Submission No.	153
Organisation Name or Name of Submitter	John Neary and Kathleen White (11 Cambridge Terrace, Dartmouth Square)

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	Both 11 Cambridge Terrace (which is a protected structure forming part of the Dartmouth Square Architectural Conservation Area) and 35 Dartmouth Road are located in the resisdential area proposed as the location of the Terminus for the Metrolink project. It is clear that during the construction phase, which is expected to last 9 years, our property at 35 Dartmouth Road will be uninhabitable and our access to and enjoyment of our home at 11 Cambridge Terrace will be severely compromised. During the operation phase the noise, vibration, light, traffic and influx of people using the station will significantly impact on our quality of life and the value of our properties. We are fully supportive of the Charlemont and Dartmouth Community Group Metrolink submission as well as the submission made on behalf of the Residents of Dartmouth Road. We wish to highlight the following key observations for the Board regarding the proposal to locate the Terminus station at Charlemont.	We have reviewed your submission and responded below to each of the observations raised, that includes the assessed noise, vibration, traffic and pedestrian impacts, and where necessary, the proposed mitigations for both the construction and operational phases of the Project. TII understand your particular concerns regards the proximity of 35 Dartmouth Road to the construction of the proposed Charlemont Station, and while TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy (EIAR Chapter 14, Appendix A14.6) there is a process in place whereby further mitigation measures, including temporary relocation, can be implemented at individual properties should this be merited. Regards light, we have not identified a particular observation with regards to this matter. During the construction phase, lighting will be designed to ensure that artificial light emitted from the construction compound does not cause a nuisance to residents. Lighting will be positioned and directed so as not to intrude unnecessarily on adjacent properties. For further information on site lighting, see section 5.12.9 of Chapter 5 and EIAR Appendix A5.18 (Site Lighting Plan). Regards lighting during the operational phase, EIAR Chapter 4, Description of the MetroLink Project, section 4.12.8.3 explains the lighting class (and therefore the light level and uniformity targets) for each area to be lit, and has been selected using BS5489-1:2020 with account made for the local ambient lighting and environmental zones. The following measures will be undertaken to ensure the quality of life of residents will not be effected by station lighting: • LED lights will be used instead of traditional lights to control light spill, in compliance with the Institute of Lighting Profession 'GN01 Guidance Notes for the Reduction of Obtrusive Light' document; • The use of luminaires will ensure that zero upward light is emitted; and • Lighting will be adjusted depending on a stations setting for example lighting columns on highways will be 12m high but lighting columns in or near residential areas will be 8m high. TII also confirm they have reviewed and responded to all other submissions made.
2	Key Observations	1	1. Despite the fact that our property at 35 Dartmouth Road will be one of the houses most impacted during the construction phase, we have received no direct communication from Metrolink about how our property will be protected. Specifically: a. We understand that it is the subject of a substratum CPO. However, we have not been received any communication in this regard. b. The property has not been identified in the Book of Reference.	No. 35 was under construction at the time referencing was carried out and would note the property lies within the land owned by 11 Cambridge Terrace who were referenced. 35 Dartmouth Road is a new mews residence to the rear of 11 Cambridge Terrace. The owner of 11 Cambridge Terrace was served the notice and the submission on page 15 notes the owner of 35 Dartmouth Road as one and the same. The new build was completed in Q4 2022 and remains part of the garden to the rear of 11 Cambridge Terrace until separately registered. A letter seeking confirmation of title pertaining to 11 Cambridge Terrace was issued on 02/02/2022, in the full knowledge that TII understood that a dwelling was currently being constructed to the rear of 11 Cambridge Terrace. A Mr John Neary responded on 09/02/2022 confirming ownership of 11 Cambridge Terrace and referring to the new dwelling being currently being constructed at the rear of 11 Cambridge Terrace. - At the time of the RO Application there was no change/new Folio to Land Registry boundary information to 11 Cambridge Terrace, therefore no transfer (of part) to new owners. - At the time of the RO Application there was no update to Registry of Deeds title, therefore no transfer (of part) to new owners. - At the time of the RO Application there was no update to The Property Price Register, therefore no indication of a sale. Accordingly, there was no new data/evidence at the time, and the understanding would have been the property (i.e. the new dwelling known as 35 Dartmouth Road) was not completed/sold prior to September 2022, at the time of the RO Application. It has not been alleged by the observer that the facts are different, but this may be clarified at oral hearing. From a Land Referencing perspective, TII could not done anything further to establish possible ownership/tenancy on a new build which was possibly not completed prior to the MetroLink RO. This will be subject of legal submissions at oral hearing in due course.

