

Submission No.			266		
Organisation Name or Name of Submitter			Richard Guiney 43-45 Middle Abbey Street		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order 2022					
1	Introduction	1	Dublin Town supports the application made by Transport Infrastructure Ireland in respect of the MetroLink project. This is a vital piece of transport infrastructure which must be completed without further delay.	TII wish to thank you for your submission and 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	
2	Transport Emissions	1	<p>Ireland is obliged to reduce its transport related carbon emissions by 51% by 2030. Given the indicative timetable provided, it is unlikely that the scheme will be delivered by that time, however, Dublin Town would strongly advocate that the scheme be completed as quickly as possible in order to assist Ireland in reaching its ambitious but necessary carbon reduction targets. Without, investment in key infrastructure projects, it will be simply impossible for Ireland to meet its obligations.</p> <p>Indeed, given the extent of our carbon reduction commitments, it is highly likely that Dublin will experience reductions in non-public vehicle movements within the city core. In order to maintain economic vibrancy and viability, alternative public transport and active travel arrangements will need to be available.</p>	<p>As noted in response item (1), TII are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order. However, due to construction timescales, MetroLink will not be operational by 2030.</p> <p>EIAR Chapter 03 (Background to the MetroLink Project) details the need for the Project, and how MetroLink will address challenges such as climate change and the production of CO2 emissions. As noted, 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), and therefore the way in which people access Dublin Airport, and other parts of the city, will be in a much more sustainable way than at present. 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. The proposed Project will be fully electrified, and will be able to reduce its emissions footprint as Ireland moves increasingly to green energy production.</p> <p>Based on modelling undertaken for Chapter 17 (Climate) it is estimated that the modal shift resulting from the provision of MetroLink will result in a reduction in GHG emissions of between 9kt and 11kt in the opening year, with the reduction expected to increase to 45kt by 2050 (Design Year). Chapter 04 (Description of the MetroLink Project) details the implementation of sustainability policy areas in the project's design to deliver an efficient, low carbon and climate-resilient metro system.</p>	
3	Capacity	1	As noted above we will have to increase capacity on our public transport systems. The fact that Metrolink will be able to carry 20,000 passengers per direction per hour, will assist considerably in this regard. Prior to the pandemic Dublin city centre had an average footfall of 450,000 per day (equating to 300,000 people). Footfall has averaged 85% of 2019 levels over the past number of months, a pattern that we anticipate will become the norm. This level of footfall requires the capacity offered by Metrolink. The lack of such options is an underlying reason for traffic congestion in the city. Indeed, Dublin Town believes that the additional lines should be added to the initial infrastructure to facilitate access to the city centre from various suburban points.	<p>EIAR Chapter 03 (Background to the MetroLink Project) details the overall need for the Project and how MetroLink will address challenges such as the current capacity constraints on the public transport network. As noted, MetroLink is the only public transport option to meet the future predicted passenger number requirements for the Swords to Dublin City Centre corridor. It will provide capacity far in excess of any other public transport option and will enhance international and regional connectivity through Dublin City and Dublin Airport. The enhanced public transport options will allow enhanced access for passengers in the surrounding communities and in rural areas further afield to access childcare, educational and medical facilities. The overall need for the Project is therefore detailed in section 3.4.11 of Chapter 3 (Background to the MetroLink Project).</p> <p>As detailed in EIAR Chapter 04 (Description of the MetroLink Project), the proposed Project has been designed to interchange with existing and future elements of the transport network, increasing connectivity and accessibility in the region. The key interchanges are as follows:</p> <ul style="list-style-type: none">* Dublin Airopo;* The Western Commuter Line also known as the Maynooth Line (formerly the Midland Great Western Railway) and the South-Western Commuter Line as known as the Kildare Line (formerly the Great Southern and Western Railway) at Glasnevin;* The DART at Tara Station;* Luas Lines (at O'Connell Street, St. Stephen's Green and Charlemont Stations); and,* The Dublin Bus network and the future BusConnects network.	
