

Submission No.			002		
Organisation Name or Name of Submitter			ACRA Association of Combined Residence Association		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Objection to the Metrolink: Submission by Town Newton and Caitríona McClean, 6 Weston Avenue, Weston Park, Lucan, Co. Dublin, K78 YA39 A.C.R.A (Association of Combined Residence Association)					
1	Letter	1	We object to the proposed MetroLink on the basis that there is a better alternative which can be delivered quicker with less environmental disruption, and with far greater impact in reducing car usage. This alternative would serve a much wider population, and would represent a greater value for public money.	EIAR Chapter 7, Consideration of Alternatives presents in detail the alternative transport options that were analysed to serve the Fingal/North Dublin Corridor. The options assessed included for heavy rail, light rail and Bus Rapid Transit (BRT) options, as well as potential combinations of options. These options were assessed in a two-stage analysis, based on feasibility of the option and on the consideration of whether the scheme meets the fundamental Project objectives by serving Swords, Dublin Airport and the city centre. A Multi-Criteria Analysis (MCA) was undertaken having regard to Environment, Economy, Safety, Accessibility, and Social Inclusion and Integration. This assessment identified an Optimised Old Metro North as the best medium and long-term transport project for the Greater Dublin Area. The reasons for this choice are presented in EIAR Chapter 7, Consideration of Alternatives, section 7.3.2.	
2	Letter	1	Because of the MetroLink's location in a small sprawl city most users will have to use public transport to get to the MetroLink bringing them into an already congested part of the city in a radial pattern, wasting vital capacity. The MetroLink is not an effective tool in reducing car usage for this very reason.	EIAR Chapter 7, Consideration of Alternatives presents in detail the alternative alignments and locations that have been considered for the Project, and how the preferred route has been identified in line the with Transport Strategy for the Greater Dublin Area. Transport modelling has been undertaken in a variety of growth scenarios, identifying a significant positive impact on reducing car usage. As detailed in EIAR Chapter 9, Traffic and Transport, notable reductions in traffic flow will be seen along key routes south of Dublin Airport, including along the M50 Motorway, and along most radial routes into Dublin City Centre. National roads such as the N11, N7, N4, M3 and M2 also see reductions in traffic flows when the proposed Project is in place. Across the modelled scenarios, a reduction of over 15,000 car trips occurs during the 12 hour period (07:00-19:00) is seen along the alignment.	
3	Letter	1	If the MetroLink was built, the city would need another double rail track from Malahide next to the existing Dart line to the city centre as well as an underground Dart to Heuston station. Even this huge capital expenditure would still have a minimal effect on car usage due to its location.	Whilst designed to provide a fully integrated transport system, MetroLink is a standalone major public transport project proposed under the Transport Strategy for the Greater Dublin Area. As such, any changes to the DART network will be considered through its own planning process. Please refer to Response (2) above regarding the impact of MetroLink on reducing car usage.	
4	Letter	1	If the MetroLink was built as far as Charlemont, it would put massive pressure on the existing Sandyford line for the MetroLink to extend underground to Sandyford. The consequences would be having an underground and overground rail system on same route from Sandyford to the Airport, servicing only a fraction of Dublin. The rest of Dublin and adjoining counties would have to wait many decades to get serviced or may not at all, due to large amount of resources that have already been expended on the MetroLink. The MetroLink is not an efficient use of public money, and in fact it would delay a transport solution for the vast majority in the greater Dublin area. We strongly object on this basis.	As detailed in EIAR Chapter 9, Traffic and Transport, a review of the total capacities on the existing public transport network has been undertaken. The model indicates that in 2035 (predicted Project Opening Year), if MetroLink was not in place, the Luas Green Line (south of Charlemont to Sandyford) would be operating 'under capacity'. When MetroLink is in place, the model does indicate an increased usage of the Luas Green Line, however the service will continue to operate with sufficient capacity remaining. Also as outlined in response (4) above and in EIAR Chapter 3, Background to the MetroLink Project, MetroLink, BusConnects and DART+ have been developed as independent standalone projects, whilst also being designed as part of a fully integrated transport system. Therefore, the delivery of MetroLink will not preclude service provision to other areas in Dublin or the adjoining counties. Other transport projects have been identified in the Transport Strategy for the GDA 2022-2042, and these will not be impacted by the delivery of MetroLink.	
