

Submission No.			34	
Organization Name or Name of Submitter			Caitriona Shaffrey (18 Dartmouth Square, Ranelagh)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Railway (MetroLink-Estuary to Charlemont via Dublin Airport) Order 2022 Case Reference Number NA29N.314724 10 th January 2023				
1	Letter	1	<p>Since the original " emerging proposed route “from Swords to Sandyford was first proposed, there have been a large number of factors which have had a modifying effect on the proposed route:</p> <p>1) The original study was done on the basis of Swords to Sandyford : there has been no major study done on the proposed terminal at Charlemont. For something so vital to the success of Metrolink : in my view, this is a very serious omission.</p>	<p>TII would disagree with your assertion that "there has been no major study done on the proposed terminal at Charlemont". TII have undertaken considerable analysis, as set out by EIAR Chapter 7, Consideration of Alternatives, section 7.7.8 and Appendix A7.9 that concluded Charlemont was a better interchange than St Stephen's Green 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>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.</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 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> <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 utilization of the MetroLink system, thereby increasing the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ration (BCR).</p>

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2	Letter	1	<p>2) Since the initial proposals have been published, there has very substantial increase in proposed housing developments to the west of Dublin including the proposed “ City Edge" development which is for circa 40,000 units. In order to keep costs down, these units are proposed to have NO underground carparks and they state:</p> <p>“ while the area is served by the Red Luas line, buses and a rail station at Park West, growing the area will require the development of the Lucan Luas line which is included in the Greater Dublin Transport Strategy as well as a new rail station at Kylemore. A new Luas stop on Naas Road and potentially a new Luas line to Kimmage. “ (source : Irish Times report 17 August 2022)</p> <p>It is inconceivable that this new development will not be linked into the new Metro.</p>	<p>As set out by EIAR Chapter 4, Description of the MetroLink Project, the overall project objective for the proposed Project, as established by the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII), and as informed by policy context, MetroLink is to 'provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre'. (National Development Plan 2021-2030, Box 9.1). The geographic areas described by the observation do not fall within the scope of the MetroLink Project. 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. 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).</p> <p>Your concern regarding increase of housing developments to the west of Dublin is noted. Additionally, extending the existing Luas network is under the NTA’s remit and consideration.</p>
3	Letter	2	<p>3) The original proposal was to utilize part of the Luas Green line in order to build the new Metro line: that the green line would terminate at Charlemont. It would appear that the population on the south side would not merit putting the Metro underground and therefore that the principle used would be to have 5km of cut and cover or retained sections. While this proposal appears to be in abeyance, the idea of cutting off these communities by having a track bisecting area which have had orbital roads for many hundreds of years is most reprehensible: in every draft development plan, the “15 minute “city is touted: to cut off areas in this way does NOT give this 15 minute framework to communities.</p>	<p>Response (1) details the policy justification for the proposed MetroLink terminus at Charlemont, as approved by the Minister for Transport and in particular notes that 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 proposed MetroLink alignment has not been extended south of Charlemont for the reasons set out by the GDA strategy, section 12.3.10, "The challenges associated with the upgrading of the Luas Green Line to a metro standard of service have led to the emergence of an alternative proposal which seeks to meet travel demand from south of Sandyford along a new light rail corridor which serves UCD post-2042. As such, the upgrading of the Green Line to metro standard is not being pursued as part of this strategy. Instead, for this strategy period, the capacity and frequency on the current Green Line from Sandyford northwards to the city centre will be incrementally increased through the provision of additional tram fleet and services and associated turnback arrangements to meet forecast passenger demand."</p> <p>Further information on the challenges associated with connecting to the existing Luas Green Line can be found in the TII published report: "Constructability Report - Green Line Closure, April 2019, ref https://www.metrolink.ie/media/ox0p3cjb/constructabilityreportgreenlineclosure.pdf". This showed that construction works to connect the metro from Charlemont to the Green Line would incur line closures over a period of up to 3-4 years, depending on construction methodology.</p> <p>For this reason it has been necessary to determine the most appropriate interchange and termination location for MetroLink. 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.’ This is also reflected by EIAR Chapter 7, section 7.7.8 MetroLink Southern Terminus Location that explains the rationale for selecting Charlemont as the optimum location for interchange with the Green Line.</p> <p>As noted by the GDA Strategy the selection of Charlemont does not preclude any future connections to the west or south of the city.</p>
4	Letter	2	<p>4) The Luas is an incredibly successful piece of infrastructure - but there is another factor not spoken of: in Sandyford, there are several “Park and Ride” carparks which are almost always full: it is presumed that these people drive from another area (west Dublin?) in order to take the Luas. There is then a huge exodus from the Luas each morning at Charlemont with people streaming down along the canal bank – presumably to Grand Canal basin area: it would seem that these people enjoy this walk - and in most European cities, these walking routes are actively encouraged: why would anyone think that to modify the Luas by cutting it off at Charlemont makes any sense?</p>	<p>There are no proposals "modify the Luas by cutting it off at Charlemont". With regards to how MetroLink interfaces with the Luas Green Line please refer to responses (1) and (3) above.</p>

