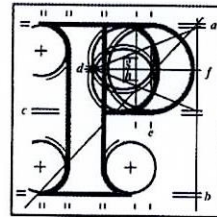


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Knocklyon Network CLG
Idrone Avenue
Knocklyon
Dublin 16

Date: 05 December 2022

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Motrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

PP Em

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Tell	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

**Knocklyon Network CLG,
Idrone Avenue,
Knocklyon
Dublin 16**

The Secretary,
An Bord Pleánála,
64 Marlborough Street,
Dublin 1.
Dear Sir/Madam,

Date.22/11/2022

Re: Case reference: NA29N.314724

314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin

Dear Sir/Madam,

Knocklyon Network CIG is a Community Organisation that represents the Community of Knocklyon and parts of Rathfarnham, Firhouse, Templeogue. We have a Community Facebook page with over 11000 followers. We work to improve and support all aspects of making our Community a better place to live.

Statement:

Our 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. We strongly support Metro South West Group and their campaign to bring Metrolink to the Transport deprived area of South West Dublin. Much of the arguments in our Submission are given in greater detail by the MSWG submission.

Submission:

We submit that Bord Pleanala 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.

Reasons as follows:

1. Failure to consider an alternative routing of the terminus notably towards Rathmines.
2. Feasibility Study from City Centre to Knocklyon.
3. Limitations of Charlemont terminus for radial extensions onwards to south city.
4. Potential Environmental benefits for south west Dublin
5. Poor access to Charlemont from Rathmines Road.
6. Lack of adequate public service in outer suburbs.

1. Failure to consider an alternative routing of the terminus towards Rathmines

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.

Rathmines Road under Bus Connects 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.

There was an obvious possibility of using Cathal Brugha Barracks in Rathmines as a terminus with its wide-open spaces and possible site for Tunnel Boring Machine which could then be re-directed to South West Dublin. The barracks is currently under review for future development under Land Development Agency for housing, and commercial buildings, suitable for a major terminus and connection to the South West Dublin.

2. Feasibility Study from City Centre to Knocklyon.

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. This study was severely flawed, and the criterion given to Jacob's International were bound to produce a negative result.

We would request that a proper/comprehensive feasibility study be done to assess the options for the south west city. Any route decided upon would be more feasible from Stephen's Green than Charlemont.

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. This study could be carried out while Metrolink continues to be built from Estuary. It will be unlikely to reach city centre before 2025.

3. 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 NTA senior executives and the Minister. There are three alternatives posed:

- a. south west city towards Tallaght,
- b. continuing the existing Luas line or
- c. heading south east towards UCD and Sandyford.

In various statements both from Government and NTA, it would seem that options b and c are no longer under consideration for Metro. This been the case it would seem appropriate to look for a suitable terminus for option c.

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, Rathmines, and Harold's Cross. MSWG have requested NTA through the Minister to give details of what suburbs could be served from a continuation of Manders Terrace to the South West. The NTA have not responded to this request of over a year.

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.*

4 Environmental Issues.

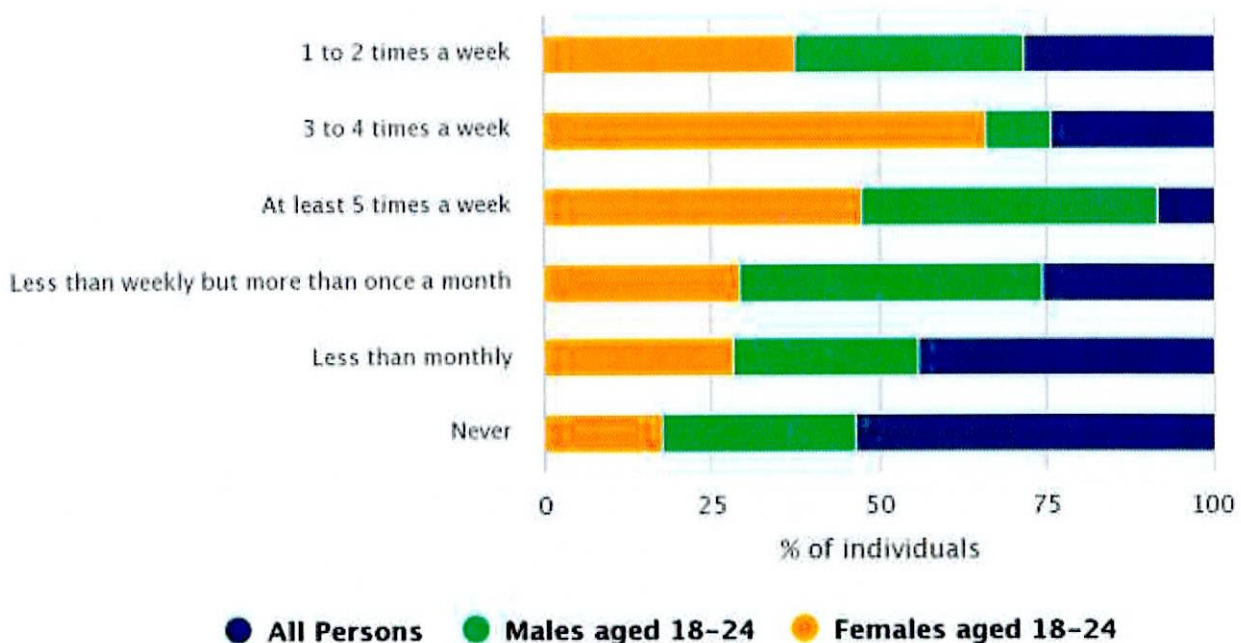
From Data collected by Metro South West Group, there is no doubt that the long-term plan for Dublin's environmental health must include substantial investment in Metro systems. There is a lack of belief in the public that buses and Bus Connects will be sufficient to meet the demands for public transport as proposed by NTA/TII.

