Submission No.	67
Organisation Name or Name of Submitter	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022				
1	Letter	1	I ask that An Bord Pleanala refuse to grant a railway order for this project on the following grounds. 1. It will not enhance public transport options within those parts of the Dublin Area in which most journeys take place(see Figure 1) It is another stand-alone non integrated project which will continue to absorb resources better used elsewhere;	TII does not concur with the view that MetroLink will not enhance pubic transport options or that it is a stand-alone non-integrated project. EIAR Chapter 3, Background to the MetroLink Project, explains the need for the Project, and how MetroLink will address 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 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 2023 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. The proposed Project will 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 the Ballymun bus corridor, as well as many of the other bus corridors in North Dublin, is currently operating well over its capacity, and therefore an alternative solution is required to accommodate demand.
2	Letter	1	2. The route chosen a. Does not cater for the Drumcondra corridor which has the greatest demand for enhanced public transport options in the north part of Dublin city. Note the north part of our capital city has more people than Fingal, the south part of Dublin City, South Dublin and Dun Laoghaire Rathdown (see Figure 4) and has had over the past 30 years see Section 1 p16-19. b. Was the outcome of a deeply flawed process run by the National Transport Authority.	With regards to observations (a) and (b) TII does not agree and would note the following: a. Response (1) above refers to how the Project will enhance the public transport network. EIAR Chapter 7, Consideration of Alternatives presents the decision-making process which determined the optimum station location for the Drumcondra area. Stations at either Drumcondra or Glasnevin were considered in the context of the achievement of the Transport Strategy for the Greater Dublin Area (GDA), having particular regard to maximising the quality interchange opportunities between different services and to provide fast and convenient access to major destinations such as Dublin city centre and Dublin Airport. Following careful consideration, it was determined that the provision of a station at Glasnevin will better meet the requirements of the GDA Transport Strategy for the reasons set out in Chapter 7, section 7.6.5 Drumcondra v Glasnevin. b. TII do not agree that MetroLink is the outcome of a flawed process. The decision was informed by a comprehensive Route Option Selecton study which was assessed in accordance with the 'Common Appraisal Framework for Transport Projects and Programmes' (CAF). EIAR Chapter 7 presents the decision-making process that has led to the proposed Project, including the consideration of alternative alignments, and the identification of the preferred route. The assessment of alternatives to identify a preferred route for the proposed Project has been undertaken based on an assessment of a number of route sections, route options and station locations. In March 2018, following a comprehensive assessment of the route options along the corridor, NTA and TII published the Alignment Options Report identifying the Emerging Preferred Route (EPR) for the proposed Project. The EPR was subject to non-statutory public consultation in 2018 and the key observations and submissions are referred to in EIAR Chapter 8, Consultation. A review of the submissions arising from the public consultation and further design development led to the establishment of a Preferred Route for the Project, which was subject to further non-statutory public consultation inn April 2019 (also presented in EIAR Chapter 8).

Submission No.	67
Organisation Name or Name of Submitter	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022				
3	Letter	1	3. Enhancing public transport options between Dublin City Centre and Dublin Airport can be done by methods other than this proposal given that a 2011 NTA Study of Dublin Airport passengers found that a. Less than one seventh (14%) of trips were business related; b. Three quarters of all trips were either for holiday/leisure (nearly half) or visiting family/relatives (over one quarter); c. Less than one third of trips originated in Dublin City Centre/South part of Dublin City; d. Three quarters (75%) had journey times of less than one hour to Dublin Airport with almost half (46%) having journey time of less than 30 minutes. See Section 1 p. 20-22, 48-50	The overall project objective of MetroLink, as established by TII and as outlined in the Transport Strategy for Greater Dublin Area (2022-2042) and National Development Plan 2021-2030 (Government of Ireland, 2021) is 'to provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre'. The decision to service Dublin Airport was accordingly a strategic decision made at the highest levels of transport and land use planning and as such is fully consistent with proper planning and sustainable development. If An Bord Pleanála were to refuse the Railway Order on the basis on this submission, it would not be possible to deliver on the policy objective set out in the Transport Strategy and National Development Plan. With regards to the 2011 NTA Study of Dublin Airport, the traffic modelling has been informed by planning datasheets (supplied by the NTA) which utilise data from the CSO 2016 Census, in conjunction with land use and growth priorities identified by the Regional Assemblies and Local Authorities. Therefore, whilst themes may be similar across the datasets, the traffic modelling undertaken as part of the EIAR utilises the most up to date data from the NTA. EIAR Chapter 3, Background to the MetroLink Project identifies the need for the proposed Project to serve Dublin Airport. To achieve the best economic performance, Irish airports (and ports) need to be served by an efficient and effective transportation network. The proposed Project will support the efficiency and growth of Dublin Airport by creating an additional passenger access opportunity and allowing for optimisation of the surrounding road and public transport networks. As detailed in EIAR Chapter 7, Consideration of Alternatives, a range of alternative route alignments and station options were considered. As a result of the multi-criteria analysis undertaken which considered a range of environmental, economic, accessibility and social inclusion elements, the preferred route was identified. Dublin Airport is the largest airport by passenger numbers in Europe without a rail connection, whilst it also has approximately 20,000 people employed within the larger airport campus who require a mode of access. Providing an efficient public transport link from Dublin Airport into the city centre via the R108 corridor facilitates interchange with the other public transport networks for onward journeys to the rest of Ireland, such as the heavy rail network via Glasnevin or Tara Street stations. EIAR Chapter 9, Traffic and Transport presents an analysis of the capacities on existing public transport networks, indicating that the bus corridors around Dublin Airport (on the M1 and R132) are operating at, or very near to, full capacity, and therefore alternative interventions are required to accommodate this demand.
4	Letter	1	In addition, the peak times for passengers departing and arriving do not correspond with the AM and PM peak commuting times in the Dublin Area. (Section 1 p. 22). This suggests that the passenger capacity proposed will not be needed for decades, if ever, given recent trends in working remotely from centralised offices.	As outlined in EIAR Appendix A9.3, the Traffic Modelling Plan, and EIAR Chapter 9, Traffic and Transport, the Eastern Regional Model (ERM) used for forecasting and assessing the impact of the Project provides a detailed representation of travel demand across four time periods - AM (morning peak), LT (lunch time), SR (School run) and PM (evening peak). This has been used to capture the varied demand throughout the day. As outlined in EIAR Chapter 6, MetroLink Operations and Maintenance, the operational strategy of the proposed Project is driven by the forecasted passenger demand. Passenger demand modelling has been used to predict the numbers of passengers boarding and alighting at each station, and the resulting passenger load on the whole Project, for up to 30 years after opening. Passenger modelling identified that passenger numbers may peak at over 18,000 passengers for the AM peak hour southbound. On the basis of the modelling prepared for the proposed Project and allowing for future growth in capacity beyond the projection year, the proposed Project is designed to accommodate 20,000 passengers per hour per direction. As such, it is not relevant that the Dublin Airport arrivals/departures peak overlaps with the Dublin Area commuting peak, because the modelling confirms that peak travel on this corridor needs a metro scale solution. EIAR Chapter 3, Background to the MetroLink Project, details how the effects of COVID-19 have been considered within the assessments. TII has observed that the road network has returned to near-normal levels (approximately 80%) very quickly following lockdown events - meaning that the capacity constraints and challenges identified are likely to persist without interventions such as the MetroLink Project. While "work from home" trends may be expected to become more prevalent in those industries where it is possible. The business case for the proposed Project has had regard to potential for lower patronage due to hybrid working and the analysis undertaken still strongly supports the provision of MetroLink.

Submission No.	67
Organisation Name or Name of Submitter	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022				
5	Letter	1	In short, the vast majority of passengers at Dublin Airport are not very time-constrained in how they access the Airport landside. So travel times between Dublin City Centre and the Airport should not be a criterion by which this proposal is assessed.	EIAR Chapter 3, Background to the MetroLink Project, identifies outbound passengers experience significant impact due to unreliability of their journey time to the Airport. TII analysis demonstrates that the M50/M1 Motorway system adjacent to Dublin Airport can at times experience unstable traffic flow patterns, or a complete breakdown of flow. In response to the consequential journey time uncertainty, many travellers to the Airport will factor in a significant buffer time to ensure that they arrive at the Airport in time. Of inbound passengers, over 60% used a car, van or taxi to leave the airport, contributing to road network congestion. Without the proposed Project, the use of private vehicles will grow as populations grow and more people fly, leading to further congestion on the road network. Travel time between Dublin City Centre and Dublin Airport is not the only criterion upon which this proposal is assessed. The benefit that MetroLink delivers are much wider than this. The MetroLink forms part of an integrated public transport network. The system is designed in an integrated manner so that people travelling from the area south of Dublin to access locations in Dublin City Centre and North Dublin, such as Mater, Swords etc. will utilise public transport to interchange with the MetroLink or will walk or cycle to access their local station. EIAR Chapter 9, Traffic and Transport presents the wider impact to journey times and shows that the proposed Project will have far reaching benefits to journey times to and from a range of locations within the Greater Dublin Area, not just between Dublin Airport and the City Centre.
