Comments

on

Transport Infrastructure Ireland responses (TII No. 067 or 064)

to

my submission

on

the TII application

to

An Bord Pleanála

for a

Railway (MetroLink – Estuary to Charlemont via Dublin Airport) Order ABP-314724-22

Donal O'Brolċáin

19 March 2024

My name is Donal O'Brolchain. I live in Drumcondra. I am speaking on my own behalf. I will refer to residents 'associations in which I have been involved in the past. Nothing I say here is be taken to indicate what the current views or positions of those associations are on this application or any other issue.

In this presentation, I will comment on the responses which TII made to my submissions. I also raise some points on issues on which TII has not offered any responses. I have raised some of these issues in my submissions during various public consultations on this project and other public issues eg. Bus Connects, Dublin City Development Plan 2022-2028

I have grouped my comments on TII responses to my submissions i

- 1. Rail Links between Dublin Airport and Dublin City Centre (TII rresponse3)
- 2. Route Selection (TII responses 1, 2, 8, 9, 10)
- 3. Data Deficits (TII responses 3, 4, 5, 10)
- 4. Flawed Project (TII response 2)
- 5. Alternatives not looked at
- 6. Eastern Route Variation
- 7. NTA/AECOM Fingal/North Dublin Transport Study
- 8. What was Drumcondra 2005?
- 9. Drumcondra CAT
- 10. Meeting with AECOM 6th Oct2014
- 11. NTA/AECOM Stage One Appraisal report (November 2014)
- 12. After NTA/AECOM Stage One Appraisal report
- 13. Meeting with AECOM Director
- 14. Trees
- 15. Port Tunnel (TII response 11)
- 16. Drumcondra Station
- 17. Ballymun (TII response 12)

Rail Link to Dublin Airport

In Response 3, TII state that *Dublin Airport is the largest Airport by passenger numbers* without a rail connection.

What are these airports?

What is the distance from these airports to the recognised centre of the nearest city?

Tell me about the rail links to each of these five Airports, please

Do Dublin Airport passengers really need this project?

Or is something that would be nice to have, but is not essential?

National Transport Authority (NTA) surveyed Dublin Airport passengers in 2011, 2016 and 2022¹. Before that, the Dublin Transportation Office(DTO) did a similar survey in 2001.² There was also 1998 CIE-Aer Rianta (as it then was) Dublin Airport Air-Rail study³.

There are four parts of these reports that are immediately relevant

- 1. Purpose of Trip;
- 2. Arrival times for departing passengers;
- 3. Journey time to the Airport;
- 4. Landside origin/destination of Airport passengers

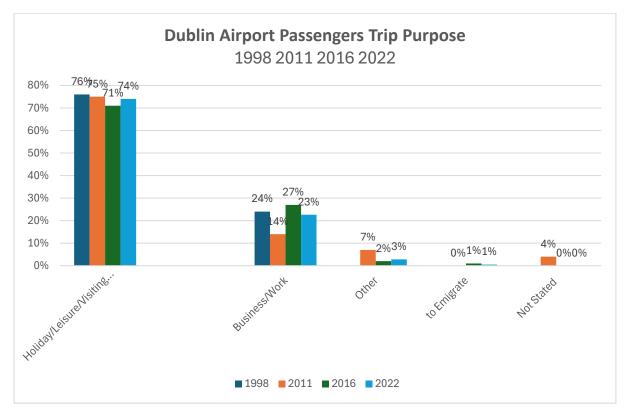
https://www.nationaltransport.ie/planning-and-investment/transport-modelling/data/airport-survey-reports-from-2001-to-2023/

¹ Airport Survey Reports from 2001 to 2023. There are separate links to each report

² The Dublin Transportation Office (DTO report in also available on the NTA link above.

³ CIE and Aer Rianta (the state body responsible for airports in this country) prepared this report. AFAIK, it was not published at the time. I got the report using Access to Information on the Environment Regulations.

Figure 1 Why do people travel?



The 2001 report did not contain any data on this. As is clear from this summary chart (Figure 2), the vast majority of airport passengers are travelling either for leisure or visiting family and friends. Do you think that these travellers are pressed for time?

Why should journey time to the Airport be criterion for assessing various options, when less than 30% of passengers travel for work/business. These might be those who are time pressed. If they are , they do have other options eg. taking taxis which can use the bus lanes or the Port Tunnel. I doubt that Financial Controllers would deem that kind of expense out of the ordinary.

Given that this has scarcely changed over the past 25 years, what do you think will happen during the next 25 years?

How has your modelling taken this into account?

Did the Business Case assumptions for CBA analysis distinguish between passengers?

If so, in what ways?

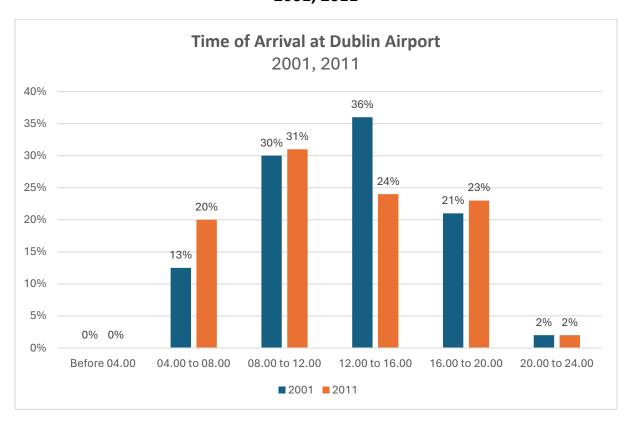
How is this reflected in the assumption of the Business Case?

Arrival Times for Passengers departing Dublin Airport.

The EIAR states that the project will result in morning peak journey time savings of 14 minutes from St. Stephen's Green to Dublin Airport.

NTA reported on the departure times of departing passengers. The reports for 2001 and 2011 did not report this data aligned with peak hour travel times (see Figure 3). However the 2016 and 2022 reports did so (see Figure 4)

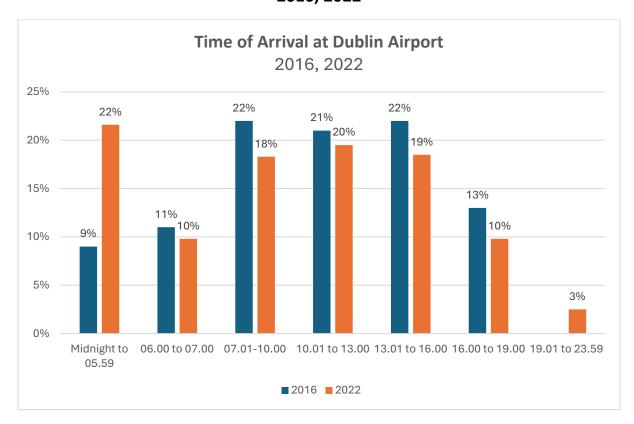
Figure 2 Time of Arrival at Dublin Airport for Departing Passengers 2001, 2011



As the 2016 and 2022 results actually give data that are actually useful to transport analysts and planners , I will focus on those years.

For 2022, over 70% of departing passengers travelled to Dublin Airport outside the peak commuting times of 07.00-10.00 and 16.00-19.00. This is up from the 60% reported on for 2016.

Figure 3 Time of Arrival at Dublin Airport for Departing Passengers 2016, 2022



Note that the 14 minute saving is on a journey that is In the opposite direction to the normal the city-centre inbound traffic that we hear about in traffic reports covering the 07.00 to 10.00 morning peak;

Does this suggest a compelling basis for assessing the time savings of this MetroLink project based on the morning peaks of 22% in 2016 and 18% in 2022?.

There is a similar reduction during the evening peaks.

In a response for information on this, Dublin Airport Authority(DAA) told me that in 2019, of their staff

- 69% live in Dublin North, while 21% live outside Dublin;
- 62% travel to work by car, with another 30% by bus.

