Submission No.	300
Organisation Name or Name of Submitter	Tom Harrington

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Reference: Railway(Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022 Case Ref: NA29N.314724				
1	Letter - introduction	1	I am making this submission as a concerned householder on Dartmouth Road. Firstly I do think development of the Metrolink is a very positive development for Dublin. My concerns in relation to proposed Charlemont Metrolink terminus primarily centre on 3 major points.	Thank you for taking the time to make a submission and your overall endorsement of the MetroLink Project. We have reviewed your submission and responded to the observations made below.
2	Letter - Point 1	1	1. Selection of Charlemont as Metrolink southern terminus versus city centre terminus form a huge cost to taxpayer perspective and prejudicing options for expansion of transport network in the future. We currently have an excellent public transport connection to Stephens Green from Charlemont on the Luas Green line so why replicate this with a metro line that stops at Charlemont terminus in a residential area with only easily accessible public transport option, if onward travel required, is the same Green Luas line. I cannot see the public good or business benefit in the extension of Metrolink to terminus at Charlemont at this enormous cost to our taxpayers and years of significant residential disruption during construction. The opportunity cost of this investment on a redundance in public transport infrastructure versus spending the money on some project offering a greater public good is not defensible. Building a terminus in Charlemont also prejudices future decisions on the potential direction of a south/southwest Metrolink line given any future project would be constrained this development and sunk cost versus a terminus in Stephens Green which would offer far greater flexibility in future transport policy decisions. On position that there is no current policy to extend Metrolink beyond Charlemont then why pursue this section of route from Stephens Green. The environ of Charlemont is a residential area not a city centre location. A city centre location has a high number of trips attracted and generated. There is scope for increased densities in the city centre, but very limited scope in the area around Dartmouth Road/ Dartmouth Square.	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. <u>Rationale for Charlemont Station</u> 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. 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 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. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise." By extending MetroLink to Charlemont it provides for future proofing of the Green Line, bypassing the capacity constrained Luas on-street running section, and ensures potential future connectivity options are enabled, either to the Green Line or for extensions of the metro. The Charlemont Station interchange provides for increased passenger utilisation of the MetroLink system, thereby increasing the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ration (BCR).

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			Response (2) continued.	<u>Cost and Replication</u> MetroLink does not replicate the Luas Green Line between St Stephen's Green and Charlemont 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.

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3	Letter - Point 2	1	**2. Noise, disturbance and impact on amenities.** The development will have a very significant impact upon the amenities of those residing in the area. This will result from the lengthy construction period of c 9 years, with noise and vibration impacts from tunnelling, the construction of the cut and fill new station, tunnelling and boring associated with the new tunnel and the intervention tunnel. Noise impacts on properties in the vicinity (Dartmouth Square West, Dartmouth Road and Cambridge Terrace) will all range from moderate to very significant. The hours of working are specified as 07:00 hrs to 19:00 hrs. The passage of the Tunnel Boring Machine (TBM) through the stations will be on a 24 hours, 7 days a week basis. HGV deliveries will be ongoing over a lengthy period of time. The impact upon this residential neighbourhood will be very significant.	Note the predictions reported below are the same as for 26 Dartmouth Road which is located slightly closer to the proposed MetroLink works. The Proposed Working Hours are outlined in EIAR Chapter 5, MetroLink Construction Phase, section 5.2.4. Standard working hours will generally be the norm for all above ground works i.e Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 13:00. Only tunnelling and other works underground will be undertaken 24 hours a day. The only exception to this is the requirement for work above ground outside standard working hours for exceptional events such as concrete pours, and abnormal deliveries. In the exceptional event these are necessary, the contractor will engage with the local community and local authority before such works are undertaken. Chapter 13 Airborne Noise and Vibration includes an assessment of airborne noise and vibration from the construction of the project. The potential significant airborne noise impacts from the construction of nearby Charlemont Station is presented in Table 13.68 where a 'Significant' to 'Very Significant' magnitude of impact is predicted at this location prior to the implementation of noise mitigation measures. Noise mitigation, as summarised in section 13.6.1 of the EIAR, includes for boundary hoarding around the station working area, comprising 7m high hoarding at the east boundary, and 4m at the remaining boundaries. In addition, the above ground support works for below sprayed concrete tunnelling works will be enclosed within an acoustically clad steel framed building to control noise breakout to surrounding receptors. With these mitigation measures in place, the magnitude of impact at 27 Dartmouth Road is reduced to "Slight to Moderate" during piling works and excavation below slab, and "Not Significant" during enabling works and finishing and fit-out works as indicated on pages 23-28 of EIAR Appendix 13.7 Construction Phase Modelling. All planned night-time work activities will have to be undertaken, controlled and mitigated under the detailed Construction Environmental Management Plan to maintain impacts below the agreed construction noise thresholds. Examples of mitigation measures that can be used to reduce impact are detailed within Chapter 13, section 13.6, including the use of enclosure structures for planned activities outside of the standard working hours. The rationale for 24/7 working on activities such as Mechanical Electrical Power (MEP) installation, TBM strip out, and tunnel clean and track laying, is that they can be managed underground without causing disturbance at night. While activities below ground are progressed on a 24/7 basis, site level activities such as deliveries etc will be limited to standard working hours (Chapter 5, Section 5.5.17.3 refers). Owing to the nature of the sprayed concrete intervention tunnel construction and to ensure a safe and stable method of excavation, and minimising settlement impact, the sprayed concrete intervention tunnel construction will be undertaken 24 hours per day, seven days per week. The groundborne noise and vibration arising from mechanical excavation of the tunnel will not exceed threshold limits. During night-time support works at the surface, an acoustically clad steel framed building will be used within the compound to control airborne noise breakout to surrounding sensitive properties. All concrete to support the sprayed concrete tunnel lining operation will be batched on site within the acoustic enclosure and will not require night-time delivery. The predicted level of groundborne noise during TBM Passage is 47dB, above the Threshold Level of 45 dB indicating a potential significant impact to occupants for the limited duration of TBM passage, which is estimated to be 2-weeks. 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. Therefore with the exception of some temporary disturbance (c. 2 weeks) resulting from the TBM passing. All other activities are not predicted to cause significant impact. 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.

