

Submission No.			126	
Organisation Name or Name of Submitter			Irene Sorohan	
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. 22/11/22				
1	Letter	1	Firstly, in general, I am in favour of the broad aim of the Metrolink project to connect Dublin's city centre to our national airport. However, as a resident living in the Dartmouth/Charlemont area, I wish to set out a number of observations for the Board regarding the proposal to locate the Terminus station at Charlemont-Dartmouth. My family home is in the midst of the community where the Terminus station is proposed to be located.	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.
2	Letter	1	I believe 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.	<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. 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 as 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> <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 alternative interchange at St Stephen's Green Station.</p>

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				<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>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. 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	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 comprehensive study or investigation has been completed by NTA/TII as part of the entire Metrolink project on the optimal location for a city-centre terminus.	<p>TII do not agree that St Stephen's Green is the most appropriate interchange location for the reasons set out by response (2) above.</p> <p>It is not correct to say that the Project "only considers St. Stephens Green East and Charlemont." 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. A station on St Stephen's Green West is not preferred for several reasons. If a station was placed on St Stephen's Green West, 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. Additional construction would be required to provide such a facility, similar in size to the proposed Albert College Park Intervention shaft. This could feasibly be situated in the Trinity College Dublin sports grounds.</p> <p>TII note that it is Government policy to provide a station and interchange with the Luas Green Line at Charlemont, as set out by the GDA Transport Strategy 2022 – 2042. Should a station be placed on St Stephen's Green West, the alignment between a station located here and the proposed Charlemont Station would also result in an undesirable horizontal reverse curve and an alignment that is greater than 1000m long, and would thus again require an intervention shaft similar to the proposed Albert College Park Intervention shaft to be provided. This would be expected to result in significant demolition and redevelopment in an existing built-up area. In both cases, compared to the proposed alignment that runs much more directly between Tara, St Stephen's Green and Charlemont, the additional length of tunnel and the addition of two intervention shafts generated by locating a station on St Stephen's Green West is uneconomic in comparison.</p> <p>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.</p> <p>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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				<p>As outlined by EIAR Chapter 3, Background to the MetroLink Project, one of the key objectives of the Project is the integration of it with the wider transport network that also includes for BusConnects and DART+ which are all included under Project Ireland 2040. Together, these projects will result in a reliable, sustainable, affordable, integrated public transport network that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2023 and make Dublin a more liveable and sustainable city.</p> <p>Arising from the decision to postpone the future upgrade of the Green Line to metro services, it is being argued that Charlemont station effectively becomes a terminus station in the short to medium term. In this regard, it is true to say that the Metrolink trains will terminate and turn back at Charlemont station, however the public transport service offering for passengers does not terminate, it transfers from Metrolink to LUAS as part of the integrated transport network.</p> <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 as referred to in response (2) above. 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>If the scheme were to terminate at St Stephen’s Green, it would be inconsistent with the GDA Transport Strategy 2022-2042. 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	<p>Requested amendment to An Bord Pleanála:</p> <p>I request the following amendments:</p> <p>1. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel.</p> <p>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.</p>	<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>