6	Letter	2	Furthermore, Dublin Airport attracts lots of meeters/greeters, at all times of the year. Very few of these people are likely to use public transport to travel to the Airport.	Please refer to Responses (3) and (5) above in relation to the need for the proposed Project to serve Dublin Airport, and the existing lack of capacity on bus corridors around Dublin Airport. EIAR Chapter 9, Traffic and Transport presents the baseline modal split for journeys to and from Dublin Airport. Between 2006 and 2016, car mode share has decreased through the years, with an increase in Bus in 2016 according to the NTA's Travel Survey. Whilst vehicular modes continue to account for over half of the total mode share, there is an increasing shift towards public transport modes.
7	N/A	2	In asking you to reject this project, I suggest that other options (see Section 1 p. 35-70, p. 111-132) would better serve the north part of our capital city region, including Swords and the Airport. Any option must focus on the most heavily trafficked corridor of that area ie. through Drumcondra which is primarily a residential and educational district. Our capital city does not need another stand alone public transport system which will not enhance our urban environment which is not well tended.	Please refer to Response (1) above regards the decision-making process in relation to an alignment serving the Drumcondra corridor, and the provision of the Project as part of a wider integrated transport network. As outlined in EIAR Chapter 3, Background to the MetroLink Project, the proposed Project will by way of modal shift and by taking significant volumes of passenger movement underground, support the transformation of the surface level urban environment, making it more attractive for people to engage with. The stations will also attract a wide range of businesses keen to take advantage of the projected footfall, helping to generate an improvement to the urban public realm. Similarly, the proposed Project stations will support opportunities to improve the urban environment through the associated reduction in vehicle numbers.
8	2. Route Chosen	6	2.7 This is a case of the public authorities and their consultants suppressing options that were worked out by respected professionals taken on by private citizens. If the public authorities were confident that the project proposed lacked merit, they did not state that, setting out their reasons. This suggests policy-driven evidence making in pursuit of a project favoured by insiders and incumbents. Such stealthy behaviour is not necessary and does not inspire trust in government.	EIAR Chapter 7, Consideration of Alternatives presents the robust decision-making process that has led to the proposed Project. This chapter details how route options have been considered and assessed, including the undertaking of non-statutory consultation throughout this process. EIAR Chapter 8, Consultation, presents the extensive public consultation and stakeholder engagement that has been undertaken throughout the entirety of the Project, including with private citizens. TII has at all times endeavoured to ensure the widest possible access for the public, stakeholders and landowners to information about the Project at all stages of its pre-planning development. In this regard, it is intended that the consultation undertaken in respect of the MetroLink project will, when the Railway Order application process is complete, fully meet the requirements of the Aarhus Convention, Codified EIA Directive, and Irish national legislation.

Submission No.	67
Organisation Name or Name of Submitter	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022				
9	3. North LUAS Loop	8	3.10 The proposed North Dublin LUAS loop would 3.10.1. serve the northern part of Dublin's Core Economic Area comprehensively; 3.10.2. be Integrated with what already exists; 3.10.3. offer 3 rail-based ways of getting to/from the City Centre from the Airport; 3.10.4. link with the existing heavy rail commuter services are 4 different points 3.10.4.1. DART at Howth Junction; 3.10.4.2. Northern Commuter services also at Howth Junction; 3.10.4.3. The Maynooth line at both Drumcondra and Broombridge.	EIAR Chapter 7, Consideration of Alternatives explains the alternative transport options that were considered to serve the Fingal/North Dublin Corridor. The options assessed included for heavy rail, light rail and Bus Rapid Transit (BRT) options in addition to combination options. Further detail on each option and the findings of the full assessment undertaken can be found in the Fingal/North Dublin Transport Study (NTA, 2015). The assessment identified an Optimised Metro North as the best medium and long-term transport project for the Greater Dublin Area. As previously noted, the proposed Project also offers strong integration with the other public transport networks. Glasnevin Station will provide quality interchange with both the Maynooth and Kildare heavy rail lines, whilst Tara Station offers quality interchange with the DART network. The Luas Red and Green Lines are located in close proximity to the O'Connell Street Station and St. Stephen's Green Station, whilst direct interchange with the Luas Green Line is provided at Charlemont. All stations offer strong integration with the existing Dublin Bus network as well as the future BusConnects network.
