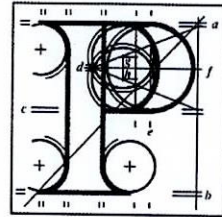


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Elisabeth Vandenberghe
14 Dartmouth Square
Dublin 6
D06FY62

Date: 05 December 2022

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Motrolink. 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.

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

Tell	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
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Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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14 Dartmouth Sq
Dublin 6,
D06FY62
22 November 2022

An Bord Pleanála
64 Marlborough Street
Dublin 1.

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

Dear Sir/Madam,

. I am writing with regard to the proposed development of a Terminus for the Metrolink project at Charlemont, Dublin 6, under the Railway Order 2022 (Metrolink – Estuary to Charlemont) Ref No NA29N.314724. My family have lived on the West side of Dartmouth Square for almost 5 decades and have supported of having a square open to all, in the setting of a 'conservation area' and as part of the local community of Dublin 6. I have paid the required fee of €50.

I am interested in environmental matters which is evidenced by my 'Green Garden' and my main transport method of cycling. I am in favour of an equitable society; working at St James Hospital which is in the centre of the most deprived part of Dublin (and with no rail/metro connectivity) makes me aware of the need for a clean urban environment with good public transport. I am in favour of the broad aim of the Metrolink project to connect Dublin's city centre to our national airport. However, as a resident living in the Dartmouth/Charlemont area, I wish to set out a number of observations for the Board regarding the proposal to locate the Terminus station at Charlemont-Dartmouth.

1. **Charlemont is the incorrect strategic location for a Terminus hub and spoke system** as it is too far out along the Luas Green Line spoke and would prejudice future options for integration of networks and services. 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.
2. **Expensive Duplication of Rail infrastructure** - The inclusion of an expensive and costly section between St. Stephens Green and Charlemont is strategically weak and duplicates the existing Luas Green Line services. NTA's cost estimate for this 1km section at €650M is an expensive duplication and significant investment that deprives other parts of Dublin, mainly west Dublin who are in immediate need of rail infrastructure to support housing and urban development.
3. **The station box at Charlemont, as constructed in 2021/22 by the Developer Hines, does not have 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.

4. **The station box at Charlemont will result in only one possible future tie in** with the Luas Green Line to the south, which would result in an option that was previously dismissed as part of the Tie-In study from March 2017. No alternatives to the station box at Charlemont were considered as it had been fixed through the design of the overhead Hines Grand Parade commercial development. 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.
5. **The Environmental Impact Assessment is inadequate** in relation the description of development, alternatives, transport assessment, noise and the cumulative effects of the development on the Charlemont-Dartmouth Community. For a project of this size, scale, investment to date, it is inadequate to propose a Railway Order with so many important studies and analysis missing.
6. **The development would result in noise and disturbance during the construction and operational phases and would result in a loss of amenities** for the area. 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.
7. The development would have **an adverse impact upon traffic** during the construction and operational phase, and it has not been properly designed and there is poor integration with other modes of transport. Pedestrian movements in and around the station would be difficult. Grand parade is an already heavily congested orbital route, which I cycle along to get to work. This has been hazardous during the Hines construction period and will be even worse for the 8 years which it will take to build the Metrolink and then for ever after because of the traffic volumes. Therefore instead of making Dublin pedestrian and bike friendly this development will have the opposite effect. 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
8. The development **will have an adverse impact upon property values**, particularly during the construction phase. For many houses in the area there will be a long term and permanent adverse impact upon property values from noise of the operating rail infrastructure, vents, 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.

Requested amendment to An Bord Pleanála

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.