DAA did not have any data on meeters/greeters? I recall seeing a figure in some report of the Dublin Transportation Initiative that put the percentage of such people as high as 40% of Airport passenger numbers. Does TII have such data?

If so, what proportion of such people are likely to use any form of public transport?

Journey time to the Airport.

Over the past 20 years, the surveys found that over 60% of passengers take less than an hour to get to Dublin Airport, (see Figure 3). As I recall, that data was not available in the 1998 report.

Time to get to Dublin Airport 2001, 2011, 2016, 2022 90% 78% 80% 689 8% 70% 63% 60% 50% 45% 40% 30%/31% 40% 330 30% 17% 20% 12% 11% 8%8% 6%% 10% 5% 0% <= 30 30-60 Less than 150-180 >240 60-90 90 - 120 120-150 180-210 1 hour **■**2001 **■**2011 **■**2016 **■**2022

Figure 4 How long does it take to get to Dubin Airport?

Note that

- At least, one third of the passengers take less than 30 minutes
- Almost as many take between 30 minutes and 60 minutes

Why should journey time between the City Centre and Dublin Airport be a key criteria in assessing options to enhance public transport the north part of capital city and Swords?

Where are the passengers headed from/to?

In this chart, I only have comparable information for the NTA surveys done in 2001 and 2011. NTA did not publish that data in the 2016 and 2022 reports. I will explain the 1998 data later⁴



Figure 5 Dublin Airport Landside Origins/Destinations

From these reports,

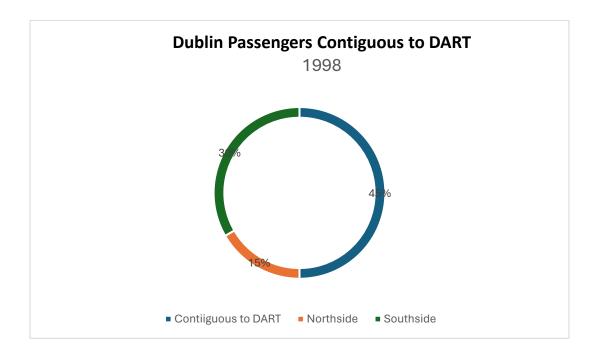
- 1. Less than a quarter of the passengers have city centre origins/destinations;
- 2. Less than 50% had destinations in Dublin City Centre + Dublin City North + Dublin City South;
- 3. The 2011 report noted that the increase in passengers to/from Fingal was probably due to people overnighting in hotels near the Airport, before catching flights. One can speculate about the reasons for this change.

Why should journey time between the City Centre and Dublin Airport be a key criteria in assessing options, when less than 50% of those passengers had a landside destinations in places other than the city centre?

CIE/Aer Rianta. Dublin Airport Air-Rail Link Study. Final Report. April 1998. (Air-Rail Link Study)

Let me just turn briefly to the 1998 data shown in the blue bar.⁵

That report said that about 45% of Dublin passengers were near the DART, with one-third of those being on the North side and the rest on the south side?



Arising from this, does TII really considers it to be good transport planning and investment not to connect to the DART at Howth Junction?

Why force people living along the DART in South Dublin and Greystones in North Wicklow into the city centre, when they could avoid the city centre by going to say Howth Junction? We need to thank in network terms.not the hub-and spoke perspective so obvious in the TII Active Projects list issued last July

The same question arises for other heavy rail commuter services to the North of the Airport (eg. Skerries, Balbriggan, Drogheda, Dundalk) which already stop at Howth Junction.

⁵ CIE/Aer Rianta. Dublin Airport Air-Rail Link Study. Final Report. April 1998. (Air-Rail Link Study) Par 4.3 "A closer review of the Dublin area airport 'air passenger' traffic highlights that approximately 45 per cent of the traffic is contiguous to the DART network...Similar information is not available for 'non-Irish' travellers through the Airport. However, market research indicates that up to 70 per cent of foreign travellers visit Dublin at some stage of their Irish trip. A review of the 1996 Bord Fáilte approved hotels and guest houses in Dublin highlights the very high concentration of bed spaces in the central area and the south east quadrant. The distribution of beds within these areas is summarised in Table 4.2 below. It is clear from this table that the south east city centre area (Dublin 2) along with the Ballsbridge and Donnybrook areas (Dublin 4) are the prime locations in terms of accommodation availability."

Data deficits?

In the response to my queries about how well this proposed line will serve Dublin Airport passengers, TII refer to With regards to the 2011 NTA Study of Dublin Airport, the traffic modelling has been informed by planning data sheets (supplied by 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 themes may be similar across the datasets, the traffic modelling undertaken as part of the EIAR utilises the most up to data data from NTA.

I could not find these data sheets in the man volumes of TII's railway order application. Perhaps my search strategy lacked merit? Or has TII published them in some Appendix to this application?

I too sought data from NTA specifically relating to landside origin/destination of Dublin Airport passengers together with the reasons for it being omitted from the 2016 and 2022 reports on the surveys of Airport passengers. While I got a lot of material printed and on a USB key, I could not compile data to fill out the missing years.

INTA staff are certainly willing to help, but seem under pressure. That is fair enough, but it does suggest that adequate staff are not being applied to ensuring that data for policy making is timely and is published.

NTA collection, collation and publication of data from its own surveys leaves a lot to be desired.

What inference can one draw from what I consider to be the deliberate withholding of summary information on this critical issue, not once but twice over the past 10 years?

Given that such data is not mentioned in Environmental Impact Assessment Report Volume 5

Appendix A9.6 Data Collection Report, would you please outline the validity and reliability of your transport modelling?

Flawed Project

In various comments (1, 2, 8, 9, 10) TII does not concur with my assessment that the NTA process which is at the origin of this project, was flawed. TII is very clear that the origin of this project is robust. In various sections, the base study that is always referred to is the Fingal/North Dublin Transport Study 2014-2015.

However, not everyone is convinced. In a 2022 report on this project⁶, the Major Projects Advisory Group (MPAG)

⁶ MPAG Review Note. MetroLink. Preliminary Business Case 21June2022 https://www.gov.ie/pdf/?file=https://assets.gov.ie/230682/6a68473b-15c6-4170-ad32-c56d682437b8.pdf#page=null

5.9 The Sponsoring Agency and day-to-day Approving Authority must be satisfied that the options analysis underpinning the preferred modal option for the proposal is sufficiently robust, up-to-date and is adequately described in the written documents submitted with the project's Railway Order application. A number of years have elapsed since the publication of the Fingal North Dublin Transport Study which underpins the decision to develop a metro system over alternative modal interventions. A document supporting the EIAR Alternatives chapter should be prepared which confirms the appropriate basis for selection of Metrolink over other modal solutions in line with the principles of proper planning and sustainable development including with reference to the cumulative delivery of the associated BusConnects and Dart+ transport projects.

This consideration is given in EIAR Chapter 7 ⁷

Alternatives not looked at

Would the present and likely demand for public transport in North Dublin be equally well met by spreading that demand over different corridors instead of trying to put it all in one corridor?

I still regard it as another alternative that has not been looked at. I proposed this at a presentation to the Dublin Economic Workshop(DEW) in 2015 and in article in the online Irish Journal of Social, Economic and Environmental Sustainability(IJSEES), published by the then Dublin Institute of Technology, now Technological University Dublin (now TUD)⁸

I included these wo papers in my submissions on this application See p 36-53, .111-132. TII did not respond.

The Fingal/North Dublin Transport Study 2014-2015 did not explicitly consider another well worked out option, the Eastern Route Variation. As I was consulted on that Study. I will go into some detail on how that happened.

In my submission on the TII consultation in May 2018, I explicitly referred to this option and included the 2006 Transportation and Engineering Review in my submission p.133-197.. TII has not responded to this.

