provided infrastructure that is integrated with planned development rather than necessitating later changes and retrospective adjustments to a new development or even possible demolition of the new development, whilst providing protected provision for the future extension of the scheme south, if required.</p> <p>It is also important to recognise that the station location at Charlemont is influenced by available vacant land and thus avoids unnecessary demolition.</p> <p>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.</p> <p>If in the future, the metro was extended south, this does not mean that inevitably open cut construction will be required or demolition of property will be necessary. It is possible that in the event of a tunnel being constructed to connect to Charlemont Station that this would be undertaken from a site further south.</p>
7	Letter	2	<p>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.</p>	<p>TII 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. 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.</p>

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8	Letter	2	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.	<p>The EIAR presents a comprehensive and detailed assessment of both groundborne and airborne noise and vibration in Chapter 13 and 14 of the EIAR. The assessments include for predictive modelling in order to identify the potential impacts on all sensitive receptors during both the construction phase and the operational phase.</p> <p>Noise and disturbance during construction:</p> <p>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.</p> <p>Noise and disturbance during operation:</p> <p>No residual noise impacts are identified at this location during operation. The calculated rail noise levels across the proposed Project are not significant in terms of any widespread community disturbance and results in a not significant to slight impact when added to the prevailing noise environment.</p> <p>Loss of amenity during construction:</p> <p>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.</p> <p>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.</p> <p>Loss of amenity during operation:</p> <p>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.</p> <p>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 Z5 with the objective “To provide for the creation and protection of enterprise and facilitate opportunities for employment creation”. The Station has been designed so that it is integrated with the proposed redevelopment of this site by a third party development, and as such, demonstrates that the proposed Project is consistent with the zoning objective. The MetroLink station design does not result in any segregation of the area, with no surface barriers or walls proposed.</p>

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9	Letter	2	<p>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.</p> <p>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. Grand Parade and the residential area around Charlemont-Dartmouth cannot sustain the significant additional traffic volumes associated with this development.</p>	<p>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.</p> <p>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”.</p> <p>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.”</p> <p>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 (10) below.</p>

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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.	<p>The MetroLink is designed to form part of an integrated public transport network with Charlemont selected as the preferred interchange location in order to maximise the potential interchange with the existing Luas Green Line. In overall terms, Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.</p> <p>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:</p> <ul style="list-style-type: none">• 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. <p>The analysis undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The largest increase in driver delay of 12 seconds is registered on the westbound approach on Grand Parade to the Ranelagh Road signalised junction.</p> <p>During the construction phase, pedestrians will experience a reduction in quality of pedestrian infrastructure and space. The construction site boundary will encroach upon footways in the local area, including the northern side of Dartmouth Road, and the southern side of Grand Parade. However, a temporary signalised crossing will be provided west of the Luas to maintain pedestrian access to and from the Stop. Whilst there are partial closures on Dartmouth Road and Grand Parade, pedestrian movements will be maintained on appropriately sized footways through the area.</p> <p>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.</p> <p>In addition, it is proposed that the pedestrian crossing on R111 Grand Parade will be repositioned to the front of the building being developed by Hines. With this infrastructure in place, the model indicates that the R111 Grand Parade will have an acceptable level of service overall, with some reductions in service seen at the pedestrian crossing where pedestrians are required to wait for a green phase at the signals. Overall, it is considered that the model displays an acceptable level of network performance.</p> <p>The proposed pedestrian crossing on Grand Parade will have minimal impact on the traffic flow along Grand Parade and can be programmed to operate in sync with the existing signalised junction at Grand Parade /Charlemont Street to maintain the flow of traffic movements. When the Project is operational, car mode share will decrease, with a reduction of up to approximately 830 car tips to and from the zones surrounding Charlemont Station over the 12hr period in 2065. In overall terms, the Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.</p> <p>Furthermore, TII have deliberately designed the Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used as a terminus.</p>

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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.	<p>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. 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.</p> <p>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.</p>
12	Letter	2	9. The development would lead to Anti-Social behaviour. I have significant concerns that this major interchnage station will attract anti-social behaviour for up to 19 hours a day. This is commenon with many European capital interchnages. This currently relatively quiet residential area that benefits from amneities, but the potential for late nifght arrivals, taxi pick-ups, drop-offs and anti-social behaviour would disturb these amenties and alter the nature of the area.	<p>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, 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.</p>
13	Letter	2	<p>Accordingly, we are requesting the following amendments of An Bord Pleanála:</p> <p>1. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel.</p> <p>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.</p>	<p>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</p> <p>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.</p>