

Submission No.			264	
Organisation Name or Name of Submitter			Rethink Metrolink	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Letter Re: Observation to ABP on MetroLink Railway Order Case No. NA29N 314724 Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin				
1	Cover page	1	While we are sure that other observations on this case will address the engineering and technology aspects in detail, Rethink Metrolink are especially concerned about the human impact of these plans, including the catastrophic negative impact on both the Charlemont and College Gate communities. More broadly, the perhaps unintended consequences for the south west of the city of the choice of Charlemont as terminus with associated tunnel extension will adversely impact the quality of life of all the suburbs of the south west, possibly for generations.	<p>College Gate: Chapter 07 (Consideration of Alternatives) details the decision-making process that has led to the development of the proposed Project, including the route alignment and station locations. Appendix A7.2 Tara Street Station Report presents in detail the various options that were considered by TII for this location. 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. Further information of the MetroLink Land Acquisition Strategy can be found at https://www.metrolink.ie/media/gc4f0bbp/metrolink-land-acquisition-strategy_final-draft_sept22_to-issue.pdf</p> <p>TII is committed to having a Property Owner Protection Scheme (POPS) in place prior to construction works commencing. The scheme allows residential property owners to register with TII if the property is within 30m of the edge of the MetroLink alignment, or 50m of station structures. The POPS comprises of condition surveys of private properties and other selected properties along the route of the proposed Project. Further information on POPS is available in Chapter 11 (Population & Land Use). Useful information on POPS can also be found in the MetroLink Frequently Asked Questions document which can be found on-line at: https://www.metrolink.ie/assets/downloads/MetroLink_FAQ.pdf.</p> <p>Charlemont: Chapter 11 (Population and Land Use) notes that the proposed underground station at Charlemont Station will be consistent with planning objectives to provide for 'Employment/Enterprise' and residential land use in the vicinity. The designation of part of Charlemont Place to the north as a 'District Centre' will complement the southern edge of the city centre location proximate to the mixed-use office district. There is potential for interchange with the Luas Green Line and bus routes, improving accessibility in the area. The impact on both population and land use at Charlemont is considered to be positive.</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>

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			Response (1) continued	<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. Please also refer to response (11) below.</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>
2	Cover page	1	This is but the latest in a long line of proposals from NTA/TII which have been characterised by inadequate consultation, occasionally shoddy analysis and less than professional management of the process which in this case led to a delay in the closing date for submissions.	<p>Chapter 8 (Consultation), and the associated appendices documents of the EIAR, presents an overview of all stakeholder and public consultation undertaken to inform the development of the proposed Project. Throughout the project, public consultations were conducted to ensure the most meaningful contribution to design phases. In preparing an application for a Railway Order for the proposed Project, the Project Team has consulted with the public and stakeholders in accordance with the following legislative, best practice and planning practice requirements: Aarhus Convention; Consolidated EIA Directive requirements; and, Requirements of National Law. Since January 2018, 1,331 meetings have taken place and more than 107 organisations have been met by Project Team members, including representatives from Dublin City Council (DCC), Fingal County Council (FCC) and local stakeholders and residents. Consultations and meetings are still ongoing in order to ensure that stakeholders are fully appraised and updated on the details of the proposed Project. TII are committed to maintaining engagement with the relevant parties to address any issues or concerns throughout the Project.</p> <p>Chapter 02 (Methodology used in Preparation of the EIAR) describes the legal provision for EIA with respect to the Project, the legislative requirements for EIA with respect to the proposed Project, the EIA process and methodology for identifying, predicting and evaluating the effects (both positive and negative) on the receiving environment caused by the proposed Project and mitigating negative effects, and the methodology and structure by which the EIAR was compiled to allow the Board to undertake the EIA. The EIAR has been prepared by competent experts in accordance with best practice and takes into account information compiled through desk-based assessment, field surveys and consultation with the relevant statutory bodies and the general public. The assessment of the potential effects of MetroLink generally follows the Guidelines on the Information to be Contained in EIARs (EPA, 2022). For some topics, industry sector or professional institute specific guidance is followed. In addition to the applicable EIA legislation and guidance, all EU Directives and national legislation relating to the specialist areas have been considered as part of the process.</p>

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			Response (2) continued.	<p>As indicated in the Notice of Further Information and Notice of Extension to the Consultation Period, a very small piece of information (EIAR Appendix A9-2, A9-2-M Traffic and Transportation Assessment – St Stephen’s Green Station) was inadvertently omitted from the EIAR which accompanied the application for a railway order, which contains further information in relation to the likely effects on the environment of the proposed railway works.</p> <p>As soon as TII became aware of this error and to ensure that the public was fully informed and no prejudice suffered, the consultation period was extended on the 25th of November 2022 to allow for full review of this information to inform submissions . Newspaper notices were also published on 25 November 2022 providing notification that this information was being submitted and was again accompanied by TII writing to the same circa 2400 property owner/occupiers notifying them of this new information.</p>
3	2. An Bord Pleanála should approve MetroLink only as far as St Stephens Green	3	It is very difficult to understand the project thinking which envisages the line terminating anywhere other than St. Stephens Green. Continuing MetroLink beyond St. Stephens Green to Charlemont is unnecessary, premature and lacks coherence in the absence of any firm plan for a future extension. The selection of Charlemont is not appropriate as the terminus in light of the (sensible) decision to shelve the Luas Green Line upgrade.	<p>Please refer to response item (1) above in relation to the reasons for continuing MetroLink to Charlemont.</p> <p>Arising from the decision to postpone the future upgrade of the Green Line to metro services, it is being argued 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, 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 passenger use, as detailed 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	2. An Bord Pleanála should approve MetroLink only as far as St Stephens Green	3	We believe that if the tunnel is bored as far as Manders Terrace, it seriously compromises the ability for a southern extension to include the highly populated city suburbs of Portobello, Lower Rathmines, and Harold's Cross. We would submit that proper planning of the project which is the subject of the Railway order requires a full and proper evaluation of the options for extension and that it is not consistent with proper planning to bring Metrolink beyond St. Stephens Green to Charlemont which would compromise the options.	Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont.

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5	2.1 Charlemont Station is neither a sensible or viable solution as a southside Metrolink Terminus	3	The selection of Charlemont as the point of tunnel emergence seems to be predicated on the related (but shelved following consultation and additional analysis) NTA plan to convert the Luas Green line into a high speed limited stop system. The effect of this decision Charlemont terminus is to pre-empt future decisions on the configuration of any comprehensive, integrated and inclusive rail-based transport solution for the south city generally. Rethink Metrolink has consistently called for consideration of extending the underground high-speed rail (the Metrolink) to deliver services to under-served parts of the south city either South West (Rathgar, Terenure, Rathfarnham, Tallaght/Sandyford) or East (Stephens Green, Donnybrook, UCD Belfield, Mount Merrion, Sandyford) or both. While the current plan to continue tunnelling to Charlemont/Ranelagh does not render this approach impossible, it would seem that terminating the Northern Metrolink line at St. Stephens Green preserves the possibility of far more elegant and integrated solutions at some stage in the future. (This was specifically envisaged in the current plan for DART underground and the original 2010 plan for Metro North, which suggests that the current Charlemont terminus does not adhere to the principle of integration which should underpin projects of this scale).	Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont.	
6	2.1 Charlemont Station is neither a sensible or viable solution as a southside Metrolink Terminus	3	The current NTA plans for Charlemont/Ranelagh suggests a policy fixation by the NTA with upgrading the Luas Green Line to the exclusion of alternative more equitable and inclusive use of taxpayer resources. It is based on a historic policy position which was always suspect and certainly does not reflect key urban social and demographic trends in the interim. It is also a proposal (Luas upgrade) which has been already rejected by key stakeholders. It is in effect driving policy through the rear-view mirror.	Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont.	