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			Response (3) continued.	Other Noise and Vibration EIAR Appendix A14.5, Groundborne Noise and Vibration and Blasting Modelling Results, 14.4 Section AZ4 Northwood to Charlemont, presents the predicted day and night groundborne noise and vibration levels for the construction and operational phases. The results for 26 Dartmouth Road (appropriate for 27 Dartmouth Road) are summarised below. (Vibration Dose Value is a parameter that combines the magnitude of vibration and the time for which it occurs) • The predicted day and night levels of groundborne vibration during TBM Passage are 0.226ms-1.75 (VDV day) and 0.190ms-1.75 (VDV night). Both of these values are lower than the VDV Threshold Levels of 1ms-1.75 (VDV day) and 0.5ms-1.75 (VDV night), meaning that no significant impact is expected on the property or occupants as a result of vibration during TBM passage. • The predicted day and night levels of groundborne vibration during Mechanical Excavation are 0.003ms-1.75 (VDV day) and 0.002ms-1.75 (VDV night). Both of these values are lower than the VDV Threshold Levels of 0.8ms-1.75 (VDV day) and 0.4ms-1.75 (VDV night), meaning that no significant impact is expected to the property or occupants during mechanical excavation. • The predicted levels of groundborne vibration during blasting activities is 7mm/s (PPV - peak particle velocity) and air overpressure 110.9 (AOpdB). Both of these values are lower than the Threshold Levels of 8mm/s PPV and 125 AOpdB meaning that no significant impact is predicted to the property during Blasting. • The predicted level of groundborne noise during mechanical excavation is 39 dB, below the Threshold Level of 40 dB, meaning that no significant impact is expected on the building occupants from groundborne noise during mechanical excavation. Construction Traffic Noise Construction traffic noise impact is assessed and presented in Chapter 13, Section 13.5.2.6.9 AZ4: Construction Traffic. This shows that construction traffic noise impacts are neutral to not significant based on the peak construction month in 2028. As noted above, the construction traffic volumes used in the assessment are based on the reasonable worst case peak scenario which reflects a 'worst case month' under which the construction of multiple work sections are taking place concurrently as part of the proposed Project in AZ3 and AZ4. A further sensitivity assessment was undertaken for each of the main site compounds in AZ4 during the AM peak period using data for the most impacted traffic road section during this period as advised by the traffic team. During the assessed AM peak hour for each construction site compound within AZ4, the highest change in noise levels are all below 3dB resulting in a negligible to minor change in traffic noise level along the local roads. The calculated noise level along the road edge, whilst categorised as medium to high will not be altered to any perceptible level as a result of construction traffic flows and hence the overall impact is not significant. The methodology used in this assessment is discussed in Section 13.2.5.1.3, with results for AZ4: Northwood to Charlemont set out in Table 13.71.

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4	Letter - Point 2 (continued)	2	2. (continued) There is no effective provision made for drop-off at this important interchange. Taxi, bus and casual private car users are not appropriately catered for. There is only a short drop on the northern side of the carriageway of Grand Parade and none on Dartmouth Road. There is no taxi rank or provision for future bus services. The interchange with other modes is therefore wholly inadequate. Drop-off on Grand Parade will result in traffic congestion and a traffic hazard (especially for cyclists as the proposed Drop-off replaces the existing footpath and cuts across the existing cycle lane). The development would have an adverse impact upon traffic during the construction and operational phase, drop-off has not been properly designed and there is poor integration with other modes.	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 private car drop-off, with the Station deliberately designed so that it is part of a 'through transport corridor' rather than a terminus station. 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. It should also be noted that the proposed station is within a 5-minute walk distance of the BusConnects proposed A Spine and E Spine routes. 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. 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. Chapter 9: Traffic & transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, Section 6.1.2.refers. TII has modelled and assessed the impact on traffic during the construction and operation phases, and no significant impacts are predicted, as summarised below. 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.