I had no involvement whatso ever in the commissioning and preparation of this alternative proposal .

https://www.academia.edu/109195956/Does_Dublins_Core_need_more_rail_links

A LUAS Loop for North Dublin's EconomicCore. IJSEES Vol 1. Issue 2 January 2018 p.62-99

https://www.academia.edu/104908322/A_LUAS_loop_for_North_Dublins_Economic_Core_instead_of_Metro_North

⁷ Chapter 7 Consideration of Alternatives

 $^{{\}tt https://downloads.metrolink.ie/documentsro/Chapter\%2007\%20Consideration\%20of\%20Alternatives.pdf} \\$

⁸ These papers were originally available on website which has since closed. I have made them available by posting them on https://independent.academia.edu/DOBrolchain

Does Dublin's Economic Core need more rail links?. Conference Paper. 2015. Dublin Economic Workshop (DEW)

Eastern Route Variation

Some time around 2006, Michael J Howard called me. I did not know who he was, as I made clear in my submission (see par. 2.3.4.2 p.14 of my submission). He outlined the work he and his cousin were funding on an alternative to then MetroNorth project. They owned land straddling the Dublin City/Fingal boundary and hoped to increase the development potential. As he said he was not getting any kind of reasonable hearing from Railway Procurement Agency(RPA) officials, someone had suggested that he contact me about Drumcondra 2005. I told that this group no longer existed. But we met for a coffee so that he could fill me on the Eastern Route Variation to then MetroNorth.. He was scathing about the attitude of some RPA officials. I included the Transportation and Engineering Review prepared by Roughan & O'Donovan in my submission on this application p.133-197) See Appendix 2 for other material.

NTA/AECOM Fingal/North Dublin Transport Study 2014-2015

In September 2014, AECOM invited me to brief them on proposals I had made on LUAS. That was how I first learnt of the Fingal/North Dublin Transport Study. Appendix 3, contains

- 1. The letter AECOM sent
- 2. The slides I used in a presentation at the meeting;
- 3. A record of the meeting held in AECOM offices on 6th October 2014;
- 4. Email to AECOM on 8 December 2014 complaining abut the report

Although unspecified, I assumed that the proposal referred to were

- 1. the Drumcondra CAT, submitted in May 2001 in response to a public notice by the Strategy Development Office of the Light Rail Project Office then in Heuston Station.
- 2. A personal submission to An Bord Pleanála in 2009 on the LUAS Cross City link (Line BXD). I asked that the Red and Green lines be linked for passenger services. As we know, there are still no through running passenger service, as the O'Connell Street/Abbey Street link between the Red and Green lines is for engineering purposes only⁹.

⁹ Submission on application for Railway Order for Broombridge Railway Order (Line BXD) Your Reference 29n.NA0004 See Appendix

What was Drumcondra 2005?

In 2001, Drumcondra 2005 was group of 8 residents associations that had been working together for at least 10 years to enhance our area. These residents' association straddled the Swords Road from Whitehall to Binn's Bridge – the notable exception being those residents between Clonliffe Road and the Royal Canal- east of Lower Drumcondra Road and north of Jones Road.



Figure 6 Drumconda OpenStreetMap

This voluntary group was formed late 1980s to hire a town planner to draw a development plan for the Drumcondra District. We had asked Dublin Corporation Councillosr and officials to draw up a development plan for our area, just as they had done for the Rathmines/Rathgar area some years previously They told us that the resources they had for that kind of work were now focused on the inner city. They suggested we do ourselves, by taking on a town planner, which we did.

I want to mention just I will just outline three points

- 1. Dublin Port Tunnel;
- 2. Public Transport through Drumcondra;
- 3. Compact Growth

AHAA made this submission during the 1990 process of amending the Dublin City Development Plan.

Note that the submission also referred to

- enhancing public transport;
- cycleways;;
- more public open space;
- preserving trees.

In June 1993, the Drumcondra Group started to campaign for the full Eastern Bypass with letter to the Irish Times in June 1993

DRUMCONDRA CAT

As were many others, we in Drumcondra 2005 were appalled at the Government decision in May 1998 to build two separate non-interconnected LRT lines in the middle of our capital city.

As I understood it, the LRT Depot at the Red Cow had been designed, specified and built to service a fully integrated system, with lines from the City Centre through Drumcondra to Ballymun, Tallaght and Dundrum.

When the Government made that bizarre decision in 1998, the Red Cow Depot could not even service the two LUAS line approved. Including the extension to Sandyford. This meant that the LRT project team had to find land for a depot. The result was that the only green space near the Sandyford commercial area was used for the depot. I gather that the total extra cost of that investment was around IR€10m and would have covered the cost of building the link between the two lines which had been planned in detail.¹⁰

In 2000, I started to prepare what became the $\overline{DRUMCONDRA}$ \overline{CITY}

ACCESS TRANSIT (CAT). Drumcondra 2005 submitted this to the Strategic Development Group of the then Light Rail Project Office in May 2001. Given the irrationality of the decision to build two non-interconnected lines, I felt that we needed to appeal to the imagination . An artist who is a neighbour came up with the CAT image. A computer adept friend formalised it. For fun, I used the Castellar which has two lines more or less equidistant from each other, just like twin-track railway lines. I wrote the arguments that I hoped would show that there was a reasoned basis to the CAT. The text is in the DRUMCONDRA CAT

¹⁰ The Sandyford Industrial was being transformed from an distribution/light manufaaruting area to include much more offices. Having lost the only publicly accessible green space, Dun Laoghaire Rathdwon CC has designated brownfield sites for parks. An Bord Pleanála upheld that decision on appeal....."¹⁰ ...The board upheld the council's view that the site was zoned for open space under the county development plan to facilitate a series of pocket parks and urban plazas in Sandyford Business Park... O'Hara's Brewery loses appeal for over plans for Dublin visitor centre. Seán McCárthaigh Irish Times 11 March 2021

The Dublin Transportation Initiative(DTI was finishing. *Platform for Change Final Report An integrated transportation strategy for the Greater Dublin Area 2000 to 2016 Dublin Transportation Office November 2001*, was published in January 2002. I will just show you what this document proposed.

In the autumn of 2000, I got a new job which involved me being out of Dublin a lot during the following 10 years. As Drumcondra 2005 Secretary, I simply did not have the time to follow through. The member associations did not seem to be worried about my reduced commitment. The Tunnel was being built and the two separate LRT lines were on the South side.

The member associations did not agree a common position in response to 2005 Transport 21 proposal for a single Metro line from the City Centre to Dublin Airport and Swords. As committee members changed in the various member associations and some died, interest in working together faded away, as happens with people acting in voluntary capacities on policy oriented projects with long time spans.

I tried to keep with developments on the Tunnel by attending some of the consultative/information meetings that the Tunnel Project group (contractors, Dublin Corporation) convened about every 6 weeks or so. ,I made submissions to and attended the Oral Hearing which the National Roads Authority(NRA) held on the Dublin Port Tunnel Draft Toll Scheme on January 2006.

I continued to take a general interest in the issues that brought Drumcondra 2005 together eg. development on the institutional lands, LUAS extensions.

Following correspondence with the Railway Procurement Chief Executive (in 2009) and the then Chair of the Dublin Docklands Development Authority, I published an article for LUAS Dockland Loop in the Sunday Times (26 September 2010). I simply suggested that the Green and Red lines be linked for passenger services. (See Appendix) Without my knowledge, an economist posted the article on the IrishEconomy.ie web forum, where it attracted some comments.¹¹

I included that article in my submission (p. 67-70) TII did not comment on this.

Meeting with AECOM 6th Oct 2014

I was surprised when I got that letter in September 2014, seeking a meeting to present some proposal on enhancing public transport in North Dublin. What follows ins my account for what I believe to have been a flawed process. On this, I differ fundamentally with TII view that it was a robust process, as I will explain.

Prior to the meeting on 6th October 2014, I asked AECOM for the terms of reference of the study and also if I could bring some other people to the meeting. I also sent the $\mathbb{C}A\mathbb{T}$. I then got in touch with Michael Howard to ask him if he wanted to present his Eastern Route Variation.

