

Submission No.			159	
Organisation Name or Name of Submitter			Kathleen McDonagh	
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. 22/11/22				
1	Letter	1	1. Living in the midst of this tightly compacted residential community, I consider the proposed development totally unsuitable as a location for a major Terminus hub. Strategically, the Charlemont / Dartmouth location is too far from Dublin city centre and it would be an unnecessary expense and duplication of the existing Green Line services.	<p>While TII agree the Charlemont site is constrained, a Station design has been developed that fits and works within this constrained site, and is adequately sized for projected passenger numbers. Responses (4) and (5) below cover TII's assessment of potential environmental impacts resulting from the construction and operation of the MetroLink Charlemont Station, noting that no significant residual impacts are predicted.</p> <p>TII do not agree that “Strategically, the Charlemont / Dartmouth location is too far from Dublin city centre” for the reasons set out below. The Board is required to have regard to the likely consequences for proper planning and sustainable development in the area in which it is proposed to carry out railway works (section 43(1) of the 2001 Act) and as such the following matters are relevant.</p> <p>The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). The Transport Strategies were prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport and approved by the Minister for Transport. It notes in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."</p> <p>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".</p> <p>Accordingly, the location of the Charlemont station was a strategic decision made at the highest levels of transport and land use planning and such is fully consistent with the proper planning and sustainable development of the area.</p> <p>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.</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 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.</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.</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 Ratio (BCR). it is true to say that the Metrolink trains will terminate and turn back at Charlemont station, However, Charlemont Station does not have the associated infrastructure and services associated with a terminus location and in fact has more in common with a “system turn back location”. Charlemont Station is located within an area of high public transport accessibility, linking with the Luas Green Line which offers reasonably similar levels of services and frequency for journeys to and from the south of Dublin. As such, public transport service offering is not considered to terminate, but transfers onto the similar service offered by the Luas Green Line, forming part of a transport corridor running from Cherrywood to Estuary. The associated environmental impacts for the turnback and station at Charlemont have been fully assessed in the EIAR. Additionally, there is a strong level of interchange offered throughout the corridor at locations such as Glasnevin, O’Connell Street, Tara Street and St Stephen’s Green, where many journeys on the MetroLink will 'terminate'.</p>

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			Response (1) continues.	<p>The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus take place.</p> <p>Regards your observation “it would be an unnecessary expense and duplication of the existing Green Line services.” The Board is not responsible for any decisions in relation to the funding the Project. It is solely responsible for assessing whether the Project is consistent with proper planning and sustainable development and that its effects on the environment are acceptable.</p> <p>The responsibility for funding the Project lies with the NTA, the Government and ultimately the Oireachtas. It has received all necessary approvals, including under the Public Spending Code for the making of a Railway Order. It will undergo further scrutiny and approvals, including under the Public Spending Code, before it is funded. It is not appropriate for the Board to make findings in relation to value-for-money that are outside its statutory functions and would cut across those arrangements. Members of the public are entitled to make representations to their TDs in relation to the value-for-money of any element of the Project.</p> <p>In any case,TII do not agree with this statement for the reasons set out 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>
2	Letter	1	Instead, why not locate such a major terminus at Stephen's Green where there would be more suitable integration of networks and services and a better location for interchange with bus, Luas and future Dart underground?	<p>TII do not agree that St Stephen's Green is the most appropriate interchange location for the reasons set out by response (1) above.</p> <p>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. Route alignments from St. Stephen's Green West that would also provide an interchange with DART at Tara Street Station would require an intervention shaft between these locations and would also need an undesirable horizontal reverse curve and so are not favoured. Integration with other public transport projects is a key project objective as outlined by EIAR Chapter 3. Such projects include 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 2021 and make Dublin a more liveable and sustainable city.</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>
3	Letter	2	2. The Station Box constructed at Charlemont 2021/22 by Hines does not have planning permission. Hence, processing the current Railway Order application which is reliant on the now constructed works is legally unsafe and contravenes the provisions of the Environmental Impact Assessment 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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4	Letter	2	<p>3. As it is, there is an enormous volume of traffic in the Charlemont area. As proposed, a Terminus station servicing trains running to the airport and elsewhere 24/7 would greatly exacerbate existing traffic flow in such a confined area and increasingly endanger health and safety and further compromise existing problems.</p> <p>Grand Parade and the residential areas around Charlemont / Dartmouth could not possibly sustain the significant additional traffic volumes running to and from the airport.</p>	<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. 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. 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. TII therefore do not agree with the observation "Grand Parade and the residential areas around Charlemont / Dartmouth could not possibly sustain the significant additional traffic volumes running to and from the airport." as this is not borne out by our transport analysis.</p> <p>TII have assessed the impact on the traffic network for both the construction and operational phases of the Project:</p> <p>Construction Phase:</p> <p>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:</p> <p>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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5	Letter	2	4. The proposed development will continue to have an adverse impact on the health of individuals in this heavily populated area. The noise and disturbance experienced already the residents takes its toll from this enterprise (boring machines etc). A continuation of this and the long-term and permanent impact of noise-operating machinery, vehicular use, tannoy systems etc will change a quiet residential neighbourhood into a noisy, busy, congested and major, unhealthy transport hub.	<p>TII recognise and are cognisant of the risk of adverse environmental impacts and have therefore carefully assessed these impacts, as documented by the EIAR and summarised below, which concludes there are no significant residual impacts.</p> <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>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:</p> <ul style="list-style-type: none">• 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. <p>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.</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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6	Letter	3	<p>We request the following amendments:-</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>	