

Submission No.	37
Organisation Name or Name of Submitter	Caroline Regan and family (26 Dartmouth Road)

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Observation Re: Railway (Metrolink-Estuary to Charlemont via Dublin Airport) order 2022 Case Reference Number NA29N.314724

1	Letter Introduction	1	<p>1. I reside at 26 Dartmouth Road, in Ranelagh, with my young children and partner. Our home is directly beside the old tram bridge where the NTA and TII propose to situate the MetroLink terminus. Our family supports the objective of Metrolink project, but we raise several concerns about the proposal that its southern terminus should be at Charlemont.</p> <p>2. We endorse the submission by our residential community "Dartmouth Road Submission" of 13 January 2023. In addition, we set out further observations.</p>	<p>Thank you for taking the time to make a submission and your overall endorsement of the MetroLink Project. We have reviewed your submission and responded to the observations made below. We have also similarly responded to all other submissions received.</p>
2	A. Health Issues	1	<p>3. The MetroLink Environmental Impact Assessment Report (EIAR) estimates "significant" and "very significant" noise and vibration impacts on our home and family, including "disturbance of sleep",¹ for at least 102 months (eight years), according to NTA and TII²</p> <p>4. "Significant impact" is equated in places in the EIAR to "very high impact"³</p>	<p>Please refer to responses (3) and (4) below which summarise the assessed noise and vibration impacts noting that with the exception of TBM groundborne noise which will only be experienced for around 2 weeks. The 102 months (eight years) period is the total construction duration for the works rather than the duration of the impacts.</p>
3	A. Health	1	<p>5. The EIAR estimates that "station piling works" and "south station works below slab" will cause up to "very significant" noise and vibration in our home from 7am every day, including weekends.⁴ "Finishing & fit out" and "Advance enabling utility and site preparation" are estimated to cause up to significant impact, too.⁵</p>	<p>Chapter 13 Airborne Noise and Vibration includes an assessment of airborne noise and vibration from the construction of the project. The potential significant airborne noise impacts from the construction of nearby Charlemont Station is presented in Table 13.68 where a 'Significant' to 'Very Significant' magnitude of impact is predicted at this location prior to the implementation of noise mitigation measures.</p> <p>Noise mitigation, as summarised in section 13.6.1 of the EIAR, includes for boundary hoarding around the station working area, comprising 7m high hoarding at the north boundary, and 4m at the remaining boundaries. In addition, the above ground support works for below sprayed concrete tunnelling works will be enclosed within an acoustically clad steel framed building to control noise breakout to surrounding receptors. With these mitigation measures in place, the magnitude of impact at 26 Dartmouth Road is reduced to "Slight to Moderate" during piling works and excavation below slab, and "Not Significant" during enabling works and finishing and fit-out works as indicated on pages 23-28 of EIAR Appendix 13.7 Construction Phase Modelling.</p>

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4	A. Health	1	6. The EIAR also anticipates that works will surpass the threshold level in our home during i) the movement of the tunnel boring machine, ii) mechanical excavation, and iii) blasting. ⁶ The first two will occur 24 hours a day. ⁷ Underground activities are anticipated to occur 24/7 and heavy concrete delivery will be at night. ⁸	<p>The Proposed Working Hours are outlined in EIAR Chapter 5, MetroLink Construction Phase, section 5.2.4. Standard working hours will generally be the norm for all above ground works i.e. Monday to Friday 07:00 to 19:00 and Saturday 07:00 to 13:00. Only tunnelling and other works underground will be undertaken 24 hours a day. The only exception to this is the requirement for work above ground outside standard working hours for exceptional events such as concrete pours, and abnormal deliveries. In the exceptional event these are necessary, the contractor will engage with the local community and local authority before such works are undertaken.</p> <p>All planned night-time work activities will have to be undertaken, controlled and mitigated under the detailed Construction Environmental Management Plan to maintain impacts below the agreed construction noise thresholds. Examples of mitigation measures that can be used to reduce impact are detailed within Chapter 13, section 13.6, including the use of enclosure structures for planned activities outside of the standard working hours.</p> <p>The rationale for 24/7 working on activities such as Mechanical Electrical Power (MEP) installation, TBM strip out, and tunnel clean and track laying, is that they can be managed underground without causing disturbance at night. While activities below ground are progressed on a 24/7 basis, site level activities such as deliveries etc will be limited to standard working hours (Chapter 5, Section 5.5.17.3 refers).