

Submission No.			163		
Organisation Name or Name of Submitter			Knocklyon Network CLG (1) - Idrone Avenue, Knocklyon, Dublin 16		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: Case reference: NA29N.314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin					
1	Letter - introduction	2	Knocklyon Network CIG is a Community Organisation that represents the Community of Knocklyon and parts of Rathfarnham, Firhouse, Templeogue. We have a Community Facebook page with over 1000 followers. We work to improve and support all aspects of making our Community a better place to live.	TII wish to thank you for taking the time to prepare a submission, and have provided responses to your concerns below.	
2	Statement	2	Our submission wholly relates to that portion of the proposed Metro Link beyond the station located at St Stephen's Green East. For the avoidance of any doubt, we are fully supportive of the project from Estuary to St Stephen's Green, which we consider is long overdue. We strongly support Metro South West Group and their campaign to bring Metrolink to the Transport deprived area of South West Dublin. Much of the arguments in our Submission are given in greater detail by the MSWG submission.	TII appreciates the submission and the statement of support for the delivery of MetroLink. Please refer to the responses below and to the Metro South West Group Response Register (189) for further details.	
3	Submission	2 and 3	<p>We submit that Bord Pleanála should defer the authorisation of the section of Metrolink beyond the St Stephen's Green station, other than to create a turning section similar in length to that which is currently proposed for Manders Terrace.</p> <p>Reasons as follows:</p> <p><b>1. Failure to consider an alternative routing of the terminus notably towards Rathmines</b></p> <p>We would submit that the Rathmines or Portobello area would be a far more suitable location for a terminus but TII has wholly failed to consider this. This became relevant once the destination for a southern terminus was to be in or in the vicinity of the south inner city, rather than Sandyford.</p> <p>Rathmines Road under Bus Connects will have four ‘A’ services and a number 80, 81 and 82 with an aggregate frequency of 33 per hour peak time in each direction. A terminus for MetroLink in Rathmines or Portobello would offer superb bus connectivity and would connect much of the south west city.</p> <p>There was an obvious possibility of using Cathal Brugha Barracks in Rathmines as a terminus with its wide-open spaces and possible site for Tunnel Boring Machine which could then be re-directed to South West Dublin. The barracks is currently under review for future development under Land Development Agency for housing, and commercial buildings, suitable for a major terminus and connection to the South West Dublin.</p>	<p>TII do not agree that the Project should not continue past St. Stephen's Green for the reasons set out below.</p> <p>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.</p> <p>The proximity of the MetroLink 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. Passengers wishing to interchange between Luas and metro at the 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.</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. This is detailed in Chapter 7 (Consideration of Alternatives, section 7.7.8).</p> <p>The location of the interchange at Charlemont does not preclude onward extension south to areas such as Rathmines. 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 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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4	Submission	3	<p><b>2. Feasibility Study from City Centre to Knocklyon</b></p> <p>We note that in the context of the preparation of the Greater Dublin Area Transport Plan 2022-2042, the National Transport Authority did a feasibility study entitled Metro to Knocklyon. This study was severely flawed, and the criterion given to Jacob’s International were bound to produce a negative result.</p> <p>We would request that a proper/comprehensive feasibility study be done to assess the options for the south west city. Any route decided upon would be more feasible from Stephen’s Green than Charlemont.</p> <p>We do not believe that any progress can be made in assessing the alternative option unless a proper assessment of metro to the south west city is done. This study could be carried out while Metrolink continues to be built from Estuary. It will be unlikely to reach city centre before 2025.</p>	<p>Please refer to response item (2) above in relation to continuation of the Project to Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any feasibility studies undertaken as part of future phases of the study will be subject to the planning, design and appraisal of the NTA.</p> <p>The Metro to Knocklyon Feasibility Study is not part of the submitted Railway Order.</p>
5	Submission	3	<p><b>3 Limitations of Charlemont terminus for radial extensions onwards to south city</b></p> <p>It would seem, that the longer-term intent is, that the MetroLink line be extended into the south city area. There are statements on this by various persons including NTA senior executives and the Minister. There are three alternatives posed:</p> <p>a. south west city towards Tallaght, b. continuing the existing Luas line or c. heading south east towards UCD and Sandyford.</p> <p>In various statements both from Government and NTA , it would seem that options b and c are no longer under consideration for Metro. This been the case it would seem appropriate to look for a suitable terminus for option c.</p> <p>We believe that if the tunnel is bored as far as Manders Terrace, this seriously compromises the ability for an extension to serve important communities. In particular we find it difficult to see how MetroLink could be extended to include relatively inner-city suburbs such as Portobello, Rathmines, and Harold’s Cross. MSWG have requested NTA through the Minister to give details of what suburbs could be served from a continuation of Manders Terrace to the South West. The NTA have not responded to this request of over a year.</p> <p>We would submit that proper planning requires a proper evaluation of the options for extension and <i>that it is not consistent with proper planning to permit a station at Charlemont which would compromise the options.</i></p>	<p>Please refer to response item (2) above in relation to continuation of the Project to Charlemont. As noted, the selection of Charlemont Station as the last station on the alignment does not preclude onward extensions to the south, south-east or south-west of the city. Any decisions for extensions to MetroLink south from Charlemont would be based on future demand requirements. Any such extensions if identified as necessary would be subject to full alternatives assessment prior to identifying a preferred route that would be submitted to An Bord Pleanála for a Railway Order.</p>
6	Submission	4	<p><b>4. Environmental Issues</b></p> <p>From Data collected by Metro South West Group, there is no doubt that the long-term plan for Dublin’s environmental health must include substantial investment in Metro systems. There is a lack of belief in the public that buses and Bus Connects will be sufficient to meet the demands for public transport as proposed by NTA/TII.</p> <p>A Metro system, operated on electricity generated by Renewable Energy Resources is among the lowest carbon footprint. See Our World in Data Table. This is the obvious solution for the growing needs for Transport in South West Dublin. The benefits increase year on year as the occupancy increases year on year as was found with Luas.</p> <p>CSO Transport Survey of 2019 found the following conclusions.</p> <p>Almost half (48.5%) of respondents aged 18 years and over never use bus services, while one quarter (24.8%) use it less than monthly. One in every sixteen (6.3%) persons use the bus services very frequently, at least 5 times a week. Persons aged 18 to 24 years use the bus services most frequently - 36% of females and 33.6% of males in this age group use the bus services at least 5 times a week. At an overall level, one in twenty of over 18-year-olds (4.7%) use the bus 3 to 4 times a week, and 8.5% use it less frequently, 1 to 2 times a week.</p>	<p>Please refer to response item (2) above in relation to the continuation of the Project to Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west. 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." Bus Connects and MetroLink are both part of a comprehensive network of public transport interventions identified in the GDA Transport Strategy 2022-2042 that will reduce GHG emissions due to the predicted modal shift away from private car usage in response to these interventions. The GDA strategy is based on detailed and comprehensive modelling of future public transport demands across the Greater Dublin Area (GDA) and on this basis the proposed public transport provision has been designed to meet demand covering the period 2022 - 2042. However, it should be noted that this will be reviewed for future plans and that future predicted public transport demands will be assessed to identify potential future extensions to MetroLink.</p>

