

Submission No.	286
Organisation Name or Name of Submitter	Suzi Taylor and G.I Taylor

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Objection/Observation: Rail Order 2022 (MetroLink-Estuary to Charlemont via Dublin Airport) Case Reference Number NA29N.314724

1	Letter - introduction	1	<p>In general we appreciate that a Metro connection from the city centre to the Airport is a worthwhile project to bring Dublin up to speed with other modern European cities.</p> <p>The proposed siting of a Metro terminus on Charlemont/Dartmouth Road though is misplaced planning in a domestic housing community. Our family home is directly opposite the proposed development of the Metro Terminus, the proposed Dartmouth Road Metro entrance/exit and the plans indicate tunnelling directly under our property. The proposed development would have huge implications for the local community and amenities in the area, as well as the listed Victorian houses on Dartmouth Road and their residents.</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.</p> <p>TII have carefully assessed both construction and operational impacts and do understand your particular concerns regards the proximity of 32 Dartmouth Road to the construction of the proposed Charlemont Station. While TII are of the view that the construction environmental impacts can be mitigated (please see further detail below), relocation is an available option during peak construction. Temporary re-housing is covered in the Airborne and Groundborne Noise Mitigation Policy and TII are available to discuss this option if that is something the property owner would like to explore. TII would further note that there are no profound impacts predicted during the operational phase.</p> <p>TII have responded below to the individual detailed observations raised by this submission, including the proposed; Charlemont southern entrance, tunnel south of Charlemont Station, construction generated ground movement impacts, and impacts on the community and amenity.</p> <p><u>The Rationale for a Proposed Station and Turnback at Charlemont</u></p> <p>TII do not agree that Charlemont is the incorrect location for an interchange with the Luas Green Line or that it prejudices future options for integration with the wider transport network for the reasons set out below.</p> <p>In the Emerging Preferred Route Report, Charlemont was identified as the last station prior to the tie-in to the Green Luas Line which was intended to be upgraded to Metro standard. As outlined in EIAR Chapter 7, the decision to terminate at Charlemont instead was driven by three factors:</p> <p>(a) the additional impacts that would be involved in upgrading the Luas south of Charlemont as a result of the proposed adoption of a high degree of automated operations (GoA4);</p> <p>(b) the development of alternatives to accommodate increased capacity on the Luas line south of Charlemont without that upgrade; and</p> <p>(c) Feedback received during the EPR non-statutory consultation.</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>
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			Response (1) continued.	<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. Passengers wishing to interchange between Luas and Metro at the St Stephen's Green terminus would face a 500m-walk along a route either through St Stephen's Green park or along the footpath north of the park, which adds significantly to the time for interchange and therefore the overall journey time for passengers and a less positive customer experience for all interchange users. This passenger experience would be reduced further for those with mobility or visual impairments as well as those travelling to/from the airport with luggage.</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. Further information is available in Chapter 7: Consideration of the Alternatives, section 7.7.8 MetroLink Southern Terminus Location.</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> <p>MetroLink to Charlemont 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>The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). The Transport Strategy was 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." Under the Planning and Development Act 2000, 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 is endorsed by detailed project-level analysis (ref EIAR Chapter 7 Consideration of Alternatives, section 7.7.8, and EIAR Appendix A7.9 Terminus Station at Charlemont compared to St. Stephens Green) and the strength of that location is reflected 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.</p> <p>The current 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 any of the above directions.</p>
