Submission No.			257		
Organisation Name or Name of Submitter			Peter Twamley FRIAI (31 Brighton Square, Rathgar)		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Railway Ord	er application	for the Me	etroLink Project submitted 30 September 2022 to An Bord Pleanála - Peter Twam	nley, Observations on the September 2022 Metrolink Planning Submission	
1	Letter - introduction statement		These observations are based on the premise that the proposed Metrolink design route south of O'Connell street is fundamentally flawed and misconceived.	Till wish to thank you for your submission, however we do not agree that the proposed MetroLink design route south of O'Connell Street is fundamentally flawed and misconceived. EIAR Chapter 7, Consideration of Alternatives presents the decision-making process which has led to the development of the proposed Project, including alternative route alignments and station locations. The overall Project objective, as established by the National Transport Authority and Transport Infrastructure Ireland and as informed by planning policy context, MetroLink is to 'provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre' (National Development Plan 2021-2030). Therefore, the route alignment in this section serves to meet this objective, offering integration with the DART and Luas networks and facilitating a connection through the city centre. As Dublin's public transport network grows through the implementation of higher capacity bus routes, more frequent heavy rail services and coverage, and the expansion of the light rail network it is critically important that to achieve the full benefits and capitalise on these investments that they are integrated fully where appropriate to attain "the network effect". High quality interchanges can significantly broaden the transport offer for their catchment and add to the appeal and attractiveness of sustainable transport by ensuring that people can easily change services to access a wider range of places by these modes, and each scheme should be designed to ensure that these are as seamless as possible.	
2	THE PROBLEM	1	The new Greater Dublin Transport Strategy 2022 - 2042 states on page 134: - "The south city terminus at Charlemont offers the optimal location for interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise." However, there is an absolute contradiction between the confirmed formal abandonment of the future conversion of the Green Line Luas to Metro use and the current Metrolink Planning application based on a preferred route from Swords to Charlemont. The purpose of this submission is not intended to delay or comment in any way on the design of the Metro on the north side of the city bu rather to correct the deficient south side design whilst the works on the north side of the city may proceed apace.	Till do not follow the observation made with regard to the "absolute contradiction between the confirmed formal abandonment of the future conversion of the Green Line Luas to Metro use and the current Metrolink Planning application". The proposed MetroLink alignment has not been extended south of Charlemont for the reasons set out by the GDA strategy, section 12.3.10, "The challenges associated with the upgrading of the Luas Green Line to a metro standard of service have led to the emergence of an alteriative proposal which seeks to meet travel demand from south of Sandyford along a new light rail corridor which serves UCD post-2042. As such, the upgrading of the Green Line to metro standard is not being pursued as part of this strategy, Instead, for this strategy period, the capacity and frequency on the current Green Line to metro Sandyford northwards to the city centre will be incrementally increased through the provision of additional tram fleet and services and associated turnback arrangements to meet forecast passenger demand." Response (1) above outlines why the Project needs to extend beyond O'Connell Street Station and the below sets out the reasons why Charlemont Station is proposed. 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 (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 cludes 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. The proximity of the metro to the Luas line at	

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			Response (2) continued.	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." 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).	
3	THE PROBLEM	1	The proposed preferred design route south from O'Connell Street fails to integrate comprehensively with Dublin's Luas and Rail public transport systems in a sensible manner. It therefore seriously fails to meet the needs of the population of the south side of the city and as such is totally ill-conceived.	Till disagree that "The proposed preferred design route south from O'Connell Street fails to integrate comprehensively with Dublin's Luas and Rail public transport systems in a sensible manner." A station at Tara Street provides good interchange opportunities, serves important key trip attractors in the study area with high potential passenger trips. This option also takes a direct and short route through areas of high demand in the centre of the study area. The interchange value provided at Charlemont with the Luas Green Line is noted by response (2) above. Fundamentally, the public transport network offering continues to the south of Dublin via the Luas Green Line. As noted by response (1) above, as Dublin's public transport network grows through the implementation of higher capacity bus routes, more frequent heavy rail services and coverage, and the expansion of the light rail network, it is critically important that to achieve the full benefits and capitalise on these investments so that they are integrated fully where appropriate to attain "the network effect". High quality interchanges can significantly broaden the transport offer for their catchment and add to the appeal and attractiveness of sustainable transport by ensuring that people can easily change services to access a wider range of places by these modes, and each scheme should therefore be designed to ensure that these are as seamless as possible.	
4	THE PROBLEM	1	The very earliest Metrolink design to join up and obliterate the Green Line Luas at Ranelagh remains in place and unchanged in the current application despite the many objections from both the public and residents' groups and also multiple political and Ministerial requests for the National Transport Authority to examine a small range of alternatives.	Please refer to response item (2) in relation to the selection of Charlemont Station arising from the decision to postpone the future upgrade of the Green Line to metro services. 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 as well as consultation with the affected parties.	
