

<b>Submission No.</b>	<b>107</b>
<b>Organisation Name or Name of Submitter</b>	<b>Grace Maguire (3 Dartmouth Square West)</b>

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**Railway (MetroLink-Estuary to Charlemont via Dublin Airport) Order 2022 Case reference Number NA29N.314724**

1	Letter - Introduction	1	Whilst I am broadly in favour of any well-thought-out transport infrastructure planning (such as the proposed MetroLink to connect the airport to the city centre), I have deep misgivings about the proposed plan and the competence of TII to execute this plan within budget and timescale. As a resident of a home very close to the proposed Charlemont terminus I feel that my views on this aspect of the plan are concrete rather than abstract.	It is regrettable that the submitter has such misgivings given TII's record in successful delivery of Road and Public transport projects.
2	Key Submission Points	1	1. Charlemont is the incorrect strategic location for a Terminus. The notion of locating a major rail terminus at a small, congested, residential street such as Dartmouth Road is plainly absurd. Dartmouth Road currently struggles with the current level of through traffic between Ranelagh and Leeson Street. The congestion that will be caused by thousands of passengers transiting the station every hour and connecting with other forms of transport will create enormous issues not only for those same passengers but for the entire community within the area.	<p>TII do not agree that Charlemont is the incorrect location for an interchange with the Luas Green Line for the reasons set out below.</p> <p>The Board is required to have regard to the likely consequences for proper planning and sustainable development in the area in which it is proposed to carry out railway works (section 43(1) of the 2001 Act) and as such the following matters are relevant.</p> <p>The connection from St Stephens Green to Charlemont / Ranelagh is supported by the current Transport Strategy for Greater Dublin Area (2022-2042). 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 south west, south or south east of the city region should sufficient demand arise."</p> <p>The Transport Strategy is "a consideration material to the proper planning and sustainable development of the area or areas in question." Development Plans are required to be consistent with the Transport Strategy. The Dublin City Development Plan 2022-2028 envisages this station at Charlemont in policy SMT22 "To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained: ... MetroLink from Charlemont to Swords".</p> <p>Accordingly, the location of the Charlemont station was a strategic decision made at the highest levels of transport and land use planning and such is fully consistent with the proper planning and sustainable development of the area.</p> <p>The current Transport Strategy 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 any of 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>

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				<p>The detailed analysis done for the Railway Order application further confirms that 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. 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 Ratio (BCR).</p> <p><b>Traffic and Pedestrian Congestion</b>  TII have modelled the impact of the potential changes to traffic and pedestrian movements and this shows there will be no significant impacts and instead MetroLink will provide improvements to the transport network as explained below. Please refer to Chapter 9, Traffic and Transport, Appendix A9.2-B Traffic and Transport AssessmentCharlemont Station, summarised in section 7.</p> <p>The MetroLink is designed to form part of an integrated public transport network with Charlemont selected as the preferred interchange location in order to maximise the potential interchange with the existing Luas Green Line. In overall terms, Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.</p> <p>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. Please refer to Appendix A9.2-B, section 6.1.3. Pedestrian Impact Assessment.</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> <p>The proposed pedestrian crossing on Grand Parade will have minimal impact on the traffic flow along Grand Parade and can be programmed to operate in sync with the existing signalised junction at Grand Parade /Charlemont Street to maintain the flow of traffic movements. When the Project is operational, car mode share will decrease, with a reduction of up to approximately 830 car trips to and from the zones surrounding Charlemont Station over the 12hr period in 2065. In overall terms, the Charlemont Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usages and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.</p> <p>Furthermore, TII have deliberately designed the Station with minimum set down space (with the exception of a drop-off on Grand Parade for persons of restricted mobility only) or room for taxi ranks so that it does not encourage the Station to be used as a terminus.</p>