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2	Misplaced Terminus	1	<p>The Terminus should be sited in the city centre, Tara Street, serving city centre area, where there are already plans for a Metro station which could be developed further. A much more suitable environment to link passengers connecting with the Dart and Luas lines, many bus lines, and has the infrastructure of services for a travelling public, having nearby shops, cafes etc. No Study has been completed by NTA/TII as part of the Metrolink project on the most suitable location for a Dublin city centre Terminus.</p>	<p>Response (1) above explains the rationale for a proposed station at Charlemont. TII do agree that Tara Street Station is an appropriate location for a key interchange and this has been provided, along with other key points of interchange including the Park & Ride at Estuary, Dublin Airport, Glasnevin and the Luas Green Line at Charlemont. As outlined in EIAR Chapter 3, the proposed Project is part of a wider integrated 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 2021 and make Dublin a more liveable and sustainable city. Whilst MetroLink is a standalone project that is not dependent on any other projects for its delivery or effective operation, it is nonetheless a critical part of the proposed integrated transport network for the Greater Dublin Area.</p> <p>TII would further note that a number of route options were considered in the process of identifying the Emerging Preferred Route (EPR). However, none of these considered the option of terminating at Tara Street as the route options were designed to facilitate a connection with the Luas Green Line south of Charlemont and the commercial, business and residential areas to the south of Tara and up to Charlemont station support significant catchment for the proposed Project.</p> <p>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> <p>The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus (train sideways, car parking etc) 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 or car. 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. Operationally, the Station will see people moving quickly in and out of the area, noting that it will act as an interchange, and has been deliberately designed with minimum set down space or room for taxis so that it does not encourage the Station to be used as a terminus. All operational environmental impacts are mitigated so they are not significant, while the impact on amenity will be permanent and positive.</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>
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3	Duplication of route and excessive project expenditure	1	<p>There is no need to duplicate Luas and Metro lines from the city centre to Charlemont, an extremely costly and disruptive extension, locking in a south direction for a future Metro development. The implications of this new alignment is very significant to the wider community, it would involve top-down construction threatening other homes in Ranelagh area in the future. The Metrolink project would be better served by providing an axis possibilities towards UCD or Terenure to serve those areas where the Luas or Dart lines do not serve at present.</p>	<p>There is no duplication of infrastructure between St Stephen's Green and Charlemont noting the capacity of the Luas south from St. Stephen's Green is restricted due to on-street running.</p> <p>There is a limit to the potential of the Luas to provide additional capacity in the on-street non-segregated section of the Luas Green Line from Charlemont northwards through the city centre. The nature of this route and the fact that it currently crosses several road junctions (Adelaide Road, Harcourt Street / Hatch Street upper and Harcourt Street / St Stephen's Green south) limit the service to a maximum of 24 trams per hour per direction. The projected demand for this section would require a higher frequency of up to 30 trams per hour and this demand cannot be met with on-street systems (Luas / bus). The interchange between Luas and MetroLink proposed at Charlemont will provide the necessary capacity to address the demand on this corridor and reduce overall travel time for passengers</p> <p>There is also high passenger demand forecast for a Metrolink station at Charlemont, including from the Ranelagh area, which would be lost if St. Stephen's Green was the MetroLink southern interchange station. The additional fare revenues collected by the Charlemont Station interchange increase the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ratio (BCR).</p> <p>TII also do not agree that Charlemont locks in the possible future extension of the Metro south. As previously noted, Charlemont does not preclude future extension of the Metro to the south, south-east or south-west should sufficient demand arise, and that this is in accordance with the government approved 2022-2042 GDA Strategy. There is also no basis to suggest there will be an increased demolition of houses, if in the future, the Metro is extended south, this does not mean that inevitably open cut construction will be required or demolition of property will be necessary. It is possible that in the event of a tunnel being constructed to connect to Charlemont Station that this would be undertaken from a site further south.</p>

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4	Unsuitable linking of Luas/Metro connection	2	<p>There is a difficult link between the Charlemont Luas (high embankment and bridge), with ground level proposed access to the Metro system, not suitable for those with disabilities/mobility issues, luggage etc. in all weathers.</p> <p>For many years the Grand Canal road route has been notoriously congested. The addition of construction traffic, followed by public access to the proposed Metro Terminus, will put excessive pressure on the area. As the Luas, Dart and many bus lines already connect passengers from south Dublin to the city centre these passengers could easily connect with a future MetroLink there.</p>	<p>Transport modelling has been carried out for both the construction and operational phases of the Project, the results of which are summarised. This shows there will be no significant impacts and that Charlemont Station will provide for improvements to the public transport network once operational.