¹¹ LUAS needs joined up thinking. A guest post . http://www.irisheconomy.ie/index.php/2010/09/28/luas-needs-joined-up-thinking/

At my invitation, Tom Coffey then recently retired CEO of the Dublin City Centre Business Association(DCCBA) joined as did two personal friends

Using only PowerPoint slides, I presented the background and my then current stance of the $\mathbb{C} A \mathbb{T}$. The last slide was an animation using either the now withdrawn Flash or MS Internet Explorer. To show you that CAT was based in some realities, I just want to show you those few slides

At that meeting, Michael Howard outlined the Eastern Route Variation as an alternative to Metro North in 2006. He gave AECOM the Roughan & O'Donovan report.

NTA/AECOM Stage One Appraisal report (November 2014)

I was shocked at the way in which the Drumcondra CAT was presented in this report and emailed AECOM to complain about what I now know to be *strategic mispresentation*..

It is simply not true that DRUMCONDRA CAT was "proposed as an alternative to the Metro North Scheme. MetroNorth did not exist as a scheme in 2001 when we made the submission in response to a proposal which was publicly advertised.

The Roughan & O'Donovan report was not mentioned at all

There was one other odd thing about that Stage One Appraisal Report. For each the 25 options considered, the report had Figures. This is an example using the preferred option. Twenty four of those drawing were dated Sept 2014. Both AECOM and ROD (Roughan & O'Donovan) were credited with these figures. See Appendix

Only one figure was credited solely to AECOM. It was the figure with the title DRUMCONDRA CAT, but it was amalgamated with the Eastern Route Variation It was dated July 2014. This was some months before AECOM sent a letter inviting me to the meeting. What on earth was going on?

What does this look like

Is it normal for these kinds of figures in these kinds of reports to have such a variation. Perhaps some of the TII team would explain to this Oral Hearing what the standard operating procedure is in producing such drawings.

Assuming that no one in TII noticed this oddity, I wonder did the NTA and AECOM notice it? I assume so. It is difficult to believe that those who made, checked and approved the report did not notice this single exception. How significant is it that it combined on drawing and assessment a well-worked out alternative Eastern Route Variation to the then preferred route with a proposal that owed more to imagination than to engineering and planning expertise.

How much due diligence did TII staff did some due diligence as they complied the EIAR with this description of the AECOM's amalgam of two disparate ideas, developed separately.

See Appendix

Figure 7 from TII MetroLink EIAR par 7.3.1 Alternatives Considered

Transport Infrastructure Ireland

MetroLink Environmental Impact Assessment Report

Option Ref	Stage 1 Option	Stage 1 Analysis
	rolling stock, fewer stations and vertical alignment changes).	
LR8	Dublin City Access Transit (CAT). An option proposed that entailed an extension of LUAS Cross City to Swords via Dorset St and Drumcondra Road.	LR8 had significant journey time to the airport and would cause significant traffic disruption as it operates at street level. As a result, LR8 was eliminated from further consideration.

I suggest that this odd discrepancy is enough to cast doubt on the validity of this EIAR, based as it is on a very questionable route selection process.). Maybe, TII will withdraw this application before the next Major Projects Advisory Group review, if An Bord Pleanála grants a railway order.

After NTA/AECOM Stage One Appraisal report

Following the publication of that NTA/AECOM Stage One Appraisal report dated November 2014, I made a submission asking that the report it be rejected in full. I also included that in my submission on this application p. 71-91

I was puzzled by the blatant misrepresentation in the Stage One Appraisal Report

As I thought I might have missed something, I commissioned two maps from the All Island Regional Observatory(AIRO) in Maynooth University, based on this map which I used in the presentation to AECOM

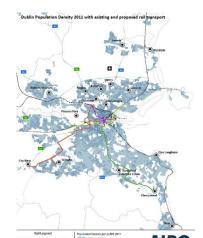
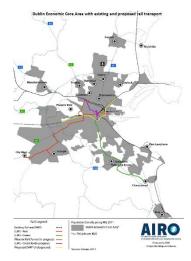


Figure 8 Greater Dublin Area Population Density 2011 with rail lines

Figure 9 Greater Dublin Area Economic Core 2011 with rail lines



I asked AIRO to superimpose the then existing and proposed urban railway infrastructure on maps showing

- 1. the population density;
- 2. the core economic area, as indicated by employment per km2.

of the Greater Dublin Area based on the most recent Census ie. 2011.

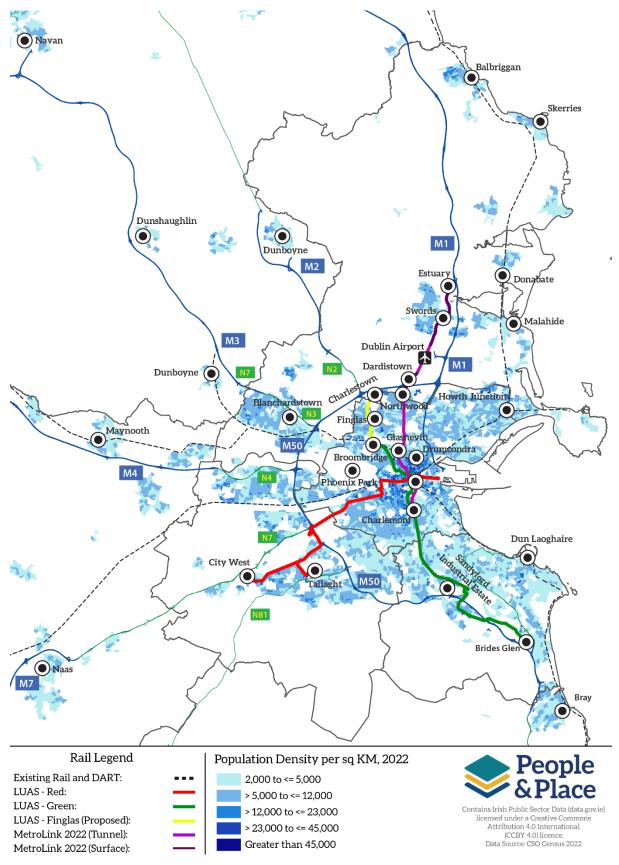
Looking at those maps, it is clear that the existing LUAS lines are more less aligned with both the core and population density. But they also reveal a public transport void in North Dublin.I realise that this EIAR has similar maps for the corridor chosen for MetroLink.

As the Eastern Variation Route reports show, that catchment area had higher numbers than the then preferred option. MetroLink is further to the West. Perhaps An Bord Pleanála would commission a similar analysis based on the 2022 Census, just as I did recently when I asked People&Place to draw these two maps showing MetroLink.

Navan Balbriggan Skerries Dunshaughlin M1 Dunboyne M2 Estuary Donabate Swords Malahide МЗ Dublin Airport Dardistown Dunboyne (B Blanchardstown Charle Howth Junction Finglas Maynooth Broombridge M50 Drumcondra Phoenix Park M4 Charlemont Dun Laoghaire City West Tallaght Brides Gler Naas Bray Rail Legend **People** Dublin Economic Core Area* Existing Rail and DART: *>= 700 jobs per KM2 (Electoral Divisions) LUAS - Red: Source: Census 2022 Contains Irish Public Sector Data (data gov.ie) licensed under a Creative Commons Attribution 4.0 International (CCBY 4.0) licence. Data Source: CSO Census 2022 LUAS - Green: LUAS - Finglas (Proposed): MetroLink 2022 (Tunnel): MetroLink 2022 (Surface):

Figure 10 Greater Dublin Area Economic Core 2022 with MetroLink

Figure 11reater Dublin Area Population Density 2022 with MetroLink



Using AIRO Census 2011 maps, I wrote an article for the IrelandafterNAMA web forum¹² I wanted to test the acceptability of using those new maps in a geography-based policy oriented forum. *Does Dublin's Core Economic Area need three rail links between the Docklands and Heuston Station/Inchicore*? was published in July 2015 ¹³

Following that article, Colm McCarthy invited me to present my ideas that the annual conference of the Dublin Economic Workshop(DEW) held in Athlone in October 2015. I presented a paper at a session on Transport. The session was chaired by the person then the economic unit in the Department of Transport.

I included that paper in my submission on this application (p.35-52). III did not comment...

Meeting with AECOM Director Nov 2015

Sometime after the final Fingal/North Dublin Transport Appraisal Report was published, I got in touch with the AECOM Director who signed off on that Report. In November 2015, we met for coffee in a hotel.. When I showed him the copy of Roughan & O'Donovan Easter Variation Route Engineering Appraisal, he seemed shocked. I am still not sure what shocked him -whether it was the fact that I had that report or that it had been presented to AECOM. during that meeting on 6th October 2014. It was short meeting. I have not been in touch with him since.

In my submission, I referred to this meeting (par 2.6 p.5). TII did not comment on this.,

After the 2016 Census, Genvest (the Howard family business) employed Roughan & O'Donovan to update the catchment areas of their Eastern Route Variation with the then Emerging Preferred Route Catchment for MetroLink. In a letter dated 11th May 201, Genvest submitted this to TII's Metrolink Project Manager in response to a public consultation. With

¹² Ireland after NAMA was established after a one day symposium held in NUI Maynooth, on November 23rd, 2009, entitled 'Geography after NAMA'. The event, attended mostly by geographers from across Ireland, sought on the one hand to discuss how the financial crisis was playing out at local, regional, national and international scales, and on the other to consider how Geography and social sciences more broadly should respond to the crisis in productive ways. Ireland after NAMA uses the establishment of the National Assets Management Agency as a symbolic, watershed event in the evolution of the crisis. It therefore does not focus on NAMA per se, though it does provide commentary on the debate, policy and workings of that organisation. Rather it provides an informed analysis of the crisis – its history and its present unfolding – drawing on social science theory and empirical research. In particular, it presents a spatial and scalar reading that acknowledges that how the crisis is playing out is spatially uneven and unequal, affecting parts of the country in different ways, and its grounding in particular communities is the result of processes operating at different scales from the local through to the global; how the crisis is playing out in rural Ireland is quite different to the cities, which is quite different to the commuting belts and the border counties for a variety of reasons. https://irelandafternama.wordpress.com/about/

¹³ https://irelandafternama.wordpress.com/2015/07/23/does-dublins-core-economic-area-need-three-rail-links-between-the-docklands-and-heuston-stationinchicore/

Genvest permission, I included it in my submission to An Bord Pleanála on this application. (the last pages TII did not comment on this.

In my submission to TII, I included a map of Workplace Location Catchment Ares which the CSO published after the 2016 Census. TII not comment on that map in their response.

I maintain that the whole basis of this project is built on what seems to be an effort to suppress consideration of alternatives, one of which was worked out to an adequate standard by the kinds of firms that the public authorities use for similar work. A Reality Distortion Field has been created and maintained on the consideration of options for enhancing public transport in the North part of our capital city. Dublin Airport and Swords. Why must there must only be one new rail corridor in the North part of Dublin City which has a larger population than any other part of the Greater Dublin Area for over 30 years

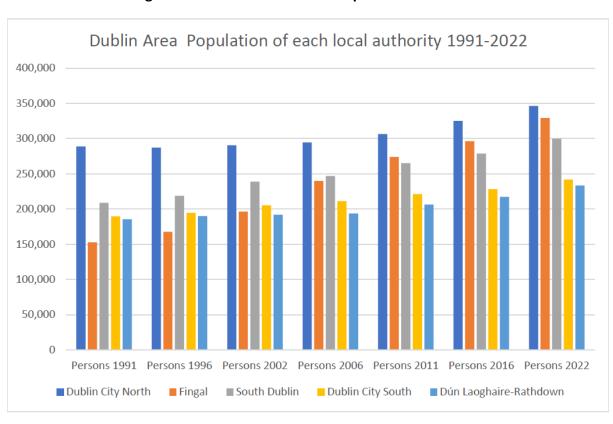


Figure 12 Greater Dublin Area Population 1991-2022

Trees

Someone is sitting in the shade today because someone planted a tree a long time ago – Warren Buffet.

introduces the Rationale for advancing MetroLink in Chapter 89 of the Preliminary Business Case (p. 87)

Summary

CMK Hort & Arb Ltd. undertook an assessment of trees within the assessment boundary between 2019 and 2021. A total of 5,435 trees were assessed. The trees were located within parks, streetscapes, agricultural lands and roadside screen plantings.

An estimated 3,437 trees will require removal to facilitate the development of the MetroLink. 112 of trees that are shown for removal are located near the city centre (south of the Royal Canal). The balance to be removed are located within areas between the Royal Canal and Lissenhall. These totals do not include category 'U' trees (i.e., those that have failed or are in a state of late decline).

The highest concentration of tree loss is within tree populations providing roadside screening on either side of the Swords Bypass R132 and directly south of the M50, to facilitate Northwood Station.

This project will remove over 60% percent of the trees in the alignment according to the In Appendix A27.3 Arboricultural Impact Assessment,

The EIAR recognises the value of trees for carbon capture and storage etc. I imagine that other chapters refer to other beneficial effects of trees in maintain our biosphere.

I gather that there are now pretty well established methods of assessing the total economic value of trees, particularly in urban area. Has TII used such methods in compiling this EIAR? Has TII tried to assess the value of the existing nearly 5,500 trees as part of the business case?

If this project goes ahead, a lot of [people will be left without shade over a swathe of North Dublin and Fingal, particularly if Bus Connect routes are approved. This sister project of MetroLink will also remove trees in a 1960s style road widening exercise.

Port Tunnel

In comment 11, TII states that it has no comment to make what I said about the Port Tunnel.

I note the commitment to proceed in accordance with the statutory planning process and all necessary legal requirements. I have no reason to believe that similar assurances were given by those bodies involved in building the Port Tunnel.

However, that did not stop an extra inbound lane being built along the Tunnel between the northern portal, almost as far as Whitehall Church.

I simply do not believe that this project will be immune from the same kind of thing being done to deal with some unknown issue that may emerge.

Adding that extra inbound lane meant more traffic through Drumcondra, with all that implies in terms of noise, air pollution etc. Coupled with that, the assumptions regarding traffic volumes assumed an LRT line through Drumcondra.

When will the public service (elected and appointed) mitigate that abuse of process, done by stealth?

Drumcondra Station

This project opts for Glasnevin instead of Drumcondra for a station. (EIAR Vol 2. Chapter 7 p.42-43)

Both commuter and mainline trains to Maynooth and Sligo already stop at Drumcondra. This was not something that transport planners had foreseen thirty years ago. The EIAR does not give any data on the existing interchange at Drumcondra Station.

The Railway Procurement Agency bought a major property to create a transport hub for Metro North. As the successor of the RPA, would TII confirm that it is still the registered owner of that property. Yes, TI would have to demolish a building it already owns and permission for which was granted when MetroNorth was granted a Railway Order.

Yes Drumcondra Station (on the Maynooth -Longford –Sligo line) is about 110m from the Kildare line and at different levels with a heavily trafficked road between them. Travellers regularly transfer over longer distances eg. in Airport terminals. Tain stations

Given that that part of Drumcondra is already a commercial hub and is near the major trip attractor/generator that is Croke Park, I remain to be convinced that choosing the site for Glasnevin is the optimum solution, given admitted potential impacts on hydrology, biodiversity and Hedigan's pub.

Ballymun

MetroLink was a unique opportunity to enhance the main street of Ballymun by putting the route on the surface, thereby moving the road traffic from the 6 lane highway that now runs through the middle of Ballymun.

Doing do would go some way to redressing what Seán O'Leary termed *Ireland's worst planning disaster?* In his book Sense of Place. A History of Irish Planning.

At present it is public policy to remove cars from the centre of Dublin City. In asking you to recommend refusal of this application, I am asking you and An Bord Pleanála to to

If removing traffic is good enough for those who visit, live or workin the city centre, it is equally good for those who live and work in Ballymun. Your recommendation can be reset on how we make place.