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3	Key Submission Points	1	<p>2. Using Charlemont as a terminus will prejudice the future evolution of the network. For reasons best known to themselves TII have always favoured continuing MetroLink along the Luas Green Line, a policy that implied the destruction and rebuild of some of the best rail infrastructure undertaken in this country. When it was pointed out to them that the depth of the tunnel under the main sewer made this impossible, they changed the plan to make Charlemont a terminus. This appears to be a stubborn refusal to face engineering reality, as well as a shocking indictment of their professional competence. It was a local resident who pointed out the existence of a deep sewer along the canal, something TII had missed in their plans.</p>	<p>For reasons set out in this response and responses to other similar submissions, the decision to locate a station at Charlemont does not prejudice the future evolution of the public transport network. The decision not to progress along the Luas Green Line with MetroLink was not driven by the location of the sewer along Grand Canal and any adjustments to the vertical alignment to de-risk the impacts to the sewer. As noted in response (1) the location of the Charlemont station was a strategic decision made at the highest levels of transport and land use planning and such is fully consistent with the proper planning and sustainable development of the area. It is provided for in the Transport Strategies and Dublin City Development Plan 2022-2028.</p> <p>The proposed MetroLink alignment has not been extended south of Charlemont for the reasons set out by the GDA strategy, section 12.3.10, "The challenges associated with the upgrading of the Luas Green Line to a metro standard of service have led to the emergence of an alternative proposal which seeks to meet travel demand from south of Sandyford along a new light rail corridor which serves UCD post-2042. As such, the upgrading of the Green Line to metro standard is not being pursued as part of this strategy. Instead, for this strategy period, the capacity and frequency on the current Green Line from Sandyford northwards to the city centre will be incrementally increased through the provision of additional tram fleet and services and associated turnback arrangements to meet forecast passenger demand. The location of the interchange at Charlemont does not preclude onward extension south. 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.</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>
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4	Key Submission Points	1	<p>3. The budget of €650M for the section between St. Stephens Green and Charlemont is an enormous misuse of financial resources when one considers that there is already a perfectly good means of making that short journey - the Luas.</p>	<p>The Board is not responsible for any decisions in relation to the funding the Project. It is solely responsible for assessing whether the Project is consistent with proper planning and sustainable development and that its effects on the environment are acceptable.</p> <p>In any event, TII do not agree with this statement for the reasons set out by response (2) above, noting that infrastructure is not being duplicated given the capacity of the Luas south from St. Stephen's Green is restricted due to on-street running.</p> <p>There is a limit to the potential of the Luas to provide additional capacity in the on-street non-segregated section of the Luas Green Line from Charlemont northwards through the city centre. The nature of this route and the fact that it currently crosses several road junctions (Adelaide Road, Harcourt Street / Hatch Street upper and Harcourt Street / St Stephen's Green south) limit the service to a maximum of 24 trams per hour per direction. The projected demand for this section would require a higher frequency of up to 30 trams per hour and this demand cannot be met with on-street systems (Luas / bus). The interchange between Luas and MetroLink proposed at Charlemont will provide the necessary capacity to address the demand on this corridor and reduce overall travel time for passengers.</p> <p>There is also high passenger demand forecast for a MetroLink station at Charlemont, including from the Ranelagh area, which would be lost if St. Stephen's Green was the MetroLink southern interchange station. The additional fare revenues collected by the Charlemont Station interchange increase the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ratio (BCR).</p> <p>Further, to ensure that public investment delivers value for money, the Public Spending Code sets out requirements for the evaluation, planning and management of public investment. The preparation of a Business Case is a key element of meeting these requirements. The Public Spending Code requires that both the Preliminary Business Case and Final Business Case for public investment projects are published.</p> <p>In July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a railway order application by TII to An Bord Pleanála in respect of the MetroLink project (Decision Gate 1). This approval was granted after the Preliminary Business Case (PBC) had undergone significant scrutiny and challenge by bodies that are independent of TII, including DoT and DPER review (including independent review by JASPERS and the Major Projects Advisory Group (MPAG)) of the PBC around timeline, costs and benefits that were updated to inform the Government decision.</p>
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5	Key Submission Points	2	4. NTA have failed to provide adequate impact studies in relation the proposed project and those that have been supplied have all the appearance of documents hurriedly put together. Witness the extension of the deadline for making submissions to ABP due to the 'inadvertent omission' of such key documents.	TII disagree with this assertion. A detailed, robust and comprehensive EIAR and supporting appendices has been prepared for the proposed Project, which has allowed TII to address all questions raised during the statutory consultation from the material provided within the EIAR and supporting documentation.  With regards to the extension of deadline referred, when it was found that c.30 pages had been inadvertently omitted from a 12,000 page submission, it was right and proper to extend the submission deadline.
6	Key Submission Points	2	5. NTA's record in managing a project of this scale is highly questionable. As mentioned in 2) they had failed to note the presence of a major sewer along the Grand Canal. The €25 million spent on excavating and building a station box beneath the Mater Hospital which will now have to be simply written off is further evidence that incompetence.	TII had not "failed to note the presence of a major sewer". It is a normal part of project design development for amendments to be made as further information becomes available, in this case surveys were undertaken of the sewer, and thus the proposed alignment design and Charlemont Station has full regard to the location of the sewer along Grand Canal.  A station box was not built previously at Mater, rather a section of wall was installed to future proof the possible construction of a station. A comprehensive alternatives/options assessment has been undertaken for this Project to ensure that it meets the objectives for this Project (not a previous one). This assessment, as presented in Chapter 7 of the EIAR identified an alternative route for the alignment that did not match the one proposed for "Old Metro North" and as a result it was not possible or desirable to utilise the section of retaining wall constructed at the time.
7	Requested amendment	2	Requested amendment to An Bord Pleanála  We request the following amendments:  1. Omit from the Railway Order the section from Tara Street Station to Charlemont Station and associated onward tunnel extension and intervention tunnel  2. Require the submission of a railway order for a section from Tara Street Station to St. Stephens Green which would effectively provide for a terminal hub station that can integrate with the Luas Green Line, multiple bus routes and future DART underground.	The above responses to the observations made explain why TII do not consider it is correct or appropriate that the MetroLink alignment south of the proposed Tara Station should be omitted, and also demonstrates why the proposed Charlemont Station has been selected by TII as the preferred interchange with the Luas Green Line.  A scheme which terminates at Tara Street would not be consistent with the Transport Strategy for Greater Dublin Area (2022-2042). In addition any decision to terminate the scheme at Tara will significantly impact on the overall viability and benefits of scheme.