</p> <p>Traffic and Pedestrians - Construction Phase</p> <p>EIAR Appendix A9.5 Scheme Traffic Management Plan presents the analysis undertaken to assess the impact of the traffic management measures on the local road network surrounding the proposed Charlemont Station during the construction phase. At the local level the following parameters have been used to assess impacts on general traffic and on pedestrians:</p> <ul style="list-style-type: none"> • Increase in walking distance/quality of service for pedestrians (through removal of footpath, reduction of quality of service, removal of a pedestrian crossing or relocation of crossing by more than 100m); • Increase in driver delays at junctions; • Changes in traffic flows on surrounding streets; and, • Additional distance travelled due to diversions. <p>The analysis undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The largest increase in driver delay of 12 seconds is registered on the westbound approach on Grand Parade to the Ranelagh Road signalised junction.</p> <p>During the construction phase, pedestrians will experience a reduction in quality of pedestrian infrastructure and space. The construction site boundary will encroach upon footways in the local area, including the northern side of Dartmouth Road, and the southern side of Grand Parade. However, a temporary signalised crossing will be provided west of the Luas to maintain pedestrian access to and from the Stop. Whilst there are partial closures on Dartmouth Road and Grand Parade, pedestrian movements will be maintained on appropriately sized footways through the area.</p> <p>Traffic and Pedestrians - Operational Phase</p> <p>A microsimulation VisWalk model has been developed for the immediate area surrounding Charlemont Station during the operational phase. The model covers the full extent of the publicly accessible station area, including the immediate vicinity of the station entrance at street level, the Luas stop and nearby junctions at Charlemont Bridge. In order to accommodate the forecast demand from the proposed Charlemont Station, a new staircase with 2.4m stair width is proposed at the south east corner of Charlemont Luas stop. An elevator will also be provided at this location for persons of restricted mobility and for travellers with luggage. Both are sized for MetroLink to Luas, and Luas to MetroLink passenger numbers. Please refer to Chapter 9: Traffic & Transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, section 6.1.3. Pedestrian Impact Assessment.</p> <p>In addition, it is proposed that the pedestrian crossing on R111 Grand Parade will be repositioned to the front of the building being developed by Hines. With this infrastructure in place, the model indicates that the R111 Grand Parade will have an acceptable level of service overall, with some reductions in service seen at the pedestrian crossing where pedestrians are required to wait for a green phase at the signals. Overall, it is considered that the model displays an acceptable level of network performance.</p> <p>The proposed pedestrian crossing on Grand Parade will have minimal impact on the traffic flow along Grand Parade and can be programmed to operate in sync with the existing signalised junction at Grand Parade /Charlemont Street to maintain the flow of traffic movements. When the Project is operational, car mode share will decrease, with a reduction of up to approximately 830 car tips to and from the zones surrounding Charlemont Station over the 12hr period in 2065. In overall terms, the Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.</p> <p>Furthermore, TII have deliberately designed the Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used as a terminus.</p>
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5	Station box on Hines site	2	<p>The station box at Charlemont, as constructed in 2021 /22 by Developer Hines, does not have the benefit of planning permission and has not been part of the EIA undertaken for this project. We have experienced high impact of drilling and construction in recent years (2021 -3) as the Hines Charlemont site is opposite our property, where the piling apparatus was in operation a few meters from the front of our houses.</p>	<p>The station box at Charlemont does have planning permission. As detailed in Chapter 4 of the EIAR (Section 4.17.12), planning permission was granted to Hines in April 2019 for Two Grand Parade including the refurbishment of Carroll's Building (an eight-storey office building), demolition of the warehouses at the rear, provision of offices and other works (Dublin City Council reference 2373/17, An Bord Pleanála reference PL29S.300873). Permission was granted in February 2020 for amendments to the previously approved proposal (DCC reference 4755/19). The permission includes a condition requiring the developer to enter an agreement with Transport Infrastructure Ireland and the NTA, inter alia, "to accommodate the potential development, construction and operation of a Metro or light railway on, at or near the site of the approved development." The permission requires the developer to facilitate the proposed Project by constructing a structural deck founded on bored secant piles which will form the central section of the Charlemont station box roof slab.</p> <p>The Hines (Grand Parade Property Trading Co. development) and Metrolink construction works required for Charlemont Station are presented in Appendix A5.3 Construction Sequence Report. As presented in EIAR Chapter 30, the cumulative potential of the Charlemont works has been assessed.</p>

