Submission No.	298
Organisation Name or Name of Submitter	Thomas Herlihy, Oakfront, Charleville

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Hand written letter re Metrolink Railway Order Application. ABP Case Reference: NA29N.314724 Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont Co Dublin				
1	Letter	1	I wish to oppose the granting of planning permission to the Metro North on several grounds. 1. It will encourage air travel which is very bad for the environment because of co2 emissions.	EIAR Chapter 9 presents the passenger demand modelling at Dublin Airport for which the proposed Project has been designed, noting that this is based on the requirements set by daa. The proposed Project does not determine the Airport passenger demand or usage, this is a matter for daa and planning control. 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. This is detailed in Chapter 3 (Background to the MetroLink Project), section 3.4.5. Based on modelling undertaken for EIAR 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 12kt and 13kt in the opening year, with the reductions expected for 2050 (Design Year) of between 2kt and 14kt. This is detailed in Chapter 3 (Background to the MetroLink Project) section 3.4.5.

Submission No.	298
Organisation Name or Name of Submitter	Thomas Herlihy, Oakfront, Charleville

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Hand written letter re Metrolink Railway Order Application. ABP Case Reference: NA29N.314724 Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont Co Dublin				
2	Letter	2	2. The excavation for the metro and the disposal of the spoil will dump thousands of tons of co2 into the atmosphere. 3. The manufacture of all parts required include the fixed infrastructure and the mobile trains / carriages will dump more co2 into the atmosphere. 4. All the structural works needed for the installation of the tracks and stations along the way will again dump more co2 into the atmosphere.	EIAR Chapter 17 (Climate) presents the proposed Project's carbon emissions during both the construction and operational phase. During the construction phase the embodied carbon assessment includes for construction materials such as concrete or steel, excavations, waste, transportation of materials and waste, power usage and water usage. Full details are available in Section 17.5.2.1 of the EIAR. As calculated using the TII Carbon Tool (v2.1) the proposed Project will result in total Construction Phase GHG emissions of 1,149KT CO2eq over the 9.25 year period, equivalent to an annualised total of 0.37% of Ireland's non-ETS 2030 target. Over the predicted 60-year lifespan the annualised emissions due to the initial Construction Phase and ongoing maintenance of the Proposed Project will reach at most 0.05% of Ireland's non-ETS 2030 emissions target, or 2% of the 2030 transport sector carbon budget. With regard to the emissions linked to the excavation of MetroLink, these emissions are considered within the embodied carbon assessment in section 17.5.2 of the EIAR. In addition to excavation of this material, the disposal and transportation of the material is considered within the embodied carbon assessment. With regard to equipment associated with the operational MetroLink, Section 17.5.3.5 discusses the embodied carbon of the rolling stock. The rolling stock is not final and once the rolling stock is finalised an Environmental Product Declaration (EPD) will be prepared for the exact specification. As this is currently not available, for the proposed Project, an EPD published in 2019 for rolling stock that is utilised on a similar Metro project (Sydney Metro Northwest) has been sourced to give a likely estimate of the embodied carbon of the rolling stock. The main components of the rolling stock are metallic materials and electronic and electrical equipment which allow a high recyclability (95.2%) potential. The Sydney Metro Northwest EPD for rolling stock had upstream and core emissions of 0.3447gCO2e per passenger km. With future improvements in technology, energy efficiency and sustainable practices the proposed Project aims to future reduce the rolling stock embodied carbon. This is detailed in Chapter 17 (Climate), section 17.5.3.5. With regard to the engineering structure works required to construct MetroLink, this has been included within the embodied carbon assessment in Section 17.5.2.1 of the EIAR. Both the materials, transport of material, water usage and power required to complete the structural works have all been included within the assessment. Furthermore, please note that monitoring and reporting of the embodied carbon in the Construction Phase will be conducted. The aim of the monitoring will be to see further ways to minimise climate impacts. Monitoring will include contractual obligations, in line with the most recent Climate Action Plan and sectoral targets. Commitments to monitor GHG emissions during the construction phase will also be secured through the outline CEMP (Appendix A5.1). Monitoring will include; embodied carbon of construction materials, water usage, power and fuel usage and waste generation (including reuse and recycling rates). A Waste Management Plan for Construction and Demolition Waste will also be implemented, as detailed in Appendix A5.1 Outline CEMP section 6.6. Please refer to response (1) above in relation to the anticipated GHG emissions during the Operational Phase. Additionally, a whole -life Carbon Management Plan will be implemented to inform the detailed design, build and operation of MetroLink. This commitment is detailed in Appendix A5.1 Outline CEMP section 6.3.
3	Letter	2	5. The cost which we are told will be 9 billion is very optimistic and I think that it will be 15 billion or more should not be put on the general taxpayer and should be paid by the users.	The project costs and benefit to cost ratios are provided in the Preliminary Business Case for the scheme which was approved by Government in July 2022.