**Charlemont-Dartmouth Community Group – Submission to An Bord Pleanala regarding Metrolink Terminus. Nov 2022**

* The following is a summary of the main points included in the 35 page ‘General Community’ Submission document. The document is currently in Draft form but will be finalised and sent to An Bord Pleanala by McCabe Durney Barnes on behalf of the wider Charlemont-Dartmouth Community before the deadline of Nov 25th 5.30pm.
* The document is broken into 2 parts – Key Submission Points AND Requests to An Bord Pleanala
* We encourage everyone in the community to make an Individual Submission to ABP.
* People can use the Key points below and cut-paste into their Letter and add their own circumstances or specific issues and feedback.
* We have separately provided a letter template.

**Key Submission Points being included in the General Community Submission document**

1. **Location of Terminus station :** Charlemont is the incorrect strategic location for a Terminus hub and spoke system as it is too far out along the Luas Green Line spoke and would prejudice future options for integration of networks and services. St. Stephens Green is in the city centre and as such, it benefits from connections with transport links to the entire wider Dublin area, as well as inter-city links.

St. Stephen’s Green therefore is advantageous as it optimises the connectivity / interchange with bus, Luas and future DART underground for passengers not only from the Greater Dublin Area, but, in fact, from all over Ireland.

St. Stephens Green is the most appropriate location as it provides for interchange with bus, Luas and future DART underground. The project incorrectly dismisses St. Stephens Green West as an appropriate terminal station. It only considers St. Stephens Green East and Charlemont. Furthermore, no Study has been completed by NTA/TII as part of the entire Metrolink project on the optimal location for a City centre terminus.

1. **Expensive Duplication of Rail infrastructure** - The inclusion of an expensive and costly section between St. Stephens Green and Charlemont is strategically weak and duplicates the existing Luas Green Line services. NTA’s cost estimate for this 1km section at €650M is an expensive duplication and significant investment that deprives other parts of Dublin that are in immediate need of rail infrastructure to support housing and urban development.
2. **The station box at Charlemont, as constructed in 2021/22** by the Developer Hines, does not have the benefit of planning permission and has not been part of the EIA undertaken for this project. Processing the current Railway Order application, which is reliant on these preliminary and now constructed works, is legally unsafe and contravenes the provisions of the EIA Directive.
3. **The station box at Charlemont will result in only one possible future tie in** with the Luas Green Line to the south, which would result in an option that was previously dismissed as part of the Tie-In study from March 2017. No alternatives to the station box at Charlemont were considered as it had been fixed through the design of the overhead Hines Grand Parade commercial development. The implications of this new alignment is very significant on our wider community as it will involve top down construction that will only be possible when many houses on Manders Terrace, Oakley Road and Charleston road are demolished.
4. **The Environmental Impact Assessment as assessed by professional Planning experts, McCabe Durney Barnes is inadequate** in relation the description of development, alternatives, transport assessment, noise and the cumulative effects of the development on the Charlemont-Dartmouth Community. For a project of this size, scale, investment to date, it is inadequate to propose a Railway Order with so many important studies and analysis missing.

As a direct result of the inadequacy of this EIA, Charlemont has gained an erroneous level of traction when St. Stephen’s Green is a far superior location.

Apart from the obvious advantages in terms of cost-effectiveness and accessibility, St. Stephen’s Green is superior because it is predominantly a commercial area (Charlemont is predominantly residential.)

1. **Traffic and Access to Charlemony**

The Traffic Study on the Charlemont area included in the current Railway Order EIAR is wholly inadequate as it omitted the impact of Airport users coming to the only Dublin South Metrolink station at Charlemont. The Traffic Study uses a strategic, generalised regional model that does not take local factors into account.

If a comprehensive ‘Traffic Study’ were conducted into the optimal location for a City centre Terminus, it would point to St. Stephen’s Green as a far superior location.

The development would have **an adverse impact upon traffic** during the construction and operational phase, and it has not been properly designed and there is poor integration with other modes of transport. Pedestrian movements in and around the station would be difficult. Grand parade is an already heavily congested orbital route. The EIA did not properly assess the impact of additional local traffic volumes, rather they used a generalised regional model that does not take local factors into account. Grand Parade and the residential area around Charlemont-Dartmouth can not sustain the significant additional traffic volumes associated with this development

1. **Foot-fall in Dublin City Centre**

Wherever the Terminus is located, it will attract a huge volume of passengers from the greater Dublin/Leinster area and this will result in pedestrian movements in and around the station.

**Locating the Terminus at St. Stephens would allow passengers to benefit from access to the range of retail and food-service outlets in the Grafton Street area, prior to or following their journey on Metrolink.** These services would not be available at Charlemont.

Apart from the obvious convenience that this would provide to passengers, it would provide a much-needed boost to retailers and food-service providers in the Grafton Street area.

1. **Loss of Amenity & Loss of Property value**

The **development would result in noise and disturbance during the construction and operational phases and would result in a loss of amenities** for a significant proportion of our community. Not only will the properties adjacent to the station experience very significant loss of amenity the adverse impact also extends to the wider community as this development will change a quiet residential neighbourhood into a noisy, busy, congested major transport hub.

Given the predominant nature of property stock in Charlemont being residential compared to commercial and hospitality at St Stephens green, the Charlemont area **will have an adverse impact upon property values**, particularly during the construction phase. For many houses in the area there will be a long term and permanent adverse impact upon property values from noise of the operating rail infrastructure, vents, tannoy systems, escalators and large traffic volumes – vehicular and pedestrian using the station 19 hours per day.

**Requested amendment to An Bord Pleanala**

We request the following amendments:

1. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel
2. Require the submission of a railway order for a section from Tara Street Station to St. Stephens Green which would effectively provide for a terminal hub station that can integrate with the Luas Green Line, multiple bus routes and future DART underground.