7	2.2 The selection of Charlemont as a transport hub is fundamentally flawed - 2.2.1 Long-term impact	4	<p>Charlemont has only become "the" major Southern transport connection hub by default. The "emerging preferred route" originally envisioned that southside passengers would access MetroLink at multiple points along the spine of an (upgraded) Green Luas Line. Under that design, Charlemont would not have been "the" focal point for access for the whole of the southside. The original strategy for the "emerging preferred route" was based on a north-south spine and not a "hub and spoke" model.</p> <p>The subsequent withdrawal of the proposal to "tie-in" the Green Luas line has now resulted in Charlemont unintentionally becoming "the" southside hub for the whole Metro project. The fundamental basis of the MetroLink transport strategy for the southside has now totally changed. However, no comprehensive study of a "hub and spoke" model has been carried out. Furthermore, no data has been proffered to demonstrate that Charlemont is the ideal solution for a long term major Southern transport connection hub.</p>	<p>As a result of the non-statutory consultation on the Emerging Preferred Route (EPR), a number of significant changes were made to the proposed Project. The EPR Public Consultation Report was published by TII, indicating that a large number of submissions were received regarding disruption to the Green Line service during upgrade works. A decision was taken to amend the extent of the MetroLink route. The proposed Project now comprises the delivery of a Metro system between Swords and Charlemont and no longer includes for the upgrading of the Luas Green Line between Charlemont and Sandyford to Metro standard. Terminating the proposed Project at Charlemont avoids disruption during construction along the Luas Green Line, which was frequently mentioned in submissions.</p> <p>Please refer also to response item (1) and (3) above in relation to the reasons for continuing to connect MetroLink to Charlemont.</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> <p>As detailed in Chapter 6 (MetroLink Operations and Maintenance), the project has been designed to ensure maximum interchange with other modes of transport, specifically more sustainable modes of transport such as walking, cycling and other forms of public transport. 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. As such, a 'hub and spoke' model aligns with the 'network effect' mentioned, and offers greater benefits than a linear spine model.</p>	

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8	2.2 The selection of Charlemont as a transport hub is fundamentally flawed - 2.2.1 Long-term impact	4	If the Metrolink strategy is to be fundamentally changed to a hub and spoke model, the most important criteria for any "hub" would be that it provides maximum flexibility to accommodate all future southern route possibilities. Under this model, the optimum location will be as close to the city centre as possible. Charlemont is clearly not as central as St. Stephen's Green and therefore already compromises future routes by bypassing densely populated city centre business areas due to the more southern location. The likelihood of future routes satisfying return on investment criteria is further compromised by the likely cost of re-aligning any future tunnel routes (away from Green Luas tie-in).	Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont.	
9	2.2 The selection of Charlemont as a transport hub is fundamentally flawed - 2.2.2 Interim Impact	4 and 5	Even as an interim solution, the logical criteria for selecting the location of a station to service the whole of the southside would be: <ul style="list-style-type: none">• It should be in an area that is already a transport hub, i.e. is well served by multiple current modes of transport - pedestrian, rail, bus, coach, taxi and car.• It should be in an area that already caters for major transport activity and is a destination for both regular commuters and tourists. St. Stephen's Green satisfies both criteria; Charlemont satisfies neither: <ul style="list-style-type: none">• Charlemont is not an existing transport hub - while there is a Luas stop, it is not a destination for buses, coaches, taxis or cars. It is also severely compromised by the Canal in terms of connectivity and traffic congestion. This is in stark contrast with the 360 degree access to St Stephens Green.• Immediately south of the proposed Charlemont station is a residential area (beginning from Dartmouth Square and Dartmouth Road). This long-standing residential and architectural conservation area has never been envisaged or proposed as a suitable location for a major transport hub. The congestion problems caused by the Canal boundary will worsen on the Canal (Grand Parade) and result in the main station access for buses, coaches, taxis, cars and pedestrians, being forced to come through this residential area. Once this is established it will become a de facto access route to MetroLink and with severe long-term implications for the local community. Even as an interim solution, why bring all southside MetroLink passengers to a Charlemont location that is less accessible than St. Stephen's Green, will cause increased traffic congestion and will destroy a residential area?	Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont. A VISWALK local model has been developed for this station, assessing the impact of the new pedestrian crossing on Grand Canal on the road network. The model demonstrates that it will have a minimal impact on driver delay on this road. In overall terms, the Charlemont station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, as evident in the forecasted modal shift, and as such further local traffic or junction modelling was not undertaken. during the operational phase, the model zones around Charlemont Station forecast a reduction in Car mode share , with a reduction of between 400 and 800 car trips over the 12hr period. With the reduced demand for car trips, it is anticipated that the demand for drop-off and parking will also reduce. Transport modelling presented in Chapter 09 (Traffic and Transport) also indicates that the majority of passengers boarding and alighting at Charlemont will transfer from/to other forms of public transport, and therefore will not induce traffic.	
10	3. Options for any future Metro South phase should not be prejudiced by the current proposal	5	The Metrolink Railway Order, case reference NA29N.31474 makes repeated references to a 'second phase project' in several decades time aimed at upgrading the Luas Green Line to Metro (high-speed, limited stops). This 'second phase project' is then used to support the adoption of Charlemont as the terminus as well as tunnel boring as far as Manders Terrace. However, in November 2021, as part of the Greater Dublin Transport Strategy 2016-2035, 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. There is a contradiction between the 'second phase project' and the stated strategy of NTA and this lack of internal consistency in their thinking is worrying.	Please refer to response item (1) and (3) in relation to the reasons for continuing MetroLink to Charlemont in line with the GDA Transport Strategy.	
11	3. Options for any future Metro South phase should not be prejudiced by the current proposal	5	There is an overwhelming case as a future phase to extend MetroLink to serve Rathmines, Cathal Brugha Barracks and onwards via Harold's Cross, Terenure and Templeogue to Tallaght. There is an inadequate plan for the supply of public transport to South West Dublin and the critical need, at this juncture, for correct decisions to be made in relation to the MetroLink trajectory into South Dublin in the future.	Future plans to extend Metro services south of Charlemont, do not form part of the Metrolink scheme. TII's role is to deliver Metrolink as supported by the Transport Strategy for Greater Dublin Area (2022-2042) and Dublin City Development Plan 2022-2028. The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy. The Transport Strategies were prepared by the National Transport Authority, scrutinised by the Joint Oireachtas Committee on Transport, and approved by the Minister for Transport. It notes in section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future Metro extensions to serve the southwest, south or southeast of the city region should sufficient demand arise."	

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12	3. Options for any future Metro South phase should not be prejudiced by the current proposal	5 and 6	<p>A proper feasibility study for continuing MetroLink to South West Dublin needs to be carried out urgently and should inform the current proposal especially in respect of the Charlemont terminus choice. In respect of the Terms of Reference for the previous study, the option of continuing MetroLink from St Stephens Green (rather than Charlemont) to South West Dublin needs to be within scope. When MetroLink comes south to St Stephens Green, it could be directed either to South West Dublin. If MetroLink were to go as far as Charlemont / Manders Terrace, under the current NTA proposal, the opportunity of serving Harolds Cross and Rathmines and other important inner suburbs would be lost. This is a serious and worrying flaw in the Terms of reference of the previous study. By including the Charlemont terminus in this phase, the NTA is attempting to prejudice and limit the opportunity for future phases of MetroLink to support under-served areas to the southwest of the city centre.</p> <p>The MetroLink "Project Review: Phase 3 (Preliminary Business Case) incorporating Independent External Review" by JASPERS, May 2022 also concluded that this is not a priority:</p> <p>- Reference A.1.4 "<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>"</p> <p>- Reference A.4.8 "<i>The connection to Ranelagh could feasibly be deferred until there is clarity on the future of the Luas Green Line</i>"</p> <p>The selection of Charlemont as the end-point, estimated to cost in the region of €650m, is not justified in the light of the decision to omit the Luas Green Line upgrade.</p>	Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont, including the future proofing for possible extensions to South West Dublin.	