</p> <p>Owing to the nature of the sprayed concrete intervention tunnel construction and to ensure a safe and stable method of excavation, the sprayed concrete intervention tunnel construction will be undertaken 24 hours per day, seven days per week. The groundborne noise and vibration arising from mechanical excavation of the tunnel will not exceed threshold limits. During night-time support works at the surface, an acoustically clad steel framed building will be used within the compound to control airborne noise breakout to surrounding sensitive properties. All concrete to support the sprayed concrete tunnel lining operation will be batched on site within the acoustic enclosure and will not require night-time delivery.</p> <p>The predicted level of groundborne noise during TBM Passage is 47dB, above the Threshold Level of 45 dB indicating a potential significant impact to occupants for the limited duration of TBM passage, which is estimated to be 2-weeks. Unfortunately there are no effective methods available to reduce groundborne noise from TBMs at source and therefore the principal mitigation measure is advance consultation and engagement to inform residents of the timing of the TBM passing to allow building occupants to prepare for the temporary elevated noise levels.</p> <p>Therefore with the exception of some temporary disturbance (c. 2 weeks) resulting from the TBM passing. All other activities are not predicted to cause significant impact. (please also refer to response (3) above regards airborne noise)</p> <p>As outlined in Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy (Appendix A14.6) there is a process in place whereby further mitigation measures can be implemented at individual properties should this be merited.</p> <p>Other Noise and Vibration EIAR Appendix A14.5, Groundborne Noise and Vibration and Blasting Modelling Results, 14.4 Section AZ4 Northwood to Charlemont, presents the predicted day and night groundborne noise and vibration levels for the construction and operational phases. The results for 26 Dartmouth Road are summarised below.</p> <p>(Vibration Dose Value is a parameter that combines the magnitude of vibration and the time for which it occurs)</p> <ul style="list-style-type: none"> The predicted day and night levels of groundborne vibration during TBM Passage are 0.226ms^{-1.75} (VDV day) and 0.190ms^{-1.75} (VDV night). Both of these values are lower than the VDV Threshold Levels of 1ms^{-1.75} (VDV day) and 0.5ms^{-1.75} (VDV night), meaning that no significant impact is expected on the property or occupants as a result of vibration during TBM passage. The predicted day and night levels of groundborne vibration during Mechanical Excavation are 0.003ms^{-1.75} (VDV day) and 0.002ms^{-1.75} (VDV night). Both of these values are lower than the VDV Threshold Levels of 0.8ms^{-1.75} (VDV day) and 0.4ms^{-1.75} (VDV night), meaning that no significant impact is expected to the property or occupants during mechanical excavation. <p>The predicted level of groundborne vibration during blasting activities is 7mm/s (RPM peak particle velocity) and air overpressure 110.0</p>
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			Response (4) continued.	<ul style="list-style-type: none"> The predicted levels of groundborne vibration during blasting activities is 7mm/s (PPV = peak particle velocity) and air overpressure 110.9 (AOpdB). Both of these values are lower than the Threshold Levels of 8mm/s PPV and 125 AOpdB meaning that no significant impact is predicted to the property during Blasting. The predicted level of groundborne noise during mechanical excavation is 39 dB, below the Threshold Level of 40 dB, meaning that no significant impact is expected on the building occupants from groundborne noise during mechanical excavation. <p>Construction Traffic Noise Construction traffic noise impact is assessed and presented in Chapter 13, Section 13.5.2.6.9 AZ4: Construction Traffic. This shows that construction traffic noise impacts are neutral to not significant based on the peak construction month in 2028. As noted above, the construction traffic volumes used in the assessment are based on the reasonable worst case peak scenario which reflects a 'worst case month' under which the construction of multiple work sections are taking place concurrently as part of the proposed Project in AZ3 and AZ4.</p> <p>A further sensitivity assessment was undertaken for each of the main site compounds in AZ4 during the AM peak period using data for the most impacted traffic road section during this period as advised by the traffic team. During the assessed AM peak hour for each construction site compound within AZ4, the highest change in noise levels are all below 3dB resulting in a negligible to minor change in traffic noise level along the local roads.</p> <p>The calculated noise level along the road edge, whilst categorised as medium to high will not be altered to any perceptible level as a result of construction traffic flows and hence the overall impact is not significant.</p>
