

| Submission No. | | | 316 | |
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| Organisation Name or Name of Submitter | | | WORK Residents Association / Michael Griffin (26 Osprey Avenue, Templeouge) | |
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| Item No. | Section Ref. | Page No. | Observation Statement | TII Response |
| Case Reference NA29N.314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin. | | | | |
| 1 | Letter - introduction | 2 | The following observation relates wholly to that portion of the proposed Metro Link beyond the station located at St. Stephen's Green East. | TII appreciates the submission. Please refer to the responses provided below to address your concerns. |
| 2 | Observations from WORK Residents' Association | 2 | <p>WORK Residents' Association is fully supportive of the project from Estuary to St. Stephen's Green.</p> <p>We submit that An Bord Pleanála should refuse the authorisation of the section of Metro Link beyond the St. Stephen's Green station, other than to allow for a turning section similar in length to that which is currently proposed for Manders Terrace.</p> | <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 interchange at St Stephen's Green Station.</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. This is detailed in EIAR Chapter 7 (Consideration of Alternatives) section 7.7.8. 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.</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 | Observations from WORK Residents' Association | 2 | Our reasons for this are as follows: (1) There has been a failure to consider an alternative location for the terminus in the Portobello / Rathmines area; (2) A terminus at Charlemont would present severe limitations for radial extensions towards many areas of south city; (3) Poor access to Charlemont from Rathmines / Portobello/ Harold's Cross (4) A terminus at Charlemont does nothing to relieve the continuation of the environmental damage caused by traffic gridlock and by a grossly inadequate public transport system for large areas of South West Dublin. | Please refer to response item (2) above in relation to the continuation of the Project to Charlemont. Responses to the individual items listed are provided below in items (4), (5), (8) and (9), respectively. |
| 4 | Observations from WORK Residents' Association | 2 | 1. Failure to consider an alternative location for the terminus. Under the BusConnects proposals Rathmines Road will carry 33 buses per hour at peak time in each direction. A terminus for Metro Link in the Rathmines Road / Portobello area would offer much greater bus connectivity and would connect areas of south west city that would be deprived of this connectivity by locating a terminus at Charlemont. A terminus at Rathmines / Portobello would better facilitate commuters on buses approaching the city via Kimmage Road Lower and Harold’s Cross wishing to connect with MetroLink. | Please refer to response item (2) above in relation to continuation of the Project to Charlemont. It is also important to note that 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. 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. A location of a station at Rathmines/Portobello would not offer this high quality interchange opportunity. The terminus station for MetroLink is located at Estuary. At this location the high capacity public transport offering terminates and the public transport offering transfers to a completely different mode, i.e. Bus & 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”. |
| 5 | Observations from WORK Residents' Association | 2 and 3 | 2. Charlemont terminus - its limitations for radial extensions to other areas of the south city Bringing Metro Link into south inner city (St. Stephen's Green station) presents opportunities for NTA, TII and the Minister with responsibility for transport to consider a location for a terminus that would render optimum benefit to the commuters from many areas of south Dublin outside of the Grand Canal. The three options that have been put forward by various people including NTA Senior Executives, the Minister and many residents' representative groups, including WORK Residents' Association, centre around: (a) Continuing Metro Link towards South West City and Tallaght, (b) Continuing on the existing Luas line, (c) Routing south east towards UCD and Sandyford. | 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. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise.' Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála. |
| 6 | 2. Charlemont terminus - its limitations for radial extensions to other areas of the south city | 3 | WORK Residents' Association submits that locating the Metro Link terminus at Charlemont and boring a tunnel as far as Manders Terrace seriously compromises the ability for an extension at some future time to serve the many communities in Harold's Cross, Terenure, Kimmage, Crumlin, Perrystown, Greenhills, Willington, Orwell, Templeogue, Firhouse and Knocklyon. | Please refer to response item (2) and (4) 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. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise.' Any future extensions to MetroLink will be subject to full optioneering, planning, design and appraisal and will require approval from An Bord Pleanála. |

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| 7 | 2. Charlemont terminus - its limitations for radial extensions to other areas of the south city | 3 | WORK Residents' Association submits that proper planning for a major infrastructural project such as Metro Link requires a proper evaluation of the options for extension. Locating a terminus at Charlemont predetermines the issue and would not be consistent with proper planning. | Please refer to response item (2) and (4) 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. |
| 8 | Observations from WORK Residents' Association | 3 | <p>3. Poor access to Charlemont from Rathmines / Portobello/ Harold's Cross</p> <p>No provision has been made in the plans for how commuters will get from Rathmines Road, Portobello or Harold's Cross to the proposed terminus at Charlemont. We reference Rathmines Road and Harold's Cross specifically as they are the major BusConnects corridors from South West Dublin (City and County).</p> <p>As Metro Link will provide a welcome transport link to Dublin Airport many of the commuters getting on /off MetroLink will carry luggage. Locating a Metro link station near major Bus Corridors would facilitate these commuters.</p> <p>We note from the documentation submitted as part of the application that "<i>while provision has been made for 162 cycle parking spaces most of which will be around the southern entrance with the remainder integrated with the urban design along the internal roads towards the northern entrance.</i>" While provision for cycle parking is welcome at the proposed Metro Link terminus no such provision has been made to meet the needs of commuters to and from the airport who wish to access MetroLink.</p> | <p>Please refer to response item (2) and (4) above in relation to continuation of the Project to Charlemont. The location for interchange at Charlemont will serve a higher number of passengers (arriving from the airport) than other potential interchange points just with bus services. However, as previously 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>As detailed in Chapter 06 (MetroLink Operations and Maintenance), the Project has been designed to ensure maximum interchange with other modes of transport, specifically more sustainable modes such as public transport, walking and cycling, taking cognisance of both existing and future networks such as BusConnects to increase the catchment of passenger demand on MetroLink.</p> |
| 9 | Observations from WORK Residents' Association | 3 | <p>4. A terminus at Charlemont does nothing to relieve the continuation of the environmental damage caused by traffic gridlock and by a grossly inadequate public transport system for large areas of South West Dublin</p> <p>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, has a large deficit of public transport. WORK Residents Association does not believe that the planned supply of public transport to 2042 by Bus Connects will meet the forecast demand. The traffic gridlock, morning and afternoon, in Willington, Kimmage, Harold's Cross, Donore and on many narrow streets of south city continues with increased carbon emissions. Only Metro Link can deliver capacity and speed for the commuters in this area of South West Dublin. WORK Residents Association notes that in the context of the preparation of the Greater Dublin Area Transport Plan 2022 - 2042 The National Transport Authority carried out a feasibility study "Metro to Knocklyon". Unfortunately, the study failed to adequately assess the issue. Locating the terminus of MetroLink at Charlemont would compound the difficulties which were not addressed in that feasibility study. While WORK Residents' Association appreciates that An Bord Pleanála cannot mandate the conduct of a feasibility study we ask that An Bord Pleanála would not compound the difficulties by granting approval for the application for a terminus at Charlemont. To grant approval would render the continuation of Metro Link to S.W. Dublin at some future date very difficult if not prohibitive.</p> | Please refer to response item (2) and (4) 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. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise." Any feasibility studies undertaken as part of future phases of the study will be subject to the planning, design and appraisal of the NTA. |