

Submission No.			256	
Organisation Name or Name of Submitter			Peter Schneider Energy Consultants	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Observation related to case number NA29N.314724 - Dublin Metrolink				
1	Letter	1	While agreeing that public transport infrastructure in the wider Dublin area needs further development, the 'Metrolink' as proposed will contribute very little to the goals of the National development plan, in particular to the promotion of low carbon transport and facilitation of intermodal transport. Also, it will contradict the goal of balanced regional development.	<p>As part of the Railway Order, the Planning Report has been prepared to set the planning context for the development and implementation of the MetroLink project. The Planning Report identifies the existing policy framework for the Project in the context of relevant national, regional and local planning strategies, plans and policy documents, including the National Development Plan.</p> <p>The NDP sets out a programme of investment that includes indicative Exchequer allocations. MetroLink is specifically identified as one of the five 'Strategic Investment Priorities' that aligns with NSO 4 Sustainable Mobility of the NPF. The NDP outlines under the heading 'Sustainable Mobility' that, 'The National Planning Framework (NPF) recognises the importance of significant investment in sustainable mobility (active travel and public transport networks) if the NPF population growth targets are to be achieved. Investing in high quality sustainable mobility will improve citizens' quality of life, support our transition to a low-carbon society and enhance our economic competitiveness.'</p> <p>EIAR Chapter 03 (Background to the MetroLink Project) details how the Project will address the challenges identified in the National Development Plan, including the following:</p> <p>Transition to a Low Carbon Society: Private vehicles are a significant contributor to Ireland's GHG emissions and providing an alternative to private vehicle-based journeys is a key benefit of the proposed Project. The proposed Project will aim to be a fully sustainable and carbon neutral public transport alternative (by the Design Year of 2050). The proposed Project, as a sustainable mobility option, will have a direct and long-lasting impact on Ireland's transition to a low carbon economy. Demand modelling suggests a diversion of 6.8 million private vehicle journeys per annum in the early years of operation and approximately 360 million car trips diverted by 2055. Accordingly, the proposed Project will support the reduction of GHG emissions, critically improving sustainability and transitioning to a low carbon society. The proposed Project will also be fully electrified.</p> <p>Intermodal Transport: The proposed Project is in many respects the 'missing link' in the public transport system. The proposed Project will facilitate, for the first time, the ability for anyone to complete a journey from their point of origin to Swords and Dublin Airport using existing rail, Luas and MetroLink services. The Project has been designed to ensure interchange with other modes of transport, specifically more sustainable modes such as public transport, walking and cycling. Opportunity for interchange with Luas is provided at O'Connell Street Station, St. Stephen's Green and Charlemont, and interchange with rail offered at Glasnevin and Tara Street. All stations facilitate interchange with both the existing bus network and future BusConnects services.</p> <p>Balanced Regional Development: As noted above, the proposed Project will facilitate travellers and commuters to access MetroLink via Iarnród Éireann services from all parts of Ireland via Glasnevin and Tara Street, as well as enhancing the Dublin-Belfast corridor through the provision of the Park and Ride Facility. This will facilitate transit-orientated development across the region, as accessibility to Dublin City Centre is strengthened in areas far from the alignment.</p>
2	Reasons for these shortcomings are:	1	1 . Within the Dublin area, the Metrolink would improve connectivity only for a small area, and it will not be economically feasible to extend it to the whole of Dublin.	<p>TII does not agree with this statement. EIAR Chapter 03 (Background to the MetroLink Project) details the overall need for the Project, and how the Project will address challenges such as enhancing both regional and international connectivity.</p> <p>As noted in response (1) above, the proposed Project will facilitate, for the first time, the ability for anyone to complete journey from their point of origin to Swords and Dublin Airport using existing rail, Luas and MetroLink services. In addition, travellers and commuters arriving on Iarnród Éireann services from all parts of Ireland will be able to access MetroLink via existing Luas services or existing rail services at Glasnevin and Tara Street Stations.</p> <p>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, leading to efficiency gains for productivity. By creating a new transport mode choice for passengers, the proposed Project will enhance regional and international connectivity and help optimise the transport network, to the benefit of the entire Irish economy. The proposed Project will improve international connectivity as tourists will be able to arrive at Dublin Airport and then access the rest of the rail network efficiently and effectively, confident in their journey time. Business travellers will be able to access Dublin City Centre more easily, increasing and improving the likelihood that international businesses will continue to make Ireland their European base of operations.</p> <p>The proposed Project objective, as established by the NTA and TII and as informed by planning policy context, is to 'provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre', and therefore the Project is not proposing to extend to the whole of Dublin at this stage. If future phases were to progress, they would be subject to their own planning and appraisal by the NTA, including an assessment of their economic feasibility.</p>

