

Submission No.			241	
Organisation Name or Name of Submitter			Orwell Park (Templeogue) Residents Association, 23 Orwell Park Rise, Templeogue - submitted by Betty Collard - Secretary of the Association	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Submission by Orwell Park (Templeogue) Residents Association on the MetroLink Proposal				
1	Letter - introduction	1	<p>This submission concerns only that portion of the proposal which goes south of St Stephens Green. The MetroLink proposal from St Stephens Green is based on bad analysis. This bad analysis relates to public transport in the area between the Red and Green Luas lines ("South West Dublin") and the related proposal to continue MetroLink to Charlemont / Manders Terrace rather than to South West Dublin.</p>	<p>TII do not agree that the proposal from St. Stephen's Green is based on bad analysis 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 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 interchange at St Stephen's Green Station.</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. This is detailed in Chapter 7 (Consideration of Alternatives) section 7.7.8. 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.</p> <p>The location of the interchange at Charlemont does not preclude onward extension south. An interchange at Charlemont is supported by policy including the Dublin City Development Plan 2022 - 2028 and the Transport Strategy for the Greater Dublin Area. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."</p> <p>By extending MetroLink to Charlemont it provides for future proofing of the Green Line, bypassing the capacity constrained Luas on-street running section, and ensures potential future connectivity options are enabled, either to the Green Line or for extensions of the metro.</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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2	1 Transport Modelling and the demand for public transport in South West Dublin	1	<p>The analysis in the Strategy Development and Modelling Report, NTA, November 2021, estimated public transport demand for the peak hour in-bound on the Rathmines and Harolds Cross corridors in 2042. The Report estimated that if there were very good public transport provision along these corridors, in-bound demand in the peak hour would amount to 15,900 (page 91). This is almost four times the existing supply of public transport¹ . However, the Modelling Report concluded that, with BusConnects, demand for public transport in 2042 would be less than the current supply (buses) on these corridors. Rather than trying to supply as much as possible of the underlying demand for public transport, the NTA is sticking rigidly only to BusConnects for the next 20 years in South West Dublin! Indeed, the Modellers acknowledged the overriding constraint on their work as follows:</p> <p><i>"Objectives are considered achieved in Phase 3 if the lower end of the plausible future demand estimates can be accommodated <u>on the public transport schemes currently in planning, (i.e. BusConnects)</u> given these schemes must be delivered to meet climate goals to 2030."</i> (page 89)</p> <p>Clearly, this constraint was inappropriate and led to the ridiculous result whereby public transport demand in 20 years' time was projected to be lower than current supply!</p>	<p>Work undertaken as part of the Strategy Development and Modelling Report by the NTA (2021) is not part of this Railway Order. This report has not informed any of the works presented in the Railway Order.</p> <p>TII do not deem it necessary to comment on this report.</p>	
3	2 BusConnects and the proposed supply of public transport in South West Dublin	1 and 2	<p>The BusConnects proposal involves a trivial increase in bus supply for South West Dublin. The following table shows the proposed supply of public transport in the peak hour, in-bound. (table in PDF)</p> <p>The NTA has contended that many more buses could use these corridors. However, this is not plausible. Due to the narrow corridors in South West Dublin, there is very little scope to increase the supply of buses. For example, Corridors 10 and 12 (from Tallaght and Rathfarnham) merge at Terenure Road East - currently a very narrow 2 lane stretch of road - see the photo. It has been reported that this would be the busiest corridor in Dublin.</p>	<p>Please refer to response item (1) above in relation to the continuation of the Project to Charlemont. As noted, the location of the interchange at Charlemont does not preclude onward extension southwest. 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>The sufficiency of NTA proposals for BusConnects are not part of this Railway Order.</p>	