5	A. Health	1	7. The Construction Sequence Report also notes that Stage 2 of the three stage project will make the front of our house the "lorry holding area" for the heavy vehicles involved in the works.	<p>The lorry holding area referred to is an area that will be temporarily closed off with traffic management during mainly off peak periods as and when required to off load major items of plant and equipment. It is not a permanent holding area and will only be used by exception for the reasons noted. Safe access to the footpath will be maintained for pedestrians.</p> <p>Appendix A5.1 Outline CEMP details the proposed mitigation and monitoring measures that the contractor(s) will be required to adhere to during the construction phase. As detailed, there will be strict controls and regulations at the site entrances/exits for construction vehicles in order to ensure the safety of other road users and pedestrians. This is standard practice for all construction site accesses and egresses.</p>
6	A. Health	2	8. The NTA/TII's proposed mitigation measures include "potential temporary relocation". It is not explained what this means, nor what the duration or our family's displacement from our home may be. It is not clear whether there is provision for retrofitting our home with sound insulation.	<p>As noted by responses (3) and (4) above, including allowing for any necessary mitigation measures, noise and vibration levels at 26 Dartmouth Road will not be significant with the exception of TBM groundborne noise for a short temporary duration of approximately 2 weeks. Therefore it is considered relocation will not be necessary. Following mitigation measures the airborne construction noise levels at 26 Dartmouth Road will be below the threshold value of 70 dB and as such mitigation in the form of noise insulation to the windows of this property will not be required.</p>

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7	A. Health	2	9. We could not find any reference to effective measures to limit airborne dust and dirt from the construction site in the Railway Order.	<p>Please refer to EIAR Chapter 16 Air Quality, section 16.6.1 which outlines the construction phase mitigation measures required for the proposed project. This section also refers to a dust mitigation plan which can be reviewed in Appendix A14.6. The Construction Environmental Management (appendix A15.1) also provides an overview of all construction phase mitigation measures including those required for the management of dust.</p> <p>It is of note that dust tends to be quite large in size in relative terms (greater than 30 microns in diameter) and falls to the ground relatively quickly. This gives the potential for soiling of cars or windows in the vicinity, but from a human health perspective would not be deemed to have a significant adverse health impact as the dust does not stay airborne and is not inhaled. Fugitive emissions of dust from the site are not predicted to be significant and to pose no nuisance to human health. Further details of how construction generated dust will be managed is summarised below.</p> <p>Dust / Air Quality Construction Phase</p> <p>EIAR Chapter 16, Air Quality, section 16.6 Mitigation Measures. The potential risk from dust emissions has been reviewed for the most important activities and each of the construction areas. Before commencing relevant works, an Air Quality Management Plan will be prepared and submitted for approval to the planning authority. The plan will take account of all relevant dust and emissions applicable to the circumstances of the relevant site, based on the local authority requirements and industry best practices. The plan will be developed by the contractor and for each worksite shall include:</p> <ul style="list-style-type: none"> - An inventory and timetable of activities which may give rise to emissions or dust; - Alert levels; - Alert system to be used (including notification process); - Details of control measures; - Details of dust monitoring arrangements, including the location of sensitive receptors, monitoring locations, and monitoring equipment to be used; and - Details of the air quality reporting requirements. <p>In order to ensure that no dust nuisance occurs, a series of measures will be implemented, as detailed in Appendix A16.4. In summary, the measures will include:</p> <ul style="list-style-type: none"> - Material handling systems and site stockpiling of materials designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods; - Any blasting will be completed by specialised contractors with a specific blasting dust management plan; and - Hoarding will be provided around the construction compounds. <p>Strict dust prevention will be in place at all times to minimise any potential emissions and these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations. Consistent implementation of good dust minimisation practices will ensure that the impact from construction dust is Long-Term, Localised, Reversible and not significant when considered with respect to the Environmental Protection Agency (EPA) description of effects (EPA 2022).</p>