4	Capacity	1	As was the case with the expansion of the London Underground, we believe that enhanced transport infrastructure will facilitate residential development along the route, with easy access to the city centre. It is not possible for Dublin to achieve sustainable development and appropriate levels of residential accommodation without an appropriate investment in sufficient public transport capacity.	<p>As noted, Chapter 03 (Background to the MetroLink Project) details the overall need for the Project, including how MetroLink will address challenges such as compact sustainable growth along the alignment. MetroLink provides capacity far in excess of any other public transport option and will facilitate compact sustainable growth along the alignment to a level not possible with other transport options. The increased public transport capacity would support the development of much needed housing provision at a higher density, allowing the benefits of compact growth to be realised.</p> <p>The proposed Project directly supports the strategic plans of the local authorities along the route. FCC have developed its future housing and employment plans for Swords to encourage high density development in close proximity to MetroLink, largely on lands that are undeveloped or underutilised. By creating a focal point at each station for compact growth planning and transport orientated developments, the proposed Project can support the development of vibrant, inclusive and resilient communities along its corridor. This is detailed in section 3.4.1 of Chapter 3 (Background to the MetroLink Project).</p>	

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5	Capacity	1	We note the interaction between MetroLink and other forms of public transport and active travel. We would strongly advocate that metro stops house significant bicycle parking to further facilitate greater use of sustainable transport options.	<p>As set out by EIAR Chapter 6, (MetroLink Operations and Maintenance), due to space constraints in the vicinity of stations in the DCC area, it has not been possible to provide 100% of bicycle parking required to meet demand at every station. However, the maximum number of bicycle parking has been provided at each station taking cognisance of available space. EIAR Chapter 31, Summaries of the route wide mitigation and monitoring proposed, goes on to further note (Mitigation Reference TT19) that cycle parking provisions per station will be monitored to ensure that the level of provision is meeting the demand. Similarly, the volume and type of cycle parking provisions required may change over the course of the Operational Phase due to the ongoing shift to shared and micro mobility solutions.</p> <p>Notwithstanding the above. TII does agree that there is a need for high density cycle parking into the future to accommodate demand from the general increase in cycling forecasted within the City. Additional provisions are outside the remit of MetroLink. In recognising the shortfall, meeting this demand will require a coordinated multi-agency approach to ensure efficient delivery of cycle parking spaces and facilities. There is a clear mix of uses in the areas surrounding MetroLink stations, which may see cycle demand in varying peak times. As a result, it requires a combined approach and delivery from multiple agencies, e.g. Dublin City Council, Fingal County Council, NTA, TII and Irish Rail, to identify how future demand can be accommodated sustainably and the maximum benefits of the parking achieved. This will include the consideration of available land, but noting such land is often already allocated as part of future development plans. TII anticipate cycle parking provisions are likely to involve a combination of fixed and shared bicycles and other facilities to support the delivery of mobility hubs across the region.</p>
6	Timescale for Delivery	1	A metro plan for Dublin was first raised in the mid 1970's but will not be delivered until the mid 2030's. This is an unacceptable delay. The lack of an integrated metro system has been a played a key role in the low density highly dispersed nature of development in Dublin. We would urge the Bord to give speedy positive response to the project. We would further urge all relevant parties to work closely together to consolidate the timescale for delivery of the project. Dublin cannot wait any longer for such vital piece of infrastructure.	<p>TII wish to thank you for your submission and 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>Please refer to response item (4) in relation to how MetroLink will facilitate compact growth along the alignment.</p>
7	Timescale for Delivery	2	Based on our experience, we believe that this project can be delivered on time and within budget with minimum disruption to the commerce and use of Dublin city centre. Footfall rose in Dublin city centre, during the construction phase of the Luas Cross City Project. We believe that Luas Cross City had a greater potential for disruption than the underground metro system. We believe that co-operation between TII, contractors, Dublin City Council and the business community will provide a framework which will enable the city to continue to function during the construction phase of the project. In this context, the opportunity to align the O' Connell St. stop with the Hammerson Dublin Central development is very fortunate. This will minimise any potential disruption on O' Connell St. and is very much welcomed by Dublin Town.	<p>Please refer to response item (1). TII recognise that there will be significant localised impacts associated with the construction phase, however these are considered to be temporary in nature in the context of the long-term benefits of the operation of MetroLink.</p> <p>TII recognise the importance of cooperation with contractors, Dublin City Council and the business community throughout the construction phase. As such, EIAR Appendix A5.1 presents an Outline Construction Environmental Management Plan (CEMP) which provides a framework that outlines how contractor(s) working for TII and the NTA will manage and, where practicable, minimise potential negative impacts during the construction phase. The outline CEMP also identifies the minimum requirements with regards to appropriate mitigation, monitoring, inspection and reporting mechanisms that need to be implemented throughout construction. For example, a Project Construction Traffic Forum will be established comprising of relevant stakeholders who can voice concerns throughout the construction phase in relation to the temporary traffic management measures in place. This forum will assist in minimising disruption to the function of the city throughout the construction phase.</p> <p>As noted in Appendix A5.1 Outline CEMP, a detailed CEMP will be developed by the contractor(s) and provided to FCC and DCC prior to the implementation of any works. TII will continue their engagement with local stakeholders and the business community throughout the construction works to minimise the impacts of construction and any disruption caused. As stated in Appendix A5.1 Outline CEMP section 3.3.1, TII and the contractor(s) will take all reasonable steps to engage with stakeholders in the local community, through the development of a Stakeholder Communications Plan.</p>

