

Submission No.			136		
Organisation Name or Name of Submitter			Cllr. James Geoghegan		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: Case reference: NA29N.314724 - 314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin					
1	Letter	1	I wish to extend my support to submissions made by the MetroSouthWest Group, MetroRethink Group and the residents of Darthmouth Road, Dartmouth Square and Cambridge Terrace. I ask that the content of these submissions be given the utmost consideration.	TII can confirm that all submissions made have been reviewed and considered.	
2	Letter	1	The single biggest concern for Dublin arising from this proposed Railway Order is the decision to locate the terminus at Charlemont, which has a knock-on effect on the future expansion of Metrolink. Inexplicably, there has been no assessment of continuing the MetroLink as afar as Tallaght Town Centre and this proposal clearly merits consideration if we are going to be ambitious about our future planning for Dublin City and make the 15 minute city vision a reality for our capital.	<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, 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); (b) the development of alternatives to accommodate increased capacity on the Luas line south of Charlemont without that upgrade; and (c) Feedback received during the EPR non-statutory consultation.</p> <p>St Stephen's Green West was not considered a feasible terminus location as it would prejudice the delivery of a station at Tara Street, which is the DART interchange for the project.</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> <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.</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> <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."</p>	

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				<p>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 supported by detailed project-level analysis 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>	
3	Letter	2	<p>The existing feasibility study makes clear that the continuation of MetroLink to Southwest Dublin is technically feasible but not necessary to consider until the period after 2042.</p> <p>This is a deeply disappointing conclusion, particularly when the communities of Terenure and Harold's Cross were promised so much more by the now Minister for Transport when he was an opposition TD.</p>	<p>As noted by response (2) above, the proposed station at Charlemont provides the flexibility for future extension of the Metro south if sufficient demand rises.</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>	
4	Letter	2	<p>In 2019, the now Minister for Transport and the Green Party advertised on bus shelters plans for a Metro South West as well as a plan for Metro to Knocklyn and UCD. In opposition in 2019, Eamon Ryan TD, as he was then, made clear that his "preferred route" was to prioritise the Metro for "Harold's Cross, Terenure, Knocklyon, Firhouse and Tallaght. " In explaining his rationale, in a speech to Dail Eireann the now Minister rightly observed that this is "an area that is atrociously served by public transport. "</p> <p>We simply have to demonstrate the type of bold ambition that Eamon Ryan TD as a member of the opposition rightly lambasted his predecessor for lacking, but which has not been improved upon in this proposed Railway Order.</p> <p>'Maybe* in 2042 is not a laudable aspiration to make the type of transformative change to our public transport system that is so desperately needed.</p>	<p>As noted above, MetroLink is being delivered in accordance with the policy set by the GDA Transport Strategy which does not preclude future extension of the Metro to the south.</p> <p>TII would also note that MetroLink is also a transformative project, and will, as noted by EIAR Chapter 3, divert 6.8 million car trips per annum in the early years, growing to 12 million per annum by 2045, resulting in a strong modal shift from private car use along all sections of the alignment</p>	

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5	Letter	2	If the tunnel is bored as far as Manders Terrace, it is difficult to see how MetroLink could be extended to include suburbs such as Portobello, Lr. Rathmines, and Harold’s Cross.	Future Metro services south of Charlemont do not form part of the Metrolink scheme as presented under the Railway Order. TII's role is to deliver Metrolink as supported by the Transport Strategy for Greater Dublin Area (2022-2042) and Dublin City Development Plan 2022-2028. The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy. 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 southwest, south or southeast of the city region should sufficient demand arise."	
6	Letter	2	I would ask the Board to consider which parts of the proposed Railway order should be granted now to allow construction to proceed as soon as possible, and which parts could be either amended or request for reconsideration considered, namely after St Stephen’s Green.	TII would note that an end of line station at Charlemont, rather than St Stephen's Green has been proposed for the reasons set out below. TII would also further note that a scheme which terminates at St Stephen's Green would not be consistent with the Transport Strategy for Greater Dublin Area (2022-2042). In addition any decision to terminate the scheme at St Stephen's Green will significantly impact on the overall viability and benefits of scheme. The connection from St Stephens Green to Charlemont / Ranelagh is supported by the previous Transport Strategy for Greater Dublin Area (2016-2035) and the current Transport Strategy for Greater Dublin Area (2022-2042). The latter 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. Please refer to response item (2).	
7	Letter	2	This application should be futureproofed so that a decision taken today, does not limit the possibilities of the Metro line into the future.	As noted by the responses above, the proposed station at Charlemont does not preclude the future extension of metro (including to the south-west) and 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.	