8	A. Health	2	10. I am diagnosed with and suffer from Chronic Daily Migraine. My husband has Long Covid. We have two young children. The estimated impacts set out in the EIAR will have life changing consequences for our health, and presumably or others who live near us, too.	<p>With the exception of TBM groundborne noise for a short temporary duration of approximately 2 weeks, with the appropriate mitigation measures in place, no other significant impacts are predicted. However TII appreciate that there are circumstances where further consideration may be required. As outlined in EIAR Appendix A14.6 Section 3.4, in circumstances where temporary disturbance or nuisance occurs for certain sensitive individuals (e.g., for medical reasons or work patterns/night working), during the construction phase of the proposed project alternative interventions may also be available. In these circumstances arrangements will be agreed locally, at the relevant time, with TII when an assessment of impact will be undertaken.</p>

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9	A. Health	2	<p>11. McCabe Durney Barnes, independent experts contracted by our local community of residents, examined the EIAR and concluded that it is inadequate. (See our community submission for detail). I am therefore concerned that the EIAR may underestimate of the impact to our home and family.</p>	<p>TII do not agree that the Environmental Impact Assessment is inadequate. The Railway Order application comprises a very detailed environmental impact assessment that has identified and assessed the potential environmental impacts of MetroLink and proposed mitigations for these impacts where necessary. TII would also draw attention to the detailed project description, construction phase description and operational phase description provided in EIA Chapters 4 and 5 and 6, and EIA Chapter 7 and associated appendices that present details of alternatives considered. EIA Chapter 9 and appendices provides a detailed analysis of transport and traffic effects, and EIA Chapters 13 Airborne Noise & Vibration, and 14 Groundborne Noise & Vibration provide a detailed assessment of potential noise and vibration effects, while Chapter 29 outlines the assessment of interactions between various environmental aspects, and Chapter 30 covers the cumulative impacts with other projects. This assessment is carried out for the full length of the alignment including relative to potential significant effects on the Charlemont-Dartmouth Community.</p>
10	B. Structural impact	2	<p>12. The eastern wall of our house is directly at the edge of the proposed terminus' large underground cavity. We draw to your attention the independent expert view from McCabe Durney Barnes, that "it is evident that a very limited assessment of settlement and subsidence has been carried out" in the EIA. This is of utmost concern.</p> <p>13. It is essential that our house is surveyed in detail to determine whether it is at high risk, and to measure settlement and other impacts, before construction. Our home is a protected structure (RPS ref no. 2138).</p>	<p>Your property is separated from the station box excavation by the Green Line structures but is in close proximity to the works - circa 10m.</p> <p>The approach taken by TII for assessing the impact of construction generated ground movements reflects the industry standard three-phased ground movement impact assessment process that is undertaken on tunnelling and underground projects around the world, that includes Channel Tunnel Rail Link (CTRL), Dublin Port Tunnel, Crossrail and High Speed 2.</p> <p>EIA Appendix A 5.17 Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement and includes for the impact on 26 Dartmouth Road which crosses the 10mm settlement contour. EIA Appendix 5.17 refers. The Phase 2 assessment of the ground movement impact to this building is "slight" (an explanation for which can be found in Table 4-4), please refer building B151 (34 Dartmouth Road) in table 5-2 of that appendix. Please note that the assessed building is closer to the excavation than your property and therefore subject to greater settlement impacts.</p> <p>Your property has been designated as "special", and hence a further Stage 3 refined assessment, despite the impact only being assessed as 'slight', will be undertaken that will take account of final design and construction methodology details most likely utilising advanced numerical modelling techniques and further surveys of the building. The results of this refined assessment typically show that earlier assessments are conservative and overestimate the likely impact of construction generated ground movements.</p> <p>Monitoring instrumentation will also be installed in the area to monitor the performance of the works and potential environmental impacts, including those discussed above to ensure that acceptable limits are not breached. TII would also draw attention to the fact that private properties within 50m of the station excavation, or 30m of the tunnel are eligible to subscribe to the Property Owners Protection Scheme (POPs) which includes for pre and post-construction condition surveys and repair of damage up to a value of €45,000. Details of the mitigation measures proposed for property owners can be found in Chapter 11 (Population and Land Use), section 11.6.1.</p>