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6			<p>It would radically impact the community of Dartmouth Road and Square for 8-10 years while the tunnelling, drilling, piling and construction work is carried out and the road closed to regular traffic. There would also be future negative impacts on the area. The nearby houses, including our's (32 Dartmouth Road, built 1890) will not be tolerable to live in while construction is carried out. It would inflict excessively high levels of noise, vibration, dust, and possible damage to Victorian properties.</p>	<p>Please refer to Responses (4) and (7) for the assessed traffic and pedestrian impacts during construction.</p> <p>TII have carefully assessed the construction impacts and TII do understand your particular concerns regards the proximity of 32 Dartmouth Road to the construction of the proposed Charlemont Station. While TII are of the view that the construction environmental impacts can be mitigated (please see further detail below), relocation is an available option during peak construction. Temporary re-housing is covered in the Airborne and Groundborne Noise Mitigation Policy and TII are available to discuss this option if that is something the property owner would like to explore.</p> <p>The Construction Sequence Report (Appendix A5.3, Section 8.4) shows diagrammatically the phasing of construction works at the site and the proximity to properties on Dartmouth Road. Noise associated with piling activities has been assessed in Chapter 13, Airborne Noise and Vibration. Noise associated with the piling works in closest proximity to Nos 26-34 Dartmouth Road has been assessed as being significant to very significant without any mitigation. However, with the mitigation measures proposed (as detailed in Section 13.6), residual noise levels are calculated to be controlled to below the construction noise thresholds and/or below the upper construction limit at these properties. Noise mitigation, as summarised in section 13.6.1 of the EIA, includes for boundary hoarding around the station working area, comprising 7m high hoarding at the north boundary, and 4m at the remaining boundaries.</p> <p>All planned night-time work activities will have to be undertaken, controlled and mitigated under the detailed Construction Environmental Management Plan (EIA Appendix A5.1) 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, and minimising settlement impact, 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 VDV Threshold Levels of 0.8ms-1.75 (VDV day) and 0.4ms-1.75 (VDV night) as set out in EIA Chapter 14, section 14.2. 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. 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.</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>
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			Response (6) continued.	<p>Other Groundborne 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 32 Dartmouth Road are summarised below. (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. • 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. 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>
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			Response (6) continued.	<p>Dust / Air Quality Construction Phase EIA Chapter 16, Air Quality, section 16.6 Mitigation Measures. The potential risk from dust emissions has been reviewed for the most important activities and for 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 (ref EIA Appendix A51. CEMP, Section 6.3). 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> <p>Construction Generated Ground Movements The EIA has assessed the impact of settlement on the houses on Dartmouth Road. EIA Appendix 5.17 refers. The settlements predicted for the buildings directly over the tunnel are up to 45mm. The Phase 2 assessment of the impact for these buildings is "Slight" - please refer building B151 (32 Dartmouth Road) in table 5-2 of that appendix.</p> <p>The protected buildings along Dartmouth Road, within the zone of influence of the works, will be subject to a further Phase 3 refined assessment (despite the impact only being assessed as 'slight') to 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>
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7	Impact on Dartmouth Road and residents	2	<p>Traffic will not have access to Dartmouth Road, we would not have vehicle access to our property, or use our off street parking, or street parking near the house for an estimated 8+ years. The area would involve haul routes and vehicle holding areas for an excessive length of time.</p> <p>It is vital that residential parking be reinstated as it affects 10 houses on that stretch of Dartmouth Road. The area is already short of parking spaces, the Hines site facilitates so few space for an office development for many hundreds people, that there is bound to be extra pressure on the area in the coming years as a result. There is valid concern about access for emergency vehicles -fire engines, ambulances, delivery trucks etc that would impact Dartmouth Square and Road, Cambridge Tee and surrounding roads where roadways access are closed.