5	Letter	1	Our organisation A.C.R.A. (Association of Combined Residence Associations) has come up with such a plan, the Newton Transport Plan, that meets most of the requirements of the Capital to operate successfully while addressing the aforementioned problems. The Newton plan is a fully integrated plan linking up all areas and incorporating all forms of public transport and accommodating active travel. The plan incorporates a common theme of orbital design as opposed to the traditionally used radial concept which brings all passengers into the centre and out again causing unnecessary congestion and consequent delays.	Please refer to Response (1) above regarding the consideration of alternative transport options. EIAR Chapter 7, Consideration of Alternatives, presents in detail the assessment undertaken to determine MetroLink as the preferred option.	
6	Letter	2	The Newton Orbital Luas: This plan is designed to takes users directly to all parts of the greater Dublin area with flexibility and has many advantages over the car. The Orbital Luas opens up huge possibilities for housing development. Transport and housing must be planned in conjunction and the Newton Orbital Luas creates the potential for combined planning. The MetroLink in contrast offers very little opportunity for new housing as the plan serves a very developed space which is already well served by housing and transport.	Please refer to Response (1) above with regard to the consideration of alternative transport options. EIAR Chapter 7, Consideration of Alternatives, presents in detail the assessment undertaken to determine MetroLink as the preferred option. As detailed in EIAR Chapter 3, Background to the MetroLink Project, compact growth will be achieved by the proposed Project along the Swords, Dublin Airport and City Centre corridor as it will provide the high-capacity transport system that will support compact development. This increased public transport capacity will support the development of much needed housing provision at a higher density, and thus will allow the benefits of compact growth to be realised.	

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7	Letter	2	<p>The Newton Orbital Luas has the potential to reduce car numbers by up to 80% and can be completed quickly. It is a cost-effective attractive solution to the deficit in public transport. (See figure 1)</p> <p>Additional Luas: The plan creates two additional Luas lines into city centre (Lucan Luas and Rathfarnham Luas) and has other areas serviced by extending existing Luas lines.</p> <p>The G-Link: By linking up the Luas in the city centre in an inner orbital ring, it can take all users in the city centre to within walking distance of their destination. (See figure 2)</p>	Please refer to Response (1) above with regard to the consideration of alternative transport options. EIAR Chapter 7, Consideration of Alternatives, presents in detail the assessment undertaken to determine MetroLink as the preferred option.	
8	Letter	3	<p>Rail: The G-link Luas described above maximises rail use because it has the potential to accommodate all users arriving at Dublin's train stations, even if train numbers were doubled. Crucially, by building the missing section of rail from Blanchardstown to Donabate via Dublin Airport on the edge of M50, the Newton Plan links up the full rail network in Dublin. This gives direct access to Dublin Airport to everyone arriving in Dublin by train without having to go through the city centre. It also creates a direct Cork to Belfast rail link. This allows for the number of trains into Dublin to more than double and for a trebling of trains on the Belfast line. There are also more country rail lines in the plan. (See figure 1)</p>	Please refer to Response (1) above with regard to the consideration of alternative transport options. EIAR Chapter 7, Consideration of Alternatives, presents in detail the assessment undertaken to determine MetroLink as the preferred option.	
