

Submission No.			192	
Organisation Name or Name of Submitter			Michael McDowell	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
2023 Metrolink Railway Order Planning Observation - Senator Michael McDowell, Leinster House, Dublin 2 - 16 th of January 2022				
1	Introduction	1	Metrolink risks damaging a lot of Dublin’s transport resources. This submission focuses primarily on the problems of locating the terminus in Charlemont for both residents and commuters. As an advocate for preserving historical structures, I am particularly concerned about how many buildings will be destroyed due to Metrolink’s construction.	<p>Thank you for taking the time to make a submission. TII have reviewed your submission and responded to the observations made below.</p> <p>TII do not agree that "Metrolink risks damaging a lot of Dublin’s transport resources" and in fact does the opposite. EIAR Chapter 3, Background to the MetroLink Project, explains how the proposed Project will provide significant benefits not only to those who choose to use it, but also to other transport network users, by generating a modal shift from private car use, thereby reducing the demand for road space and creating the opportunity for the road transport system to achieve optimum levels of efficiency and effectiveness. Also as outlined in Chapter 3, the proposed Project is part of an integrated 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 2021 and make Dublin a more liveable and sustainable city. Whilst MetroLink is a standalone project that is not dependent on any other projects for its delivery or effective operation, it is nonetheless a critical part of the proposed integrated transport network for the Greater Dublin Area.</p> <p>With regards the destruction of buildings, TII would first of all note that the destruction of buildings, taken in this context to mean demolition, is always regrettable and TII fully appreciate and acknowledge the very significant impact this has on owners and tenants. Where demolition has been proposed, this has only been done so after careful consideration and evaluation of the impacts and benefits. In most cases TII have been able to preserve the architectural heritage of property, as outlined in EIAR Chapter 26 Architectural Heritage. TII also appoint a Project Conservation Architect (PCA) to oversee the MetroLink works.</p> <p>Considering the significant length of the proposed alignment through a primarily urban area, the number of buildings to be demolished is considered to be minimal (refer to EIAR Chapter 21, Land Take, Table 21.5) reflecting the efforts TII have taken in the design to achieve this. As outlined in Chapter 26 of the EIAR, properties of architectural heritage value that are to be demolished will be recorded by the Project Conservation Architect (PCA) by means of photography and a written description to English Heritage level 2 prior to demolition.</p>
2	Problems for Commuters and Local Residents Near Metrolink Stations	1	The roads in the Charlemont area are very narrow. If drivers want to drop off or collect commuters from the terminus, it will cause congestion and other traffic-related issues.	<p>TII have undertaken detailed transport modelling, further details below, that shows MetroLink will not cause congestion and related traffic issues. 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, and instead as intended, as a through transport corridor.</p> <p>The MetroLink is designed to form part of an integrated public transport network with Charlemont selected as the preferred interchange location in order to maximise the potential interchange with the existing Luas Green Line. 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.</p> <p>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>
			Response (2) continued.	<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> <p>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. The EIAR Chapter 9: Traffic & transport, Appendix A9.2-B Traffic and Transport Assessment Charlemont Station, Section 6.1.2. refers.</p>

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3	Problems for Commuters and Local Residents Near Metrolink Stations	1	The construction of the interchange at Charlemont will involve tunnelling deep enough to avoid the Grand Canal and the main sewerage line serving Tallaght that runs alongside it. This will continue southwards for 360 metres in order to create a “turnback facility” for an underground station located beside Dartmouth Square.	Yes this observation is correct.
4	Problems for Commuters and Local Residents Near Metrolink Stations	1	Most of the bus routes nearby run through Rathmines, Ranelagh and Terenure. Many commuters will have to walk for at least 10 minutes. This causes significant difficulties for people with disabilities and others with mobility issues. For this reason, transport routes must overlap. The Metrolink Station for St Stephen’s Green also presents similar problems.	<p>The choice of Charlemont as a station location and interchange point is based on robust analysis that has identified that this location provides significant passenger numbers for the proposed MetroLink. Passengers using MetroLink will arise from (1) The ability for an immediate interchange with Luas (which is one of the key project objectives), (2) passenger demand modelling which identified significant demand within the catchment served by this station, and (3) It should also be noted that the proposed station is within a 5-minute walk distance of the Bus Connects proposed A Spine and E Spine routes.</p> <p>The proposed Project has been designed on the principle of Access for All and as outlined above there will be a drop off location at Charlemont station for people with restricted mobility only.</p> <p>The location of the St Stephens' Green station was chosen as it will provide interchange with DART at Tara Street. One of the key project objectives is to maximise interchange opportunities with other public transport and a station location at St. Stephen's Green West did not allow for the key interchange with DART services. A number of route options were considered in the process of identifying the Emerging Preferred Route (EPR).</p> <p>Further it should be noted that 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>
5	Problems for Commuters and Local Residents Near Metrolink Stations	1	The Green Line of the Luas will have to be closed for two years as the Charlemont Station is being constructed. This will no doubt put a strain on Dublin’s transport infrastructure. Metrolink will also cause other problems for commuters living on the Green Line in the Ranelagh area.	The construction of the MetroLink Charlemont Station will not interfere with the operation, or require the closure of the Luas Green Line.