4	2 BusConnects and the proposed supply of public transport in South West Dublin	2 and 3	<p>Under Busconnects, buses would turn right from Rathfarnham Road into Terenure Road East. That road would also receive buses and general traffic from Terenure Place, which is right opposite Terenure Road East. Terenure Place would receive buses from Templeogue Road, which would only contain buses and bikes. General traffic which now uses Templeogue Road would be diverted at Templeogue Bridge and Templeville Road to the KCR. There they could go to town via Crumlin (Stannaway and Clogher Roads) or they could turn right and access Terenure via Terenure Road West; it is likely that many motorists would choose this option. In addition to receiving 20 'A' buses in the peak hour, Terenure Road East would be expected to also receive 6 'S4' orbital buses and 4 '81' buses via Terenure Road West, giving a total of 30 buses per hour. This is a bus every 2 minutes, in addition to cars, vans, taxis, bikes etc. (photo in PDF)</p>	<p>Please refer to response item (3) above.</p>	
5	2 BusConnects and the proposed supply of public transport in South West Dublin	3	<p>Currently, Terenure Road East receives 19 in-bound buses in the peak hour and is highly congested in peak periods. To increase the number of buses in the peak hour by over 50 per cent, as proposed in BusConnects, would be a formidable challenge. The notion, as proposed by the NTA, that even more buses could be accommodated is difficult to comprehend.</p>	<p>Please refer to response item (3) above.</p>	
6	3 Local impact in the Templeogue area	3	<p>This is one example of the effects of failure to provide substantial public transport capacity in South West Dublin. Traffic congestion is set to become much worse in the absence of metro in South West Dublin. Essentially, the forecast for the whole GDA under the Draft Transport Strategy for the Greater Dublin Area 2022-2042 is that, following the full implementation of all elements of the Strategy, car trips will decline by only 1.8 per cent by 2042.</p>	<p>Please refer to response item (3) above.</p>	

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7	3 Local impact in the Templeogue area	3	<p>In South West Dublin, which has no high capacity public transport, it is highly likely that car traffic will increase over the coming years. The highly populated areas of Knocklyon, Firhouse, Scholarstown etc. currently have three car routes into the city:</p> <ul style="list-style-type: none">• Via Cypress Grove Road onto Lower Kimmage Road: Under BusConnects Lr Kimmage Road would be closed to general traffic.• Via Templeogue Road: Under BusConnects this would be closed to general traffic.• Via Wellington Lane, Whitehall Road, Stannaway Road, Clogher Road. Under BusConnects this would remain open to general traffic. <p>Under BusConnects this would be the only one of the three routes that would remain open to general traffic.</p>	Please refer to response item (3) above.
8	3 Local impact in the Templeogue area	3 and 4	<p>The Wellington Lane Walking and Cycling Scheme, Part 8 Report (DBFL, 2022) has some interesting statistics regarding traffic congestion on the one remaining route for general traffic. According to survey data in the Report, in the morning 8am-9am peak, 1,008 vehicles entered Wellington Lane from the Spawell roundabout. In the same hour, 1,052 vehicles went from the Spawell roundabout towards Templeogue Village; let us assume that the vast majority of these were city-bound. If BusConnects proceeds as planned, very few of the 1,052 vehicles will proceed towards Templeogue Village as their options will be severely limited as described above. Most of them will enter Wellington Lane. In other words, the volume of traffic on Wellington Lane is likely to double. This would mean that the volume of traffic on Wellington Lane - with one traffic lane in each direction - would match the volume of traffic on the Tallaght Bypass - with two lanes plus a bus lane in each direction!</p> <p>The inevitable result of the lack of high capacity public transport in South West Dublin between the Red and Green Luas lines (in effect, metro, as the streets are too narrow for Luas) coupled with the funnelling of the general traffic from three routes onto one road under BusConnects would be that the volume of traffic along Wellington Lane would be at least twice its current level. Wellington Lane would turn quickly into a slow moving car park.</p>	Please refer to response item (3) above.
