

Submission No.			263	
Organisation Name or Name of Submitter			Recorders Residents Association	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Submitted by Pauline Foster, Chairman on behalf of Recorders Residents Association - Re: Case reference: NA29N.3 14724 -MetroLink. 314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin.				
1	Letter Statement:	1	The Recorders Residents’ Association wish to make a submission which relates solely to that portion of the proposed MetroLink beyond the station located at St Stephen's Green East. Please note that we are fully supportive of the project from Estuary to St Stephen's Green, which we consider is long overdue.	Thank you for taking the time to make a submission and your overall support of the MetroLink Project from Estuary to St Stephen's Green. We have reviewed your submission in relation to the proposal for the project beyond the station located at St Stephen's Green and responded to the observations made below.
2	Letter Submission:	1	<ul style="list-style-type: none">• We submit that Bord Pleanála should defer the authorisation of the section of MetroLink beyond the St Stephen's Green station, other than to create a turning section.	<p>TII do not agree that the sections of MetroLink beyond St Stephen’s Green should be deferred 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 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> <p>The section of MetroLink route between St Stephen's Green and Charlemont Stations contributes significantly to the overall benefits of the scheme. It serves a significant area of the south city of Dublin and offers enhanced access from the local area to the city centre and a direct connection to Dublin Airport. It serves key trip attractors including residential areas and offices / workplace locations, with high passenger boarding and alighting figures in the peak hours. During the morning peak, at Charlemont station the flows include 1,800 passengers alighting, 2,300 boarding and 1,229 passengers alighting, 2,276 boarding during the evening peak. The passenger numbers contribute significantly to the overall benefits of the scheme and the effect of these benefits outweigh the additional costs that are associated with the delivery and operation of the section from St Stephen's Green to Charlemont station. 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. 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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3	Letter Charlemont Station - no benefit to South West Dublin.	1	The decision to locate the terminus at Charlemont is in our opinion, an extremely poor decision and would have no benefit to our sector of the city. Not in the short term or in the long term. It would appear that NTA/TII have ‘boxed’ themselves into a corner by continuing to opt for Charlemont as the terminus. When the decision was reached not to continue the connection to the Green Luas Line this station should also have been deleted from the proposal. An Bord Pleanála have a golden opportunity in their hands to pause this line at St. Stephen’s Green whilst a fully informed, independent Feasibility Study is undertaken to assess an alternative line towards Tallaght, via Rathmines.	<p>TII have concluded that that the optimum location for the interchange with the Luas Green Line is at Charlemont. Response (2) above explains the rationale for extending MetroLink beyond St Stephen’s Green, whilst further noting the below.</p> <p>It is being argued that arising from the decision to postpone the future upgrade of the Green Line to metro services that Charlemont station effectively becomes a terminus station in the short to medium term. In this regard, it is true to say that the Metrolink trains will terminate and turn back at Charlemont station, however the public transport service offering for passengers does not terminate, it transfers from Metrolink to LUAS as part of the integrated transport network.</p> <p>The terminus station for MetroLink is located at Estuary where all of the activities normally associated with a terminus (train sideways, depot, car parking etc) take place. At this location the high capacity public transport offering terminates and the public transport offering transfers to a completely different mode, i.e. Bus and car. The environmental effect of the Metrolink terminus are accordingly assessed in the EIAR. Charlemont Station does not have the associated infrastructure and services associated with a terminus location and in fact has more in common with a “system turn back location”. Charlemont Station is located within an area of high public transport accessibility, linking with the Luas Green Line which offers reasonably similar levels of services and frequency for journeys to and from the south of Dublin. As such, public transport service offering is not considered to terminate, but transfers onto the similar service offered by the Luas Green Line, forming part of a transport corridor running from Cherrywood to Estuary. The associated environmental impacts for the turnback and station at Charlemont have been fully assessed in the EIAR.</p> <p>Charlemont station itself was chosen on the basis of its interchange potential with Luas, as well as local bus services, as outlined above. The section of the line between St Stephen's Green and Charlemont generates considerable benefits for the scheme in terms of increased patronage, referred to in response (2) above. Operationally, the Station will see people moving quickly in and out of the area, noting that it will act as an interchange, and has been deliberately designed with minimum set down space or room for taxis so that it does not encourage the Station to be used as a terminus. All operational environmental impacts are mitigated so they are not significant, while the impact on amenity will be permanent and positive.</p> <p>The proposed route alignment from Estuary to Charlemont is consistent and compliant with the GDA Transport Strategy 2022-2042 (published in January 2023) in which states that 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.</p>
4	Letter Highest car usage.	2	We are acutely aware of the poor public transport decisions, down the years, particularly in the area between the Red and Green Luas lines, which have led to greatly increased private car usage. It is time now to lay plans to address this deficit. MetroLink should go no further than St. Stephen’s Green and the construction time from Estuary should be used to do a proper assessment of continuing the lineout south west, through Rathmines as requested by MSWG.	Responses (2) and (3) above explain the rationale for why MetroLink should extend beyond St Stephen’s Green to Charlemont, and further TII do consider that a "proper assessment" has been undertaken as evidenced by responses (2) and (3) above.
