



Leo and Anne Crehan  
11 Dartmouth Square West  
Ranelagh  
Dublin 6  
D06 KR63

**Date:** 10 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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11 Dartmouth Square West  
Ranelagh  
Dublin D06 KR63

08 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

We live at 11 Dartmouth Square West and we write 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, which will adversely affect our property. We have paid the required fee of €50.

Firstly, in general, we are 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, we wish to set out a number of observations for the Board regarding the proposal to locate the Terminus station at Charlemont-Dartmouth. Our family home is in the midst of the community where the Terminus station is proposed to be located; and further, the application makes provision for part of our property to become the subject of a Compulsory Purchase Order.

We respectfully ask that you consider the following points in making your decision on the Application.

- 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. If St. Stephen's Green were to be designated as the hub, there would be the opportunity for an integrated underground commercial development which could be privately funded as part of the project.
- 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. If the Green Luas Line is becoming overloaded, surely that is because it is the only north/south transit system going through South Dublin; a better, and cheaper, solution would be to build 1 or 2 parallel new Luas lines to service South Dublin, which would reduce the demand on the Green Line.

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 its location was fixed in order to accommodate the design of the Grand Parade commercial development by Hines. 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 inadequate** in relation to 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 analyses missing. Full details of this inadequacy are set out in the observations submitted by the Charlemont-Dartmouth Community Group, of which we are members.
6. **The development would result in noise and disturbance during the construction and operational phases which will 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 noise and disturbance for our dwelling**, that we will experience during construction, will be far in excess of that indicated in the Applicant's EIA. The level of noise, vibration and disturbance, combined with its duration, will render this house uninhabitable.
8. **Locating part of the proposed Charlemont station box within the curtilage of our property**, so close to the Victorian masonry walls of our Victorian-era Protected Structure, should not be regarded as being in accordance with the proper planning and development of what the Planning Authority has deemed to be an Architectural Conservation Area. Because of the breach of planning procedures noted in #3 above, it will not be possible to modify this location by conditioning an approval; the only way to resolve it would be to reject the proposed location of the Charlemont terminus.
9. The development would have **an adverse impact upon traffic** during the construction and operational phase; access 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 travel to the airport. Grand Parade and the residential area around Charlemont-Dartmouth can not 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, and for our house in particular, 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 by changing a quiet, residential neighbourhood into a noisy, busy, congested major transport hub.

**We therefore 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, future DART underground and possible future Luas line out the N11.
3. In addition to the above, we wish to advise that **the Application is in breach of agreed terms between TII and us.** TII agreed a position prior to any planning application and in those circumstances, it is submitted that TII ought to amend the Application to comply with the terms of what was previously agreed.

Yours sincerely



Leo Crehan



Anne Crehan