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11	C. Traffic	2	<p>14. We emphasise the community submission "Dartmouth Road Submission" comments regarding the closure of Dartmouth Road throughout the enabling works, and the need to provide for resident access and parking both during construction and after the terminus enters operation.</p>	<p>The closure of Dartmouth Road will take place in two stages, the total duration of which is 4 years, noting the first closure of 18 months will be partial .</p> <p>1. Partial closure of Dartmouth Road to enable utilities to be diverted. Subject to Statutory Undertaker approvals (ESB, Eircom etc.) this process is estimated to take up to 18 months, while access is maintained along Dartmouth Road via a proposed single lane closure.</p> <p>2. Full closure. Once the utilities have been diverted, the road is then shut to through traffic (pedestrian access is maintained) and is estimated to take up to 30 months to complete the piling, and roof slab of the station. The utilities and road will then be reinstated and the road reopened.</p> <p>Diversions will be put in place for local access, including deliveries, emergency services, bin collection, and pedestrian access maintained to all properties. The impacts on parking will be monitored during construction to reinstate any disrupted areas as soon as practicable. On completion of construction and reopening of Dartmouth Road, parking will be reinstated.</p> <p>During the closure of Dartmouth Road, approximately 30 on street parking spaces will be lost during the main works, however there will be no impact to on-street loading bays. EIAR Chapter 5, MetroLink Construction Phase specifies the 5 residential properties that will be impacted during the works. The closure will be monitored to determine if it is required at all points, or if the spaces can be temporarily reinstated temporarily throughout the works. Once the construction works are complete and Charlemont Station is operational, the remaining on-street spaces will be fully reinstated.</p> <p>As outlined in Appendix A5.1 Outline Construction Environmental Management Plan, the contractor(s) will be required to maintain emergency access routes throughout the construction phase. These will be developed in consultation with the emergency services and documented as part of the detailed CEMP(s). All required diversions will be appropriately signed, and a comprehensive publicity and information campaign will take place prior to the Commencement of works to minimise the severity of the impact.</p>
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12	D. Dublin City's needs	2	<p>15. There is a broader concern beyond the impacts listed above: The terminus for Dublin's MetroLink should be in the city centre, and should be located to allow interoperation or connection to other transport systems in the future. The NTA/TII have not undertaken a study that fully considers this. Instead they have only studied a limited scenario in which a terminus would be located at the East side of St. Stephen's Green. They have not properly studied St. Stephen's Green as a location.</p> <p>16. This must be corrected. Positioning MetroLink's terminus at St. Stephen's Green's (non-East) side would create a natural hub location to which other transport can be joined in the future. In contrast, placing MetroLink's terminus at Charlemont forecloses the possibility of integrating with the City's other transport systems. The strategic benefit to the City from locating the terminus at St. Stephen's Green is likely to be profound and must be examined.</p>	<p>TII do not agree that Charlemont is the incorrect location for an interchange with the Luas Green Line or other transport systems, or that it impacts future options for integration with the wider transport network for the reasons set out below.</p> <p>The Board is required to have regard to the likely consequences for proper planning and sustainable development in the area in which it is proposed to carry out railway works (section 43(1) of the 2001 Act) and as such the following matters are relevant.</p> <p>TII's role is to deliver the MetroLink project as provided for in the previous Transport Strategy for Greater Dublin Area (2016-2035) and the current Transport Strategy for Greater Dublin Area (2022-2042) and as supported by the Dublin City Development Plan 2022 - 2028.</p> <p>The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). The Transport Strategies were prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport and approved by the Minister for Transport. It notes in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."</p> <p>The Transport Strategy is "a consideration material to the proper planning and sustainable development of the area or areas in question." Development Plans are required to be consistent with the Transport Strategy. The Dublin City Development Plan 2022-2028 envisages this station at Charlemont in policy SMT22 "To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained: ... MetroLink from Charlemont to Swords".</p> <p>Accordingly, the location of the Charlemont station was a strategic decision made at the highest levels of transport and land use planning and such is fully consistent with the proper planning and sustainable development of the area. The Transport Strategy considers a range of options for the onward extension of MetroLink to meet the demand for travel over the period of the strategy. This includes consideration of the need for the upgrade of the Luas Green Line to metro with a metro extension to Dublin south west, south or south east. Whilst the strategy envisages that further extensions will be delivered after 2042, MetroLink which terminates at Charlemont allows for the possible extension of the metro in all the above directions.