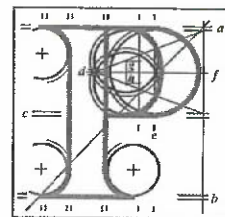


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Peter Twamley
31 Brighton Square
Rathgar
Dublin 6
D06KF96

Date: 07 December 2022

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. 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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Railway Order application for the MetroLink Project submitted 30 September
2022 to An Bord Pleanála – Peter Twamley

Observations on the September 2022 Metrolink Planning Submission

**THESE OBSERVATIONS ARE BASED ON THE PREMISE THAT THE PROPOSED METROLINK DESIGN
ROUTE SOUTH OF O'CONNELL STREET IS FUNDAMENTALLY FLAWED AND MISCONCEIVED**

THE PROBLEM

- The new Greater Dublin Transport Strategy 2022 - 2042 states on page 134: -
"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."
- However, there is an absolute contradiction between the confirmed formal abandonment of the future conversion of the Green Line Luas to Metro use and the current Metrolink Planning application based on a preferred route from Swords to Charlemont.
- The purpose of this submission is not intended to delay or comment in any way on the design of the Metro on the north side of the city but rather to correct the deficient south side design whilst the works on the north side of the city may proceed apace.
- The proposed preferred design route south from O'Connell Street fails to integrate comprehensively with Dublin's Luas and Rail public transport systems in a sensible manner. It therefore seriously fails to meet the needs of the population of the south side of the city and as such is totally ill-conceived.
- The very earliest Metrolink design to join up and obliterate the Green Line Luas at Ranelagh remains in place and unchanged in the current application despite the many objections from both the public and residents' groups and also multiple political and Ministerial requests for the National Transport Authority to examine a small range of alternatives.
- Despite these requests no alternative options were ever put out to Public Consultation for Dublin's largest ever Public Transport project.
- A half-baked feasibility study of a Metro (South West) to Knocklyon option carried out by Jacobs Engineering for the NTA in July 2021 managed to produce an 80% positive cost benefit ratio despite the study not including the potential passenger capacity of inner city Portobello, the suburb of Rathmines including a future redeveloped mainly residential Cathal Brugha Barracks site, the suburb of Firhouse and even Tallaght itself.

- The Dublin South West Study also carried out by Jacobs Engineering for the NTA as recently as November 2021 to inform the 2022 – 2042 Greater Dublin Transport Strategy says in paragraph 4.2.3 page 27 –

“The Tallaght Town Centre LAP (2020-2026) proposes to develop a transport hub in Tallaght Town Centre to facilitate seamless interchange between active modes bus, and Luas Red line. Whilst Tallaght Town Centre is not within the study area, it is within close proximity, therefore the improved interchange may impact demand within the study area”.

RESULTS

- Instead of providing an efficient and economic through running Metrolink option from the northern suburbs to the southern suburbs of the city, this interim route proposal is for a truncated design into the south inner city where it must stop and construct a large underground turn back facility with an unknown life span.
- The Dart Underground as provided for in National Development Plan is Dublin’s most significant and critical missing section of Public Transport infrastructure. Extraordinarily no inter-connection is provided with the Dart Underground in this flawed Metrolink route design proposal.
- The proposed route contains an unnecessary diversion from O’Connell Street to Tara Street Dart and mainline Rail. Yet other connections already exist from O’Connell Street west to Heuston Station and east to Connolly station and Dart via the current Luas Red line.
- The route requires the demolition of College Gate Apartments and associated community facilities and has placed owners and tenants in limbo since the concept was first revealed.
- The diversion travels under Leinster House and subsequently locates a station remotely on the wrong side of St Stephen’s Green distant from a planned future Green Line Luas and Dart Underground interchange.
- Major environmental damage will be caused to the historic Dartmouth Square residential quarter by the imposition of a particularly large and deep interchange at Charlemont.

OPPORTUNITY LOSSES

- The opportunity of providing an alternative through running Public Transport light rail facility to the south-west sector of the city, comprised of distinctly residential areas which themselves could be further densified is lost, as well as the possibility of connecting to a new transport hub in Tallaght as proposed by South Dublin County Council in their Tallaght Town Centre LAP (2020-2026).
- No Metrolink service will be provided for Portobello, Rathmines, Harold’s Cross (adjacent via access from Mount Drummond) or to the Cathal Brugha Barracks site. Cathal Brugha Barracks is the largest potential development site in the south city centre, capable of housing a very large future community and commercial population and as such would more than justify a Metrolink station on its own or adjacent to it.

- The loss of some amelioration of the significant anticipated physical and traffic impact damage to the inner city suburbs of Templeogue Terenure Rathgar and Ranelagh by the current Bus Connects design proposals which are yet to be submitted to An Bord Pleanála.
- The loss of an extension of the service life of the Luas Green Line by virtue of a resultant reduced passenger demand or the possibility of creating capacity to service areas beyond the current Bride's Glen terminal within the present investment and usage constraints.
- The loss of a potential reduction of commuter traffic on sections of the N81 where a light rail service could provide a viable alternative commuter option.

CONSEQUENTIAL FINANCIAL IMPACTS

- Based on distance alone the cost of a direct route from O'Connell Street to St Stephen's Green would be considerably less than the proposed diversionary loop from O'Connell Street to Tara Street and on to St Stephen's Green including the additional station at Tara Street.
- Additional costs for stopping at Charlemont with an expensive underground "turn-back" facility will be incurred unless a takeover of the Luas Green Line were to proceed contrary to commitments already given.
- A very expensive deep basement interchange station at Charlemont will be required due to its proximity to the canal for the avoidance of adjacent underground infrastructural services.
- As this route does not run from St Stephen's Green to Portobello, Rathmines and on to the South West of the city, alleviating pressure on the current near capacity Green Line Luas, a potential reduction in future Green Line running costs or savings in future Green Line investment is squandered.
- The Tax payer must bear the cost of this mis-guided planning submission by the National Transport Authority.

AN BORD PLEANALA IS URGED TO SEND TRANSPORT INFRASTRUCTURE IRELAND BACK TO THE DRAWING BOARD TO REDESIGN A SENSIBLE ECONOMIC INTEGRATED SOUTH CITY PUBLIC TRANSPORT LIGHT RAIL ROUTE FROM O'CONNELL STREET TO TALLAGHT SERVING THE MAXIMUM POPULATION CAPACITY, AVOIDING BUILDINGS DEMOLITION AT TARA STREET AND LEAVING THE LUAS GREEN LINE UNDISTURBED

Author Peter Twamley FRIAI
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Dated - 24 November 2022