

Submission No.			137		
Organisation Name or Name of Submitter			James Wickham		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: Case reference: NA29N.314724 - MetroLink. 314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin					
1	Introduction	1	<b>Introduction</b> This observation is to support the construction of MetroLink as soon as possible. However, there needs to be recognition that it is a second-best project which results from the political failure to recognise the necessity for substantial and sustained rail investment in the GDA (Greater Dublin Area).	<p>TII thank you for your submission and stated support for the delivery of MetroLink. TII as the Government Agency responsible for delivering MetroLink, are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order.</p> <p>EIAR Chapter 7 (Consideration of Alternatives) details the decision-making process that has led to the development of the proposed Project, including the assessment of alternative modes of transport such as rail. The assessment identified an Optimised Metro North (LR7) as the best medium- and long-term transport project for the Greater Dublin Area for the following reasons:</p> <ul style="list-style-type: none"><li>* It was the most economically advantageous scheme when compared to other options, delivering the highest benefit to cost ratio (BCR) of 1.5, almost double the BCR of the next best scheme (Tunnelled Luas);</li><li>* It generated the highest level of transport benefits when compared to other options, with the highest number of additional public transport trips generated in the morning peak travel period;</li><li>* It provided a new strategic public transport corridor, avoiding reliance on either the existing heavy rail lines or the Luas Cross City line;</li><li>* It delivered a connection right into the centre of the city, serving O’Connell Street and St. Stephen’s Green;</li><li>* It retained the opportunity to extend Luas Cross City to Finglas, which would not be feasible if the tunnelled Luas options were selected, and it avoided reducing the service level on Luas Cross City to Cabra and Broombridge;</li><li>* Due to the high level of segregation, it was considered to significantly increase capacity to allow for potential future growth along the corridor, when compared to other options;</li><li>* It could potentially be extended southwards in the longer term to alleviate high travel demand on the Luas Green Line, and ultimately form a complete north south metro corridor traversing both the north and south city; and</li><li>* This option delivered the highest safety benefits when compared to other options.</li></ul>	
2	Outstanding controversies: (1) Tara Street and Stephens Green	1	<b>Outstanding controversies: (1) Tara Street and Stephens Green</b>  Both of these are changes from the original plans for Metro North as originally approved by ABP which had no Tara Street station and Stephen's Green station was on the West side of the Green. These changes have been partly justified in terms of reducing construction disruption, but appear in fact to derive from the assumption that Dart Underground (the ‘Interconnector’) will never be built. This necessitates some interchange with suburban rail, hence the Tara Street station. Given the effective abandoning of Stephens Green as an underground station for the Interconnector the Stephen's Green Metrolink station can be more easily constructed on the East side of the Green. It is claimed that this ‘interconnects’ with the Luas but this is an exaggeration and stretches the meaning of ‘interconnection’. Passengers wishing to change from Metrolink to Luas will have to walk the length of Stephens Green in the open air.	<p>As outlined by EIAR Chapter 3 (Background to the MetroLink Project) one of the key objectives of the Project is the integration of it with the wider 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. A station at Tara Street provides good interchange opportunities, serves important key trip attractors in the study area with high potential passenger trips. This option also takes a direct and short route through areas of high demand in the centre of the study area.</p> <p>A station on St Stephen’s Green West is not preferred for several reasons:</p> <p>If a station was placed on St Stephen’s Green West, the alignment between the proposed Tara Station and a station on St Stephen’s Green West would result in an undesirable horizontal reverse curve and an alignment greater than 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with the MetroLink Fire Strategy. Additional construction would be required to provide such a facility, similar in size to the proposed Albert College Park Intervention shaft. This could feasibly be situated in the Trinity College Dublin sports grounds but would import additional environmental impacts and cost.</p> <p>TII note that it is Government policy to provide a station and interchange with the Luas Green Line at Charlemont, as set out by the GDA Transport Strategy 2022 – 2042. Should a station be placed on St Stephen’s Green West, the alignment between a station located here and the proposed Charlemont Station would also result in an undesirable horizontal reverse curve and an alignment that is greater than 1000m long, and would thus again require an intervention shaft similar to the proposed Albert College Park Intervention shaft to be provided. This would be expected to result in significant demolition and redevelopment in an existing built-up area.</p> <p>In both cases, compared to the proposed alignment that runs much more directly between Tara, St Stephen’s Green and Charlemont, the additional length of tunnel and the addition of two intervention shafts generated by locating a station on St Stephen’s Green West is uneconomic in comparison.</p>	