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8	Need to go underground	2	<p>The fact that our entire transport system is situated above ground has been detrimental for the city. In addition to the obvious traffic congestion, the allocation of so much space for buses, trams and other forms of transport has limited the potential to develop plazas and meeting points within the city. Research in Ireland and abroad demonstrates the growing need for such recreational spaces and also the desire for outdoor dining and the development of parklets. Our ability to meet 21st century requirements has been hindered by poor transport choices which continues to limit our choices for active use of space within the city.</p> <p>The heavier rainfall associated with climate change will necessitate greater greening of the city. This cannot be done where an excessive amount of space is required for hard landscaping to accommodate transport uses.</p> <p>Anyone still advocating for road based solutions in Dublin simply does not understand the evolving city dynamic.</p>	<p>Chapter 07 (Consideration of Alternatives) presents the decision-making 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 Transport (BRT) options in addition to combination options. Shortlisted options that met the fundamental project objectives were then subject to further analysis by way of a Multi-Criteria Analysis having regard to Environment, Economy, Safety, accessibility and Social Inclusion and Integration. The assessment identified an Optimised Metro North (LR7) as the best medium- and long-term transport project for the Greater Dublin Area for many reasons. In particular, 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.</p> <p>As detailed in Chapter 03 (Background to the MetroLink Project), the proposed Project will support opportunities to improve the urban environment, as will the associated reduction in vehicle numbers. The attractiveness of the urban environment is also a key determinant in where people choose to live. As the proposed Project improves this in North Dublin it will help to attract both people, amenities and businesses into the area, further encouraging compact growth, job opportunities and sustainable housing developments. The proposed Project will by way of modal shift and by taking volumes of passenger movement underground, support the transformation of the surface level urban environment, making it more attractive for people to engage with. This is detailed in section 3.4.6 of Chapter 3 (Background to the MetroLink Project).</p> <p>The Project design has been developed to ensure that the proposed Project can be constructed and operated to reduce climate change effects and to be resilient to climate change. This is detailed in section 4.6.3.1 of Chapter 4 (Description of the MetroLink Project).</p>	
9	Route	2	<p>Dublin Town was extremely disappointed by the decision not to extend Metrolink to the employment and residential hub of Sandyford. Like so many transport decisions taken in Ireland, post-independence, we believe that this decision will come to be seen as short sighted and counterproductive. However, the city needs a metro system and we do not advocate for further delays to the commencement of the project to address this deficiency.</p> <p>However, we would strongly advocate that the extension to Sandyford be planned for now and delivered in the tightest possible timescale. We further believe that Metro south west is required and would yield additional passengers if delivered. We would like to see the Finglas Luas Line meeting the Metro in Ballymun to link 2 large population centres and provide access to the airport to a greater number of northside residents with only 1 interchange.</p>	<p>As explained by EIAR Chapter 7, Consideration of Alternatives, section 7.5 Assessment of Alternative Route Options, the assessment of alternatives to identify a preferred route for the proposed Project has been undertaken based on the assessment of a number of route options and station locations.</p> <p>The proposed MetroLink alignment has not been extended south of Charlemont for the reasons set out by the Transport Strategy for the GDA 2022-2042, 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 Sandyford 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." This incremental increase in capacity on the Luas Green Line is incorporated into the forecasted passenger modelling, as detailed in Chapter 9 (Traffic and Transport) section 9.4.4.2.</p> <p>Further information on the challenges associated with connecting to the existing Luas Green Line can be found in the TII published report: "Constructability Report - Green Line Closure, April 2019, ref https://www.metrolink.ie/media/ox0p3cjb/constructabilityreportgreenlineclosure.pdf".</p> <p>For this reason it has been necessary to determine the most appropriate interchange and termination location for MetroLink. 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." This is also reflected by EIAR Chapter 7, section 7.7.8 MetroLink Southern Terminus Location that explains the rationale for selecting Charlemont as the optimum location for interchange with the Green Line.</p> <p>As noted by the Transport Strategy of the GDA 2022-2042 the selection of Charlemont does not preclude any future connections to the west or south of the city.</p> <p>The Preferred Route for Luas Finglas has been identified through its own planning and appraisal process as a separate project of the NTA, and therefore has not been considered within this project. Interchange between MetroLink and the Luas Green Line is facilitated at O'Connell Street, St. Stephen's Green and Charlemont, with the Ballymun Station offering interchange with future BusConnects services that will serve the wider populations.</p>	

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10	Route	2	Dublin Town welcomes the moves to integrate the city's public transport provision. We are pleased to see moves to accommodate active travel access to the public transport system. We need greater innovation and interchange so that cross city and radial journeys are better accommodated through sustainable transport.	Chapter 03 (Background to the MetroLink Project) indicates that demand modelling suggests a diversion of 6.8million private vehicle journeys per annum in the early years of operation and approximately 360 million car trips diverted by 2055. Accordingly, the Project will support the reduction of GHG emissions which are critical to improving sustainability and transitioning to a low carbon society. The Project has been designed to ensure maximum interchange with other modes of transport, particularly more sustainable modes such as public transport, walking and cycling, to facilitate a reduction in reliance on private vehicles. Chapter 09 (Traffic and Transportation) presents details of modal shift along the alignment. Across the full alignment, there is a reduction in Car mode share, with a corresponding increase in Public Transport mode share, as well as increases in the use of active modes, demonstrating the Project's contribution to a shift towards sustainable modes.
11	Conclusion	2	The proposals for a Dublin metro have been discussed planned, designed consulted on, replanned, redesigned and consulted on again and again over decades. It is now time to stop discussing and start delivering. We cannot wait for decades to come for the most basic transport provision. This simply has to be agreed and commenced without further delay.	TII wish to thank you for your submission and 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.