9	3 Local impact in the Templeogue area	4	<p>This would have severe, negative implications for:</p> <ul style="list-style-type: none">o The proposed F2, 81 and 82 bus services along Wellington Lane;o The functioning of the Spawell roundabout / intersection;o The build-up of traffic on the Tallaght Bypass and on the link road between the Tallaght Bypass and the Firhouse Road;o Emissions from slow moving 'stop-start' traffic.	Please refer to response item (3) above.
10	3 Local impact in the Templeogue area	4	<p>The continuation of MetroLink towards Tallaght would remove many cars from the streets of South West Dublin and thereby facilitate cycling and buses.</p>	<p>Please refer to response item (1) above in relation to the continuation of the Project to Charlemont. As noted, the location of the interchange at Charlemont does not preclude onward extension south. An interchange at Charlemont is supported by policy including the Dublin City Development Plan 2022 - 2028 and the Transport Strategy for the Greater Dublin Area. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."</p>

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11	3 Local impact in the Templeogue area	4	We have seen above that BusConnects would lead to a trivial increase in the supply of public transport; now we see that it would bring about increased congestion.	Please refer to response item (3) above.	
12	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	4	The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021 rejected the continuation of MetroLink to South West Dublin. However, this Report had many flaws, including: (a) The proposal that was made by the Metro South West Group was not examined. This proposal is that MetroLink would proceed directly from St Stephens Green to a new station at Portobello, with the Tunnel Boring Machine being parked under Cathal Brugha Barracks; as a Phase 2, MetroLink would be continued to South West Dublin.	The Metro to Knocklyon Feasibility Study (NTA, 2021) is not part of this Railway Order. Please refer to response item (1) in relation to the continuation of MetroLink to Charlemont.	
13	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	b) No assessment was carried out of continuing MetroLink as far as Tallaght Town Centre (a major attractor and population centre). The option of examining the continuation of MetroLink to Tallaght was disallowed by the NTA.	The Metro to Knocklyon Feasibility Study (NTA, 2021) is not part of this Railway Order.	
14	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	c) The radius around potential stations ("buffer zone") to determine their suitability and from which passengers are to be sourced was too small at 600m. This is just a 'rule of thumb'. It assumes that all passengers would access the station on foot. However, the Metro South West Group carried out research on this matter across the outer suburbs between the Red and Green Luas lines. This research shows that, based on just two potential stations with Park and Ride and Cycle and Ride, substantial time savings could be achieved from a wide area by cycling or driving to a metro station and completing the journey by metro. This research was not even referred to much less incorporated in the Feasibility Study.	The Metro to Knocklyon Feasibility Study (NTA, 2021) is not part of this Railway Order.	
15	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	(d) There was no provision for Park and Ride nor Cycle and Ride and they are completely absent from the Feasibility Study. Nor is there any consideration of orbital feeder buses to the metro.	Please refer to response item (14) above in relation to the Metro to Knocklyon Feasibility Study (NTA, 2021).	
16	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	(e) No consideration was given to the opportunities to 'capture' motorists on the N81 to leave their cars at a Park and Ride at a location such as Spawell and complete their journey city wide by public transport	Please refer to response item (14) above in relation to the Metro to Knocklyon Feasibility Study (NTA, 2021).	
17	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	(f) Over 100,000 vehicles pass by the Spawell exit on the M50 every day. Many of these motorists are based in Dublin and they are cruising around the motorway as a way of accessing different destinations in the city. Why was no consideration given to the opportunities to 'capture' some of these drivers so that they might leave their cars at a Park and Ride at a location such as Spawell and complete their journey city wide by public transport. MSWG research shows that substantial time savings would accrue. For example, a motorist driving from Spawell to the city in the morning could expect a journey time of c. 40 minutes (per Google Maps); the same journey by metro would take 15 minutes	Please refer to response item (14) above in relation to the Metro to Knocklyon Feasibility Study (NTA, 2021).	