</p>	<p>Dartmouth Road will not be closed for 8+ years, and while TII do acknowledge the impact, the closure of the road is necessary to enable construction. The closure 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>During the closures, diversions will be put in place for local access, including deliveries, emergency services, bin collection, and pedestrian access maintained to all properties. 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> <p>Approximately 30 on street parking spaces will be lost during the main works, however there will be no impact to on-street loading bays. EIA Chapter 5, MetroLink Construction Phase specifies the 5 residential properties that will be impacted during the works. As detailed in Chapter 9 (Traffic and Transport) section 9.7.1.2., the closure will be monitored to determine if it is required at all points, or if the spaces for parking can be reinstated temporarily throughout the works. On completion of construction and reopening of Dartmouth Road, parking will be reinstated.</p> <p>During the periods of partial (18 month) and full closures (30 months) of Dartmouth Road the closed lanes may temporarily be utilised for lorry holding / marshalling to control the movement of HGVs onto site and thus mitigating the potential for traffic build up on adjacent roads. As detailed in the Scheme Traffic Management Plan (Appendix A9.5), Charlemont is within the Dublin City Council HGV restriction zone and permits will need to be arranged for HGVs to enter the zone and specific routes followed. By agreement with the Local Authority, construction vehicles will be strictly controlled in terms of the hours of operation (i.e. construction traffic may be prohibited during periods of very heavy traffic) and by imposing restriction on vehicle size and weight. There will be strict controls and regulations at the entrance to the site in order to ensure the safety of other road users. Construction vehicles will be required to switch their engines off when stationary as noted in EIA Appendix A5.1 CEMP, Table 6.2: Noise and Vibration Measures, Topic ANV5.</p> <p>During the duration of the road closure along Dartmouth Road, access for emergency response vehicles will be maintained through the site to the edge of the excavation in front of No. 32 to 35 Dartmouth Road. The Outline Construction Environmental Management Plan (CEMP) referred to in Appendix A5.1 sets out the full requirements of the main contractor to protect the environment during the construction phase. The CEMP includes the requirement to provide an Emergency Response Plan, section 5.10. The plans for emergency access through the site will be developed by the contractor and agreed in consultation with the emergency services and documented as part of the detailed CEMP in advance of construction commencement for approval by DCC.</p> <p>Also, as previously noted, when the Station is operational, TII have deliberately designed the Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used as a terminus or for drop-off and pick-up.</p>
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8	Metro project piling, tunnelling and associated works.	2	<p>The proposed tunnelling drilling/piling for the Metro project would be much closer, for much longer than the Hines site works in recent years. The closeness of this proposed activity to our houses is not clearly indicated on plans, but would be within a few metres of the front elevation of our house. The piling machinery and processing of ground works, removal of materials etc is extremely noisy, makes the properties noticeably vibrate, and is a stressful environment to live in. These buildings were not constructed with an eye to heavy duty drilling and construction. Settlement issues which might arise from tunnel drilling under our property, could cause damage to houses, outbuildings and land are a real concern.</p> <p>The road area that is proposed to be closed for years, to facilitate construction, has planned an area outside our houses on Dartmouth road as holding area for heavy trucks, with deliveries and removal of materials etc.</p>	<p>TII note that drawing ML1-JAI-SRD-ROUT_XX-DR-Z-02090 (Structures Details Book 2 of 3) shows and labels the outline of the underground station, and which indicates the southern extent of the underground element of the station. Property Drawing ML-P 307 0-A (Property Details, Book 2 of 2) also shows the footprint of the station in relation to surrounding property, as does Alignment drawing ML1-JAI-ARD-ROUT_XX-DR-Y-03096 (Alignment Details Book 2 of 2).</p> <p>Response (6) outlines the assessed impact of construction noise and vibration, and settlement, and response (7) sets out the proposed traffic management for Dartmouth Road.</p>
9	Impact from work schedule during proposed construction period.	3	<p>The extended "working day" for the development of the proposed project is much longer than what is considered a working day, beginning very early in the day, to late in the evenings, Monday to Saturday (half day Saturday) well beyond what would be considered acceptable on a road of family homes. It will disturb sleep and rest, impact on the whole home environment, perhaps 70+ hours per week, almost double hours of the accepted working week. Add to that the set up 1 /2 hour allowed each end of the day extends the time it would impact us. The TBM (boring machine) would operate 24/7 under our properties.</p> <p>Our experience with the Luas embankment maintenance is that it often works outside Luas operating times, with scant regard for the people living beside and near the line sleeping at night/ early mornings</p>	<p>Please refer to Response (6) above as regards working hours and the assessed impacts of construction, including reference to asociated mitigation proposals,</p>

