

Submission No.			35	
Organisation Name or Name of Submitter			Carmen Neary	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Reference Number:NA29N.314724 Railway (Metrolink. Estuary to Charlemont) via Dublin Airport Order 2022, 22 December 2022				
1	Letter	1	When Dublin City Council and subsequently An Bord Pleanála gave permission for the construction of the Hines Development located between Dartmouth Road and Grand Parade they acted "ultra-Vires" and exceeded their powers. They essentially attempted to predetermine the route of the Metro and the location of the station box when they granted permission for the construction of the roof of a station.	<p>The preferred route for MetroLink was published in March 2019 following a comprehensive route options study. The preferred route was based on the emerging preferred route for the scheme which included a station at Charlemont. The Charlemont Metro Enabling Works were constructed to enable the Charlemont Development to proceed whilst simultaneously ensuring there was an option available to construct a station at Charlemont that avoided unnecessary demolition, took advantage of an available site, provided infrastructure that is integrated with planned development rather than necessitating later changes and retrospective adjustments to a new development or even possible demolition of the new development, whilst providing protected provision for the future extension of the scheme south, if required. As such it was consistent with proper planning and sustainable development at this location.</p> <p>The MetroLink enabling works at Charlemont did not predetermine the route for MetroLink. The location for the MetroLink station at Charlemont was determined as part of the Greenline Tie In Study and at the route option selection stage.</p> <p>It is also important to recognise that the proposed station location at Charlemont is influenced by available vacant land and thus avoids unnecessary demolition.</p>

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2	Letter	1	I am not opposed in principle to the construction of a Metrolink however I believe that creating a Terminus at Charlemont is a mistake. The line should terminate at St Stephen's Green which would form a hub - as is the case in other main cities.	<p>TII do not agree that Charlemont is the incorrect location for an interchange with the Luas Green Line 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.</p> <p>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.</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 utilisation 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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3	Letter	1	No study has been completed by NTA/TII as part of the entire Metrolink project on the optimal for a city centre terminus.	<p>TII and NTA have carefully considered the options for an interchange with the Luas Green Line as noted by response (2) above, and further expanded on below. Please refer to response item (2) in relation to policy requirements and Charlemont terminus.</p> <p>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 and St. Stephen's Green East. 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. 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> <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.</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</p>

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				<p>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>If a decision was taken to terminate MetroLink at St Stephen's Green, significant changes would be required to the scheme. These would include design changes at St Stephen's Green Station and provision of alternative turnback facilities immediately south of the station.</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>
4	Letter	1	Continuing the line from St Stephen's Green to Charlemont, at a proposed cost of €650m is an outrageous cost to duplicate the existing infrastructure.	<p>The Board is not responsible for any decisions in relation to the funding the Project. It is solely responsible for assessing whether the Project is consistent with proper planning and sustainable development and that its effects on the environment are acceptable.</p> <p>The responsibility for funding the Project lies with the NTA, the Government and ultimately the Oireachtas. It has received all necessary approvals, including under the Public Spending Code for the making of a Railway Order. It will undergo further scrutiny and approvals, including under the Public Spending Code, before it is funded. It is not appropriate for the Board to make findings in relation to value-for-money that are outside its statutory functions and would cut across those arrangements. Members of the public are entitled to make representations to their TDs in relation to the value-for-money of any element of the Project.</p> <p>TII do not agree with this statement for the reasons set out by response (2) above, noting that infrastructure is not being duplicated given 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>

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				<p>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>Further, to ensure that public investment delivers value for money, the Public Spending Code sets out requirements for the evaluation, planning and management of public investment. The preparation of a Business Case is a key element of meeting these requirements. The Public Spending Code requires that both the Preliminary Business Case and Final Business Case for public investment projects are published.</p> <p>In July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a railway order application by TII to An Bord Pleanála in respect of the MetroLink project (Decision Gate 1). This approval was granted after the Preliminary Business Case (PBC) had undergone significant scrutiny and challenge by bodies that are independent of TII, including DoT and DPER review (including independent review by JASPERS and the Major Projects Advisory Group (MPAG)) of the PBC around timeline, costs and benefits that were updated to inform the Government decision.</p>
5	Letter	1	The Environmental Impact Study is inadequate and further studies are essential.	<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 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 &amp; Vibration, and 14 Groundborne Noise &amp; 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>