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7	4 Environmental Issues	4 and 5	<p>Green House Gas (GHG) Emissions are a major contributor to global climate change, which will increase the number and severity of extreme weather events in the region. In the United States, the biggest source of GHG emissions is from transportation. Every trip taken with Metro and not a car reduces the region's carbon footprint. On average, traveling by Metro results in 46% less GHG emissions per mile than driving in a single-occupancy vehicle.</p> <p>The transport sector emitted 12.0 million tons (Mt) CO2 in 2021 and accounted for 34.0% of Ireland’s total energy emissions. Transport remained the most carbon intensive demand sector, with 95.5% of transport energy demand coming from fossil fuels.</p> <p>Rebounding from 2020 COVID-related travel restrictions, energy demand for transport increased by 8.3% in 2021, and was a significant driver of the overall increase in Ireland’s energy-related emission this year.</p>	Please refer to response item (6) above.
8	4 Environmental Issues	5	<p>Private car use is by far the largest transport sub-sector, and accounts for 43.0% of all transport energy demand. Energy demand by private cars is 67% greater than the combined demand of both heavy goods and light goods commercial vehicles on Irish roads. These numbers highlight the urgent need to reduce the climate impact of private car use by increasing the number of journeys we make by foot, by bicycle, and on public transport, while simultaneously replacing petrol and diesel cars with EVs. Provisional data from the first 6-months of 2022 indicates that demand for petrol is up by 27%, compared to the same period in 2021, and the demand for diesel is up by 15%, as consumption of both fossil fuels return to pre-COVID levels. Cars account for 65% of Dublin's transport emissions. <i>Source SEAI Report on Transport Energy consumption.</i></p>	Please refer to response item (6) above.
9	4 Environmental Issues	6	<p>In addition to the socioeconomic benefits such as reduction in travel time, travel cost, accident rate, per capita vehicle ownership etc., the ability of metro system towards substantial reduction in per capita pollution emission is considered as one of the major benefits.</p> <p>However, if the benefits offered by the metro system such as reduced traffic congestion, GHG emissions, accident rates, savings in travel time and cost, safety and comfort are assessed and quantified collectively, the metro projects could become the most cost-effective projects than the other public transport project alternatives.</p> <p>These details from the 2016 Census Data, CSO highlight our over dependence on the car. In Conclusion we see a Metro to South West Dublin originating at Stephen’s Green as the answer to not only Public Transport needs in South West Dublin, but the only Environmentally satisfactory answer to reducing Green House Gases and encouraging a Modal shift from Private cars to Public Transport.</p>	Please refer to response item (6) above.
10	Submission	6	<p><b>5 Poor access to Charlemont from Rathmines Road</b></p> <p>The original Metro North project, which was approved for a Railway Order by An Bord Pleanála, had the metro station on the western (College of Surgeons) side of St Stephens Green, where the interchange between the Green Line and metro would be swift.</p> <p>Charlemont would be unsuitable for an interchange between MetroLink and the Green Luas line. Figure 7.1 shows the vertical separation that would occur were the Luas /metro interchange to be located in Charlemont.</p> <p>Figure 7.2 shows that the first manoeuvre for incoming Luas passengers (many with luggage and/or disabilities) would be to cross the Luas line (looking both ways to avoid being mown down by an incoming or outgoing Luas). Would this be a safe manoeuvre to require, for example, from children?</p>	<p>TII do not agree that Charlemont is an unsuitable interchange between MetroLink and the Luas Green Line. Please refer to response item (2) in relation to the suitability of the interchange at Charlemont. As noted, the interchange arrangements at Charlemont provide for significantly better interchange arrangements compared to an interchange at St. Stephen's Green.</p> <p>Please refer to response item (11) below in relation to the anticipated pedestrian comfort levels at the interchange. Wayfinding will be appropriately signed to ensure safe movements for all users.</p>