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10	Metro station Entrance/Ext on Dartmouth Road	3	<p>The proposed positioning of a Metro entrance/exit right opposite our homes would mean exposing us to continuous extra light and noise, as is usually experienced around station entrances when operational, 365 days/nights annually. The entrance/exit is not suited to a quiet residential road and should not be positioned facing and in such close proximity to our houses. There is no reason why the entrance has to face in this direction, as depicted on plans. Noise would arise from surface passenger movements, with usual luggage, PA announcements, noise of escalators, lifts, rail operating noise, ventilation, local traffic, car parking and set down area, whoever is accessing the station from the south side. There is no indication of screening off entrance area.</p>	<p>The current access arrangement whereby the entrance canopy faces Dartmouth Road is the optimum design solution as it will allow passengers to exit the station and move away from the station quickly.</p> <p>Noise</p> <p>With regards to the noise of operating rail infrastructure, EIAR Chapters 13 and 14 present a comprehensive and detailed assessment of operational airborne and groundborne noise and vibration. No residual noise impacts are identified at this location during operation. The calculated rail noise levels across the proposed Project are not significant in terms of any widespread community disturbance and result in a not significant to slight impact when added to the prevailing noise environment.</p> <p>EIAR Chapter 13, sections 13.2.3.2 and 13.5.3.2.3 recognise that ventilation systems if not designed and mitigated effectively are potential noise sources. Section 13.6.2.3 outlines the detailed considerations that will be included in the design to ensure that the ventilation systems do not exceed limits as per BS 4142, including:</p> <ul style="list-style-type: none"> • Reduction of induct flow rates; • Reduction of elements in the airflow; • In duct attenuators; • Orientation of grilles and louvres away from sensitive receptors; • Acoustic louvres; and • Anti-vibration mountings and couplings will be incorporated into the design to control vibration. <p>Measures to mitigate noise from the use of public address systems is also detailed in Chapter 13 (sections 13.5.3.2.4 and 13.6.2.4). Best practice design principles will be employed to minimise noise breakout at the surface from these systems via escalators, lift shafts and stairwells.</p> <p>Mechanical elements associated with lifts and escalators are housed below ground and are fully enclosed. The operation of lifts and escalators will not generate any notable noise sources during operation and will not be audible above the prevailing noise environment.</p> <p>With regards to stations entrances, these are transient areas for passengers entering and exiting the station. These activities are not the source of significant noise generation and form part of the existing soundscape in the existing prevailing environment. It is acknowledged footfall numbers will increase in the vicinity of the station entrance, however this activity does not translate to significant noise impacts.</p> <p>As noted above TII have deliberately designed the Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used as a terminus. There will be no car parking or set-down areas on Dartmouth Road.</p> <p>Finally, the Operator will be required to adhere to noise limits to ensure that there are no significant effects. To provide further assurance, it will also be a requirement placed upon the MetroLink operator to act responsibly and considerately, and be a 'good neighbour' when operating the station.</p>
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			Response (10) continued.	<p>Lighting</p> <p>Regards lighting during the operational phase, EIAR Chapter 4, Description of the MetroLink Project, section 4.12.8.3 explains the lighting class (and therefore the light level and uniformity targets) for each area to be lit, and has been selected using BS5489-1:2020 with account made for the local ambient lighting and environmental zones.</p> <p>All lighting within the station and at ground level will be designed to ensure that there is no significant light spill effecting nearby residential properties. Furthermore, as outlined in responses above, noise levels from the entrance are not predicted to be significant.</p> <p>As explained in EIAR Chapter 6, Operation and Maintenance, Section 6.6.6 Lighting, the following measures will be undertaken to ensure the quality of life of residents will not be effected by station lighting:</p> <ul style="list-style-type: none"> • LED lights will be used instead of traditional lights to control light spill, in compliance with the Institute of Lighting Profession 'GN01 Guidance Notes for the Reduction of Obtrusive Light' document; • The use of luminaires will ensure that zero upward light is emitted; and • Lighting will be adjusted depending on a stations setting for example lighting columns on highways will be 12m high but lighting columns in or near residential areas will be 8m high.