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18	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	(g) Excessive reliance was placed on the Eastern Regional (Transport) Model. This model predicts behaviours based on current options. As metro has no precedent in Ireland, deeper analysis is required which goes beyond people's current transport decisions, which are based on current options.	<p>Please refer to response item (14) above in relation to the Metro to Knocklyon Feasibility Study (NTA, 2021).</p> <p>The ERM has been utilised to provide the majority of the input transport data for the assessment of the proposed Project, as indicated in section 9.4.3.1 of EIAR Chapter 9 (Traffic and Transport). The ERM provides a multi-modal forecasting capability required for the assessment of large-scale projects. It includes full geographic coverage of the eastern region (counties Dublin, Wicklow, Kildare, Meath, Louth, Wexford, Carlow, Laois, Offaly, Westmeath, Longford, Cavan and Monaghan), a detailed representation of the road network, a detailed representation of the public transport network and services, a detailed representation of all major transport modes including active modes, accurate mode choice modelling of residents, a detailed representation of travel demand of four time periods (AM- morning peak, 07:00- 10:00, LT-lunchtime, 10:00-13:00, SR-school run, 13:00-16:00, and PM, evening peak, 16:00-19:00) and a prediction of changes in trip destination in response to changing traffic conditions, transport provision and/or policy. The ERM has been used to provide forecast transport movements, such as passenger numbers, origin/destination and changes in travel behaviour due to the proposed Project.</p>
19	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	(h) Direct use of POWSCAR data, in conjunction with data on metro availability and speeds, would have enabled better forecasts to be made of metro patronage and Transport User Benefits.	Please refer to response item (14) above in relation to the Metro to Knocklyon Feasibility Study (NTA, 2021).
20	4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021	5	(i) Environmental benefits were excluded from the Feasibility Study. These are major shortcomings. All of them have a similar effect: to reduce Transport User Benefits and adversely affect the Benefit to Cost ratio. There is little doubt that if these shortcomings were addressed, the Benefit to Cost ratio would increase significantly from the 0.8, which was reported in the Feasibility Study, and exceed 1 by a substantial amount.	Please refer to response item (14) above in relation to the Metro to Knocklyon Feasibility Study (NTA, 2021).
21	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6	From the above flaws in the NTA/Jacobs Feasibility Study, it is clear that this Feasibility Study provides no basis for rejecting the proposal that MetroLink should proceed from St Stephens Green to Portobello/Rathmines, pending its continuation to South West Dublin as a Phase 2 project.	Please refer to response item (14) above in relation to the Metro to Knocklyon Feasibility Study (NTA, 2021).
22	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6	The NTA/TII proposal that MetroLink would proceed to Charlemont / Manders Terrace: • Would seriously deplete the Transport User Benefits of continuing MetroLink to South West Dublin, as the highly populated and attraction-rich areas of Portobello, Harold Cross and most of Rathmines would be bypassed;	Please refer to response item (1) in relation to the continuation of the Project to Charlemont.

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23	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6	<ul style="list-style-type: none">• Would merely duplicate the existing Green Luas line from Charlemont to St Stephens Green for negligible additional Transport User Benefits;	<p>Please refer to response item (1) in relation to the continuation of the Project to Charlemont. 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).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.</p>
24	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6	<ul style="list-style-type: none">• These negligible benefits would cost around €650m;	<p>Please refer to response item (23) above in relation to the benefits associated with continuing to Charlemont.</p>
25	5 why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6	<ul style="list-style-type: none">• This would represent serious pre-funding of one southside option: converting the Luas Green Line to metro;	<p>Please refer to response item (1) in relation to continuing the Project to Charlemont, partly due to the decision to postpone the future upgrade of the Green Line to metro services.</p>
26	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6	<ul style="list-style-type: none">• There is no Government nor civil society approval for converting the Green Line to metro.	<p>Please refer to response item (13) above in relation to the future continuation of Metro along the green line.</p>
27	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6	<p>Indeed, according to the NTA's Draft Transport Strategy 2022-2042:</p> <p><i>"The challenges associated with the upgrading of the Luas Green Line to a metro standard of service have led to the emergence of an alternative proposal which seeks to meet travel demand from south of Sandyford along a new light rail corridor which serves UCD post-2042".</i></p> <p>Thus, there will be no need in the future to convert the Luas Green Line to metro, as there is a wide road all the way from Stillorgan to St Stephens Green, which could accommodate a Luas service; this would be a cheaper alternative and it would not require the closure of the Green Line for an extended period.</p>	<p>Please refer to response item (1) in relation to the continuation of the Project to Charlemont. Any feasibility studies for Green Line extensions or routes are subject to the planning, design and appraisal of the NTA.</p>

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28	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	6 and 7	<p>In the absence of</p> <ul style="list-style-type: none">• Any justification for including the advance subsidy of the conversion of the Green Line in the MetroLink proposal, and• A proper evaluation of the Rathmines / South West Dublin alternative, <p>there is no basis for An Bord Pleanála to approve sending MetroLink to Charlemont / Manders Terrace, as this would diminish the substantial economic, social and environmental benefits of continuing MetroLink to South West Dublin, while increasing its capital cost. Therefore, An Bord Pleanála should adopt a conservative approach.</p>	Please refer to response item (1) in relation to the continuation of the Project to Charlemont
29	5 Why An Bord Pleanála should not approve of MetroLink going to Charlemont/Manders Terrace	7	<p>If An Bord Pleanála gives its approval for MetroLink to go no further than St Stephens Green, the Government will have many options. For example, Government may wish to apply for a further Railway Order, or a Variation of an existing Railway Order:</p> <ul style="list-style-type: none">• To continue to South West Dublin (The MetroLink TBM to continue to South West Dublin "running through");• To continue to Rathmines as an interim measure (with its good bus connectivity). <p>Neither of these options would be possible if MetroLink goes to Charlemont / Manders Terrace as set out in the application for a Railway Order.</p>	Please refer to response item (1) in relation to the continuation of the Project to Charlemont. As noted, the location of the interchange at Charlemont does not preclude onward extension south. An interchange at Charlemont is supported by policy including the Dublin City Development Plan 2022 - 2028 and the Transport Strategy for the Greater Dublin Area. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."
30	6 Conclusion	7	<p>OPTRA agrees with Frank McDonald:</p> <p><i>"Although the thorny issue of whether MetroLink would consume most of the Luas Green Line has been "parked" for another day, there is an overwhelming case to extend it to serve Rathmines - including Cathal Brugha Barracks, now the subject of a Government-sponsored feasibility study for a major housing scheme - and onwards via Harold's Cross, Terenure and Templeogue to Tallaght."</i></p>	Please refer to response item (29) above in relation to Charlemont Station and the potential for future extensions to the south and south west.
31	6 Conclusion	7	<p>He goes on to say:</p> <p><i>"In November 2021, the NTA announced that it planned to develop new Luas lines serving UCD Belfield and Knocklyon/Rathfarnham to take pressure off the existing Green Line - but only after 2042 - with the aim of removing the need for it to be upgraded to metro standard south of Charlemont. What all of this indicates is that the NTA is making it up as it goes along."</i></p>	Please refer to response item (29) above in relation to Charlemont Station and the potential for future extensions to the south and south west.
32	6 Conclusion	7	<p>OPTRA recommends that An Bord Pleanála should approve the Railway Order minus its continuation to Charlemont / Manders Terrace.</p> <p>NOTE: OPTRA is a founding member of the Metro South West Group and supports its analysis which was submitted to ABP before the original deadline in November 2022.</p>	TII wish to thank you for your submission. Please refer to the responses provided above in relation to your concerns, and to the responses to the Metro South West Group submission (Submission Number 189) for further details.