5	THE PROBLEM	1	Despite these requests no alternative options were ever put out to Public Consultation for Dublin's largest ever Public Transport project.	Chapter 08 (Consultation) details the stakeholder and public consultation that has taken place throughout the project development, including but not limited to the Emerging Preferred Route (EPR) consultation, Environmental Impact Assessment (EIA) Scoping consultation, and Preferred Route Public Consultation. As detailed, early and continuous public participation has influenced the design and development of the MetroLink project. The MetroLink Project team responded to submissions and feedback received during the above-mentioned non-statutory public consultation periods. The MetroLink Project Team has at all times endeavoured to ensure the widest possible access for the public, stakeholders and landowners to information about the project at all stages of its pre-planning development. As noted in the Transport Strategy for the GDA 2022-2042, the decision to defer the upgrade of the Luas Green Line to a metro standard of service has been influenced by the disruption and challenges it would generate, leading to the development of an alternative proposal which seeks to meet the travel demand from the south of Sandyford along a new light rail corridor which serves UCD post-2042. The capacity and frequency on the current Green Line from Sandyford northwards to the city centre will be incrementally increased through the provision of additional tram fleet and services and associated turnback arrangements to mee forecast passenger demand.	

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6	THE PROBLEM	1	A half-baked feasibility study of a Metro (South West) to Knocklyon option carried out by Jacobs Engineering for the NTA in July 2021 managed to produce an 80% positive cost benefit ratio despite the study not including the potential passenger capacity of inner city Portobello, the suburb of Rathmines including a future redeveloped mainly residential Cathal Brugha Barracks site, the suburb of Firhouse and even Tallaght itself.	Responses (1) and (2) above set out the rationale for why MetroLink is proposed to extend beyond O'Connell Street 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 as well as consultation with the affected parties. The Metro to Knocklyon Feasibility Study is not part of the submitted Railway Order, or within the scope or remit of the MetroLink Project.
7	THE PROBLEM	2	The Dublin South West Study also carried out by Jacobs Engineering for the NTA as recently as November 2021 to inform the 2022 - 2042 Greater Dublin Transport Strategy says in paragraph 4.2.3 page 27: "The Tallaght Town Centre LAP (2020-2026) proposes to develop a transport hub in Tallaght Town Centre to facilitate seamless interchange between active modes bus, and Luas Red line. Whilst Tallaght Town Centre is not within the study area, it is within close proximity, therefor the improved interchange may impact demand within the study area".	Responses (1) and (2) above set out the rationale for why MetroLink is proposed to extend beyond O'Connell Street 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. The Dublin South West Study is not part of the submitted Railway Order, or within the scope or remit of the MetroLink Project.
8	RESULTS	2	Instead of providing an efficient and economic through running Metrolink option from the northern suburbs to the southern suburbs of the city, this interim route proposal is for a truncated design into the south inner city where it must stop and construct a large underground turn back facility with an unknown life span.	The rationale for extending MetroLink to Charlemont has been set out above by response (2). As previously stated, the proposed MetroLink alignment has not been extended south of Charlemont for the reasons set out by the GDA strategy, section 12.3.10, "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. As such, the upgrading of the Green Line to metro standard is not being pursued as part of this strategy. Instead, for this strategy period, the capacity and frequency on the current Green Line from Sandyford northwards to the city centre will be incrementally increased through the provision of additional tram fleet and services and associated turnback arrangements to meet forecast passenger demand." It is further noted, that 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 (2012-2042). 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. Charlemont station itself was chosen on the basis of its interchange potential with Luas, as well as local bus services. The section of the line between St Stephen's Green and Charlemont generates considerable benefits for the scheme in terms of increased patronage.
9	RESULTS	2	The Dart Underground as provided for in National Development Plan is Dublin's most significant and critical missing section of Public Transport infrastructure. Extraordinarily no inter-connection is provided with the Dart Underground in this flawed Metrolink route design proposal.	As part of the Transport Strategy for the GDA 2022-2042, DART Underground is proposed to be delivered in a period subsequent to the strategy period, i.e. after 2042. However, interchange with DART services has been provided for at the Glasnevin and Tara Street Stations, enhancing regional connectivity across Ireland.
10	RESULTS	2	The proposed route contains an unnecessary diversion from O'Connell Street to Tara Street Dart and mainline Rail. Yet other connections already exist from O'Connell Street west to Heuston Station and east to Connolly station and Dart via the current Luas Red line.	Please refer to response item (3) which details the strategic need for a MetroLink station at Tara Street. Whilst the Luas Red Line Stop on Abbey Street is within a 5 minute walk from the proposed O'Connell Street Station, as a result it is not considered to be a high-quality interchange in the same way as Glasnevin, Tara Street or Charlemont, in line with the Project's objective noted by response (1) above. This objective is detailed in Chapter 4 (Description of the Project).

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11	RESULTS		The route requires the demolition of College Gate Apartments and associated community facilities and has placed owners and tenants in limbo since the concept was first revealed.	TII would only ever propose a demolition where it is considered necessary to deliver the objectives of the Project, and in doing so, are very respectful and cognisant of the impact this has on the owners and tenants of the property in question. The loss of the College Gate Apartments is unfortunately a regrettable significant impact that is necessary for the construction of the important interchange with DART at Tara Street. By way of support, as noted in EIAR Chapter 21, Land Take, TII will offer compensation to property owners for land that is deemed to be acquired land in accordance with the general compulsory purchase code. Compensation will be provided through the Compulsory Purchase Order (CPO) process. In recognition of the impact on residential cases where properties are to be acquired, and given the unique circumstances surrounding the proposed impacts to College Gate Apartment complex, TII will engage the services of a property advisory company to engage directly with property owners. Property owners will be invited to participate in a Discretionary Scheme. The Discretionary Scheme will offer property owners the opportunity to negotiate and reach a 'Pre-Agreement' on both a baseline residential unit price and other matters of compensation that an owner would normally be entitled to under the compensation stage. This will provide the parties with as much certainty as possible at this early stage.				
12	RESULTS		The diversion travels under Leinster House and subsequently locates a station remotely on the wrong side of St Stephen's Green distant from a planned future Green Line Luas and Dart Underground interchange.	TII do not agree that the proposed St Stephen's Green station is on the "wrong side" of the Green. EIAR Appendix A7.3 St Stephen's Green Report details the assessment of alternative station locations at St Stephen's Green. A station at St Stephen's Green East was identified as part of the Emerging Preferred Route (EPR), (ARUP, 2018) as a result of an in-depth multidisciplinary analysis which also considered options on the west side of St Stephen's Green, in a more central location within the Park, or options with no stations at all in this location. The assessment identified St Stephen's Green East as the preferred option for the following reasons: • It best serves passenger demand along the corridor. • It serves more key trip attractors than other options through the city including St Stephen's Green, the National Concert Hall, the Cultural Institutions such as the National Gallery and the National Museum. Furthermore the route option serves key commercial, retail and office trip attractors such as the Grafton Street. • The strategic need for a station at Tara Street to provide interchange with the DART, in line with the project objectives, was a key driver for the location of a station at Tara Street to provide interchange with the DART, in line with the project objectives, was a key driver for the location of a station and Archaeology, Architecture and Cultural Heritage and Landscape, however it was identified that the majority of impacts could be mitigated during design. Also, as previously noted, an interchange with the Luas Green Line at St Stephen's Green will not be able to deliver the required capacity beyond St Stephen's Green, noting that 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. Regards DART Underground, as per the GDA 2022-2042 Transport Strategy, DART Underground				
13	RESULTS		Major environmental damage will be caused to the historic Dartmouth Square residential quarter by the imposition of a particularly large and deep interchange at Charlemont.	TII disagree that major environmental damage will be caused to Dartmouth Square. TII have carried out a comprehensive and detailed environmental impact assessment that has identified and assessed the potential environmental impacts of MetroLink and proposed mitigations for these impacts where necessary. EIAR Chapter 9 and appendices provides a detailed analysis of transport and traffic effects, Chapter 11 presents an analysis of the potential for effect on the local population, EIAR Chapters 13 Airborne Noise & Vibration, and 14 Groundborne Noise & Vibration provide a detailed assessment of potential noise and vibration effects, Chapter 26 presents an assessment of the potential for effects on architectural heritage while Chapter 29 outlines the assessment of interactions between various environmental aspects, and Chapter 30 covers the cumulative impacts with other projects. The EIAR finds that there are predicted to be no significant negative impacts at Charlemont during the operation of the proposed Project. There is however potential for short term effects during the construction phase as outlined in the chapters listed above. However mitigation measures are presented in each chapter (specified above) to mitigate these effects. A Summary of the Route Wide Mitigation and Monitoring for the Proposed Project can be found in Chapter 31 (a section relating to each discipline is included within, noting impacts at Charlemont, such as in section 31.8 Airborne Noise and Vibration.)				

