

John Conway and Orlaith McCarthy
15 Dartmouth Square West
Ranelagh
Dublin 6
D06 R998

Date: 16 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.

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.

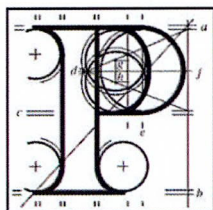
Yours faithfully,



Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An
Bord
Pleanála

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

John Conway and Orlaith McCarthy

(b) Observer's postal address

15 Dartmouth Square West, Ranelagh, Dublin 6. D06 R998

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

N.A.

(b) Agent's postal address

N.A

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

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The agent at the postal address in Part 2

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Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

NA29N.314724

- (b) **Name or description of proposed development**

Railway (Metrolink – Estuary to Charlemont via Dublin Airport Order 2022)

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Terminus at Charlemont

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

15 Dartmouth Square West
Ranelagh
Dublin 6

13.01.2023

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,

Our names are John Conway and Orlaith McCarthy. We have been living at # 15 Dartmouth Square West for more than 40 years.

We are writing regarding 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. We have paid the required fee of €50.

It is important to state at the outset that we are very much in favour of the Metrolink project to connect Dublin's city centre to our national airport and the broader objective of providing a modern and efficient public transport infrastructure for the people of Dublin. That is why we have a number of concerns that the current plan is not optimal and is wasteful of public money.

We want to set out a number of observations for the Board regarding the proposal to locate the city centre Terminus station at Charlemont-Dartmouth. Our family home is in the midst of the community where the Terminus station is proposed to be located.

Key Submission Points

Our concerns are focused on (a) Strategy & Policy Issues and (b) Neighbourhood & Community Issues.

5. Grounds

We discuss below firstly the Strategy & Policy Issues and then the Neighbourhood & Community Issues.

(a) Strategy & Policy Issues

1. **Charlemont is NOT the correct strategic location for a Terminus hub and spoke system.** 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 for the Terminus 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.

The 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 implications of this new alignment are very significant for 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.

(b) Neighbourhood & Community

The entire Dartmouth Square - North, South, East & West - is designated as an ACA and all of the dwellings are protected structures. We have been part of this community for more than 40 years and we have often remarked on the pride which all the neighbours take in the physical environment in which we live. We feel a

5. Grounds

responsibility to maintain and protect it and to hand it on to future generations of residents in as good or better condition as we received it.

We note that in the Dublin City Development Plan 2022 – 2028 our houses are covered by the zoning objective Z2 – ‘to protect and / or improve the amenities of the residential conservation areas’.

Clearly, the proposal to locate the city centre Terminus within such close proximity of our dwelling at # 15 Dartmouth Square West is blatantly inconsistent with this zoning objective. The construction phase of 9+ years will place an intolerable burden on us residents in terms of noise, vibration, subsidence, and the work compound. But matters will not improve when construction is completed, and the terminus becomes operational. Indeed, the situation will get worse in terms of noise, vibration, subsidence risk and traffic congestion.

We are both in our late 60s. This project is a life sentence for us. Our property will be unsaleable throughout the 9+ years of the construction phase and the position will not improve in the operational phase.

We have a particular worry about the structural damage that our property could suffer as a result of subsidence and vibrations during the construction phase as the tunnelling will be within very close proximity indeed to our dwelling (well less than 50 metres).

We have major worries about so many aspects of the Environmental Impact Assessments (EIA) which have been undertaken – or so often not been undertaken. We set out below some specific concerns.

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, and 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. The proposed Terminus provides very poor integration with other modes of transport.

Pedestrian movements in and around the station would be very 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.

5. Grounds

A Terminus at Charlemont will attract a huge volume of passengers travelling to and from the airport. They will come from Dublin South and the greater Dublin / Leinster area via car or taxi with baggage and baby buggies for onward destination to the airport. However, there is absolutely no space for set-down at Grand Parade or in the residential area around Charlemont-Dartmouth. This neighbourhood 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.

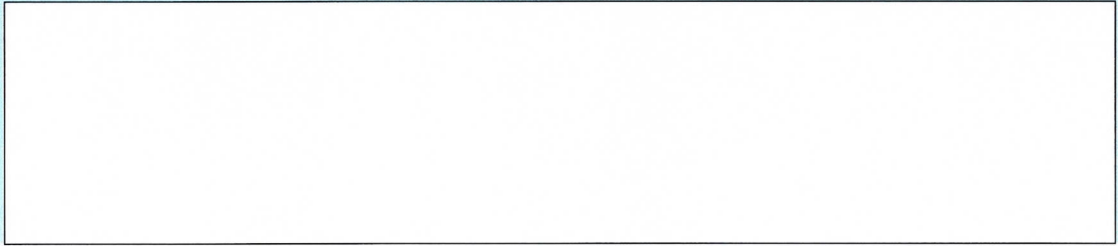
We believe that the logical place for the city centre Terminus is in St. Stephens Green. This location would effectively provide for a hub station that can integrate with the Luas Green Line and multiple bus routes. There is also ample space for taxi and private car set-down.

Importantly, this solution saves public money in the short term while at the same time it leaves open a broader range of strategic options to extend the Metro in the future such as the South West corridor.

Yours sincerely,

John Conway & Orlaith McCarthy
087 650 4489

5. Grounds

A large, empty rectangular box with a black border, intended for content related to the '5. Grounds' section.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☐

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes