



John Neary and Kathleen White
11 Cambridge Terrace
Dartmouth Square
Dublin 6
D06 AV82

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.

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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11 Cambridge Terrace
Dartmouth Square
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35 Dartmouth Road
Ranelagh
Dublin D06 P6Y1

13 January 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 Neary and Kathleen White and we are the joint owners of the properties at 11 Cambridge Terrace and 35 Dartmouth Road in Ranelagh, Dublin 6. We are 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. We have paid the required fee of €50.

Both 11 Cambridge Terrace (which is a protected structure forming part of the Dartmouth Square Architectural Conservation Area) and 35 Dartmouth Road are located in the residential area proposed as the location of the Terminus for the Metrolink project.

It is clear that during the construction phase, which is expected to last 9 years, our property at 35 Dartmouth Road will be uninhabitable and our access to and enjoyment of our home at 11 Cambridge Terrace will be severely compromised. During the operation phase the noise, vibration, light, traffic and influx of people using the station will significantly impact on our quality of life and the value of our properties.

We are fully supportive of the Charlemont and Dartmouth Community Group Metrolink submission as well as the submission made on behalf of the Residents of Dartmouth Road.

We wish to highlight the following key observations for the Board regarding the proposal to locate the Terminus station at Charlemont.

Key Observations

1. Despite the fact that our property at 35 Dartmouth Road will be one of the houses most impacted during the construction phase, we have received no direct communication from Metrolink about how our property will be protected. Specifically:
 - a. We understand that it is the subject of a substratum CPO. However, we have not been received any communication in this regard.
 - b. The property has not been identified in the Book of Reference.

- c. We have not received any specific information about the provision of mitigating measures for noise, access, dust and dirt, etc.
 - d. We have not received any assurances about compensation in the event of damage to the house as a result of construction work or subsidence even though the excavation of the tunnel driving at 30 metres deep will be located a mere 2 metres from the front elevation of the property.
 - e. We have not received any information about the provision of relocation expenses, including security and maintenance of our empty house, in the expected event that our lives become intolerable or unsafe during the construction period.
 - f. During the operation phase we note that there has been no assessment of the noise and air emissions from the proposed overtrack ventilation system to be located directly opposite 35 Dartmouth Road.
 - g. The proposal to locate a pedestrian crossing directly outside the house will make it impossible for our car to access the electric car charging point located in the courtyard of the house. This is not acceptable.
2. The current proposal will essentially turn a quiet residential street, which is covered by Objective Z2 zoning : *to protect and/or improve the amenities of residential conservation areas*, into the forecourt of a busy Terminus Station. It is noted that all mature trees on the street will be lost as a result of the development and no replacements are proposed.
 3. **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.
 4. **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.
 5. **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.
 6. **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.
 7. **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.

8. **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.
9. 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.
10. 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 amendments 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.
3. If the construction of a station at Charlemont is permitted, require the provision of adequate mitigation measures to protect the owners of residential properties significantly affected during the construction and operational phases.
4. If the construction of a station at Charlemont is permitted, require the relocation of the proposed pedestrian crossing directly outside No 35 Dartmouth Road.

Yours sincerely,

John Neary and Kathleen White