5	Letter 50 years evidence.	2	The 1970’s saw a massive increase in the expansion of housing in South West Dublin, yet this was accompanied by a reduction in the number of buses servicing the area. The 2001 studies showed that bus alone could not be meet demand into the future. We are in that ‘future’ now and it has been proven. The then mooted rail link from Stephens Green to Tallaght remains imaginary. Equally, BusConnects proposals in 2019 cannot, in our opinion, address the deficit in public transport for our area. The expected negative impact of traffic, moved about like the chairs on the Titanic, into the entire area west of Terenure and over to the Crumlin Road, will have a detrimental effect on life quality for those in the mid area. We would question the price the ‘squeezed middle’ will pay for arguable improvements (no time-constant journeys) in the extreme outskirts of the city.	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.

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6	Letter Solution.	2	<p>MetroLink, continued to South West Dublin via Stephens Green, Rathmines etc. has the potential to resolve this scenario, with buses freed-up to do the job of connecting the suburbs - which is the current driver of much of the private car necessity.</p> <p>The recent GDA review failed to consider an alternative routing of MetroLink - simply terminating it at the point where problems could not be surmounted and endeavouring to make the proverbial ‘silk purse out of a sow’s ear’ out of a station at Charlemont. Instead an alternative route should have been investigated.</p> <ul style="list-style-type: none">• We would submit therefore, that, in preference to Charlemont, the nearby Rathmines or Portobello area would be a far more suitable location for the MetroLink terminus.• This would not interfere with the established use of the Luas Green Line. Passengers opting to transfer to MetroLink could do so at Stephens Green or O’Connell Street. It would be remiss of us not to add that the ideal scenario would of course be at a station on the West side of the Green.	<p>The GDA strategy 2022 -2040 and the recommendations contained therein in respect to future transport link south of Charlemont fall outside the remit of TII and are a matter for the National Transport Authority. Future metro services to Terenure/Rathmines/Portobello do not form part of the MetroLink scheme. The MetroLink scheme as proposed in this railway order application is consistent with GDA strategy 2022-2040.</p> <p>Responses (2) and (3) explain the rationale for why MetroLink should extend beyond St Stephen's Green to Charlemont, noting that an interchange at St Stephen’s Green or O’Connell Street would not address the fact that the capacity of the Luas south from St. Stephen's Green is restricted due to on-street running.</p> <p>At the Emerging Preferred Route (EPR) stage of the Project, route options included potential station locations on St. Stephen's Green West. Route alignments from St. Stephen's Green West that would also provide an interchange with DART at Tara Street Station would require an intervention shaft between these locations and would also need an undesirable horizontal reverse curve and so are not favoured. As outlined by EIAR Chapter 3, Background to the MetroLink Project, one of the key objectives of the Project is the integration of it with the wider transport network that also includes for BusConnects and DART+ which are all included under Project Ireland 2040.</p>
7	Letter A ‘Metro’ made of buses.	2	<p>The volume of buses needed under BusConnects to service Terenure/Rathmines (Corridor 10/12) is testament to the need for a metro. A huge percentage of the entire bus fleet, 66 per hour, will endeavour to do the job a metro, up and down these roads for the next quarter of a century. Even at this volume, the service is likely to be inadequate. Time constant travel will not be achieved. Public Transport congestion will result.</p>	<p>Future metro services to Terenure/Rathmines or Portobello do not form part of the Metrolink scheme.</p>
8	Letter Rathmines Road v ‘Ranelagh’ Road (Northbrook Ave).	3	<p>A comparison of bus service to Charlemont and the limited space on the canal front suggests to us that further evidence that the choice of Rathmines for the Terminus of MetroLink offers so much more. Connectivity for much of the south west city could be greatly enhanced as these 33 buses operate from a large arc of the suburbs - Dundrum to Tallaght.</p> <ul style="list-style-type: none">• We submit that this is a further reason why An Bord Pleanála should defer the authorisation of the section beyond Stephens Green, in order to conduct a proper feasibility study into this possibility.	<p>Please refer to response (7) above, noting that the further south and to the west MetroLink is extended at this time will further constrain the route options available in the future should it be deemed necessary to extend MetroLink.</p> <p>Future metro services to Terenure/Rathmines or Portobello do not form part of the Metrolink scheme.</p>