10	4. North part of Dublin City is under-served with rail-based transport	9	4.2. Based on the Metrolink proposed in 2018, I commissioned two more maps of the same type, to take account of the results of the 2016 Census see Figure 5 and 6. I realise that the 2022 routing is slightly different to that on which these maps were based. However, both show that the optimum route has not been chosen to serve people living and working in the north Dublin .	EIAR Chapter 7, Consideration of Alternatives outlines the relevant criteria that was used during the Preliminary Assessment to establish the merits of the feasible and practicable routes identified, in order to develop the most appropriate feasible options for consideration at the next stage. The criteria consisted of the potential for interchange, potential trip demand, key trip attractors nearby, and the impact on the directness of the route (journey times). Therefore, the surrounding population, and associated trip demand, has been strongly considered, however it was not the sole factor upon which the Preferred Route was developed. The Transport Modelling Report (Appendix A9.4) outlines how the NTA's planning datasheets have been used to project the population and job growth both within the GDA, and within a 15 minute walking catchment of the MetroLink alignment, as far as 30 years after opening, demonstrating positive linear growth in both scenarios around the Project alignment.
11	5. Dublin Port Tunnel	13	After the Minister signed the order to approve the [Dublin Port Tunnel] project, significant changes were made by adding an extra lane to the inbound slip road from the Coolock Lane Interchange the Shantalla Road Bridge, see section 1 p. 23-24. 5.4. This was done by stealth. Apparently, NRA sought approval for this as part of an extension to the M50 in another part of the Dublin region! It is not at all clear that the impact of this change was ever assessed in terms of increased traffic through Drumcondra , with all that implies in terms of air and noise pollution, see section 1 p. 25 I suggest that this way of proceeding negated the environmental impact assessment which was the subject of the sworn inquiry. 5.5. Building a north city LUAS loop would mitigate some the harm done by this outrageous abuse of process by the public authorities.	TII and the MetroLink Project will proceed in accordance with the statutory planning process and all necessary legal requirements. TII has no comment to make as regards the Dublin Port Tunnel project observation, and nor should TII's response be taken to infer any opinion with regard to the Dublin Port Tunnel project observation.
12	6. Streetscape, Community Severance, Place Making	13	6.1.2 Given the cost of underground stations, it is much cheaper to put such through traffic in a tunnel. This would calm Ballymun's main street with space for walking, cycling, public transport, supported by a network of sit-around hand around public parks are developed and maintained, as in Dublin 2. 6.1.3. The local and national public authorities are implementing a policy of removing traffic from Dublin City Centre. That they are not applying the same policy to Ballymun is clear evidence of lack of balance and consideration for all citizens when allocating public resources.	As noted by the above responses, MetroLink is designed to address multiple and wider strategic transport challenges rather than just singular geographic issues as part of a wider integrated transport network. TII do not agree that Ballymun will not benefit from and experience a reduction in traffic. EIAR Chapter 3, Background to the MetroLink Project, explains how MetroLink will provide a frequent and reliable public transport alternative to the private car, and it is predicted to achieve significant modal shift to public transport along this corridor. This in turn will reduce demand for road space, particularly in the Ballymun area where the bus corridor is currently operating over capacity and cannot sufficiently accommodate the demand at present. The provision of MetroLink along the Ballymun/R108 corridor therefore serves to facilitate a reduction in traffic in this area. In conjunction with this, the proposed street level layout around the station, as part of the BusConnects Core Bus Corridor proposals, will reduce the R108 Ballymun Road to one vehicular traffic lane in each direction to accommodate a designated bus lane and cycling infrastructure in the vicinity of Ballymun Station.