

Submission No.			284	
Organisation Name or Name of Submitter			Saint Anne's Resident's Association (110 Saint Annes Kimmage) - submitted by Aidan Hodson, Chairperson the Association	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Case reference: NA29N.3 14724 -314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin				
1	Statement	2	This submission wholly relates to that portion of the proposed Metro Link beyond the station located at St Stephen's Green East. For the avoidance of any doubt we are fully supportive of the project from Estuary to St Stephen's Green, which we consider is long overdue.	TII wish to thank you for your submission and statement of support for the delivery of MetroLink. Please refer to the responses below to address your concerns.
2	Submission	2	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 similar in length to that which is currently proposed for Manders Terrace.	<p>TII do not agree that the Project should not continue past St. Stephen's Green 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 to areas such as Rathmines. 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	Submission	2 and 3	<p>Reasons are as follows: 1 . Failure to consider an alternative routing of the terminus notably towards Rathmines</p> <p>We would submit that the Rathmines or Portobello area would be a far more suitable location for a terminus but TII has wholly failed to consider this. This became relevant once the destination for a southern terminus was to be in or in the vicinity of the south inner city, rather than Sandyford.</p>	<p>Further to response item (2) above.</p> <p>It is also important to note that arising from the decision to postpone the future upgrade of the Green Line to Metro services,-Charlemont station effectively becomes a terminus station in the short to medium term. While it is true to say that the MetroLink trains will terminate and turn back at Charlemont station, the public transport service offering for passengers does not terminate, as it transfers from MetroLink to LUAS as part of the integrated transport network. 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. The-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. A location of a station at Rathmines/Portobello would not offer this high quality interchange opportunity.</p> <p>Please note that future Metro services south of Charlemont do not form part of the Metrolink scheme as presented under the Railway Order. 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."</p>	
4	1. Failure to consider an alternative routing of the terminus notably towards Rathmines	3	<p>Rathmines Road under BusConnects will have four ‘A’ services and a number 80, 81 and 82 with an aggregate frequency of 33 per hour peak time in each direction. A terminus for MetroLink in Rathmines or Portobello would offer superb bus connectivity and would connect much of the south west city including our own area of St. Anne’s Estate off Kimmage Road West close to KCR Junction via the 15a bus route to Rathmines and, if located in Portobello, via the no. 9 bus.</p>	<p>Please refer to response item (2) and (3) above in relation to continuation of the Project south of Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála.</p>	
5	1. Failure to consider an alternative routing of the terminus notably towards Rathmines	3	<p>We note that 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 matter. Among its limitations this feasibility study did not include the continuance of the Metro beyond Knocklyon to link up with Tallaght and the Red Line Luas. This addition would have made the Benefit Cost Ratio exceed the 1.0 necessary for approval.</p> <p>We would request that a proper/comprehensive feasibility study be done to assess the options for the south west city.</p> <p>We do not believe that any progress can be made in assessing the alternative option unless a proper assessment of metro to the south west city is done.</p>	<p>Please refer to response items (2) and (3) above in relation to continuation of the Project south of Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála.</p> <p>The Metro to Knocklyon Feasibility Study is not part of the submitted Railway Order.</p>	