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3	Key Observations	1	c. We have not received any specific information about the provision of mitigating measures for noise, access, dust and dirt, etc.	(c) For the reason explained in response (2) above, no direct mailing of information was carried out to No.35 Dartmouth Road. The EIAR and associated appendices presents the proposed mitigation measures for the Project. Chapter 13 and Chapter 14 of the EIAR identifies the required mitigation measures for noise and vibration associated with the Project, and Chapter 16 provides mitigation measures associated with dust. Further detail on mitigation measures are provided in Appendix A5.1 Construction Environmental Management Plan (CEMP) and Appendix A16.4 Dust Management Plan. In summary: <u>Construction Noise and Vibration</u> 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. In addition, the above ground support works for below ground sprayed concrete tunnelling works will be enclosed within an acoustically clad steel framed building to control noise breakout to surrounding receptors. On the implementation of these measures the residual impacts at the adjacent 34 Dartmouth Road, and therefore comparable for 35 Dartmouth Road, are predicted to be Moderate to Significant. EIAR Appendix A14.5, Groundborne Noise and Vibration and Blasting Modelling Results, 14.4 Section AZ4 Northwood to Charlemont presents the predicted vibration levels during TBM passage for various sensitive receptors and outlines the predicted VDV (Vibration Dose Value is a parameter that combines the magnitude of vibration and the time for which it occurs) for TBM Passage during the day and night at the adjacent 34 Dartmouth Road are 0.251ms-1.75 (VDV day) and 0.211ms-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 0.003ms-1.75 and 0.003ms-1.75 for day and night-time respectively. 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 34 Dartmouth Road an exceedance vibration level of 9.3mm/s PPV (Peak Particle Velocity) is predicted compared to the threshold level for this building of 8mm/s resulting in a potential significant impact. As a result, mitigation measures will be implemented to reduce the risk to buildings as outlined in EIAR Chapter 14, Section 14.5.1.2, including measures to reduce the impact of blasting through the preparation of specific blast design at each location, minimisation of the maximum instantaneous charge weight or alternatives to blasting. With the implementation of appropriate mitigation to reduce vibration from blasting the residual impact is predicted to be reduced to not-significant. The predicted level of groundborne noise during TBM passage is 48 dB LASmax at 34 Dartmouth Road, which is above the 45 dB LASmax threshold, resulting in a significant impact on the occupants of this address for the relatively short 2-week duration of the TBM passage. Unfortunately there are no effective methods available to reduce groundborne noise from TBMs at source and therefore the principal mitigation measure is advance consultation and engagement to inform residents of the timing of the TBM passing to allow building occupants to prepare for the temporary elevated noise levels. 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, including temporary relocation, can be implemented at individual properties should this be merited. <u>Operational Noise and Vibration</u> EIAR Chapters 13 and 14 present a comprehensive and detailed assessment of operational airborne and groundborne noise and vibration. No residual noise impacts are identified at this location during operation. The calculated rail noise levels across the proposed Project are not significant in terms of any widespread community disturbance and result in a not significant to slight impact when added to the prevailing noise environment. EIAR Chapter 13, sections 13.2.3.2 and 13.5.3.2.3 recognise that ventilation systems if not designed and mitigated effectively are potential noise sources. Section 13.6.2.3 outlines the detailed considerations that will be included in the design to ensure that the ventilation systems do not exceed limits as per BS 4142, including: • Reduction of induct flow rates; • Reduction of elements in the airflow; • In duct attenuators; • Orientation of grilles and louvres away from sensitive receptors; • Acoustic louvres; and • Anti-vibration mountings and couplings will be incorporated into the design to control vibration. Measures to mitigate noise from the use of public address systems is also detailed in Chapter 13 (sections 13.5.3.2.4 and 13.6.2.4). Best practice design principles will be employed to minimise noise breakout at the surface from these systems via escalators, lift shafts and stairwells. <u>Access</u> During construction, pedestrian access will be maintained to the property. Once the station is operational, as outlined by EIAR Chapter 9 Traffic and Transport, with mitigation measures implemented there will be a residual long term slight impact on pedestrians as a result of there being more pedestrians in the area. However the use of existing footpaths will be at "acceptable comfort levels". There will be no other residual impacts in the operational phase related to traffic or transport. (also see responses (16) and (17) below).