Conclusion

In a recent interview, the NTA CEO spoke about making up for the last 10 years of underinvestment in public transport. That seems to be a continuation of spoke&hub thinking.

In asking you to recommend refusal of this application, I am asking you to reset public transport in our capital city. For our common good, option and policy makers must break from the lack of insight on urban management that resulted in non interconnected railway lines built in our capital city. This has not yet been corrected.

Adding this project with systems which are not-interoperable with existing LUAS would reinforce that lack of insight. MetroLink is absorbing time and effort in an all or nothing effort to look modern – Ireland cannot be modern without an underground in Dublin. Zurich is one the richest and for some, a most highly desirable place to live, according to some indices. On-street light rail the predominant public transport.

I am asking you to take your lead from the same NTA/AECOM North Dublin/Fingal Transport Study on which this project relies. LUAS lines can be added and made operational a few kilometres at time as in proposed for Finglas LUAS. We can increment our way to enhancing public transport in North Dublin without putting everything into the black hole that in MetroLink. Doing so adds to the know-how of how to do this kind of project which is easily transferable to other urban areas in Ireland.

Figure 13 Extract from NTA/AECOM Fingal/North Dublin Transport Study First Appraisal Report November 2014 (p.39)

AECOM National Transport Authority
Fingal / North Dublin Transport Study

Expansion of the current light rail system to serve the Study Area could present significant benefits as follows:

- Light rail is a high quality product with high capacity that has already been well received within the City;
- Expansion of the network would present significant integration benefits and maximise the overall offer presented by the network;
- Light rail integrates well into the urban environment which will be important for areas like the north inner city and Swords;
- Light rail has a proven ability to drive urban renewal and economic growth which is an important objective within the current Study Area;
- Light rail, unlike heavy rail, can have shared use sections where space is limited, although ideally it should be segregated as much as possible;
- Light rail presents a suitable option where the level of demand is between bus and heavy rail capacities;
- The current light rail network includes a number of Park and Ride facilities that will further encourage a shift from car mode for commuting trips;
- Light rail is highly legible with a high commuter awareness of routes, catchment areas as well as facilities to enable ease of utilisation; and
- Emissions from light rail are low and remote from the vehicle.

Despite these advantages, the provision of light rail services presents significantly higher capital costs than traditional bus or BRT solutions and requires a minimum threshold of demand to support a business case for development.

Intelligence is not to make no mistakes, but quickly to see how to make them good.

Brecht.

Appendix 1

Donal O'Brolchain
 pages 1-14 of my submission (25 November 2022)
 to An Bord Pleanála on the application for a
 Railway Order (MetroLink-Estuary to Charlemont via Dublin Airport))Order 2022

2. TII Responses downloaded from

https://downloads.metrolink.ie/documentsro/MetroLink%20RO%20Statutory%20Consult ation%205.2%20Pt%201%20of%202%20-

%20TII%20Response%20to%20Submissions%20001%20to%20140.pdf

Table 3: Index - Submissions Received in Response to Railway Order Application Statutory Consultation (Alphabetical Order)

Submission No.	Submission Entity/ Person	Location	Area/ Category
48	College and Wainsfort Residents Association	SSG-Charlemont	AZ4 (h)
49	Colm and Caitriona Warfield	Charlemont	AZ4 (i)
50	Commission for Railway Regulation	Multiple	MULT AZ's
51	Conor and Lorraine Power	Charlemont	AZ4 (i)
52	Coras Iompair Eireann	Multiple	MULT AZ4
53	Core Capital	SSG-Charlemont	AZ4 (h)
54	Cormac McKay and Aeravai	Multiple	GEN
55	Dan Coulcher and Paula Fyans	General	GEN
56	DECC Geological Survey Ireland	Multiple	GEN
57	Declan Ryan	SSG-Charlemont	AZ4 (h)
58	Deirdre Byrne and Family	Seatown-Swords	AZ1(a)
59	Deirdre Vaughan	Griffith Park-Glasnevin	AZ4 (c)
60	Denis McLoughlin and Teresa Reid	Charlemont	AZ4 (i)
61	Dermot and Doris Healy	Tara	AZ4 (g)
62	Desmond and Kathleen Rice	Griffith Park-Glasnevin	AZ4 (c)
63	Development Applications Unit	Multiple	MULT AZ's
64	Devonmill Limited	Swords-Fosterstown	AZ1(b)
65	Diarmuid Burke	Charlemont	AZ4 (i)
66	District 7 Community Alliance	Mater	AZ4 (e)
67	Donal O'Brolcain	General	GEN

Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022

Note. In this submission, I refer documents, reports, submissions, letters and a record of a meeting with associated emails. I have attached these in two sections ie.

Section 1 - A 2019 submission to Transport Infrastructure Ireland (TII) on Metrolink, which is paginated, after the first two pages

Section 2. Other relevant material, identified by tabs.

I ask that An Bord Pleanála 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;
- 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 p.16-19.
 - b. Was the outcome of a deeply flawed process run by the National Transport Authority.
- 3. Enhancing public transport options between Dublin City Centre and Dublin Airport can be done by methods other than this proposal given than a 2011 NTA Study of Dublin Airport passengers found that
 - a. Less than one seventh (14%g) 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

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.

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.

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.

The 2014-2015 NTA/AECOM Fingal/North Dublin Transport Study, to which Transport Infrastructure Ireland (TII) refers in this application pointed out that

Expansion of the current light rail system to serve the Study Area could present significant benefits as follows:

- Light rail is a high quality product with high capacity that has already been well received within the City;
- Expansion of the network would present significant integration benefits and maximise the overall offer presented by the network;
- Light rail integrates well into the urban environment which will be important for areas like the north inner city and Swords;
- Light rail has a proven ability to drive urban renewal and economic growth which is an important objective within the current Study Area;
- Light rail, unlike heavy rail, can have shared use sections where space is limited, although ideally it should be segregated as much as possible;
- Light rail presents a suitable option where the level of demand is between bus and heavy rail capacities;
- The current light rail network includes a number of Park and Ride facilities that will further encourage a shift from car mode for commuting trips;
- Light rail is highly legible with a high commuter awareness of routes, catchment areas as well as facilities to enable ease of utilisation; and
- Emissions from light rail are low and remote from the vehicle. ¹

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.

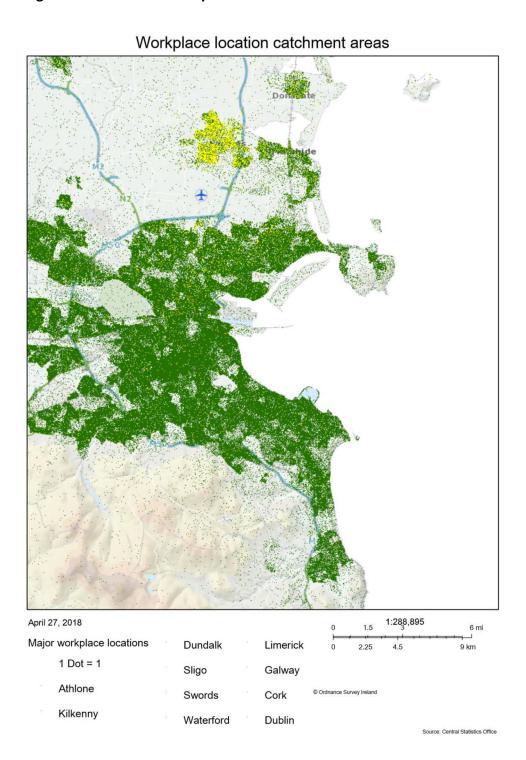
Our capital city does not need another stand alone public transport system which will not enhance our urban environment which is not well tended.