11	Barriers along pavement outside 32-34 Dartmouth Road	3	The proposed barriers at 6.4 m only reach half way up the upper floor of the houses 32-34, leaving the upper rooms very exposed to the vibration, noise, dust pollution etc and lack of privacy from this operation.	<p>The proposed barrier (hoarding) is 4m high along the east boundary by houses 32 to 34. The primary purpose of the hoarding is to mitigate airborne noise. The height of the barrier has been determined through modelling and calculation of predicted construction noise levels.</p> <p>Refer to Response (6) for Vibration impact assessment.</p> <p>As explained by Response (6) above, an acoustic enclosure will also be provided at Charlemont during night-time support works for sprayed concrete tunnelling works. The full range of noise mitigation and vibration mitigation measures are detailed in Section 6.2 of the CEMP (Appendix 5.1 of the EIAR).</p> <p>Whilst the barriers will provide mitigation for dust emissions, the main control measures will be focused on preventing dust generation and controlling generation at source (see response (6) above). The full range of dust mitigation measures are detailed in Section 6.3 of the CEMP, Appendix A16.2 (Site Specific Potential for Construction Phase Dust Impacts) and Appendix A16.4 (Dust Management Plan) of the EIAR.</p>
12	Outdoor spaces and community	3	Loss of amenities to wider community, as Dartmouth Square is used regularly by a wide number of people for exercise during the working day and weekends, outdoor Yoga sessions, community events etc. The prospect of many years of not being able to use outdoor areas, our gardens etc. due to high levels of noise impacts during construction period. Bees have been kept at this property since the 1960s and pollinators of even more importance in the present time.	<p>TII acknowledge that construction noise is likely to be heard in outdoor spaces, including gardens close to Charlemont Station and Dartmouth Square. Chapter 13 presents the potential significant airborne noise impacts, with Table 13.90 summarising the potential construction noise impacts once noise mitigation has been considered. EIAR Appendix A13.7 Construction Phase modelling includes assessment of construction noise on Dartmouth Square properties (nos 62 to 68) representative of Dartmouth Square, based on the proposed noise mitigation. The Predicted Magnitude of Impact is indicated to be 'Not Significant' or 'Moderate to Significant' depending on the activity and whether weekday or Saturday mornings.</p>

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13	Outdoor spaces and community	3	It is a well-accepted implication of the high levels of noise, disruption, anti-social behavior, displacement which this proposed project would inflict on the residents is harmful to health, leading to poor quality sleep and rest. The accumulated noise levels are acknowledged to elevate blood pressure and hypertension, and other cardiovascular impacts. The health impacts of prolonged exposure is a concern to those in the vicinity.	<p>EIAR Chapter 10, Human Health has identified that there may some residual effects during construction after mitigation measures due to the noise and vibration arising from mechanical excavation, TBM advancement and proposed blasting resulting in "annoyance to users, but no health effects". No impacts to human health are predicted for the operational phase.</p> <p>Regards anti-social behaviour, the interchange will certainly increase the number of people passing through the area, however the risk of anti-social behaviour has been considered by the Project and is addressed by EIAR Chapter 6, MetroLink Operations and Maintenance. Section 6.6.5.8 specifically addresses how this will be managed, including how the architectural and urban realm design is designed to discourage anti-social behaviour, for example through the attractive setting, use of public lighting, open sight-lines, and avoidance of areas where individuals and groups of people can hide. Subject to data protection impact assessment and compliance with the General Data Protection Regulation (GDPR) CCTV will also be installed throughout the MetroLink system, to provide general security and surveillance of all the public areas. TII would also note Charlemont Station has been deliberately designed without drop-off (with the exception of a drop only for persons of restricted mobility on Grand Parade) and taxi pick-up areas.</p>
14	Properties impacted proximity to Metro Station	4	Although properties with easy access to a transport hub benefit, it does not enhance quality of life, property value or security to those in immediate vicinity. The proposed development would have impact on value of our properties, especially during the construction stage. Access to main transport is an advantage at a short distance, but being in the direct proximity to a station is negative in impact.	<p>There is evidence to suggest that property values will in fact increase in close proximity to public transport infrastructure and that local residents will greatly benefit from having a world class Metro system providing access to the city centre, airport and north city at their door step.</p> <p>While TII are of the view that the construction environmental impacts can be mitigated (as described in above Responses), relocation is an available option during peak construction. Temporary re-housing is covered in the Airborne and Groundborne Noise Mitigation Policy and TII are available to discuss this option if that is something the property owner would like to explore.</p>