13	4. Rethink Metrolink proposes a set of investment principles which we believe should continue to underpin transport strategy	6	<p>Rethink Metrolink strongly urges that the development of strategic solutions to Dublin public transport requirements should be guided by the following:</p> <ul style="list-style-type: none">• Transport solutions should be based on a strategic approach encompassing all options in an integrated plan.• High-speed urban rail solutions should run underground when servicing the city centre and inner-suburban neighbourhoods.• Incremental development of urban rail transport should prioritise areas of high demand where there is no existing rail link.• Investment of incremental taxpayers' monies should not be predicated on decommissioning existing essential and well-proven transport assets, specifically light-rail services such as Luas.• Investment proposals should include analysis and quantification of the social, economic and environmental effects of the proposed route on all the affected communities.• The energy crisis and the fallout from the pandemic have been unwelcome reminders of the perils of forecasting and the challenges of devising a regional transport strategy. Government policy in relation to remote working demonstrates the profound changes that this global pandemic will have on future transport patterns in Ireland. It is widely expected that the volume and pattern of future commuting in the Dublin region will change markedly due to the dramatic increase in remote and hybrid working. It is very possible that commuter numbers may actually decline. As a consequence it is likely that the current carrying capacity of the Luas system will be able to cope with demand until 2050 and not 2040 as currently assumed. In light of this, it cannot be good transport strategy to even explore options involving the destruction of existing fit-for-purpose light rail infrastructure: therefore the only rationale for including any consideration of the Luas Green Line (City-Centre to Sandymount) in the strategic review is to confirm that it should be retained in its current tram format, in our opinion.	<p>Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont.</p> <p>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 offering 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.</p> <p>Chapter 07 (Consideration of Alternatives) presents the decision making process that has led to the development of the proposed Project, including the Multi-Criteria Analysis that has been undertaken for the route alignment, considering the social, economic and environmental effects of the proposed route on all the affected communities.</p> <p>Chapter 09 (Traffic and Transportation) and the associated chapter appendices, details how the passenger modelling has been informed by a range of growth scenarios and transport infrastructure scenarios. Similarly, passenger modelling for the Project's business case included sensitivity tests such as Alternative Demand (such as the impacts of COVID-19), and Slow Growth patterns to determine the possible economic impacts in all possible scenarios. The range of BCR still indicates that the Project will be of benefit to Dublin.</p>	
14	5. Rethink Metrolink continues to have concerns about the consultation process	6 and 7	<p>Rethink Metrolink has already expressed concerns that NTA needs to be more transparent in its strategising and decision making. For example, an earlier consultation on the preferred Metrolink route did not provide full relevant information on engineering challenges that have a direct bearing on the exact location for the Luas-Metrolink tie-in and had the effect of ensuring disproportionate focus - with adverse public commentary - on the community’s concern about the closure of Dunville Avenue. This information was only released in a subsequent detailed design report. In addition we should remember that NTA insisted that the Luas green line could not cope with likely demand growth to 2040 until activist groups actually presented solutions involving tram length and frequency, scenarios which must have been developed by a well-resourced entity such as NTA.</p> <p>In addition, we are concerned by the reluctance of NTA to engage directly with community groups including Rethink Metrolink. As Rethink Metrolink (representing a broad cohort of residents who are situated adjacent to the Luas Green line as well as commuters who have been daily users of that facility for the last 18 years) we made extensive submissions to all prior consultations; we requested that a meeting of manageable numbers and duration with NTA but that was not forthcoming. At that time, the Joint Oireachtas Committee on Transport did deem it appropriate to meet with us, in fact on the same day that the NTA met with them.</p> <p>The Metrolink Railway Order, case reference NA29N. 31474 will have an immediate adverse impact on two communities, namely the residents of the College Gate development and the Charlemont/Dartmouth Square community. In the longer term, the south west quadrant of the city will be disadvantaged by the choice of Charlemont as terminus as it precludes the development of the needed southwest alignment. The impact on these citizens has been poorly reflected in the current proposal and the wider planning process provides surprisingly limited opportunity for advocacy on behalf of these impacted groups.</p>	<p>Chapter 07 (Consideration of Alternatives) presents the decision making process that has led to the development of the proposed Project. Taken together with other proposed route alignment and design improvements, design responses to consultation submissions resulted in a number of changes to the Emerging Preferred Route leading to a Preferred Route. While based on the EPR alignment, the Preferred Route developed on and improved on earlier preliminary design considerations. As such, detailed engineering analysis was not undertaken for the identification of a Preferred Route, but once identified was then progressed to further analysis and design.</p> <p>Please refer to response item (2) in relation to consultation and stakeholder engagement undertaken as part of the Project. As noted, TII are committed to maintaining engagement with all relevant parties throughout the Project.</p> <p>Consultation between Rethink and NTA on plans for a southern Metro extension are not a matter for this Railway Order.</p> <p>Please refer to response item (1) and (3) above in relation to the reasons for continuing MetroLink to Charlemont. Response item (1) also details the predicted impacts on the residents of College Gate.</p>	