A Metro system, operated on electricity generated by Renewable Energy Resources is among the lowest carbon footprint. See Our World in Data Table. This is the obvious solution for the growing needs for Transport in South West Dublin. The benefits increase year on year as the occupancy increases year on year as was found with Luas.

CSO Transport Survey of 2019 found the following conclusions.

Almost half (48.5%) of respondents aged 18 years and over never use bus services, while one quarter (24.8%) use it less than monthly. One in every sixteen (6.3%) persons use the bus services very frequently, at least 5 times a week. Persons aged 18 to 24 years use the bus services most frequently – 36% of females and 33.6% of males in this age group use the bus services at least 5 times a week. At an overall level, one in twenty of over 18-year-olds (4.7%) use the bus 3 to 4 times a week, and 8.5% use it less frequently, 1 to 2 times a week.

Figure 10.1 Frequency of use of bus services by sex and selected age group, 2019



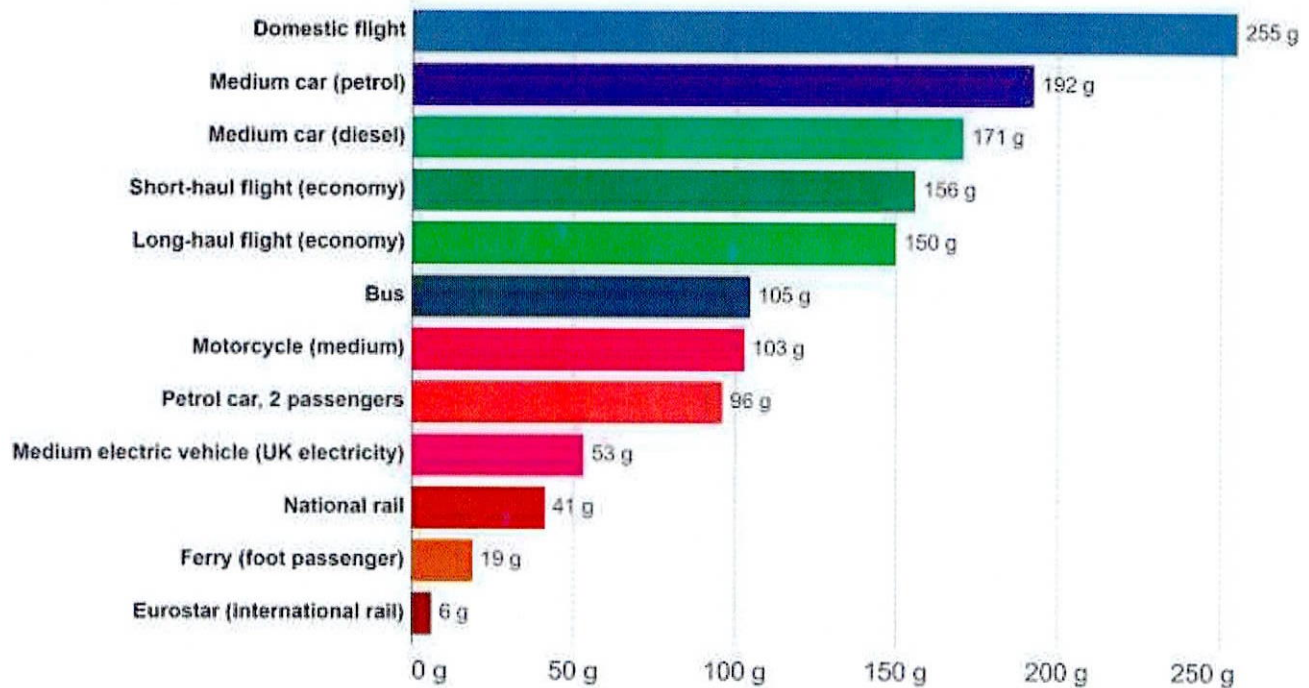
Source: CSO Ireland

Green House Gas (GHG) Emissions are a major contributor to global climate change, which will increase the number and severity of extreme weather events in the region. In the United States, the biggest source of GHG emissions is from transportation. Every trip taken with

Metro and not a car reduces the region's carbon footprint. On average, traveling by Metro results in 46% less GHG emissions per mile than driving in a single-occupancy vehicle.

Carbon footprint of travel per kilometer, 2018

The carbon footprint of travel is measured in grams of carbon dioxide-equivalents per passenger kilometer. This includes the impact of increased warming from aviation emissions at altitude.



Source: UK Department for Business, Energy & Industrial Strategy. Greenhouse gas reporting: conversion factors 2019.

CC BY

Note: Data is based on official conversion factors used in UK reporting. These factors may vary slightly depending on the country, and assumed occupancy of public transport such as buses and trains.

We can see from above, that travel by Rail (Eurostar) is the most efficient

The transport sector emitted 12.0 million tons (Mt) CO₂ in 2021 and accounted for 34.0% of Ireland's total energy emissions. Transport remained the most carbon intensive demand sector, with 95.5% of transport energy demand coming from fossil fuels.

Rebounding from 2020 COVID-related travel restrictions, energy demand for transport increased by 8.3% in 2021, and was a significant driver of the overall increase in Ireland's energy-related emission this year.

Private car use is by far the largest transport sub-sector, and accounts for 43.0% of all transport energy demand. Energy demand by private cars is 67% greater than the combined demand of both heavy goods and light goods commercial vehicles on Irish roads. These numbers highlight the urgent need to reduce the climate impact of private car use by increasing the number of journeys we make by foot, by bicycle, and on public transport, while simultaneously replacing petrol and diesel cars with EVs.

Provisional data from the first 6-months of 2022 indicates that demand for petrol is up by 27%, compared to the same period in 2021, and the demand for diesel is up by 15%, as consumption of both fossil fuels return to pre-COVID levels. Cars account for 65% of Dublin's transport emissions.

Source SEAI Report on Transport Energy consumption.

In addition to the socioeconomic benefits such as reduction in travel time, travel cost, accident rate, per capita vehicle ownership etc., the ability of metro system towards substantial reduction in per capita pollution emission is considered as one of the major benefits.

However, if the benefits offered by the metro system such as reduced traffic congestion, GHG emissions, accident rates, savings in travel time and cost, safety and comfort are assessed and quantified collectively, the metro projects could become the most cost-effective projects than the other public transport project alternatives.

These details from the 2016 Census Data, CSO highlight our over dependence on the car. In Conclusion we see a Metro to South West Dublin originating at Stephen's Green as the answer to not only Public Transport needs in South West Dublin, but the only Environmentally satisfactory answer to reducing Green House Gases and encouraging a Modal shift from Private cars to Public Transport.

5 Poor access to Charlemont compared to Stephens Green.

The original Metro North project, which was approved for a Railway Order by An Bord Pleanala, had the metro station on the western (College of Surgeons) side of St Stephens Green, where the interchange between the Green Line and metro would be swift.

Charlemont would be unsuitable for an interchange between *MetroLink* and the Green Luas line. Figure 7.1 shows the vertical separation that would occur were the Luas /metro interchange to be located in Charlemont.

