

Submission No.			259	
Organisation Name or Name of Submitter			Prionsias Mac Fhlannchadha (6 Wilkins Court, Limekiln Lane)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Observation on a Stratgeic Infrastructure Development Application				
1	Observation details 5. Grounds	3	I wish to firstly state my full support for the Metro plan with the exception of the intention to extend to Charlemont.	Thank you for taking the time to make a submission and your overall endorsement of the MetroLink Project with the exception of extending MetroLink to Charlemont Station. We have reviewed your submission and responded to the observations made below.
2	Observation details 5. Grounds	3	As confirmed by the NTA, the Draft Greater Dublin Area Transport Strategy 2022-2040 was presented for Public Consultation in January with the report issued to the Minister in April. Under Section 12 of the Dublin Transport Authority Act, until such time as the Minister approves the Draft Plan for 2022-2040, the plan covering this development is the Greater Dublin Area Transport Strategy (2016-2035) (“the Plan”) and any reference to draft plans in this application is premature by the Applicant.	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.
3	Observation details 5. Grounds	3	<p>Under the Plan, section 5.3.1 clearly states that</p> <p><i>“New Metro North is a modified version of the original Metro North proposal which proposes providing a similar service at significantly reduced costs... This new metro line will provide a high-speed, high-capacity, high-frequency public transport link from the city centre to Dublin Airport and Swords. New Metro North will serve a large number of significant destinations, including Ballymun, Dublin City University and the Mater Hospital, and will interchange with other rail and bus services in the vicinity of Drumcondra, O’Connell Street and St. Stephen’s Green.”</i></p> <p>It is clear from this document that there is no requirement nor policy for the Metro North to extend beyond St. Stephens Green. Any extension of the Metro North Scheme to Charlemont is included in the “Metro South (5.3.1)/ Luas Green Line Capacity Enhancements (5.3.2) both of which have been removed in the Draft Dublin Strategy (2022-2040) and therefore one must ask why the extension to Charlemont, a poorly serviced station with poor amenities, especially for those with additional needs, has been included as part of the Metro North Planning Application.</p>	<p>The Board is required to have regard to the likely consequences for proper planning and sustainable development in the area in which it is proposed to carry out railway works (section 43(1) of the 2001 Act) and as such the following matters are relevant.</p> <p>It is not correct to say "there is no requirement nor policy for the Metro North to extend beyond St. Stephens Green". The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). The Transport Strategies were prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport and approved by the Minister for Transport. It notes in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."</p> <p>The Transport Strategy is "a consideration material to the proper planning and sustainable development of the area or areas in question." Development Plans are required to be consistent with the Transport Strategy. The Dublin City Development Plan 2022-2028 envisages this station at Charlemont in policy SMT22 "To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained: ... MetroLink from Charlemont to Swords".</p> <p>Accordingly, the location of the Charlemont station was a strategic decision made at the highest levels of transport and land use planning and such is fully consistent with the proper planning and sustainable development of the area.</p> <p>The current Transport Strategy considers a range of options for the onward extension of MetroLink to meet the demand for travel over the period of the strategy. This includes consideration of the need for the upgrade of the Luas Green Line to metro with a metro extension to Dublin south west, south or south east. Whilst the strategy envisages that further extensions will be delivered after 2042, MetroLink which terminates at Charlemont allows for the possible extension of the metro in all any of the above directions (Transport Strategy Section 12.3.2, and Measure LRT2 – Further Metro Development).</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 alternative interchange at St Stephen’s Green Station. Passengers wishing to interchange between Luas and metro at an alternative St Stephen's Green terminus would face a 500m-walk along a route either through St Stephen’s Green park or along the footpath north of the park, which adds significantly to the time for interchange and therefore the overall journey time for passengers and a less positive customer experience for all interchange users. This passenger experience would be reduced further for those with mobility or visual impairments as well as those travelling to/from the airport with luggage.</p>