</p> <p>The proximity of the metro to the Luas line at Charlemont provides for a positive customer experience for all users with short interchange distance and due to the proximity, clear wayfinding and high visibility of the interchange. The interchange arrangements at Charlemont provide for significantly better interchange arrangements compared to an interchange at St Stephen's Green Station.</p> <p>The detailed analysis done for the Railway Order application further confirms that the section of MetroLink route between St Stephen's Green and Charlemont Stations contributes significantly to the overall benefits of the scheme. It serves a significant area of the south city of Dublin and offers enhanced access from the local area to the city centre and a direct connection to Dublin Airport. It serves key trip attractors including residential areas and offices / workplace locations, with high passenger boarding and alighting figures in the peak hours. During the morning peak, at Charlemont station the flows include 1,800 passengers alighting, 2,300 boarding and 1,229 passengers alighting, 2,276 boarding during the evening peak. The passenger numbers contribute significantly to the overall benefits of the scheme and the effect of these benefits outweigh the additional costs that are associated with the delivery and operation of the section from St Stephen's Green to Charlemont station.</p> <p>The location of the interchange at Charlemont does not preclude onward extension south. An interchange at Charlemont is supported by policy including the Dublin City Development Plan 2022 - 2028 and the Transport Strategy for the Greater Dublin Area. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."</p>
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			Response (12) continued.	<p>By extending MetroLink to Charlemont it provides for future proofing of the Green Line, bypassing the capacity constrained Luas on-street running section, and ensures potential future connectivity options are enabled, either to the Green Line or for extensions of the metro.</p> <p>The Charlemont Station interchange provides for increased passenger utilisation of the MetroLink system, thereby increasing the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ratio (BCR).</p> <p>It is not correct to say that "The NTA/TII have not undertaken a study that fully considers this. Instead they have only studied a limited scenario in which a terminus would be located at the East side of St. Stephen's Green. They have not properly studied St. Stephen's Green as a location." A number of route options were considered in the process of identifying the Emerging Preferred Route (EPR). These route options included potential station locations on St. Stephen's Green West.</p> <p>St. Stephen's Green West was ruled out as the alignment between the proposed Tara Station and a station on St Stephen's Green West would result in an undesirable horizontal reverse curve and an alignment greater than a 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with the MetroLink Fire Strategy. Further, as a potential station location, St Stephen's Green West itself is a very constrained location due to the presence of buildings, Luas and St Stephen's Green Park. Maintaining the Luas operational during station construction would be complex and challenging with significant disruption expected, whilst the impacts on St Stephen's Green Park would be greater for a station in this location compared to the proposed location on St Stephen's Green East. This would be the result of; the likely need to place more of the station in the Park compared to the proposed station on St Stephen's Green East; it would impact an area of the Park that has greater amenity value than St Stephen's Green East due to the nearby Park entrance adjacent to the southern end of Grafton Street, and there would be a risk of impacting the existing Park lake. In summary, an alignment that links the proposed Tara, St Stephen's Green East and Charlemont stations is a more direct and economic alignment, does not require additional intervention infrastructure, avoids a complex engineering interface with the Luas Green Line, impacts the Park less and has less potential for disruption during the construction phase.</p> <p>As outlined by EIAR Chapter 3, Background to the MetroLink Project, one of the key objectives of the Project is the integration of it with the wider transport network that also includes for BusConnects and DART+ which are all included under Project Ireland 2040. Together, these projects will result in a reliable, sustainable, affordable, integrated public transport network that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2023 and make Dublin a more liveable and sustainable city.</p> <p>Arising from the decision to postpone the future upgrade of the Green Line to metro services, it is being argued that Charlemont station effectively becomes a terminus station in the short to medium term. In this regard, it is true to say that the Metrolink trains will terminate and turn back at Charlemont station, however the public transport service offering for passengers does not terminate, it transfers from Metrolink to LUAS as part of the integrated transport network.</p>
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			Response (12) continued.	<p>The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus take place. At this location the high capacity public transport offering terminates and the public transport offering transfers to a completely different mode, i.e. Bus . The environmental effect of the Metrolink terminus are accordingly assessed in the EIAR. Charlemont Station does not have the associated infrastructure and services associated with a terminus location and in fact has more in common with a “system turn back location”. Charlemont Station is located within an area of high public transport accessibility, linking with the Luas Green Line which offers reasonably similar levels of services and frequency for journeys to and from the south of Dublin. As such, public transport service offering is not considered to terminate, but transfers onto the similar service offered by the Luas Green Line, forming part of a transport corridor running from Cherrywood to Estuary. The associated environmental impacts for the turnback and station at Charlemont have been fully assessed in the EIAR.</p> <p>Charlemont station itself was chosen on the basis of its interchange potential with Luas, as well as local bus services, as outlined above. The section of the line between St Stephen's Green and Charlemont generates considerable benefits for the scheme in terms of increased patronage. The fact that the Charlemont Station is now being referred to and considered as a “terminus station” rather than an interchange station, does not increase the environmental impacts the station has on its local environment, in terms of passenger demand, airborne noise, vibration and other environmental effects.</p> <p>If the scheme were to terminate at St Stephen's Green, it would be important to determine where the next station south of St Stephen's Green would be located for a future extension as required in the Draft Transport Strategy for Greater Dublin Area (2022-2042). With single bore tunnel configuration, the maximum distance between stations is 1,000m. If the distance between stations extends beyond 1,000m there is a need for an intervention shaft or separate escape tunnel. Selecting a different station location other than Charlemont within a 1,000m arch south of St Stephen's Green Station will be challenging given the limited space available for a station within this area and it is reasonable to assume that the Station may be located outside the 1km arch, thus requiring the construction of an intervention shaft similar to that currently proposed at Albert College Park between St Stephen's Green and the proposed station location.</p> <p>The proposed route alignment from Estuary to Charlemont is consistent and compliant with the GDA Transport Strategy 2022-2042 (published in January 2023) in which states that the south city terminus at Charlemont offers the optimal location for interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise.</p>
13	D. Dublin City's needs	3	17. The construction of the large underground “station box” at Charlemont has already been substantially completed by Hines, a private development company, before the Railway Order was drafted. NTA and TII describe “Stage 1” of the development of Charlemont as “the Hines Development”.12 That first stage of construction was unlawful. At least three difficulties arise: i) the construction was outside of the context of a Railway Order; was ii) undertaken without planning permission; and iii) without an environmental impact assessment. As a result, constructing MetroLink's terminus at Charlemont would therefore expose the entire MetroLink project to acute legal hazard.	The MetroLink enabling works constructed as part of the Hines development was included in the planning application for the Hines Development and has the benefit of planning permission which was granted in April 2019.
14	Request	3	18. Therefore, we request An Bord Pleanala order the following amendments: i. Omit the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel from the Railway Order; and ii. Require the submission of a railway order for a section from Tara Street Station to St. Stephens Green that enables a terminal hub station that can integrate with the Luas Green Line, bus routes and future DART underground.	<p>The above responses to the observations made explain why TII do not consider it is correct or appropriate that the MetroLink alignment south of the proposed Tara Station should be omitted, and also demonstrates why the proposed Charlemont Station has been selected by TII as the preferred interchange with the Luas Green Line</p> <p>A scheme which terminates at Tara Street would not be consistent with the Transport Strategy for Greater Dublin Area (2022-2042). In addition any decision to terminate the scheme at Tara will significantly impact on the overall viability and benefits of scheme.</p>