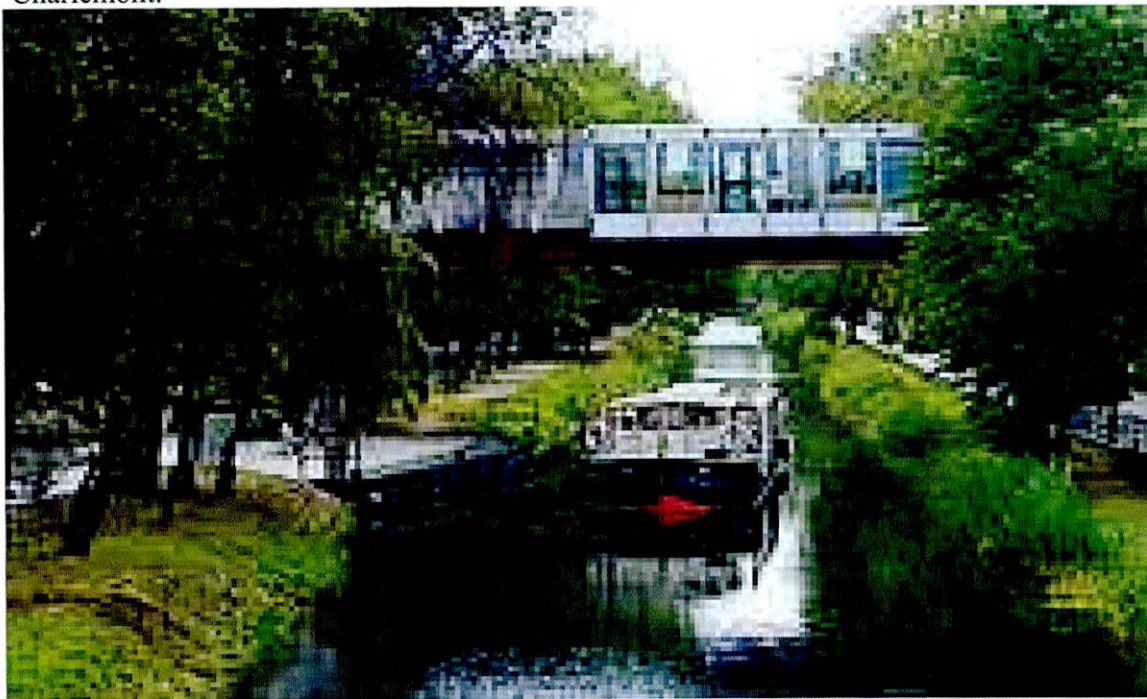
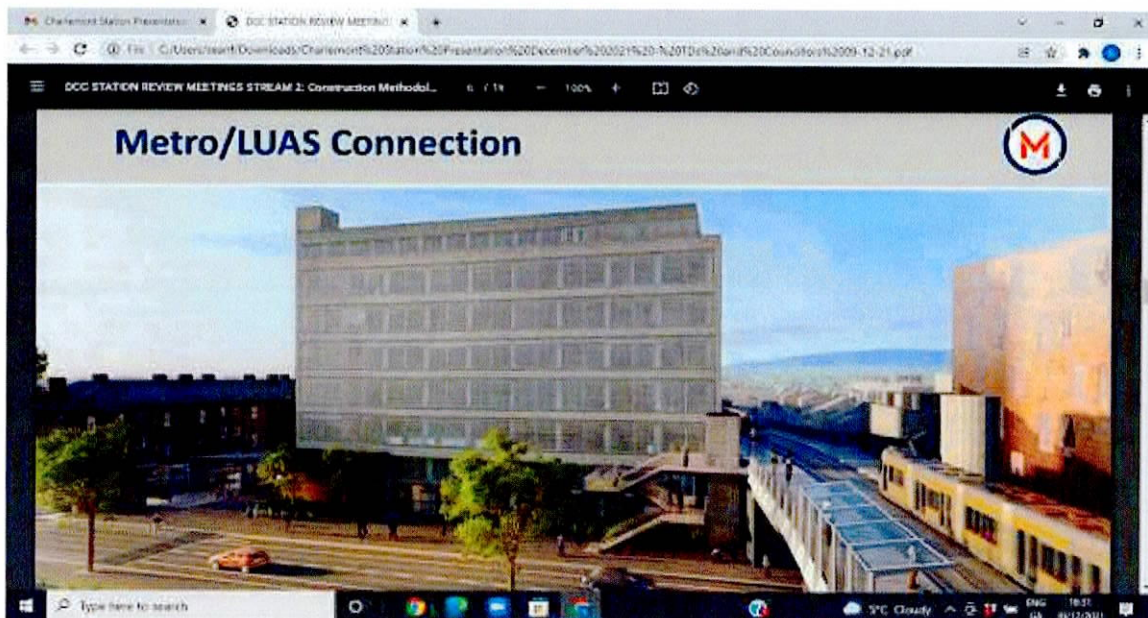


Figure 7.2 shows that the first manoeuvre for incoming Luas passengers (many with luggage and/or disabilities) would be to cross the Luas line (looking both ways to avoid being mown down by an incoming or outgoing Luas). Would this be a safe manoeuvre to require, for example, from children?