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			Response (3) continued.	<u>Dust / Air Quality Construction Phase</u> EIAR Chapter 16, Air Quality, section 16.6 Mitigation Measures. The potential risk from dust emissions has been reviewed for the most important activities and each of the construction areas. Before commencing relevant works, an Air Quality Management Plan will be prepared and submitted for approval to the planning authority. The plan will take account of all relevant dust and emissions applicable to the circumstances of the relevant site, based on the local authority requirements and industry best practices. The plan will be developed by the contractor and for each worksite shall include: - An inventory and timetable of activities which may give rise to emissions or dust; - Alert levels; - Alert system to be used (including notification process); - Details of control measures; - Details of dust monitoring arrangements, including the location of sensitive receptors, monitoring locations, and monitoring equipment to be used; and - Details of the air quality reporting requirements. In order to ensure that no dust nuisance occurs, a series of measures will be implemented, as detailed in Appendix A16.4. In summary, the measures will include: - Material handling systems and site stockpiling of materials designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods; - Any blasting will be completed by specialised contractors with a specific blasting dust management plan; and - Hoarding will be provided around the construction compounds. Strict dust prevention will be in place at all times to minimise any potential emissions and these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations. Consistent implementation of good dust minimisation practices will ensure that the impact from construction dust is Long-Term, Localised, Reversible and not significant when considered with respect to the Environmental Protection Agency (EPA) description of effects (EPA 2022). <u>Dust / Air Quality - Operational Phase</u> As noted by EIAR Section 16.6.2 Operational Phase, all ambient air pollutants will remain in compliance with the ambient air quality standards and the proposed Project has negligible impacts at all modelled receptors, and therefore no specific operational phase mitigation measures are required.
4	Key Observations	1	d. We have not received any assurances about compensation in the event of damage to the house as a result of construction work or subsidence even though the excavation of the tunnel driving at 30 metres deep will be located a mere 2 metres from the front elevation of the property.	The impacts of construction generated ground movements on 35 Dartmouth Road have been assessed. The approach taken by TII for assessing the impact of construction generated ground movements reflects the industry standard three-phased ground movement impact assessment process that is undertaken on tunnelling and underground projects around the world, that includes Channel Tunnel Rail Link (CTRL), Dublin Port Tunnel, Crossrail and High Speed 2. EIAR Appendix A 5.17 Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement and includes for the assessed impact on 35 Dartmouth Road. The Phase 2 assessment of the assessed impact on a representative building adjacent to No. 35 is "slight" (an explanation for which can be found in Table 4-4), please refer to representative building B-151 in table 5-2 of the appendix. Given that your property is a new build, the impacts described above are likely to be less. As your property is in close proximity to the station box excavation, the assessment work undertaken for the EIAR has determined that your property along with other similar neighbouring properties have been designated as "special" (please refer to section 4 Subsidence Damage Assessment Methodology of Appendix A5.17). Consequently, the property will be subject to a further Phase 3 refined assessment (despite the impact only being assessed as 'slight') to take account of final design and construction methodology details. The Phase 3 assessment will 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 in the area to monitor the performance of the works and potential environmental impacts, including ground movements to ensure that acceptable limits, determined as part of the Phase 3 assessment, are not breached. TII would also draw attention to the fact that private properties within 50m of the station excavation, or 30m of the tunnel are eligible to subscribe to the Property Owners Protection Scheme (POPs). The Property Owners' Protection Scheme is in addition to the existing legal rights of property owners and is in place to provide a simple and prompt way of rectifying any damage caused under the project up to the ceiling of €45,000. If the sum should exceed this amount the normal claims process would be used with the insurance companies for TII and/or the contractor.

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5	Key Observations	1	e. We have not received any information about the provision of relocation expenses, including security and maintenance of our empty house, in the expected event that our lives become intolerable or unsafe during the construction period.	As noted by the responses to this submission, the environmental impacts when they are mitigated are considered to be within acceptable levels with the exception of an approximate 2 week period when the TBM passes generating groundborne noise, and construction airborne noise that could be Moderate to Significant (see response (3) above). TII also confirm that no works will be undertaken that are unsafe. As outlined in Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy (Appendix A14.6) there is a process in place whereby further mitigation measures can be implemented at individual properties should this be merited. TII also confirm that while of the view that the construction environmental impacts can be mitigated, relocation is an available option during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider.
6	Key Observations	1	f. During the operation phase we note that there has been no assessment of the noise and air emissions from the proposed overtrack ventilation system to be located directly opposite 35 Dartmouth Road.	TII can confirm that the EIAR has considered noise and air emissions from the station ventilation system. Please refer to response (3) above, Operational Noise and Vibration, and Dust / Air Quality - Operational Phase.
7	Key Observations	1	g. The proposal to locate a pedestrian crossing directly outside the house will make it impossible for our car to access the electric car charging point located in the courtyard of the house. This is not acceptable.	The location of pedestrian crossings have been chosen to ensure that there are no permanent restrictions to property access. At this location, the pedestrian crossing is designed to ensure that it will not restrict access to your property TII will meet with you to ensure arrangements are in place to ensure access to your electric charging point can be maintained.
8	Letter - Point 2	2	2. The current proposal will essentially turn a quiet residential street, which is covered by Objective Z2 zoning: to protect and/or improve the amenities of residential conservation areas, into the forecourt of a busy Terminus Station. It is noted that all mature trees on the street will be lost as a result of the development and no replacements are proposed.	As outlined by response (3) above, no residual noise impacts are identified at this location during the operational phase. 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 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. 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 operational phase related to traffic or transport. In addition, no significant residual negative impacts are anticipated on the Population and Land Use from the operation of the proposed Project as outlined in Chapter 11 Population and Land use. 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 a result, it is not considered that the proposed development compromises the requirements of the Dublin City Development Plan 2022 – 2027. It is regrettable there will be a loss of three street trees at this location that need to be felled to facilitate the construction of the proposed station. However TII would note that the impact of tree loss is considered in Chapter 15: Biodiversity section 15.8.1. Habitat Loss, with replanting proposed in the landscape design to compensate for habitat loss by providing new areas for trees. The landscape plan includes for the planting of 3,444 individual trees which will be organised in small copses, lines of trees and within woodland habitats. The planting of these new trees will compensate for the loss and will not result in significant negative residual effect on trees at any geographic scale.