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6	Submission	3	<p>2. Limitations of Charlemont terminus for radial extensions onwards to south city. It would seem, that the longer term intent is, that the MetroLink line be extended into the south city area. There are statements on this by various persons including NT A senior executives and the Minister. There are three alternatives posed: a. south west city towards Tallaght, b. continuing on the existing Luas line or c. heading south east towards UCD and Sandyford.</p> <p>We believe that if the tunnel is bored as far as Manders Terrace, this seriously compromises the ability for an extension to serve important communities. In particular we find it difficult to see how MetroLink could be extended to include relatively inner city suburbs such as Portobello, Lr. Rathmines, and Harold’s Cross with potential onward extension in Phase 2 of Metro Link to South West Dublin towards Tallaght.</p> <p>We would submit that proper planning requires a proper evaluation of the options for extension and that it is not consistent with proper planning to permit a station at Charlemont which would compromise the options.</p>	<p>Please refer to response item (2) above in relation to continuation of the Project south of Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála.</p>
7	Submission	4	<p>3. Potential Environmental benefits for south city consequential from pause for exploration of alternative extension route. Deferring the section of MetroLink beyond St. Stephen’s Green would remove potential congestion in the south city arising from the works towards Charlemont. In the longer term it would also enhance the feasibility of the future continuance of Metrolink Phase 2 to South West Dublin and on to Tallaght. This in turn would facilitate an efficient public transport system to accommodate the sprawling suburbs to the South West of the City with consequent reduction in carbon emissions.</p>	<p>Please refer to response item (2) above in relation to continuation of the Project south of Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála.</p>
8	3. Potential Environmental benefits for south city consequential from pause for exploration of alternative extension route	4	<ul style="list-style-type: none">• There is a large population (350,000+ in Census 2022) between the Red and Green Luas lines.• With only narrow roads, buses cannot be sufficient to service this population and the narrow streets have led to the rejection of Luas (twice) by the NTA.• There is a compelling case to continue MetroLink as a Phase Two project from the city to Tallaght in South West Dublin.• Pending the decision on Phase Two, MetroLink should have its final station in St Stephens Green and the interchange of passengers with the Green Luas should take place here.• This would facilitate the option of including Rathmines, Harolds Cross and Portobello in the catchment of Phase Two of MetroLink.	<p>Please refer to response item (2) above in relation to continuation of the Project south of Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála.</p>
9	3. Potential Environmental benefits for south city consequential from pause for exploration of alternative extension route	4	<p>In view of Climate Change, the future continuance of MetroLink Phase 2 to South West Dublin (which would be more feasible with the deferral in the immediate/medium term of the section beyond St. Stephen’s Green), would remove many car journeys from the outer suburbs and off the often congested M50 thereby reducing our carbon emissions.</p>	<p>Please refer to response item (2) above in relation to continuation of the Project south of Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála.</p> <p>Information on the impact of the MetroLink Project on Climate during the Construction Phase and Operational Phase to further the achievement of the national climate objective, is set out in full within Chapter 17: Climate.</p>

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10	Submission	4	4. Poor access to Charlemont from Rathmines Road. As we note above there will be numerous buses (33 per hour peak in each direction) on Rathmines Road once BusConnects is implemented. Therefore, we think it is very likely that a lot of passengers will alight at Portobello Bridge and walk across to the MetroLink, particularly if they want to access parts of the North city or the airport, quite likely with luggage.	The proposed MetroLink project is part of a proposed future integrated public transport network for Dublin, so interchange with other modes of public transport is to be encouraged. However it should be noted that detailed modelling has been undertaken for the project to understand the level of interchange and passenger demand at each proposed station. As presented in Table 5.8, Table 5.9 and Figure 5.2 of Appendix A9.2B to the EIAR a pedestrian assessment has been undertaken having regard to predicted future pedestrian movements including those generated by Bus Connects. There are predicted to be passengers coming from the Portobello area as suggested. However the assessment of impact presented in Section 6.1.3 of the above mentioned report indicates that levels of pedestrian comfort overall will be acceptable around Charlemont station in 2050, once the proposed pedestrian crossing and access staircase to the LUAS stop is in place.	