¹ Source: National Transport Authority. AECOM Fingal/North Dublin Transport Study. Stage One Appraisal Report November 2014 p.39

1. Transport options in the Greater Dublin Area

The 2016 Census found that the major workplace catchment areas are inside the M50 as shown in Figure 1

Figure 1 Dublin Area workplace location catchment areas Census 2016



2. Route Chosen

- 2.1. On 10th May 2018, I asked Transport Infrastructure Ireland (TII) for access to papers, documents and records (including emails and sticky notes) under the European Communities (Access to information on the Environment) Regulations 2007 2014, on four topics arising from the MetroLink proposal. (Section 1 p. 1-33)
 - 2.1.1. The misleading statements in the Alignment Options Report on the origins of a Metro system for the Greater Dublin Area;
 - 2.1.2. The misplaced emphasis on Swords, compared to the North Part of Dublin City or even the western part of Fingal around Blanchardstown;
 - 2.1.3. The need for fast access between the City Centre and Dublin Airport;
 - 2.1.4. Commitments and assumptions explicitly made in approving and building the Dublin Port Tunnel. I actively supported that project as one of a mutually reinforcing set of proposals which would enhance our capital city region .
- 2.2. TII responded on 8 June 2018 (see Section 1 second page unpaginated!) pointing out that

The basis for the criteria to provide a safe, high frequency, fast, efficient and sustainable public transport light rail service connecting Swords, Dublin Airport and Dublin City Centre arises from the findings of the Fingal/North Dublin Transport Study, which was commissioned by the National Transport Authority (NTA) and is available to view/download from the NTA website, www.nationaltransport.ie

- 2.3. TII's application for this railway order refers to the Fingal/North Dublin Transport Study 2014-2015
 - 2.3.1. In September 2014, I received a letter from AECOM asking me to contact them to arrange a meeting in connection with a Fingal/North Dublin Transport Study which the National Transport Authority had commissioned. I was surprised to receive this letter, as I was not aware that such a study had been commissioned.
 - 2.3.2. On 6th October 2014, the meeting took place in AECOM offices The aim of the meeting was to present the CITY ACCESS TRANSIT (CAT) which Drumcondra 2005 had proposed in response to a public consultation in March 2001 (see Section 1 p. 96-108)
 - 2.3.3. By prior agreement with AECOM, I was accompanied by five people, all of whom are named in the agreed record of the meeting. See agreed record of this meeting Section 1 p. 92-95 and pre/post meeting emails clarifying some points see Section 1 107-110
 - 2.3.4. Among those that I invited were the Howard brothers, developers based in North Dublin.

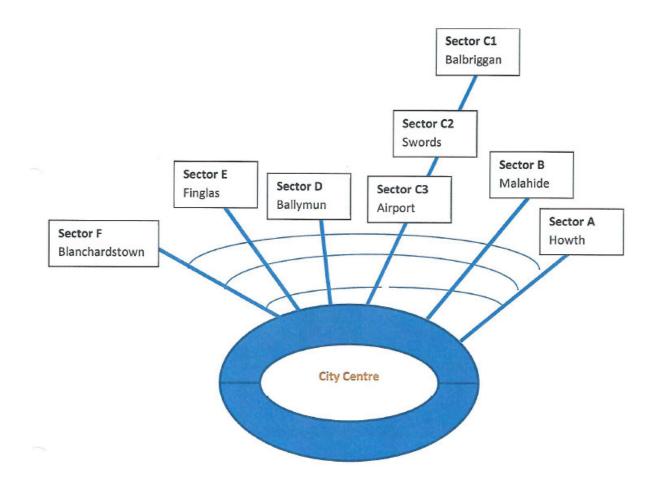
- 2.3.4.1. In 2006, they had commissioned a team of consultants to report on an alternative routing for the then proposed Metro North. As the work concluded, Michael Howard asked about Drumcondra 2005. By then, the residents' association which formed Drumcondra 2005 did not agree on the then proposed Metro North. Thus there was no common approach to MetroNorth, following the 2001 proposal for the DRUMCONDRA CITY ACCESS TRANSIT (CAT). I pointed that out to Michael Howard.
- 2.3.4.2. I had not worked or socialised with the Howards before they approached me nor have I since. When AECOM approached me in 2014, I asked Michael Howard if he would like to join me at the proposed meeting to present his proposal, as there appeared to be an opportunity to have other options re-evaluated. He accepted my invitation.
- 2.3.4.3. During the meeting, Michael J. Howard presented the *Metro East* proposal which he had commissioned from Roughan O'Donovan and others in 2005/2006. He also handed over a copy of that proposal to AECOM together with a submission made to the Railway Procurement Agency at the time . See Section 1 p. 133 197 .
- 2.4. The NTA/AECOM Stage One Appraisal Report was dated November 2014.
 - 2.4.1. It is clear from the text of that NTA/AECOM report that
 - 2.4.2. A casual reader would get the impression that Drumcondra 2005 was present at a workshop for key stakeholders held on 27th August 2014. This was not true.
 - 2.4.3. The Roughan O'Donovan Report which the Howard brothers had presented during the October 2014 meeting was not referred at all;
 - 2.4.4. the DRUMCONDRA CITY ACCESS TRANSIT (CAT) proposal was completely misrepresented. See Section 2. NTA/AECOM report p. par 3.12 LR* :City Access Transit (CAT) p. 59.61
- 2.5. In a submission (dated 19 January 2019) on that report, I called for the NTA/AECOM Fingal/North Dublin Transport Study Stage One Appraisal Report November 2014 to be rejected in full. See Section 1 p. 71-91 also Section 2 for covering letter.
- 2.6. It would seem that the AECOM Director who signed off on the Final Report of the NTA/Fingal North Dublin Transport Study Stage 2 Appraisal Report June 2015 was NOT aware that the Howards had given AECOM the final report of the Roughan O'Donovan Metro North Transportation and Engineering Review Final Revision June 2006 (known as Metro East) during the meeting on 6 October 2014.

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.

3. North LUAS Loop

- 3.1. Following the outrageously misleading NTA/AECOM Fingal/North Dublin Transport Study Stage One Appraisal Report November 2014, in April 2016, I sought further information from NTA. see Section 2
- 3.2. The key document that emerged was Draft Study of Transport Options for Fingal Corridors in advance of Metro North April 2012. see Section 2
- 3.3. I was taken aback when I saw that there was no consideration of Drumcondra in the Sector C1/Balbriggan Sector C2/Swords, Sector C3 Airport. This contrasted very poorly with explicit treatment of both Finglas and Ballymun, other north city suburbs.

Figure 2 Main Fingal transport corridors to/from the City Centre



Source; NTA DRAFT Study of Transport Options for Fingal Corridors in advance of Metro North. April 2012

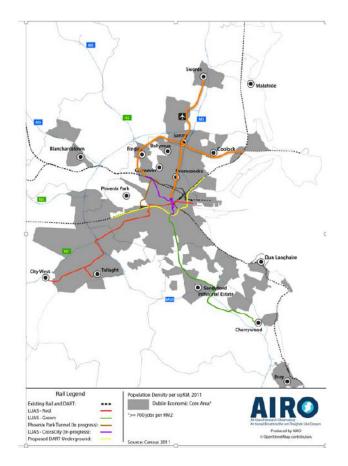
- 3.4. This was very surprising, given a 1996 review (by Oscar Faber for the then Department of Transport, Energy and Communications, seemingly prompted by the EU Commission) of the then proposed integrated three line Light Rail system,. This review identified more trip attractors/generators per km on a line connecting the City Centre to Ballymun through Drumcondra. see Table 1 Comparison of Trip Attractors Generators on three LUAS lines 1996 see section 1. 26. also p. 116
- 3.5. In a 2012 NTA report on Bus Rapid Transit (BRT) Core Network Report, NTA concluded that passenger demand on a route through Drumcondra exceeded the capacity of that particular option. No further consideration would be given to using that particular form of public transport through Drumcondra. See Section 1 p. 37, 122
- 3.6. As I was puzzled by the complete exclusion of Drumcondra when the public authorities were considering how to enhance public transport the north part of our capital city, I commissioned two maps based on the 2011 Census from AIRO.
 - 3.6.1. These superimposed the then existing LUAS lines (including LUAS cross-city then under construction), heavy rail-commuter lines including DART and the Phoenix Park Tunnel (then projected to open for commuter services in 2016) and the then proposed Metro route on maps the Dublin area showing
 - 3.6.2. the economic core, measured by \geq 700 jobs km²
 - 3.6.3. population density;