6	Problems for Commuters and Local Residents Near Metrolink Stations	1	College Gate apartments, Townsend Street, Markievicz Leisure Centre, and Ashford House on Tara Street will all have to be knocked down to build Metrolink. Local residents have been left in a state of limbo as a result of these decisions.	<p>As noted above, TII regret any demolition of property, and fully appreciate and acknowledge the very significant impact this has on owners and tenants. Where demolition has been proposed, this has only been done after careful consideration and evaluation of the impacts and benefits.</p> <p>TII appreciate that this is a worrying time for owners and residents and will offer compensation to property owners for land that is deemed to be acquired land in accordance with the general compulsory purchase code through the Compulsory Purchase Order (CPO) process. This is set out in EIAR Chapter 21 Land Take, section 21.6.1.2 Compensation for Compulsory Purchase. TII are committed to working with the residents who will be affected to find an agreeable resolution.</p> <p>While it regrettable that demolition of properties is required to enable the construction of MetroLink, TII believe that in the longer term station greatly enhance and improve the local area and will ultimately bring benefits to those living it proximity the proposed station.</p>

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7	Demolition of Historical and Protected Structures	1	Building the Metrolink terminus in Charlemont will cause damage to the historic Dartmouth Square residential quarter by the imposition of a deep interchange.	<p>TII acknowledge the architectural and historical significance of the Dartmouth Square buildings and recognise that the properties are also designated Protected Structures. Hence the properties are included in the impact assessment and presented in the EIAR Chapter 26 (Architectural Heritage), Table 26.26, BH-581 to BH-617.</p> <p>TII can provide assurance that structural damage will not be caused to Dartmouth Square properties. Both the impact of construction generated ground movements and vibration have been assessed. EIAR Appendix A 5.17 Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement on Dartmouth Square where the prediction for settlement is not to exceed the 'Slight' category, an explanation for which can be found in Table 4-4 of the aforementioned report.</p> <p>The assessment work undertaken for the EIAR has determined that properties adjacent to the site along Dartmouth Square have been designated as "special" and hence a further Phase 3 refined assessment will be undertaken that will take account of final design and construction methodology details most likely utilising advanced numerical modelling techniques and further surveys of the building. The results of this refined assessment typically show that earlier assessments are conservative and overestimate the likely impact of construction generated ground movements.</p> <p>Monitoring instrumentation will also be installed to monitor the performance of the works and potential environmental impacts, including those discussed above to ensure that acceptable limits, set as part of the Phase 3 assessment, are not breached. TII would also draw attention to the fact that private properties within 50m of the station excavation, or 30m of the tunnel are eligible to subscribe to the Property Owners Protection Scheme (POPs) which includes for pre and post-construction condition surveys. The Property Owners’ Protection Scheme is in addition to the existing legal rights of property owners and is in place to provide a simple and prompt way of rectifying any damage caused under the project up to the ceiling of €45,000. If the sum should exceed this amount the normal claims process would be used with the insurance companies for TII and/or the contractor.</p> <p>As outlined in chapter 26, the only impact on architectural heritage during construction or operation of Metrolink will be on the “BH-581 and BH-582: Dartmouth Square and Environs ACA and granite kerbing at Dartmouth Square” due to provision of utilities along Dartmouth Square West that will impact the steps leading down from Grand Parade to Dartmouth Square, with potential impact on granite steps, granite kerbing and historic concrete lamp standards. Following mitigation, which will be prepared by the Project Conservation Architect (PCA), the residual impact will be reduced to slight.</p>