Submission No.			137	
Organisation Name or Name of Submitter			James Wickham	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Case reference: NA29N.314724 - MetroLink. 314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin				
				<p>As a potential station location, St Stephen’s Green West itself is a very constrained location due to the presence of buildings, Luas and St Stephen’s Green Park. Maintaining the operation of the Luas during station construction would be complex and challenging with significant disruption expected, whilst the impacts on St Stephen’s Green Park would be greater for a station in this location compared to the proposed location on St Stephen’s Green East. This would be the result of; the likely need to place more of the station in the Park compared to the proposed station on St Stephen’s Green East; it would impact an area of the Park that has greater amenity value than St Stephen’s Green East due to the nearby Park entrance adjacent to the southern end of Grafton Street, and there would be a risk of impacting the existing Park lake.</p> <p>In summary, an alignment that links the proposed Tara, St Stephen’s Green East and Charlemont stations is a more direct and economic alignment, does not require additional intervention infrastructure, avoids a complex engineering interface with the Luas Green Line, impacts the Park less and has less potential for disruption during the construction phase.</p> <p>It is acknowledged that passengers wishing to interchange between Luas and MetroLink at the St. Stephen’s Green station will have a 500m-walk along a route either through St Stephen’s Green Park or along the footpath north of the park. The interchange time is calculated at 7.58 minutes. However, the interchange arrangements at Charlemont provide for a significantly better connection with Luas compared to St. Stephens Green Station, where the interchange time is calculated at 2.9 minutes. Interchange times and routes are detailed in Appendix A7.9 (Terminus Station at Charlemont compared to St. Stephen’s Green).</p>
3	Outstanding controversies (2) Termination at Charlemont	2	<p><b>Outstanding controversies (2) Termination at Charlemont</b></p> <p>One reason for the opposition to the upgrading of the Green Line through Ranelagh and further South was the complete failure of the NTA to consider the extent of ‘community segregation’ (XXX) that this would entail. Thus while a light rail / tram can weave through streets and even enhance the streetscape, an above ground metro with ATO has to be completely separated from its immediate surroundings. The NTA has to understand that transport systems inevitably involve issues of urban design. . . The proposed routing of the Metrolink extension to the South West as a primarily underground route would not raise these issues. However, such an extension cannot remain just another fantasy on the NTA’s maps. Such an extension would make it more logical for there to be a genuine interconnection with the Luas at Stephen’s Green with the station (see above) located on the West side of the Green.</p>	<p>The connection from St Stephens Green to Charlemont is supported by the previous Transport Strategy for Greater Dublin Area (2016-2035) and the current Transport Strategy for Greater Dublin Area (2022-2042). The latter 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 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> <p>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 and 2,300 boarding, and 1,229 passengers alighting and 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. Refer to EIAR Chapter 3.</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 Ration (BCR).</p> <p>Please refer to response Item (2) regarding the siting of St. Stephen’s Green East as the preferred location for the MetroLink station over St. Stephen’s Green West.</p>

Submission No.			137	
Organisation Name or Name of Submitter			James Wickham	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Case reference: NA29N.314724 - MetroLink. 314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin				
4	A good but isolated project instead of connecting GDA	2	<p><b>A good but isolated project instead of connecting GDA</b></p> <p>Discussion of Metrolink has become just another isolated project justified purely in terms of the predicted numbers travelling along and within this specific corridor (see the NTA GDA plan). It is only marginally part of any broader transport network. By contrast the interconnector was the centrepiece of a proposed transport network for Dublin as a whole. It is important to notice that a 'Midterm Review' of Transport 21 back in 2010 suggested that given the new (then) financial constraints, the T21 programme should be re-configured with DART Underground and Luas Cross-City prioritised over Metro North. This was in terms of value for money, equity and the impact on the city as a whole.</p>	<p>TII disagree that MetroLink is an isolated project. As detailed in Chapter 3 (Background to the MetroLink Project), the proposed Project is part of an integrated transport solution that also includes for BusConnects and DART+ which are all included under Project Ireland 2040. Together these projects will result in reliable, sustainable, affordable, integrated public transport 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.</p> <p>The Planning Report submitted with the Railway Order application identifies and considers the existing policy framework for the MetroLink project in the context of relevant national, regional and local planning strategies, plans and policy documents. It concludes that the Project complies with and supports the policies set out in NTA's Transport Strategy for the GDA 2016-2035 through the commitment to deliver a high-capacity high-frequency cross-city public transport link to serve Dublin Airport, institutions, facilitate multi-modal interchange with other cross city transport modes to enhance connectivity and the provision of a strategic P&amp;R Facility north of Swords.</p> <p>MetroLink will interchange with key existing and planned high-capacity public transport infrastructure proposed for the region. It will not preclude the future delivery of DART+ Tunnel, formerly known as the DART Underground project, which will be subject to a route selection process for a new project.</p> <p>MetroLink will align with the bus network along the scheme and enhance the interchange between the various modes of public transport operating in the city and wider metropolitan area, both now and in the future. The design has been developed with this in mind and, in so far as possible, is seeking to provide for improved existing or new interchange opportunities with other transport services.</p>
5	A good but isolated project instead of connecting GDA	2	<p>Nearly twenty years ago a study used interviews with transport experts to explore possible future scenarios for Dublin in 2026. The experts' 'realistic' scenario suggested that by then the 'prestige project' of a metro to the airport would:</p> <p>'Ensure that the city centre remains attractive enough and accessible enough to serve as a recreational centre and tourist destination. However the city centre is an island in a vast suburban sprawl for expanding the rail network for inhabitants has been defined as too expensive compared with a single line to the airport for visitors' (Wickham, 2006. p. 205).</p> <p>In all fairness Metrolink as currently planned will give accessibility North of the airport (Swords etc). However that does not detract from the key point that the current route will make creation of a public transport network even more disjointed. It is too late to change it, but there should be a public recognition - not least by transport ministers - that prioritising Metrolink over the Interconnector has removed a key component of any public transport system for the GDA as a whole.</p>	<p>Please refer to response item (4) above in relation to MetroLink interconnectivity and compliance with national, regional and local transport strategy and policy.</p>
6	Delays have made the need for investment even greater	2	<p>Delays have made the need for investment even greater</p> <p>International experience shows that the possibility of shifting large numbers of car journeys to more sustainable modes is greatest where there is a transport network which makes much of the city accessible to as many people as possible without a car. This is possible not only in very large metropolitan areas (e.g. London) but also in somewhat smaller metropolitan areas such as Dublin (Newman et al, 2013). Consequently meeting Ireland's climate change targets for transport requires sustained investment in rail in the GDA. Further delays exacerbate the problem and increase the need for such expenditure down the line. Cancelling and postponing transport projects has already made the situation for worse than it need be (Caulfield et al, 2020).</p>	<p>Please refer to response item (1) in relation to the delivery of the Project and the consideration of rail alternatives.</p>