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9	Letter - Point 3	2	3. 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.	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. In the Emerging Preferred Route Report, Charlemont was identified as the last station prior to the tie-in to the Green Luas Line which was intended to be upgraded to Metro standard. as outlined in EIAR chatper 7, decision to terminate at Charlemont instead was driven by three factors: (a) the additional impacts that would be involved in upgrading the Luas south of Charlemont as a result of the proposed adoption of a high degree of automated operations (GoA4); (b) the development of alternatives to accommodate increased capacity on the Luas line south of Charlemont without that upgrade; and (c) Feedback received during the EPR non-statutory consultation. St Stephen's Green West was not considered a feasible terminus location as an alignment that links the proposed Tara and St Stephen's Green west would have 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. St Stephens Green West would also require a complex engineering interface with the Luas Green Line, signficantly greater impacts on the Park and has greater potential for disruption during the construction phase. 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). The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). The Transport Strategy was prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport and approved by the Minister for Transport. It notes in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise." Under the Planning and Development Act 2000, 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 is supported by detailed project-level analysis and the strength of that location is reflected 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.

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10	Letter - Point 3 (continued)	3	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 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 (9) 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. However these options were ruled out as it was not possible to design an alignment that would also provide a MetroLink interchange with DART at Tara Street Station without the requirement for an additional intervention shaft and poor reverse curve. 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 and the GDA Transport Strategy 2022-2042 (section 12.3.2). Together, these projects will result in a reliable, sustainable, affordable, integrated public transport network that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2021 and make Dublin a more liveable and sustainable city. It is being argued that Charlemont station effectively becomes a terminus station in the short to medium term. In this regard, it is true to say that the Metrolink trains will terminate and turn back at Charlemont station, however the public transport service offering for passengers does not terminate, it transfers from Metrolink to LUAS as part of the integrated transport network. The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus (train sideways, car parking 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 and 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. 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.

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11	Letter - Point 4	2	4. 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. 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 (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 / 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.
12	Letter - Point 5	2	5. 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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13	Letter - Point 6	3	6. 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. 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.	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 decision not to proceed with 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. 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.
14	Letter - Point 7	2	7. 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.	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. This assessment is carried out for the full length of the alignment including relative to potential significant effects on the Charlemont-Dartmouth Community.
15	Letter - Point 8	3	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.	For noise and vibration assessed impacts please refer to response (3) above. 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. Response (8) above explains why TII consider the proposed station complies with the zoning defined by the Dublin City Development Plan 2022 - 2027. 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.

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16	Letter - Point 8 (continued)	3	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 9) - 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 can not 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 (17) below.

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17	Letter - Point 9	3	9. 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. 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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18	Letter - Point 10	4	10. 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, tannoy 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 (3) above outlines the predicted environmental impacts with regards to noise and vibration, and amenity, while responses (16) and (17) summarise the assessed traffic and pedestrian impacts. TII would note that as explained by response (17) 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.
19	Requested Amendments	4	Requested amendment to An Bord Pleanala 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 which would effectively provide for a terminal hub station that can integrate with the Luas Green Line, multiple bus routes and future DART underground. 3. If the construction of a station at Charlemont is permitted, require the provision of adequate mitigation measures to protect the owners of residential properties significantly affected during the construction and operational phases. 4. If the construction of a station at Charlemont is permitted, require the relocation of the proposed pedestrian crossing directly outside No 35 Dartmouth Road.	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. TII have also outlined how the potential construction and operational environmental impacts will be mitigated, but as confirmed by response (5) above, TII are available to discuss with the property owner the option to relocate during the peak construction. Regards the proposed pedestrian crossing outside No 35 Dartmouth Road, as noted by response (7) above, TII propose to meet with you to ensure that an arrangement can be arrived at that ensures you can charge your car.