Submission No.	151
Organisation Name or Name of Submitter	John Loughrey

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				
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 with the exception of Charlemont Station. We have reviewed your submission and have responded to the observations made below.
2	Letter	1	I object to the proposed Metrolink Extension to Charlemont on the following grounds; 1 . Additional Cost. The requirement to interface with LUAS could be achieved at an earlier location eg Stephens' Green with adaptations that would save public funds of approximately 650 million Euro on this section project which duplicates existing rail infrastructure. This is especially relevant in the rising interest rate environment.	<u>Rationale for selecting Charlemont as the preferred interchange with the Luas Green line</u> While an interchange with the Luas Green Line could be achieved at St Stephen's Green, Charlemont has been chosen as the interchange 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. 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." 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". 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. 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. 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. Passengers wishing to interchange between Luas and metro at an alternative St Stephen's Green terminus would face a 500m-walk along a route either through St Stephen's Green park or along the footpath north of the park, which adds significantly to the time for interchange and therefore the overall journey time for passengers and a less positive customer experience for all interchange users. This passenger experience would be reduced further for those with mobility or visual impairments as well as those travelling to/from the airport with luggage. 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 details are provided on Table 7-16 in Chapter 7: Consideration of the Alternatives, section 7.7.8. MetroLink Southern Terminus Location.

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			Response (2) continued.	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. 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). Duplication of Existing Infrastructure 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. 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. In any case, TII do not agree with the duplication of rail infrastructure observation for the reasons set out by the 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. 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 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 Ration (BCR). 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. 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.
3	Letter	1	2. Future Strategic Planning. A future south city Metro extension will need to be flexible in terms of transport and population demographics. A terminus at Charlemont restricts other direction options, and is strategically weak, whereas an earlier terminus retains future options.	TII do not agree with the observation that the selection of Charlemont is "strategically weak" or constrains future options for extending the metro if deemed required. The preferred location of the MetroLink interchange with the Luas Green Line has been selected for the reasons set out by response (2) above. This includes the consideration of possible future onward extension of the metro. The proposed Charlemont Station allows for a future tie into the Luas Green Line should it be determined in the future that through running metro services to Sandyford is the required solution to address the public transport needs to the south of the city.

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4	Letter	1	3. Unsuitability of the area. The Charlemont area and surrounding roads are historic Victorian residential areas with limited scope for increased transport interfacing, footfall and required amenities. The character of the many protected structure dwellings are at risk. Noise and disturbance during construction will result in loss of amenities for the area and an adverse impact upon traffic.	TII have assessed the impact on traffic and pedestrians, noise during construction and amenity. A summary of this assessment is provided below which indicates there will not be a significant impact and that the character of the dwellings will not be impacted. Assessed Traffic and Pedestrian Impacts In overall terms, 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. Construction Phase EIAR Appendix A9.5 Scheme Traffic Management Plan presents the analysis undertaken to assess the impact of the traffic management measures on the local road network surrounding the proposed Charlemont Station during the construction phase. At the local level the following parameters have been used to assess impacts on general traffic and on pedestrians: • Increase in walking distance/quality of service for pedestrians (through removal of footpath, reduction of quality of service, removal of a pedestrian crossing or relocation of crossing by more than 100m); • Increase in driver delays at junctions; • Changes in traffic flows on surrounding streets; and, • Additional distance travelled due to diversions. The analysis undertaken at this location indicates that the increased volume of traffic on Grand Parade and Northbrook Road does not translate into any significant increase in driver delay. The largest increase in driver delay of 12 seconds is registered on the westbound approach on Grand Parade to the Ranelagh Road signalised junction. During the construction phase, pedestrians will experience a reduction in quality of pedestrian infrastructure and space. The construction site boundary will encroach upon footways in the local area, including the northern side of Dartmouth Road, and the southern side of Grand Parade. However, a temporary signalised crossing will be provided west of the Luas to maintain pedestrian access to and from the Stop. Whilst there are partial closures on Dartmouth Road and Grand Parade, pedestrian movements will be maintained on appropriately sized footways through the area. Operational Phase 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. 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. 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 signalised 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. 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.

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			Response (4) continued.	<u>Noise and Disturbance During Construction</u> The EIAR presents a comprehensive and detailed assessment of both groundborne and airborne noise and vibration in Chapter 13 and 14 of the EIAR. The assessments include for predictive modelling in order to identify the potential impacts on all sensitive receptors during the construction phase. No profound impacts have been identified for residents and mitigation measures proposed will be effective at reducing the impacts on these properties. Significant mitigation is proposed to include 4m high noise barriers and further proposed mitigation in line with the Airborne and Groundborne Noise Mitigation Policy. On the implementation of these measures the residual impacts are predicted to be moderate. However, as outlined in Transport Infrastructure Ireland (TII) Airborne and Groundborne Noise Mitigation Policy (Appendix A14.6) there is a process in place whereby further mitigation measures can be implemented at individual properties should this be merited. <u>Loss of Amenity During Construction</u> EIAR Chapter 11, Population & Land Use provides an assessment of effects on community amenity during construction and operation, which relates to the interaction of impacts on air quality; visual amenity; traffic and transport; and noise and vibration. At this location during construction as outlined in Section 11.5.2 of Chapter 11, no impacts are identified on the retail sector or community and social infrastructure (e.g. schools or hospitals). Any severance/disruption to transport will be limited by site mitigation measures such as alternative routes reducing impacts to not significant.
5	Letter	2	4. Environmental impact The environmental impact assessment of the project in relation to transport, noise, alternatives and cumulative impact on the Chariemont-Dartmouth community is inadequate for a project of this scale.	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 & Vibration, and 14 Groundborne Noise & 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.
6	Letter	2	5. Station Box. The station box at Gharlemont, constructed in 2020/21 by Hines does not have the benefit of planning permission and therefore the current railway order application which relies on this already constructed work, is legally unsafe.	The MetroLink enabling works constructed as part of the Hines development was included in the planning application for the Hines Development and has the benefit of planning permission which was granted in April 2019.
7	Letter	2	I request the following amendments: Omit from the Railway Order the section from Tara Street Station to Gharlemont Station and associated onward tunnel extension and intervention tunnel. 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 LuasGreen Line, multiple bus routes and future DART underground.	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 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.