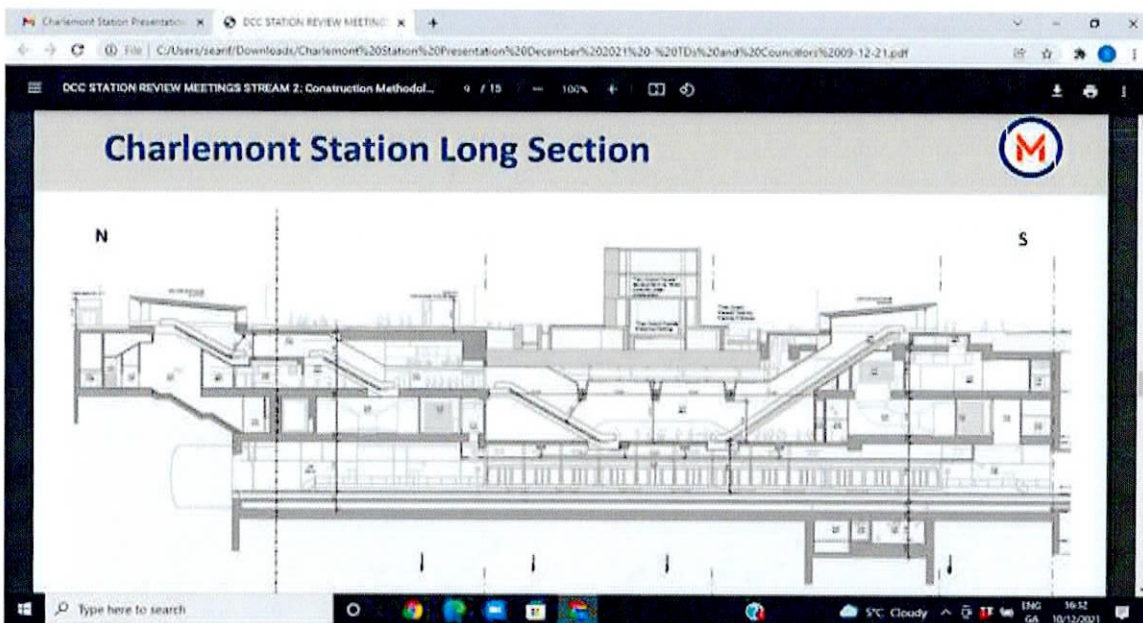


The second manoeuvre would require passengers to descend 3 flights of stairs in the open. It could be expected that there would be considerable congestion on these stairs and many passengers would be moving slowly and add to the congestion.

The third manoeuvre would be a walk in the open towards the entrance to the proposed metro station. This is a station that lies alongside and above a canal and a major traffic route.

The fourth manoeuvre – descending to the metro platform - is shown in Figure 7.3.

The complexity and safety issues surrounding Charlemont make it unsuitable as an interchange



The Tables below show the greater superiority of Stephens Green as a terminus over Charlemont.

Inter-modal connectivity St Stephens Green vs Charlemont

St Stephens Green	Charlemont
<ul style="list-style-type: none"> Greenline Luas. Bus Services. 11, 31, X32, 32X, 37, 38A, 39, 39A, 41X, 44. 46A, 61, 70, 84X, 100X, 125, 145, 155, 181, 193, 194, 194A. 700, 824. D and E Spines. 	<ul style="list-style-type: none"> Green Luas Line -located 10 Metres above the Ground. Connection by three flights of stairs and three escalators from Metro Station.

<ul style="list-style-type: none"> ■ Due to wide roads and paths: lots of possibilities for Cycleways and Cycle Storage. ■ Viking Splash. Hop-on-Hop-Off Buses. ■ Taxi Rank. 	<ul style="list-style-type: none"> ■ Buses. 44, 61. 450 Metres to access: 145, 155, 11, 46A; E Spine. ■ Road along the Canal is a very busy Motor route. Pathways are narrow, not conducive to cycleways, people with cases coming from the airport. Makes more sense for passengers to access or exit Metro at Stephens Green if travelling on Green Line Luas. ■ No Taxi Rank.
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Car and bike parking St Stephens Green vs Charlemont

St Stephens Green	Charlemont
<ul style="list-style-type: none"> ■ Q-Park Dawson St. 370 car spaces. ■ Grafton Car Park. 380 Car spaces. ■ Drury St. Park Rite. 465 spaces. And Drury Street Private Car park. ■ Q-Park Stephens Green S/C. 1,127 Car park spaces. ■ Q-Park Setanta Place. 146 Car Park spaces. ■ Plus, additional spaces. ■ Secure Cycle parking in Drury St car park. 	<ul style="list-style-type: none"> ■ No Parking Facilities nearby for either cars or bikes.