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14	OPPORTUNITY LOSSES	2	The opportunity of providing an alternative through running Public Transport light rail facility to the south-west sector of the city, comprised of distinctly residential areas which themselves could be further densified is lost, as well as the possibility of connecting to a new transport hub in Tallaght as proposed by South Dublin County Council in their Tallaght Town Centre LAP (2020-2026). No Metrolink service will be provided for Portobello, Rathmines, Harold's Cross (adjacent via access from Mount Drummond) or to the Cathal Brugha Barracks site. Cathal Brugha Barracks is the largest potential development site in the south city centre, capable of housing a very large future community and commercial population and as such would more than justify a Metrolink station on its own or adjacent to it.	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." Any future extension of metro services to the locations described do not form part of the Railway Order Application for MetroLink.			
15	OPPORTUNITY LOSSES	3	The loss of some amelioration of the significant anticipated physical and traffic impact damage to the inner city suburbs of Templeogue Terenure Rathgar and Ranelagh by the current Bus Connects design proposals which are yet to be submitted to An Bord Pleanála.	BusConnects is not within the scope of the MetroLink Project or TII's remit, and therefore TII are not in a position to comment on "the significant anticipated physical and traffic impact damage" referred to by the observation. As noted by response (14) above, the proposed station at Charlemont does not preclude future extension of the metro should sufficient demand in the future arise.			
16	OPPORTUNITY LOSSES		The loss of an extension of the service life of the Luas Green Line by virtue of a resultant reduced passenger demand or the possibility of creating capacity to service areas beyond the current Bride's Glen terminal within the present investment and usage constraints.	As noted by response (14) above, the proposed station at Charlemont does not preclude future extension of the metro should sufficient demand in the future arise. As part of the Transport Strategy for the GDA 2022-2042, 'the NTA is satisfied that sufficient demand for the extension of the Luas Green Line from Bride's Glen to Bray exists and that a project should be pursued to meet this demand. The alignment and the locations to be served between Bride's Glen and Bray have yet to be determined and will be subject to detailed design and planning work.'			
17	OPPORTUNITY LOSSES	3	The loss of a potential reduction of commuter traffic on sections of the N81 where a light rail service could provide a viable alternative commuter option.	As noted by response (14) above, the proposed station at Charlemont does not preclude future extension of the metro should sufficient demand in the future arise.			
18	CONSEQUENTIAL FINANCIAL IMPACTS	3	Based on distance alone the cost of a direct route from O'Connell Street to St Stephen's Green would be considerably less than the proposed diversionary loop from O'Connell Street to Tara Street and on to St Stephen's Green including the additional station at Tara Street.	Please refer to response (3) above which outlines the strategic need and importance for a MetroLink station at Tara Street. The proposed Tara Station offers the highest forecasted patronage south of Dublin Airport, and therefore increases the benefits of the scheme and significantly contributes to the forecasted BCR. Til consider that it is therefore not appropriate to refer to the connectivity provided to Tara Street Station as a 'diversionary loop'.			
19	CONSEQUENTIAL FINANCIAL IMPACTS	3	Additional costs for stopping at Charlemont with an expensive underground "turn-back" facility will be incurred unless a takeover of the Luas Green Line were to proceed contrary to commitments already given. A very expensive deep basement interchange station at Charlemont will be required due to its proximity to the canal for the avoidance of adjacent underground infrastructural services.	Response (2) above explains why an extension beyond Charlemont is not proposed at this time, and the benefits of extending MetroLink to Charlemont provides, including an improved BCR.			
20	CONSEQUENTIAL FINANCIAL IMPACTS	3	As this route does not run from St Stephen's Green to Portobello, Rathmines and on to the South West of the city, alleviating pressure on the current near capacity Green Line Luas, a potential reduction in future Green Line running costs or savings in future Green Line investment is squandered.	Please refer to response (14) above.			

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21	CONSEQUENTIAL FINANCIAL IMPACTS	3	The Tax payer must bear the cost of this mis-guided planning submission by the National Transport Authority.	TII do not agree that this is a misguided planning submission and would note the following with regards cost. 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.		
22	Letter - concluding statement	3	An Bord Pleanála is urged to send Transport Infrastructure Ireland back to the drawing board to redesign a sensible economic integrated south city public transport light rail route from O'Connell street to Tallaght serving the maximum population capacity, avoiding buildings demolition at Tara street and leaving the Luas Green Line undisturbed.	For the reasons set out above, TII consider the Railway Order application is an economic proposal, as demonstrated by the approval of the Preliminary Business Case (see response (21) above), noting the strategic need and importance for a MetroLink station at Tara Street that provides the highest forecasted patronage south of Dublin Airport, and therefore increases the benefits of the scheme and significantly contributes to the forecasted BCR, whilst recognising that the proposed station at Charlemont does not preclude future extension of the metro should sufficient demand in the future arise.		