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5	Letter	2	5) If the Metro were to be terminated at St Stephens Green, it would surely give the most potential to link in with these major new developments to the west of the city as well as other potential new sites (the barracks at Rathmines) and the proposed Player Wills housing (287 units) which is not connected or proposed to connect to any Luas or metro?	Please refer to response (1) above that explains the policy justification, as approved by the Minister for Transport for locating the southern interchange at Charlemont rather than St Stephen's Green.
6	Letter	2	6) If O’Connell Street and St Stephens Green were to be the central terminus points, it would have an impact on these areas. With future new plans for rejuvenation in this area (proposed refurbishment of the St Stephens Green shopping centre) it surely makes way more sense to locate a major terminus/hub at this point to help improve the further diversification of use.	As noted by response (1) above, 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.
7	Letter	3	7) It is noted that the proposed Metrolink is capable of carrying 20,000 people per hour IN EACH DIRECTION: if the Metrolink terminates at Charlemont, there is a very narrow warren of streets around it and the barrier of the canal with narrow footpaths which makes dissipation of large throngs problematic : if the terminus were at St Stephen’s Green, there are many possible options - Luas, buses, taxis etc.	<p>The rationale for locating the southern MetroLink interchange at Charlemont rather than St Stephen's Green is explained by response (1) above.</p> <p>With particular regards to the pedestrian comfort in the vicinity of the proposed Charlemont Station. 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. Both are sized for MetroLink to Luas, and Luas to MetroLink passenger numbers.</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 signalized 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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8	Development	3	8) The draft development plan appears to be a well-balanced plan which seeks to create thriving communities all around the city, each with their own characteristics: this proposal which seeks to drop a major hub into a residential area without developing the ancillary facilities such as cafes, shops and public open space. It is not clear how the boundary with the former Carroll's building will be handled - whether it will be secured at evening times which would segregate the area further .	<p>The draft development plan falls outside of the scope of the MetroLink Project and the remit of TII. The proposed MetroLink Station at Charlemont has been integrated with the public realm, however the wider development of the area is a matter for Dublin City Council.</p> <p>As set out by EIAR Chapter 4, Description of the MetroLink Project, section 4.17.12.2 "The Charlemont station is an underground cut and cover station with two public access points, located beside and integrated with an adjacent development (currently under construction). It has surface connectivity to the Luas Green Line along Grand Parade and has two entrance/exits from the station, one onto Grand Parade and one onto Dartmouth Road. The Grand Parade exit provides connectivity to the Luas stop with additional path width provided between the two modes of transport. The site is also characterized by the presence of the Carroll's Building, which is an office building completed in 1964 and listed on the DCC Record of Protected Structures. A landscape avenue of trees and low-level planting segregates pedestrians from the road, creating a safer environment for pedestrian movement in this area. The path widths and circulation routes are improved between the entrance and a Luas stairs and access lift on the western side of the Charlemont Luas stop. The second exit/entrance onto Dartmouth Road has a public plaza integrating seating, raised planters, large mature trees and cycle parking. The station box itself sits adjacent to an office development that is within private ownership. The landscape design within this area is coordinated with the development currently under construction and integrated with the infrastructural requirements. The landscape design here consists of pockets of planting and strategically placed mature trees to integrate and soften the human experience within this zone. Parking spaces and cycle parking are also provided here, as well as ramp access to private parking and office basement." (Chapter 4, section 4.17.12.2).</p> <p>The securing of the Carrolls Building is a matter for the owners of the property, however TII can confirm that any securing of the Carrolls property will not limit access to the MetroLink Station. Access will be maintained to both entrances of the Station, including via the access linking Dartmouth Road to Grand Parade.</p>