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11	5 Poor access to Charlemont from Rathmines Road.	7	<p>The second manoeuvre would require passengers to descend 3 flights of stairs in the open. It could be expected that there would be considerable congestion on these stairs and many passengers would be moving slowly and add to the congestion.</p> <p>The third manoeuvre would be a walk in the open towards the entrance to the proposed metro station. This is a station that lies alongside and above a canal and a major traffic route.</p> <p>The fourth manoeuvre - descending to the metro platform - is shown in Figure 7.3.</p> <p>The complexity and safety issues surrounding Charlemont make it unsuitable as an interchange.</p>	<p>Please refer to response item (10) in relation to the interchange arrangements at Charlemont Station.</p> <p>As outlined in Chapter 09 (Traffic and Transport), 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>
12	Submission	9	<p><b>7 (6) Lack of adequate public service in outer suburbs</b></p> <p>In Knocklyon and the surrounding suburbs we are over dependent on the car for transport. Surveys found that over 74% of the population travel in a car daily. We are faced with large increase in population and cars as the county is expected to increase in population by over 50,000 in the coming 10 years. This added to the existing 350000 living in the triangle between the two Luas lines adds to congestion, pollution, time wasted in traffic, further dependence on the car. NTA proposals for Bus Connects are entirely inadequate and will not encourage a modal switch to public transport. There proposal in the latest Greater Dublin Area Transport Strategy Review is to look at possibility of three additional Luas lines, but in 2042. In addition, we have planning permission by SDCC to build an Interpretive Centre for the Dublin Mountains in the Knocklyon Area. This is proposed to bring 300000 visitors a year to the area. A metro station with a shuttle bus would solve this increase if suitably planned, as the roads certainly will be unable to accommodate these numbers.</p>	<p>Please refer to response items (2, 6) above in relation to the potential for future extensions to MetroLink. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west. 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>
13	6 Lack of adequate public service in outer suburbs	9	<p>The rush hour congestion in mornings and evenings is getting worse as all available land is filled with new and necessary apartment blocks. The lack of any time consistency in public transport. The increase in pinch points for traffic on routes. Public transport is not attractive. At present the population sees only more cars as their only option for travel.</p>	<p>Please refer to response item (2) above in relation to the continuation of the Project to Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west. 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>
14	6 Lack of adequate public service in outer suburbs	9	<p>“What had the outside reviewers have to say about continuing to Charlemont/Manders Terrace?”</p> <p><i>Jaspers: "Regarding the project’s scope and design several technical aspects appear to make the project expensive: in particular the inclusion of the connection to Ranelagh/Charlemont. The connection to Ranelagh could feasibly be deferred until there is clarity on the future of the Green Line (subject to an improved understanding of how this could physically be delivered in a scenario with Metro operational)."</i></p> <p>Major Projects Advisory Group: <i>“The rationale for extending the preferred scheme to Charlemont is noted by JASPERS as "strategically weak" given the additional costs involved and the duplication of the LUAS Green Line which also provide a public transport service to the areas of the city centre in question".</i></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> <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 Ration (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>

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15	Conclusions	10	We suggest the following three conclusions. <ul style="list-style-type: none"><li>• Metro is necessary for Dublin South West.</li><li>• Metrolink proceed as soon as possible from Estuary to Stephens Green.</li><li>• A proper Feasibility study be undertaken in the next year to see the most suitable route for continuation of Metrolink when it reaches Stephens Green.</li></ul>	Please refer to response item (2) above in relation to the continuation of the Project to Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west. 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.' Any feasibility studies undertaken as part of future phases of the study will be subject to the planning, design and appraisal of the NTA.

**TII Response**

I wish to thank you for taking the time to prepare a submission, and have provided responses

TII **appreciates the** submission and **the** statement of support for the delivery of MetroLink. Please refer to the Metro South West Group Response Register (189) for further details.

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The connection from St Stephens Green to Charlemont / Ranelagh is supported by the previous (2016-2035) and the current Transport Strategy for Greater Dublin Area (2022-2042). The latter envisages the onward extension of MetroLink to meet the demand for travel over the period of the strategy. The upgrade of the Luas Green Line to metro with a metro extension to Dublin south west, south east and north envisages that further extensions will be delivered after 2042, MetroLink which terminates at Charlemont / Ranelagh and the extension of the metro in all the above directions.

The proximity of the MetroLink to the Luas line at Charlemont provides for a positive customer interchange distance and due to the proximity, clear wayfinding and high visibility of the interchange. Charlemont provide for significantly better interchange arrangements compared to an interchange at St Stephen's Green. Passengers wishing to interchange between Luas and metro at the St Stephen's Green terminus would have to travel either through St Stephen's Green park or along the footpath north of the park, which adds significantly to the overall journey time for passengers and a less positive customer experience for all passengers. The experience would be reduced further for those with mobility or visual impairments as well as those with luggage.

The section of MetroLink route between St Stephen's Green and Charlemont Stations contributes to the scheme. It serves a significant area of the south city of Dublin and offers enhanced access from the

connection to Dublin Airport. It serves key trip attractors including residential areas and offices, boarding and alighting figures in the peak hours. During the morning peak, at Charlemont station alighting, 2,300 boarding and 1,229 passengers alighting, 2,276 boarding during the evening peak significantly to the overall benefits of the scheme and the effect of these benefits outweigh the cost of the delivery and operation of the section from St Stephen's Green to Charlemont station. [ALG 1 in the EIAR.]

Noting St. Stephen's Green is designated as a national monument. Terminating the metro at St. Stephen's Green would require to re-excavate a second time in this area to accommodate the works necessary for a future extension. This is not a desirable or an acceptable scenario given the availability of an alternative approach.

The location of the interchange at Charlemont does not preclude onward extension south to area south of Charlemont is supported by policy including the Dublin City Development Plan 2022 - 2028 and the Dublin Area. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont of the Green Line interchange with the Green Line in response to growing demand in the longer term and is an appropriate location for future metro extensions to serve the south west, south or south east of the city region should so

By extending MetroLink to Charlemont it provides for future proofing of the Green Line, bypassing the existing running section, and ensures potential future connectivity options are enabled, either to the Green Line or to the

The Charlemont Station interchange provides for increased passenger utilisation of the MetroLink service delivered by the Project, reflected by an improved Project Benefit Cost Ratio (BCR).

Please refer to response item (2) above in relation to continuation of the Project to Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any feasible extensions in the later phases of the study will be subject to the planning, design and appraisal of the NTA.

The Metro to Knocklyon Feasibility Study is not part of the submitted Railway Order.

Please refer to response item (2) above in relation to continuation of the Project to Charlemont Station as the last station on the alignment does not preclude onward extensions to the south, south-west or south-east. Any decisions for extensions to MetroLink south from Charlemont would be based on future demand identified as necessary would be subject to full alternatives assessment prior to identifying a preferred route. An Bord Pleanála for a Railway Order.



Please refer to response item (2) above in relation to the continuation of the Project to Charlemont Station does not preclude onward extensions to the south or south-west. As noted by the GDA 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line longer term and is an appropriate location to facilitate any potential future metro extensions to the city region should sufficient demand arise." Bus Connects and MetroLink are both part of transport interventions identified in the GDA Transport Strategy 2022-2042 that will reduce GHG shift away from private car usage in response to these interventions. The GDA strategy is based on projections of future public transport demands across the Greater Dublin Area (GDA) and on this basis the project has been designed to meet demand covering the period 2022 - 2042. However, it should be noted that future predicted public transport demands will be assessed to identify potential future

Please refer to response item (6) above.

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TII do not agree that Charlemont is an unsuitable interchange between MetroLink and the Luas (2) in relation to the suitability of the interchange at Charlemont. As noted, the interchange arrangement is a significantly better interchange arrangements compared to an interchange at St. Stephen's Green.

[ALG Note: The submission raises concerns about the safety of changing between LUAS and Me

Please refer to response item (10) in relation to the interchange arrangements at Charlemont St

As outlined in Chapter 09 (Traffic and Transport), a microsimulation VisWalk model has been developed to assess the impact of the proposed Charlemont Station on the surrounding area during the operational phase. The model covers the full extent of the station and its immediate vicinity, including the immediate vicinity of the station entrance at street level, the Luas stop and nearby roads. To accommodate the forecast demand from the proposed Charlemont Station, a new staircase will be provided at the south east corner of Charlemont Luas stop. An elevator will also be provided at this location. Both the staircase and elevator will be provided to meet the forecast MetroLink passenger numbers.

In addition, it is proposed that the pedestrian crossing on R111 Grand Parade will be repositioned and developed by Hines. With this infrastructure in place, the model indicates that the R111 Grand Parade will provide overall, with some reductions in service seen at the pedestrian crossing where pedestrian crossings are at the signals. Overall, it is considered that the model displays an acceptable level of network performance.



Please refer to response items (2, 6) above in relation to the potential for future extensions to M. Charlemont Station does not preclude onward extensions to the south or south-west. As noted in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in the longer term and is an appropriate location to facilitate any potential future metro extensions to the east of the city region should sufficient demand arise.'

Please refer to response item (2) above in relation to the continuation of the Project to Charlemont Station does not preclude onward extensions to the south or south-west. As noted by the GDA in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in the longer term and is an appropriate location to facilitate any potential future metro extensions to the east of the city region should sufficient demand arise.'

TII do not agree with this statement for the reasons set out by response (2) above, noting that 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 from Charlemont northwards through the city centre. The nature of this route and the fact that it is a single-lane road (Adelaide Road, Harcourt Street / Hatch Street upper and Harcourt Street / St Stephen's Green) limits the number of trams per hour per direction. The projected demand for this section would require a higher frequency of trams. This demand cannot be met with on-street systems (Luas / bus). The interchange between Luas and bus is required to provide the necessary capacity to address the demand on this corridor and reduce overall travel time.

There is also high passenger demand forecast for a Metrolink station at Charlemont, including for the interchange if St. Stephen's Green was the MetroLink southern interchange station. The additional fare revenue from this interchange increase the benefits delivered by the Project, reflected by an improved Project Benefit-Cost Ratio.

Further, to ensure that public investment delivers value for money, the Public Spending Code sets out the principles for the planning and management of public investment. The preparation of a Business Case is a key element of this process. The Public Spending Code requires that both the Preliminary Business Case and Final Business Case be published.

In July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a Business Case to Bord Pleanála in respect of the MetroLink project (Decision Gate 1). This approval was granted after the project had undergone significant scrutiny and challenge by bodies that are independent of TII, including the Environmental Protection Agency, independent review by JASPERS and the Major Projects Advisory Group (MPAG)) of the PBC are being updated to inform the Government decision.

Please refer to response item (2) above in relation to the continuation of the Project to Charlemont Station does not preclude onward extensions to the south or south-west. As noted by the GDA 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line longer term and is an appropriate location to facilitate any potential future metro extensions to of the city region should sufficient demand arise.' Any feasibility studies undertaken as part of the planning, design and appraisal of the NTA.