9	Letter Limitations of Charlemont.	3	<p>1. The range of the radial extensions into the south of the city is far more limited at Charlemont compared to St. Stephens Green, due to its more southerly location.</p> <p>2. In the context of the preparation of the Greater Dublin Area Transport Plan 2022-2042, the National Transport Authority did a feasibility study entitled Metro to Knocklyon. We don't regard this as having been, in any way, adequate to fully assess the selection of a viable route into South West Dublin in particular.</p> <p>3. We do not believe that any meaningful progress can be made in assessing an alternative option unless a proper assessment of metro to the south west city is done.</p>	<p>The analysis underpinning the development of the Greater Dublin Area Transport Plan 2022-2042 is not a matter for TII or the Railway Order application process.</p> <p>Responses (2) and (3) explain the rationale for why MetroLink should extend beyond St Stephen's Green to Charlemont, noting that an interchange at St Stephen’s Green or O’Connell Street would not address the fact that the capacity of the Luas south from St. Stephen's Green is restricted due to on-street running.</p>

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10	Letter Financial return consideration.	3	<p>A metro station located at Portobello/Rathmines could reap the benefit of the 33 buses which will converging on the Rathmines Road for the next 20 years fed from a swathe of South West Dublin, i.e. between the Green Luas Line and the Red Luas Line with a population of over 350,000.</p> <p>Motorists normally using the M50 would be enticed to leave the car and use bus and metro to the north side of the city. By comparison, no ‘new’ passengers would add financially to Charlemont Station.</p> <p>We would also add that to progress to Charlemont would be an extremely costly exercise if, subsequently, minds were changed and the south west route was given precedence.</p>	<p>As noted by response (3) above, the proposed route alignment from Estuary to Charlemont is consistent and compliant with the GDA Transport Strategy 2022-2042 (published in January 2023) which states that 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.</p> <p>Further as noted by response (8) above, the further south and to the west MetroLink is extended at this time will further constrain the route options available in the future should it be deemed necessary to extend MetroLink.</p> <p>Responses (2) and (3) also explain the considerable increased passenger utilisation, and hence improved Project Benefit Cost Ration (BCR) that locating the a station at Charlemont brings to the Project.</p>
11	Letter Reduced Environmental Benefit.	3	<p>Poor access from Rathmines Road to Charlemont, particularly for those with mobility issues, would have a limiting effect on the numbers of passengers wishing to use MetroLink to the airport. The habitual route via the M50, with long- stay parking would be likely to continue.</p> <p>We believe that a metro extension to Portobello/Rathmines would result in the beginnings of huge environmental benefits for the south west city.</p> <p>Under current plans Climate action will be almost non-existent due to the on- going dependence on the private car until circa 2050.</p>	<p>MetroLink is not a standalone project. As explained by EIAR Chapter 3, Background to the MetroLink Project, 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>TII would reiterate that 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 (now published), 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>
12	Letter Conclusion	4	<p>Outside reviewers had this to say about continuing to Charlemont/Manders Terrace :-</p> <p>Jaspers: <i>“The connection to Ranelagh could feasibly be deferred until there is clarity on the future of the Green Line (subject to an improved understanding of how this could physically be delivered in a scenario with Metro operational)”</i></p> <p>As ‘outside reviewing residents’ we would add:</p> <p>We do not believe that any progress can be made in assessing the options unless a proper assessment of metro to the south west city is done. Pause at St. Stephens Green and be sure the next steps are the right ones, with both options being evaluated.</p>	<p>Responses (2) and (3) above explain the rationale for extending MetroLink to Charlemont and why St Stephen's Green is not suitable as an interchange with the Luas Green Line, including the fact that the capacity of the Luas south from St. Stephen's Green is restricted due to on-street running, whilst noting that the location of the interchange at Charlemont does not preclude onward extension south.</p> <p>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>
13	Letter Conclusion		<p>Our Ref: TTAS-MO-06074-2022 Reply from Minister Eamon Ryan.</p> <p>a) <i>” ...Studying a metro proposal in isolation in a standalone feasibility study would undermine this integrated approach and not provide an overall picture of the transport system needed to cater for medium and long-term demand in the south west of Dublin. ”</i></p> <p>Our comment on this: The proposal before An Bord Pleanála is in effect a standalone project. Utilising the opportunity to pause at St. Stephens Green offers an opportunity to investigate the following now:</p> <p>b) <i>“While a metro to the south west of Dublin is not proposed before 2042 in the current draft GDA Transport Strategy, the NTA reviews and updates the strategy every 6 years. As such, this proposal may be reconsidered in future and progressed if there is sufficient passenger demand on the corridor. ”</i></p> <p>Our comment on this: If the Feasibility Study done by NTA had included the population of Lr. Rathmines and Portobello AND extended to Tallaght, we have no doubt it would have easily exceeded the demand criteria. We also note that the GDA Transport Strategy is still at draft stage.</p>	<p>MetroLink is not a standalone project. As explained by EIAR Chapter 3, Background to the MetroLink Project, 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>TII would reiterate that 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 (now published), 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>