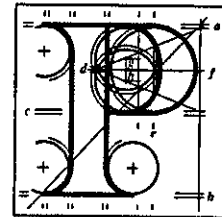


Our Case Number: ABP-314724-22



An
Bord
Pleanála

Aidan Hodson
C/O Saint anne's Resident's Association
110 Saint Annes
Kimmage
Dublin 12
D12 KP40

Date: 05 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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Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
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64 Sráid Maoilbhríde
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64 Marlborough Street
Dublin 1
D01 V902

**St Anne's Residents' Association
Kimmage
Dublin 12**

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Date...22/11/2022.....

Dear Sir/Madam,

Re: Case reference: NA29N.314724

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

Dear Sir/Madam,

Statement:

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.

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 are as follows:

1. Failure to consider an alternative routing of the terminus notably towards Rathmines
2. Limitations of Charlemont terminus for radial extensions onwards to south city.
3. Potential Environmental benefits for south city consequential from pause for exploration of alternative extension route.
4. Poor access to Charlemont from Rathmines Road.
5. Unsatisfactory linkage of MetroLink and Luas at Charlemont
6. Current Traffic Congestion in St. Anne's Residents' local area requiring a major upgrade of public transport

AN BORD PLEANÁLA	
LDG- <u>059460-22</u>	
ABP- _____	
24 NOV 2022	
Fee: € <u>50</u>	Type: <u>cheque</u>
Time: _____	By: <u>reg post</u>

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 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.

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.

We would request that a proper/comprehensive feasibility study be done to assess the options for the south west city.

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.

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 NTA 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.

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.

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.

3. Potential Environmental benefits 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.

- 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.

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.

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.

- There is no thought given in the TII 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.

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.

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.

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.

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 of 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.

Conclusion

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.

Yours sincerely,



Aidan Hodson

Chairperson, St Anne's Resident's Association.

110 St. Annes, Kimmage,
Dublin 12, D12 KP40.