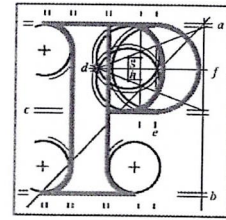


**Our Case Number:** ABP-314724-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Geraldine Ann Cusack & Geraldine O'Connell Cusack  
7A and 7 Dartmouth Square West  
Ranelagh  
Dublin 6  
D06YX97

**Date:** 18 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, there is no fee for an affected landowner, listed on the schedule, to make an observation on this case, therefore, a refund of €50 will be made to the credit/debit card used to make the online observation.

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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Facs  
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Geraldine Ann Cusack / Geraldine O'Connell Cusack

No.7A/No.7 Dartmouth Square West

Ranelagh

Dublin 6

D06YX97

January 13<sup>th</sup>, 2023

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,

My name is Geraldine Ann Cusack and I live at No.7A Dartmouth Square West Ranelagh Dublin 6. My home is the self-contained separated utilities basement level apartment dwelling of the building at No. 7 Dartmouth Square West. My mother's home is the upper build dwelling (No.7). I am writing regarding 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. I have paid the required fee of €50.

Firstly, in general, 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 several observations for the Board regarding the proposal to locate the Terminus station at Charlemont-Dartmouth.

Both my home and my mother's home backs directly onto where the Terminus station is proposed to be located. Our homes on the western side of Dartmouth Square are covered by zoning **Objective Z2** To protect and/or improve the **amenities of residential conservation** areas; the lands to the rear are covered by zoning **Objective Z1** To protect, provide, and improve **residential amenities**. Currently,

there is controlled parking on either side of Dartmouth Square West. Dartmouth Square is also covered by the **Dartmouth Square ACA**.

The proposed link between St. Stephens Green and Charlemont cannot be justified in planning terms. Furthermore, it undermines the business case for the entire project and this 'Terminus at Charlemont' element should effectively be refused for the MANY reasons we outline below including:

#### **Construction Impacts**

- ✓ Noise and Vibration
- ✓ Settlement & Subsidence
- ✓ Hydrogeology
- ✓ Phasing & Programme
- ✓ Hours of Operation
- ✓ Construction Compound
- ✓ Traffic and Transport
- ✓ Impact on Utilities
- ✓ Human Health
- ✓ Interactions of Effects

#### **Operational Impacts**

- ✓ Noise and Vibration
- ✓ Hours of Operation
- ✓ Traffic and Transport
- ✓ Impact upon Amenities

#### **Conservation area property issues and wider residential community losses**

- ✓ Compulsory Purchase Order
- ✓ Rear Lane
- ✓ Properties
- ✓ Devaluation of Properties
- ✓ Temporary Relocation
- ✓ Required Purchase at Market Value
- ✓ Costs

## **Key Submission Points**

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 that 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 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.
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 implication 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 wholly 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. 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 cannot 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.

**Re: this Railway Order as it stands**

- We are seeking the removal of the Tara Street to Charlemont section of the rail order.
- Specifically the Charlemont station should not form part of the rail order as it will severely and demonstrably adversely affect the residential amenities of the Dartmouth Square residents both during the construction phase and the operational phase.
- The deep construction required immediately adjacent to residential houses is wholly inappropriate and will result in a very severe loss of amenity and devaluation of property.

## **Re: Construction Phase**

- The construction noise impact assessment is wholly inadequate as it fails to consider the internal noise impact over a 9-year period. The assessment of the effects of upon residential amenities is different between the construction stage and the operational phase. In the construction stage, there is no assessment upon the internal noise levels. I work full-time. I work through a blended remote working model for four days a week in my 'home office'. How am I expected to be able to work my full-time employment role for 9+years with all the combined noise impacts affecting the quality of my working environment? How does this project justify the intolerable levels of interference through loss of sleep, general ongoing daily disturbance and psychological impacts resulting in a detriment to human health for me and my neighbours who are also full time employed and work from home?
- The EIAR fails to properly assess the building damages from settlement and potential subsidence impacts of the tunnelling upon the 'conservation protected' houses along Dartmouth Square West.
- The hydrogeological impact assessment is inadequate as it has not been based upon local bore hole logs.
- Construction of the intervention tunnel will give rise to significant noise and disturbance, 24/7 during the period of its construction.
- The construction phase is a medium-term effect which has not been properly considered in the EIAR.
- Intolerable traffic will be generated during construction with HGV traffic on quiet residential roads will have a severe impact upon amenities.
- There will a severe impact upon human health which has not been properly assessed.
- The proposed rail order does not mitigate the profound impact that the proposed scheme will have on residents of Dartmouth Square given the associated scale and time period of the proposed development.

## **Re: Operational Phase**

- The operation of the trains and associated ventilation systems has the potential to adversely affect the amenities of the residents and has not been properly assessed.

- Proposed design will result in significant rat-running between Ranelagh Road and Grand Parade to the detriment of the residents on Dartmouth Square West.
- The overall impact of the both the construction and operational phases of the project, in terms of noise, vibration, visual impacts, traffic, HGV movement, construction activity, operational emissions, anti-social behaviour and general activity around the station will be such as to severely and permanently adversely affect the residential amenities of the residents listed in this submission and would be in material contravention of the Dublin City Development Plan zoning objective for the area, which is Z2: "to protect and/or improve the amenities of residential conservation areas."

#### **Re: Property Issues**

- The permanent acquisition of part of the rear laneway will legally impede rights of access to the rear of properties.
- The permanent loss of part of the laneway will inevitably impact upon the amenity and value of retained land/property.
- There will be a significant devaluation in property and the Board must refuse this element of the railway order.
- Owners' costs of engaging in the process should be borne by TII.

We request amendments in relation to the OMISSION of the section between Tara Street and Charlemont and the making of a separate railway order application for a section between Tara Street and St. Stephens Green.

The EIAR is wholly inadequate and does not properly, coherently, and cohesively assess the combined and interacting impacts of the proposed development.

My family's specific concerns for this proposed (and present construction/investigative activities already taking place) are being treated as inconsequential for our livelihoods. Our close-knit and very supportive community of families in this cultural heritage residential zone and catchment area of the Charlemont Luas station are being ignored in this Railway Order. We also have founded concerns that this major interchange station would attract anti-social behaviour for up to 19 hours a day. The law enforcement strategy is not equipped nor has the required resources allocated to such upheaval in a change on community circumstances. The potential for late night arrivals, taxi pick-ups, drop-offs and



anti-social behaviour would destroy the present community amenities and alter the well managed present nature of the area.

We need to be heard and professional due diligence conducted on our behalf regarding this completely inappropriately proposed Terminus location at the Charlemont Luas station. How and why has this Charlemont location been so ineptly strategically located for a Terminus hub and spoke system in such an inappropriate and unreasonable location – this needs to be transparently identified and articulated by An Bord Pleanála.

The Environmental Impact Assessment as assessed by professional Planning experts, McCabe Durney Barnes is wholly 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.

As a direct result of the inadequacy of this EIA, Charlemont has gained an erroneous level of traction when St. Stephen's Green is a far superior location. St. Stephen's Green is predominantly a commercial area (Charlemont is predominantly residential.) notwithstanding the obvious advantages in terms of cost-effectiveness and accessibility.

#### **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 to provide for a terminal hub station that can integrate with the Luas Green Line, multiple bus routes and future DART underground.

Yours sincerely,

Geraldine Ann Cusack (No. 7A)

Geraldine O'Connell Cusack (No. 7)