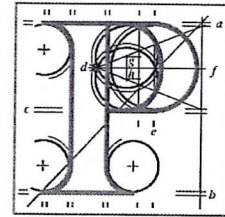


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Niall Parsons
1 Dartmouth Square
Dublin 6
D06 XN50

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

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

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

Niall Parsons

1 Dartmouth Square,

Dublin 6, D06 XN50

The Secretary, An Bord Pleanála,

64 Marlborough Street,

Dublin 1, D01 V902

Date : 15.01.2023

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

Case Reference Number NA29N.314724

Dear Sir/Madam,

My name is Niall Parsons and I am the owner of the residence at 1 Dartmouth Square, Dublin 6, D06 XN50. The property is located on the corner of Dartmouth square and Dartmouth Road.

I note that as the owner of no. 1 Dartmouth Square I have not been named in the Book of Reference. TII have details of my ownership. Ref letter to me TII Metrolink Ref ML0102 dated 01.02.22 .I have been issued with and have received the documentation issued by TII.

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.

I have paid the required fee of €50. I wish to make the following observations on the application:

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 the owner of a residence 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.

My property, No.1 Dartmouth Square, D.6 is a Protected Structure, a residential property, and is in the midst of the community where the Terminus station is proposed to be located.

1. I understand that no Study has been completed by NTA/TII as part of the entire Metrolink project on the optimal location for a City centre terminus. 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.

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 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. 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.

9. Residential Properties on Dartmouth Square West, in particular, will be adversely affected by the location of a Terminus MetroLink station at Charlemont.

No. 1 Dartmouth Square, my property, will be affected by the location of the vast Southern Entrance Plaza and the Tunnel Ventilation Exhaust ducts located behind the boundary wall.

Metro Design:

- 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.

Construction Phase:

- The construction noise impact assessment is wholly inadequate as it fails to consider the internal noise impact over a 9-year period, defers assessments to the design and construction stage, fails to properly assess night-time impacts, and incorrectly categorises impacts as very significant as opposed profound.
- The EIAR fails to properly assess the settlement impacts of the tunnelling upon the houses on Dartmouth Square West and there may be settlement of between 10mm and 30 mm which would severely affect these protected buildings.
- The hydrogeological impact assessment is inadequate as it has not been based upon local bore hole logs and no local impact assessment has been undertaken around the Charlemont station.
- Construction of the intervention tunnel will give rise to significant noise and disturbance, 24/7 during the period of its construction.
- The construction phase will last over 9 years. This is a medium-term effect which has not been properly considered in the EIAR.
- The hours of construction proposed include 12 hour working days and significant element of 24 hour working during certain periods of the contract.

- The alternative construction compound has not been properly assessed and given the impacts of that proposed, it is incumbent upon TII to properly assess this and propose it as a mitigating measure.
- Additional traffic will be generated during construction and the rediverting of traffic will have an adverse effect upon the local road network. HGV traffic on quiet residential roads will have a severe impact upon amenities.
- No local traffic modelling has been undertaken as part of the assessment and the impact upon pedestrians has not been properly assessed.
- There will a severe impact upon human health which has not been properly assessed.
- Overall, the proposed mitigation measures do 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.

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.
- The post completion permanent arrangement will result in significant rat-running between Ranelagh Road and Grand Parade to the detriment of the residents on Dartmouth Square West. No adequate drop-off, pick-up facilities, taxi ranks, or interchange with other services are proposed.
- 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. The impacts will be so severe as to evidently 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."
- The mitigation measures proposed do not meaningfully mitigate the significant adverse impacts during operation for residents of Dartmouth Square West.

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.
- The development will inevitably impact upon the 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.

I would be glad if ABP could consider the above non exhaustive list of observations . Furthermore I request the following amendments to the proposal :

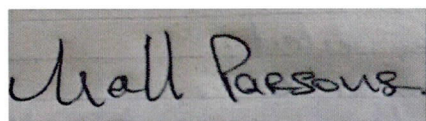
1. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel

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.

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.