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3	Reasons for these shortcomings are:	1	<p>2. Because of its design as a stand-alone metro, it will not be possible to integrate it with either the LUAS, the DART, or long-distance rail services.</p> <p>3. As Metrolink does not connect to either of the main Dublin train stations nor to Busáras, its connectivity with the wider Dublin area and the rest of the country will be poor.</p>	<p>As detailed in Chapter 03 (Background to the MetroLink Project), the proposed Project is in many respects the 'missing link' in the public transport system. The proposed Project will facilitate, for the first time, the ability for anyone to complete a journey from their point of origin to Swords and Dublin Airport using existing rail, Luas and MetroLink services. In addition, travellers and commuters arriving on Iarnród Éireann services from all parts of Ireland will be able to access MetroLink via existing Luas services at O'Connell Street, St Stephen's Green and Charlemont, or existing rail services at Glasnevin and Tara Street Stations.</p> <p>Whilst MetroLink, BusConnects and DART+ have been developed as independent standalone projects under the Transport Strategy for the Greater Dublin Area, they, together with the existing transport network and other public transport projects, are designed to provide a fully integrated transport system that will support the Irish economy while helping Ireland reduce its carbon emissions and contribute in the transition towards a climate neutral economy by 2050.</p> <p>Please refer to responses (1), (2) and the above text in relation to the integration of MetroLink with other modes of transport, and its role in enhancing regional connectivity. Connection to the Connolly and Heuston Train stations are facilitated through the interchanges provided at Glasnevin and Tara Street Stations. All stations have been designed to ensure interchange with existing bus services as well as the future BusConnects network, facilitating connection to Busáras.</p>
4	Reasons for these shortcomings are:	1	<p>4. While better public transport connections to Dublin airport are badly required, it should be taken into account that this airport serves as a main transport hub for the whole country, not just for Dublin. Therefore, a 'heavy' rail connection to the airport, e.g. from the existing Phoenix Park tunnel, would serve connectivity to the airport much better, as it would allow direct trains from anywhere in Ireland and from Dublin stations that are already served by the DART. Also, this airport link could be realized at a fraction of the cost of Metrolink. It could also be extended on surface to Swords and to the main Belfast line</p>	<p>Chapter 07 (Consideration of Alternatives) presents the decision-making process that has led to the development of the proposed Project, including the consideration of alternative transport options. The options assessed included for heavy rail, light rail and Bus Rapid Transit (BRT) options, in addition to combination options. These options included for a heavy rail connection to Dublin Airport. 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">* It was the most economically advantageous scheme when compared to other options, delivering the highest benefit to cost ratio of 1.5;* 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;* It provided a new strategic public transport corridor, avoiding reliance on either the existing heavy rail lines or the Luas Cross City Line;* It delivered a connection right into the centre of the city, serving O'Connell Street and St. Stephen's Green;* 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;* 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;* 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,* This option delivered the highest safety benefits when compared to other options.
5	Reasons for these shortcomings are:	1	<p>5. The Metrolink project will incur enormous costs for rather small improvements and would probably lead to delay or cancellation of other infrastructure projects with a better cost - benefit ratio, such as the heavy rail airport link mentioned above.</p>	<p>Please refer to response (4) above in relation to the reasons MetroLink was identified as the preferred option, including its cost benefit ratio.</p> <p>The business case for the Project has been approved by Government in line with the Public Spending Code based on economic and financial appraisals undertaken in a range of scenarios. The assessment finds that MetroLink is a very positive investment for the people of Ireland, in the country's journey to a low carbon and more sustainable transport network. 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, to ensure the benefits of MetroLink can be realised as soon as possible. The proposed Project has been planned as a standalone project, and therefore the planning and delivery of other transport or infrastructure projects should not be impacted.</p>