9	Letter	3	<p>City Centre Bus: A contraflow loop interchange plan on the Quays. This addresses the over one hundred (100) flaws in the city centre, the simple solution is a bus contraflow along the river. Details of this have already been submitted to Dublin City Council (see figure 3).</p> <p>Buses Outside the City: There are two bus orbitals on Dublin's outskirts. 1. The CORE bus loop on the M50, with main Interchange at Liffey Valley. This orbital loop links all outlying estates to each other. 2. The Outer orbital on the outskirts which is a new concept to maximise bus use with a high frequency.</p> <p>Country Bus Loop: This is a bus loop to maximise bus use into Dublin for up to 100 kilometres.</p> <p>The NTA have been made aware of the Newton Plan but have not responded.</p>	<p>Please refer to Response (1) above with regard to the consideration of alternative transport options. EIAR Chapter 7, Consideration of Alternatives, presents in detail the assessment undertaken to determine MetroLink as the preferred option.</p> <p>The referred to Newton Orbital Luas Plan does not form part of the GDA Strategy, TII are not party to communication between NTA and ACRA.</p>	
10	Letter	4	<p>We object to public money being spent on the Metrolink and ask that ABP refuse permission to proceed on the basis that the Metrolink is wasteful and does not address the climate change crisis in an adequate manner. It does not provide public transport in an acceptable time frame for the greater Dublin area but serves only a small section in an inefficient manner that will give rise to further spending, disruption and delays.</p>	<p>TII strongly refute that MetroLink is wasteful. 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 Codes 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> <p>EIAR Chapter 7, Consideration of Alternatives outlines the robust decision making process that has led to the proposed Project, which has included the consideration of costs and anticipated monetary benefits. As detailed, the preferred option was the most economically advantageous scheme when compared to other options, delivering the highest benefit to cost ratio.</p> <p>EIAR Chapter 3, Background to the MetroLink Project details how MetroLink will contribute to the achievement of numerous climate action goals, through the delivery of both a sustainable mobility solution to reduce carbon emissions, and sustainable design. Analysis of the Project's potential impact on climate are presented in Chapter 17, Climate.</p> <p>TII confirm that the Project will be expedited as quickly as possible in accordance with the necessary planning approvals being in place and Government policy and direction.</p>	

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11	Letter	4	We ask ABP to require the NTA to look at alternative plans in a transparent manner in keeping with EU legislation.	<p>TII are of the view, for the reasons set out by the above responses, and as evidenced by the detail presented by EIAR Chapter 7, Consideration of Alternatives, that alternative transport options have been considered in a transparent manner and appropriately assessed in accordance with EU legislation before selecting the proposed MetroLink project as the preferred option.</p> <p>Further, and as noted above, MetroLink will address transport challenges within the Greater Dublin Area. The proposed Project will provide significant benefits not only to those who choose to use it, but also to other transport network users, by reducing the demand for road space and creating the opportunity for the road transport system to achieve optimum levels of efficiency and effectiveness. Also as outlined in EIAR Chapter 3, the proposed Project is part of an integrated transport network that also includes for BusConnects and DART+ which are all included under Project Ireland 2040. Together, these projects will result in a reliable, sustainable, affordable, integrated public transport network that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2021, and make Dublin a more liveable and sustainable city. Whilst MetroLink is a standalone project that is not dependent on any other projects for its delivery or effective operation, it is nonetheless a critical part of the proposed integrated transport network for the Greater Dublin Area.</p> <p>Attention is also drawn to Chapter 4, Description of the MetroLink Project that confirms the overall project objective for the proposed Project, as established by the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII), and as informed by planning policy context, MetroLink, is to 'provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre'. (National Development Plan 2021-2030, Box 9.1).</p> <p>The proposed Project will also improve the performance of the public transport and road networks in North Dublin, including the critical Dublin-Belfast trade corridor, and the supporting infrastructure for Dublin Port and Dublin Airport. By creating a new transport mode choice for passengers, the proposed Project will enhance regional and international connectivity and help optimise the transport network. EIAR Chapter 9, Traffic and Transport, presents an analysis of the capacity of existing public transport corridors, indicating that many of the other bus corridors are currently operating well over its capacity, and therefore an alternative solution is required to accommodate demand.</p> <p>Further, EIAR Chapter 7, Consideration of Alternatives presents in detail the robust decision making process that has led to the proposed Project, including alternative alignment options and feasibility assessments of cost, amongst other considerations. The proposed Project has been designed to ensure maximum interchange with other modes of transport, leading to positive impacts reaching far beyond the alignment through direct connections to both the heavy rail and Luas networks.</p>