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			Response (3) continued.	<p>The detailed analysis done for the Railway Order application further confirms that the section of MetroLink route between St Stephen's Green and Charlemont Stations contributes significantly to the overall benefits of the scheme. It serves a significant area of the south city of Dublin and offers enhanced access from the local area to the city centre and a direct connection to Dublin Airport. It serves key trip attractors including residential areas and offices / workplace locations, with high passenger boarding and alighting figures in the peak hours. During the morning peak, at Charlemont station the flows include 1,800 passengers alighting, 2,300 boarding and 1,229 passengers alighting, 2,276 boarding during the evening peak. The passenger numbers contribute significantly to the overall benefits of the scheme and the effect of these benefits outweigh the additional costs that are associated with the delivery and operation of the section from St Stephen's Green to Charlemont station. Further information is available in Chapter 7: Consideration of the Alternatives, section 7.7.8 MetroLink Southern Terminus Location.</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.</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>
4	Observation details 5. Grounds	4	As noted in JASPERS external technical assessment of the Metro North Project (Preliminary Business Case) incorporating Independent External Review issued on the 2nd of May, 2022) <i>“It is noted that the revised design for St Stephens Green arose following the objective to provide a connection to Charlemont/Ranelagh, which is no longer considered a priority by the independent review team.”</i> Of pertinence also as opined by the external consultants <i>“several technical aspects of the project appear to make the project expensive; in particular... the inclusion of the connection to Ranelagh/ Charlemont.”</i> Given the inordinate costs of the project to date in comparison to other European projects of a similar nature this unmerited extension to Charlemont should be value engineered out of the Metro North Project.	<p>Assessment work prior to the Emerging Preferred Route public consultation in 2018 (as provided on the TII MetroLink web site) considered multiple route options for the MetroLink alignment between Swords and Charlemont, based on maximising potential catchment for the metro and integration with other public transport modes. The best performing option from these assessments was selected as the Emerging Preferred Route (EPR) which included stations at Tara Street (providing integration with the Dart) and at Charlemont (providing integration with the Luas Green Line) and incorporating a station at St Stephen's Green East. Options which incorporated a station at St Stephen's Green West did not provide for a station at Tara and did not perform as well in the option comparison and were thus discounted. The EPR route was subsequently developed as the Preferred Route and following further design development now forms the basis of the Railway Order submission.</p> <p>A station on St Stephen’s Green West is not preferred for several reasons:</p> <p>If a station was placed on St Stephen’s Green West, the alignment between the proposed Tara Station and a station on St Stephen’s Green West would result in an undesirable horizontal reverse curve and an alignment greater than a 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with the MetroLink Fire Strategy. Additional construction would be required to provide such a facility, similar in size to the proposed Albert College Park Intervention shaft. This could feasibly be situated in the Trinity College Dublin sports grounds.</p> <p>TII note that it is Government policy to provide a station and interchange with the Luas Green Line at Charlemont, as set out by the GDA Transport Strategy 2022 – 2042. Should a station be placed on St Stephen's Green West, the alignment between a station located here and the proposed Charlemont Station would also result in an undesirable horizontal reverse curve and an alignment that is greater than 1000m long, and would thus again require an intervention shaft similar to the proposed Albert College Park Intervention shaft to be provided. This would be expected to result in significant demolition and redevelopment in an existing built-up area.</p> <p>In both cases, compared to the proposed alignment that runs much more directly between Tara, St Stephen’s Green and Charlemont, the additional length of tunnel and the addition of two intervention shafts generated by locating a station on St Stephen’s Green West is uneconomic in comparison.</p> <p>As a potential station location, St Stephen’s Green West itself is a very constrained location due to the presence of buildings, Luas and St Stephen’s Green Park. Maintaining the Luas operational during station construction would be complex and challenging with significant disruption expected, whilst the impacts on St Stephen’s Green Park would be greater for a station in this location compared to the proposed location on St Stephen’s Green East. This would be the result of; the likely need to place more of the station in the Park compared to the proposed station on St Stephen’s Green East; it would impact an area of the Park that has greater amenity value than St Stephen’s Green East due to the nearby Park entrance adjacent to the southern end of Grafton Street, and there would be a risk of impacting the existing Park lake.</p>

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			Response (4) continued.	<p>In summary, an alignment that links the proposed Tara, St Stephen’s Green East and Charlemont stations is a more direct and economic alignment, does not require additional intervention infrastructure, avoids a complex engineering interface with the Luas Green Line, impacts the Park less and has less potential for disruption during the construction phase.</p> <p>Response (3) above explains the reasons for why TII are proposing a station at Charlemont, noting 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> <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). It is therefore not justifiable to propose that this section of the proposed line is "value engineered out" given the benefits it will deliver.</p> <p>Finally, while JASPERS comments are noted, it is also of note that 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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5	Observation details 5. Grounds	4	Also as advised by JASPERS in their "Project Review: Phase 3 (Preliminary Business Case) incorporating Independent External Review issued on the 2nd of May, 2022 <i>“The connection to Ranelagh could feasibly be deferred until there is clarity on the future of the Luas Green Line,”</i> highlighting the external assessors difficulty in obtaining comfort in the rationale for the extension to Charlemont. Given that the Metro South and Luas Capacity Enhancements do not feature in the draft GDA Transport Strategy 2022-2040 there is no merit in continuing this extension to Charlemont and in fact to do so is tantamount to poor project planning and a waste of money by the NTA as it may jeopardise further expansion plans to other areas of Dublin, in particular South West Dublin.	Responses (3) and (4) above explain the rationale and benefits of continuing MetroLink to Charlemont, noting that the connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). TII therefore do not agree, noting responses (3) and (4) above, that; there is no merit in continuing MetroLink to Charlemont, money is being wasted or that possible future extension of the metro south is not taken account of. It is also not correct to say that the GDA Transport Strategy 2022 - 2040 does not feature "Metro South" and " LUAS Capacity Enhancements". Section 12.3.2 states the following " 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. "
6	Observation details 5. Grounds	4	I hope that the Bord can consider approving this valuable scheme which will greatly help improve connectivity in the GDA but omit the extension of the Metro North to Charlemont due to the lack of support for an extension to same and the impact it may have on future extensions to the line.	The above responses to the observations made explain why TII do not consider it is correct or appropriate that the MetroLink alignment is not continued to Charlemont, and also explains why the proposed Charlemont Station has been selected by TII as the preferred interchange with the Luas Green Line A scheme that does not extend to Charlemont would not be consistent with the Transport Strategy for Greater Dublin Area (2022-2042), as approved by Cabinet. In addition any decision to terminate the scheme before Charlemont will significantly impact on the overall viability and benefits of scheme.