Facilities in St Stephens Green vs Charlemont

St Stephens Green	Charlemont
<ul style="list-style-type: none"> ■ Shopping: Stephen's Green S/C, Grafton Street, Nassau Street, Wicklow Street, Georges Street, More. ■ Theatres: Gaiety Theatre, National Concert Hall, Bewley's Café Theatre, Theatre of Little Museum of Dublin. ■ Museums: National Gallery, National Archaeology, Natural History, The Little Museum, Literature Museum, Royal Hibernian Academy, Mansion House, Royal Irish Academy, Trinity College. ■ Restaurants, Pubs, Cafes. Numerous. ■ Hotels: Buswells, The Green, Stauntons, Shelbourne, The Merrion, The Westbury, Grafton St. Studios, The Fitzwilliam, more. 	<ul style="list-style-type: none"> ■ There is no shopping area nearby. ■ No Theatres or Museums nearby. ■ Hotels: Hilton, Clayton, Wilder Townhouse, Mespil. ■ Limited number of Restaurants, Bars, Cafes in the area.

Future transport options from St Stephens Green vs Charlemont

St Stephens Green	Charlemont
<ul style="list-style-type: none"> ■ This location leaves all options open for the future direction of Metro further to the South. ■ If there are more Luas lines post-2042, then Stephen's Green is a more suitable hub. ■ A destination in itself with its connectivity and passenger destination. ■ It has more access for other services, including buses, Luas, and Metro 	<ul style="list-style-type: none"> ■ This location limits the options for the continuation of <i>MetroLink</i>, ruling out Harold's Cross and most of Rathmines. ■ NTA have suggested that in 2042 Charlemont could be a hub for three more Luas Lines, coming from Tallaght / Knocklyon, UCD / Sandyford and Lucan. ■ Access to town or the Stephens Green area would necessitate ascending to the Green Luas or descending to the metro. ■ How could the confined Charlemont area accommodate any or all of this?

7 Lack of adequate public service in outer suburbs.

In Knocklyon and the surrounding suburbs we are over dependent on the car for transport. Surveys found that over 74% of the population travel in a car daily. We are faced with large increase in population and cars as the county is expected to increase in population by over 50,000 in the coming 10 years. This added to the existing 350000 living in the triangle between the two Luas lines adds to congestion, pollution, time wasted in traffic, further dependence on the car. NTA proposals for Bus Connects are entirely inadequate and will not encourage a modal switch to public transport. There proposal in the latest Greater Dublin Area Transport Strategy Review is to look at possibility of three additional Luas lines, but in 2042. In addition, we have planning permission by SDCC to build an Interpretive Centre for the Dublin Mountains in the Knocklyon Area. This is proposed to bring 300000 visitors a year to the area. A metro station with a shuttle bus would solve this increase if suitably planned, as the roads certainly will be unable to accommodate these numbers. The rush hour congestion in mornings and evenings is getting worse as all available land is filled with new and necessary apartment blocks. The lack of any time consistency in public transport. The increase in pinch points for traffic on routes. Public transport is not attractive. At present the population sees only more cars as their only option for travel.

"What had the outside reviewers have to say about continuing to Charlemont/Manders Terrace?"

Jaspers: "Regarding the project's

scope and design several technical aspects appear to make the project expensive: in particular the inclusion of the connection to Ranelagh/Charlemont..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)"

Major Projects Advisory Group:" The rationale for extending the preferred scheme to Charlemont is noted by JASPERS as "strategically weak" given the additional costs involved and the duplication of the LUAS Green Line which also provide a public transport service to the areas of the city centre in question "

We suggest the following three conclusions.

- Metro is necessary for Dublin South West.
- Metrolink proceed as soon as possible from Estuary to Stephens Green.
- A proper Feasibility study be undertaken in the next year to see the most suitable route for continuation of Metrolink when it reaches Stephens Green

Yours sincerely,

Eugene Barrett

Director

Knocklyon Network CLG.