8	Demolition of Historical and Protected Structures	1	Under the current plans, the Carlton Cinema dating from 1938, will be demolished. This was a landmark in O’Connell Street for decades until its closure in 1994. Other neoclassical and art deco buildings will also be destroyed.	<p>Before submitting the Railway Order application with proposals for demolition, TII have carefully considered and evaluated options and associated impacts and benefits, details of which are provided in EIAR Chapter 7, Consideration of Alternatives. Unfortunately, due to the available land, combined with the construction challenges associated with providing O’Connell Street Station, there is no means of retaining the Carlton Cinema structure, however the facade is retained in recognition that the property is on the Dublin City Record of Protected Structures (RPS) and the National Inventory of Architectural Heritage (NIAH).</p> <p>Prior to the demolition of number 52-54 O’Connell Street Upper, the building is to be recorded to English Heritage level 3. The recording of associated coal cellars to facilitate propping of the facades, the demolition, and the propping of the facade will be carried out in accordance with a method statement approved by the Project Conservation Architect (PCA). As referred to in response (7) above, to ensure the protection of the facade during construction, vibration and settlement monitoring equipment will be installed and monitored to ensure that at no time do vibrations or settlement exceed given limits. As covered in response (7) above, in the event of predetermined trigger limits (set through the Phase 3 assessment process) being breached, all work in the vicinity will to stop until the cause of the issue is identified and resolved.</p>
9	Suggestions	2	South Dublin County, in their Tallaght Town Centre LAP (2020-2026) proposed running a light rail transport facility through the area. Although some feasibility studies have said relying on Bus Connects is the best for Dublin South West, many have noted that the existing public transport infrastructure underserves the area.	<p>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 south west, south or south east of the city region should sufficient demand arise."</p>

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10	Suggestions	2	<p>At an Oireachtas Committee earlier this year, Mr Hugh Creegan said one of the reasons for choosing Charlemont as a terminus is that it would allow the Metrolink to be expanded to Dublin South West at a later point. If there were a plan to have a Metrolink Station in Dublin South West now, this would likely cause fewer transport disruptions after Metrolink is built.</p> <p>It’s not plausible that there is no space to build a Metrolink terminus in either Terenure, Rathfarnham, Templeogue, Knocklyon or Firhouse. There are also no plans to run the metro through Portobello, Rathmines, Harold’s Cross or the Cathal Brugha Barracks site, which will be a large residential area in years to come.</p> <p>Rethink Metrolink drafted a transport strategy consultation submission. This should be reviewed so adequate changes can be made. Peter Twamley Railway Order application for the MetroLink Project submitted 30 September 2022 also makes important points that should be considered.</p>	<p>As noted by response (9) above, the location of the interchange at Charlemont does not preclude onward extension south.</p> <p>TII therefore do not agree that MetroLink proposals require a rethink, and TII also confirm they have responded to the submission made by Peter Twamley, noting also that 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.</p>
11	Suggestions	2	<p>Metrolink will not be built until 2032 at the earliest. However, it’s development is likely to be delayed. It won’t be operational until 2042, in all likelihood. The budget for Metrolink initially was €4 billion; it has grown to approximately €20 billion within the last five years. The money being spent on Metrolink could be invested in other areas of our transport infrastructure such as light-rail, which would not be as disruptive.</p>	<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>In any case, as noted by response (1) above, MetroLink will deliver significant benefits and thus return on its investment, by generating a modal shift from private car use and the associated benefits that brings with it.</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> <p>The opening of MetroLink is currently forecast for 2035, not 2042 as stated.</p>
12	Conclusion	2	<p>Significant changes are required to the plans for Metrolink. Situating the terminus for the Metrolink in Charlemont will cause significant problems for both commuters and residents. The city’s southwest will continue to be underserved even after its construction. Given the cost, disruptions, and time it will take to build, it would be better for the government to focus on developing surface Luas-like tram lines in the medium to long term. This could be developed quicker and will cause minimal disruptions by comparison.</p>	<p>TII do not agree that "Significant changes are required to the plans for Metrolink". TII have undertaken detailed transport modelling, that shows a MetroLink station at Charlemont will not cause congestion and related traffic issues, and 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.</p> <p>Future possible extension of the metro has been considered as reflected 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>Finally, MetroLink will deliver significant benefits and thus return on its investment, by generating a modal shift from private car use and the associated benefits that brings with it. This was reflected 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.</p>