11	4. Poor access to Charlemont from Rathmines Road.	4	<ul style="list-style-type: none">• There is no thought given in the TH plans to the route such people will walk/take, but we suspect it would be on both sides of Canal Road and Grand Parade.• The Railway Order plan contains no proposals for a proper infrastructure to facilitate this.• However, the most obvious solution to this problem is to have a terminus closer to Rathmines Road.	<p>As outlined in Chapter 09 (Traffic and Transport), a microsimulation VisWalk model has been developed for the immediate area surrounding Charlemont Station during the operational phase. The model covers the full extent of the publicly accessible station area, including the immediate vicinity of the station entrance at street level, the Luas stop and nearby junctions at Charlemont Bridge. In order to accommodate the forecast demand from the proposed Charlemont Station, a new staircase with 2.4m stair width is proposed at the south east corner of Charlemont Luas stop. An elevator will also be provided at this location. Both are sized for MetroLink to Luas, and Luas to MetroLink passenger numbers.</p> <p>In addition, it is proposed that the pedestrian crossing on R111 Grand Parade will be repositioned to the front of the building being developed by Hines. With this infrastructure in place, the model indicates that the R111 Grand Parade will have an acceptable level of service overall, with some reductions in service seen at the pedestrian crossing where pedestrians are required to wait for a green phase at the signals. Overall, it is considered that the model displays an acceptable level of network performance.</p>	
12	4. Poor access to Charlemont from Rathmines Road.	4	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 similar in length to that which is currently proposed for Manders Terrace.	<p>Please refer to response item (2) above in relation to the continuation of the Project to Charlemont.</p> <p>If a decision was taken to terminate MetroLink at St Stephen's Green, significant changes would be required to the scheme. These would include design changes at St Stephen’s Green station and provision of alternative turnback facilities immediately south of the station.</p>	
13	4. Poor access to Charlemont from Rathmines Road.	5	It would be premature to constrain the available options by allowing MetroLink to proceed beyond St Stephens Green to Charlemont / Manders Terrace. Having the Tunnel Boring Machine left buried under Ranelagh will add a further seven hundred million euros (approximately) without any transport benefits. Based on the results of the feasibility study mentioned above, a decision could be made on the southern alignment of Metrolink well before the Tunnel Boring Machine comes near St. Stephen’s Green.	Please refer to response item (2) above in relation to the continuation of the Project to Charlemont over St Stephen's Green.	
14	Submission	5	5. Unsatisfactory linkage of MetroLink and Luas at Charlemont Charlemont is most unsuitable as the interchange with Luas as it would require incoming Luas passengers to cross the Luas tracks; descend three flights of stairs; walk in the open; and descend three escalators to finally reach the MetroLink train. By contrast, locating the interchange in St Stephens Green could require a short walk and one escalator. While the Charlemont interchange might be considered inconvenient for many, for others such as mothers with buggies, people with disabilities and older people it could border on social exclusion.	<p>TII do not agree that Charlemont provides an unsuitable interchange with the Luas Green Line. 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>Please refer to response items (10) (11) in relation to the pedestrian impact assessment undertaken at this location.</p>	

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15	Submission	5	6. Current Traffic Congestion in St. Anne’s Residents’ local area requiring a major upgrade of public transport Living at the KCR end of Kimmage Road West, we currently access the city through some public transport corridors with significant pinch points e.g.. Terenure Cross, Rathmines Road, Kimmage Cross Roads, Lower Kimmage Road (particularly around Mount Argus), Harold’s Cross Bridge. The consequent long journey times lead to considerable stress for our residents particularly during morning gridlock. This has led to a situation where one of the main objections do our residents and other neighbouring residents’ groups to recent proposed new housing developments in the area, being that they would worsen traffic congestion. It seems to us and to many engineers to whom our umbrella MSWG group has spoken that the solution to this would be a MetroLink to the South West City and Tallaght.	Please refer to response item (2) above in relation to continuation of the Project 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.
16	Conclusion	5	The above are the key reasons why as a residents’ association, in the immediate term, we are seeking the deferral of the section of MetroLink beyond St. Stephen’s Green in order to provide time for the feasibility study referred to earlier and to enhance the feasibility of a future Phase 2 to the South West Dublin and on to Tallaght.	Please refer to response item (2) above in relation to continuation of the Project to Charlemont. As noted, the selection of Charlemont Station does not preclude onward extensions to the south or south-west of the city. Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála.