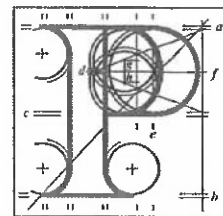


**Our Case Number:** ABP-314724-22



**An  
Bord  
Pleanála**

Caroline Regan and family  
26 Dartmouth Road  
Ranelagh  
Dublin 6

**Date:** 26 January 2023

**Re:** Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]  
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to  
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

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Dublin 1  
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26 Dartmouth Road  
Ranelagh

16 January 2023

An Bord Pleanála  
64 Marlborough Street  
Dublin 1

Observation Re: Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022  
Case Reference Number **NA29N.314724**

Dear Sir/Madam,

1. I reside at 26 Dartmouth Road, in Ranelagh, with my young children and partner. Our home is directly beside the old tram bridge where the NTA and TII propose to situate the MetroLink terminus. Our family supports the objective of Metrolink project, but we raise several concerns about the proposal that its southern terminus should be at Charlemont.
2. We endorse the submission by our residential community “Dartmouth Road Submission” of 13 January 2023. In addition, we set out further observations.

#### **A. Health**

3. The MetroLink Environmental Impact Assessment Report (EIAR) estimates “significant” and “very significant” noise and vibration impacts on our home and family, including “disturbance of sleep”,<sup>1</sup> for **at least 102 months** (eight years), according to NTA and TII.<sup>2</sup>
4. “Significant impact” is equated in places in the EIAR to “very high impact”.<sup>3</sup>
5. The EIAR estimates that “station piling works” and “south station works below slab” will cause up to “very significant” noise and vibration in our home from 7am every day, including weekends.<sup>4</sup> “Finishing & fit out” and “Advance enabling utility and site preparation” are estimated to cause up to significant impact, too.<sup>5</sup>
6. The EIAR also anticipates that works will surpass the threshold level in our home during i) the movement of the tunnel boring machine, ii) mechanical excavation, and iii) blasting.<sup>6</sup> The first two will occur **24 hours a day**.<sup>7</sup> Underground activities are anticipated to occur 24/7 and heavy concrete delivery will be at night.<sup>8</sup>
7. The Construction Sequence Report also notes that Stage 2 of the three stage project will make the front of our house the “lorry holding area” for the heavy vehicles involved in the works.<sup>9</sup>

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<sup>1</sup> Chapter 10, MetroLink Environmental Impact Assessment Report, p. 33.

<sup>2</sup> Pre-Application Consultation File, p. 663.

<sup>3</sup> See for example the table on Chapter 14, MetroLink Environmental Impact Assessment Report, p. 6.

<sup>4</sup> Chapter 13, MetroLink Environmental Impact Assessment Report, p. 110-111.

<sup>5</sup> Chapter 13, MetroLink Environmental Impact Assessment Report, p. 109 and 112.

<sup>6</sup> Chapter 14, MetroLink Environmental Impact Assessment Report, p. 36-37, 41, 57.

<sup>7</sup> Non technical summary, MetroLink MetroLink Environmental Impact Assessment Report, p. 30.

<sup>8</sup> Chapter 13, MetroLink Environmental Impact Assessment Report, p. 158.

<sup>9</sup> A5.3 Construction Sequence Report, p. 159.

8. The NTA/TII's proposed mitigation measures include "potential temporary relocation".<sup>10</sup> It is not explained what this means, nor what the duration or our family's displacement from our home may be. It is not clear whether there is provision for retrofitting our home with sound insulation.
9. We could not find any reference to effective measures to limit airborne dust and dirt from the construction site in the Railway Order.
10. I am diagnosed with and suffer from Chronic Daily Migraine. My husband has Long Covid. We have two young children. The estimated impacts set out in the EIAR will have life changing consequences for our health, and presumably for others who live near us, too.
11. McCabe Durney Barnes, independent experts contracted by our local community of residents, examined the EIAR and concluded that it is inadequate. (See our community submission for detail). I am therefore concerned that the EIAR may underestimate of the impact to our home and family.

## **B. Structural impact**

12. The eastern wall of our house is directly at the edge of the proposed terminus' large underground cavity. We draw to your attention the independent expert view from McCabe Durney Barnes, that "it is evident that a very limited assessment of settlement and subsidence has been carried out" in the EIAR.<sup>11</sup> This is of utmost concern.
13. It is essential that our house is surveyed in detail to determine whether it is at high risk, and to measure settlement and other impacts, before construction. Our home is a protected structure (RPS ref no. 2138).

## **C. Traffic**

14. We emphasise the community submission "Dartmouth Road Submission" comments regarding the closure of Dartmouth Road throughout the enabling works, and the need to provide for resident access and parking both during construction and after the terminus enters operation.

## **D. Dublin City's needs**

15. There is a broader concern beyond the impacts listed above: The terminus for Dublin's MetroLink should be in the city centre, and should be located to allow interoperation or connection to other transport systems in the future. The NTA/TII have not undertaken a study that fully considers this. Instead they have only studied a limited scenario in which a terminus would be located at the East side of St. Stephen's Green. They have not properly studied St. Stephen's Green as a location.
16. This must be corrected. Positioning MetroLink's terminus at St. Stephen's Green's (non-East) side would create a natural hub location to which other transport can be joined in the future. In contrast, placing MetroLink's terminus at Charlemont forecloses the possibility of integrating with the City's other transport systems. The strategic benefit to the City from locating the terminus at St. Stephen's Green is likely to be profound and must be examined.

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<sup>10</sup> Chapter 10, MetroLink Environmental Impact Assessment Report, p. 46.

<sup>11</sup> Dartmouth Road Submission, 13 January 2023, p. 27-28.

17. The construction of the large underground “station box” at Charlemont has already been substantially completed by Hines, a private development company, before the Railway Order was drafted. NTA and TII describe “Stage 1” of the development of Charlemont as “the Hines Development”.<sup>12</sup> That first stage of construction was unlawful. At least three difficulties arise: i) the construction was outside of the context of a Railway Order; was ii) undertaken without planning permission; and iii) without an environmental impact assessment. As a result, constructing MetroLink’s terminus at Charlemont would therefore expose the entire MetroLink project to acute legal hazard.

### **Request**

18. Therefore, we request An Bord Pleanála order the following amendments:

- i. Omit the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel from the Railway Order; and
- ii. Require the submission of a railway order for a section from Tara Street Station to St. Stephens Green that enables a terminal hub station that can integrate with the Luas Green Line, bus routes and future DART underground.

Yours sincerely,

Caroline Regan

On behalf of the family at 26 Dartmouth Road

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<sup>12</sup> A5.3 Construction Sequence Report, p. 150.