15	Assessments of properties	4	<p>Facilitating of assessments, though necessary, before during and at the end of the proposed project intrude on our homes, limit the use of our outdoor space and any interim plans we may have for the property.</p> <p>The long term Issues of security, maintenance, insurance cover, etc require quick attention to any issues arising from impacts from site works, tunnelling etc affecting our property.</p>	<p>A detailed environmental impact assessment has been undertaken and submitted as part of the Railway Order application. Monitoring instrumentation will also be installed in the area to monitor the performance of the works and potential environmental impacts, including ground movements 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. The Property Owners' Protection Scheme is in addition to the existing legal rights of property owners and is in place to provide a simple and prompt way of rectifying any damage caused under the project up to the ceiling of €45,000. If the sum should exceed this amount the normal claims process would be used with the insurance companies for TII and/or the contractor.</p> <p>Response (6) above outlines how noise, vibration and dust impacts will be mitigated so that use of outdoor space is not significantly impacted. TII acknowledge that the temporary closure of Dartmouth Road may limit interim plans for the property due to restricted access (but noting pedestrian access is maintained at all times), but would also note that MetroLink does not encroach within the boundary of the property itself, and after approximately 30 months the hoarding is moved back to the other side of Dartmouth Road, and the road reopened and parking reinstated. TII do not envisage any increase in security issues.</p> <p>TII would also draw attention to the Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy (Appendix A14.6) where there is a process in place whereby further mitigation measures can be implemented at individual properties should this be merited.</p> <p>Regarding insurance, the TII MetroLink Property Owners' Protection Scheme (POPS) is available to homeowners within 30m of the proposed Project, with any consequential damage caused by MetroLink works covered under the POPS scheme (see policy for full details). TII do not expect there to be any adverse impact on the insurability of residential properties arising from MetroLink.</p> <p>Finally, as noted above, TII also confirm that while of the view that the construction environmental impacts can be mitigated, relocation is an available option during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider. Where temporary re-housing arrangements are made, TI will meet all reasonable costs associated with the temporary accommodation and all relevant expenditure associated with the move.</p>

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16	Please see additional illustrations/plans and photographs provided:	4	<p>Construction proposals at 32-34 Dartmouth Road diagram showing extreme depth, proximity to properties, proximity of tunnelling under properties, restriction of footpath/access, denying off / on street parking access for construction duration, excessive height of hoarding /screen so close to the fronts of our properties, though only half way for upper floors, restricting daylight from homes, but not noise and vibration, dust etc. This will continue for 8.5 years and potentially extended beyond that if there are any unforeseen issues.</p> <p>Plan of proposed Metro Entrance/Exit escalators, Set Down area and its associated noise and light pollution impact 24/7 in close relation to our property, directly opposite the house. It also indicates direction of tunnelling under our property.</p> <p>No provision indicated for screening on proposed Metro entrance/Exit escalators to reduce light and noise (operating rail infrastructure, station announcements , vents, escalators, drop off, movement of passengers with their luggage, and additional traffic to drop off areas. This would seriously impact with its proximity to nearby homes. Needless to say an increase in litter, disturbance, security issues etc. are also of concern.</p> <p>Recent photo image taken from front of our property above garage/studio roof, showing proximity of roadway, proposed entrance/exit to Metro, how close it all is planned near the house facade.</p>	Please refer to responses (4), (6), (7), (10), (12) and (13). Sources of light pollution have been addressed in the preliminary design for the scheme and operational requirements noted in Response (10) above. However if evidence remains of any potential light pollution arising from the scheme this will be fully mitigated at the detailed design stage.
17	Conclusion	4	This submission supports the request made in the general area submission to omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel. In addition to the strategic planning reasons for the omission of this section of MetroLink, this submission highlights that the EIAR fails to adequately assess impact of the development upon the houses on Dartmouth Road. The project would seriously affect the residential and other amenities of the residents of Dartmouth Road both during the construction and operational phases.	<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> <p>TII do not agree that the EIAR fails to adequately assess the impact of the development on Dartmouth Road as demonstrated by the responses to the observations made by this submission. 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 EIAR Chapters 4 and 5 and 6, and EIAR Chapter 7 and associated appendices that present details of alternatives considered. EIAR Chapter 9 and appendices provides a detailed analysis of transport and traffic effects, and EIAR 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.</p> <p>As noted above, TII do understand your particular concerns regards the proximity of 32 Dartmouth Road to the construction of the proposed Charlemont Station. While TII are of the view that the construction environmental impacts can be mitigated, relocation is an available option during peak construction. TII are available to discuss this option if that is something the property owner would like to explore and consider, noting that the southern boundary to the site will only be close to the property for the period of the full Dartmouth Road closure, estimated to be 30 months, and will then be stepped back to the other sider of the road when Dartmouth Road is reopened. TII would further note that there are no profound impacts predicted during the operational phase.</p>