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			Response (4) continued	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, including Dartmouth Road. 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. 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 expect the provision of a MetroLink Station at Charlemont to negatively impact the quality of life of those in the immediate neighbourhood, and would further note that 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. Chapter 9: Traffic & transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, Section 7 Summary refers.
5	Letter - Point 2 (continued)	2	2. (continued) I have significant concerns that this major interchange station will attract anti-social behaviour for up to 19 hours a day during its operational times, and also when the station is closed. This is common with many European capital interchanges. This currently is a relatively quiet residential area that benefits from amenities, but the potential for late night arrivals, taxi pick-ups, drop-offs and anti-social behaviour would disturb these amenities and alter the nature of the area.	The interchange will certainly increase the number of people passing through the area, however it is important to note that people will be using MetroLink, similar to LUAS as a transport hub, moving quickly in and out of the area. The station will not be a destination attracting people to the area. Furthermore as outlined in Chapter 6 of the EIAR, CCTV will be installed at all stations including Charlemont with monitoring of each station being managed from the Operational Control Centre. This means that in the unlikely event of antisocial behaviour, MetroLink security staff and /or An Garda Siochana will be notified immediately to manage the situation.

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6	Letter - Point 3	2	3. Residence Impact It is clear there will be significant disturbance for extended period during construction and it is unclear whether it will be possible to access or reside in 27 Dartmouth Road during this phase. While I appreciate this is a consequence of many projects to develop our public infrastructure it is very difficult to accept when to construct Metrolink terminus at Charlemont seems flawed at many levels as presented in detail in the 'Charlemont & Dartmouth Community Group Metrolink submission'. From a personal perspective I would ask you to reconsider this proposed development and the cost/benefit assumptions before inflict these difficulties on the residents whether this is a result of CPO, temporary relocation or consequence the general disturbance during construction and in operation on residents of Dartmouth road.	**Access** TII can confirm that although parking may be impacted during the closure of Dartmouth Road, West of the Luas Bridge in accordance with Chapter 9, Appendix A9.5 section 7.11.5.3.5, it will be possible to locate the proposed site entrance/exit (Figure 7.58) to maintain access to 27 Dartmouth Road throughout the duration of the construction Phase. Parking may need to be suspended during normal working hours for traffic management purposes during construction operations. The closure of Dartmouth Road will take place in two stages, the total duration of which is 4 years, noting the first closure of 18 months will be partial. 1. Partial closure of Dartmouth Road to enable utilities to be diverted. Subject to Statutory Undertaker approvals (ESB, Eircom etc.) this process is estimated to take up to 18 months, while access is maintained along Dartmouth Road via a proposed single lane closure. 2. Full closure. Once the utilities have been diverted, the road is then shut to through traffic (pedestrian access is maintained) and is estimated to take up to 30 months to complete the piling, and roof slab of the station. The utilities and road will then be reinstated and the road reopened. Diversions will be put in place for local access, including deliveries, emergency services, bin collection, and pedestrian access maintained to all properties. The impacts on parking will be monitored during construction to reinstate any disrupted areas as soon as practicable. On completion of construction and reopening of Dartmouth Road, parking will be reinstated. During the closure of Dartmouth Road, approximately 30 on street parking spaces will be lost during the main works, however there will be no impact to on-street loading bays. EIAR Chapter 5, MetroLink Construction Phase specifies the 5 residential properties that will be impacted during the works. The closure will be monitored to determine if it is required at all points, or if the spaces can be temporarily reinstated temporarily throughout the works. Once the construction works are complete and Charlemont Station is operational, the remaining on-street spaces will be fully reinstated. As outlined in Appendix A5.1 Outline Construction Environmental Management Plan, the contractor(s) will be required to maintain emergency access routes throughout the construction phase. These will be developed in consultation with the emergency services and documented as part of the detailed CEMP(s). All required diversions will be appropriately signed, and a comprehensive publicity and information campaign will take place prior to the Commencement of works to minimise the severity of the impact. Noise and Vibration As noted by response (3) above, including allowing for any necessary mitigation measures, noise and vibration levels at 27 Dartmouth Road will not be significant with the exception of TBM groundborne noise for a short temporary duration of approximately 2 weeks. Therefore it is considered relocation will not be necessary. It is also noted that following mitigation measures the airborne construction noise levels at 27 Dartmouth Road will be below the threshold value of 70 dB and as such mitigation in the form of noise insulation to the windows of this property will not be required. Once operational, MetroLink is not predicted to cause disturbance, and will as noted by response (4) above 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 expect the provision of a MetroLink Station at Charlemont to negatively impact the quality of life of those in the immediate neighbourhood, and would further note that 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. Rationale for a Proposed Station at Charlemont Response (2) above explains the rationale for a proposed station at Charlemont, noting that 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), as well as being in accordance with the 2022 - 2042 GDA Transport Strategy approved by Government.