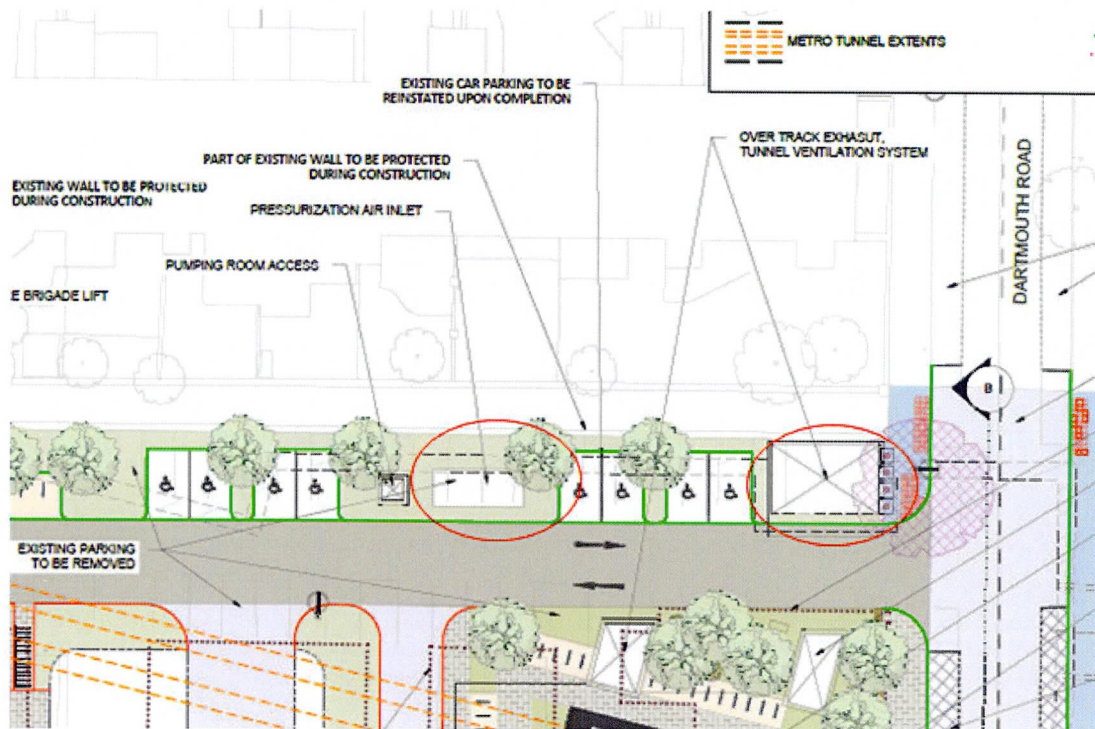
3. The deep construction proposed to construct the Charlemont Terminus Station immediately adjacent to residential houses is wholly inappropriate and will result in a very severe loss of amenity and devaluation of property.

Yours sincerely,

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Niall Parsons".

Niall Parsons

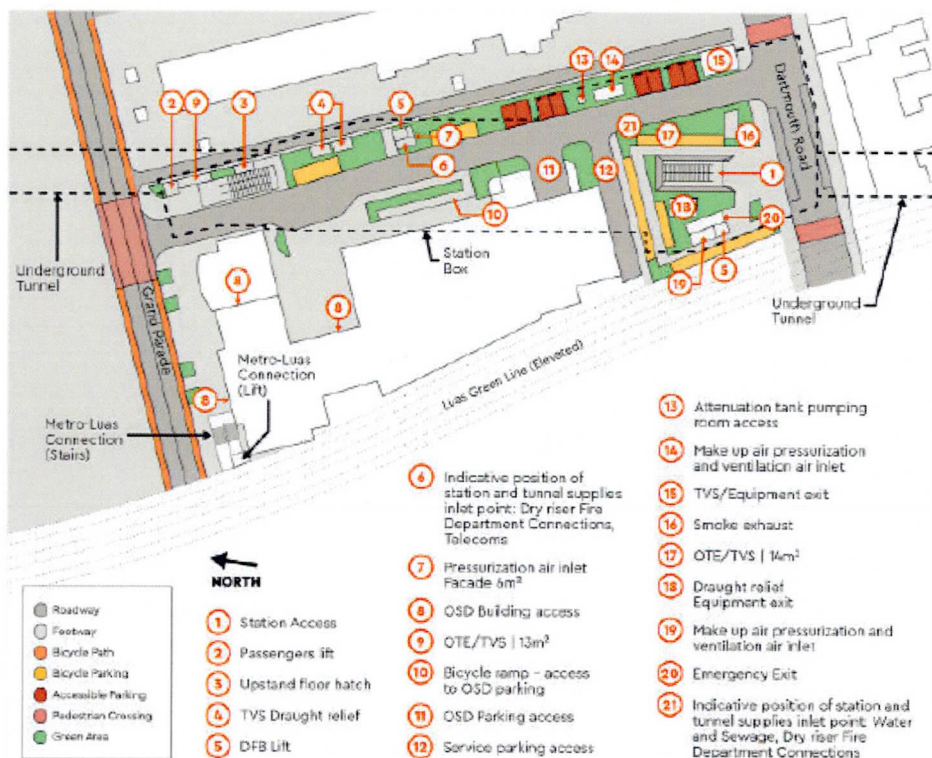
Figure 19: Southern End Ventilation and Exhaust System (outline in red)



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Item 15 Metro Over Track Exhaust - Tunnel Ventilation System located behind No. 1 Dartmouth Sq.

Figure 2: Charlemont station Surface Layout



Charlemont Metro Station Plaza - South Entrance located at rear of No. 1 Dartmouth Square .