See Figure 3

- 3.7. These maps formed the basis for a proposed LUAS Loop around the North City with spurs to the Airport, Swords and Howth Junction. This built on the proposal to extend LUAS from Broombridge to Finglas.
- 3.8. In October 2015, I presented this proposal at a session on transport at the Dublin Economic Workshop in Athlone. see. Section 1 p. 26-70, and also an article in the January 2018 issue of the Irish Journal of Social, Economic and Environmental Sustainability see Section 1p. 111 132
- 3.9. I first used the maps in an article question the need for DART Interconnector, published in the webforum *irelandafternama* published in July 2015

<u>Does Dublin's Core Economic Area need three rail links between the Docklands and Heuston Station/Inchicore?</u>

Figure 3 A North Dublin on-street LUAS Loop with spurs to the Airport, Swords and Howth Junction

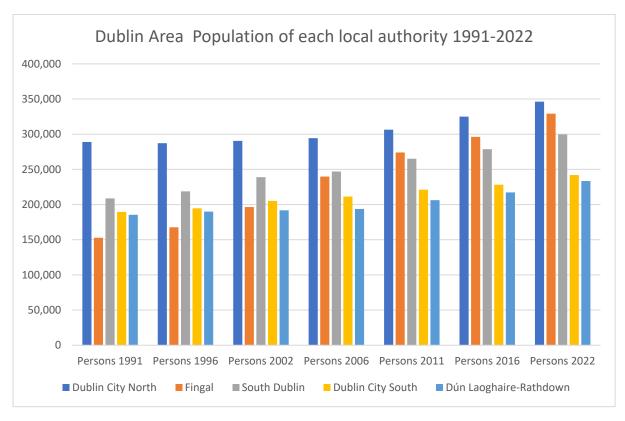


- 3.10. The proposed North Dublin LUAS loop would
 - 3.10.1. serve the northern part of Dublin's Core Economic Area comprehensively;
 - 3.10.2. be Integrated with what already exists;
 - 3.10.3. offer 3 rail-based ways of getting to/from the City Centre from the Airport;
 - 3.10.4. link with the existing 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.
- 3.11. This North Dublin LUAS Loop fitted the urban transport network proposed in *A Platform for Change*. This proposed a LUAS line through Drumcondra for the north part of Dublin. This line would have spurs to the Airport and Howth Junction, in addition to a spur from a circular Metro system, as part of a set of mutually re-inforcing measures to make is easier to travel around the Dublin area. see Section 1 p.13-14

4. North part of Dublin City is under-served with rail-based transport

4.1. The north part of Dublin City has the highest population of all the local authority areas in the Greater Dublin area. This has been so over the past 30 years see Figure 4

Figure 4 North Dublin City has the highest population within the Greater Dublin Area



Source: CSO Census Data. For 2022, preliminary results

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 .

Figure 5 Dublin Population Density 2016 with the 2018 proposed Metrolink and other rail based transport

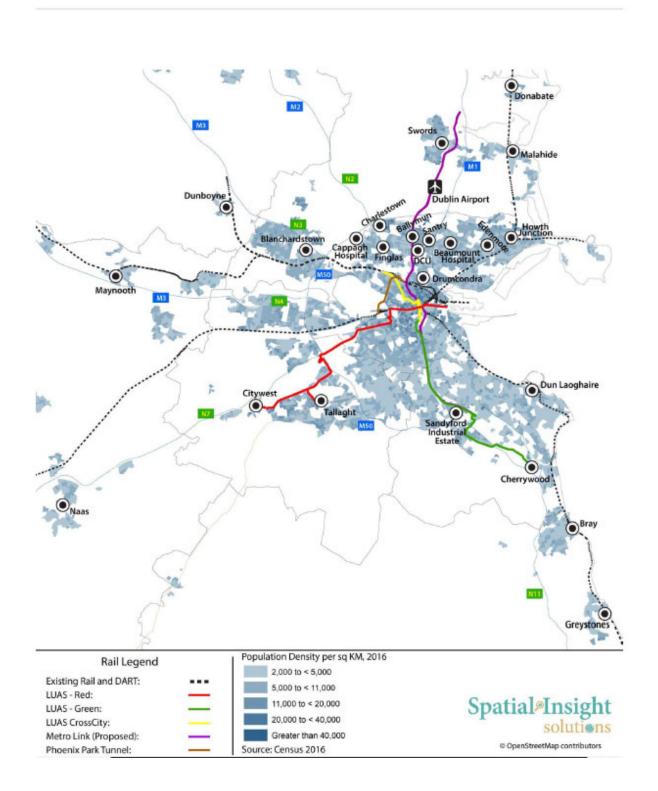
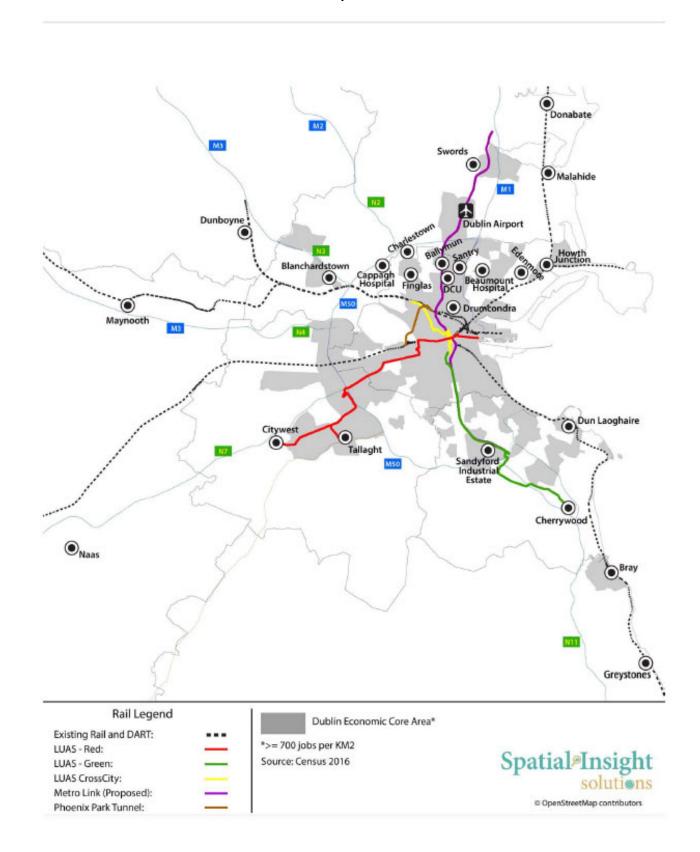


Figure 6 Dublin Core Economic Area 2016 with the 2018 proposed Metrolink and other rail based transport



4.3. In 2018, the Howards commissioned Roughan O'Donovan to compare the catchments of the then Emerging Preferred Route (for MetroLink) with the Eastern Route Variation which they had worked on and presented in 2006. This was submitted to TII during the 2018 Metrolink Public Consultation see Section 2 Comparison of the totals within the catchment of each route shows that the overall population within the catchment area of the 'Eastern Route Variation' is higher than along the current 'Emerging Preferred Route' and therefore the TII should consider the Eastern Route Variation as a viable option for MetroLink. See Figure 7

Figure 7 2016 CSO Summary Data for Metrolink 'Emerging Preferred Route' and Eastern Route Variation

Route	Emerging Preferred Route	Eastern Route Variation
	<u>Catchment</u>	<u>Catchment</u>
Population	73,071	75,890
Employed	33,092	36,176
Education	8,883	8,501

Source: Genvest Submission to the Project Manager MetroLink May2016

If the public authorities are really trying to promote modal shift in transport, they have chosen the wrong route for this project

5. Dublin Port Tunnel

- 5.1. The benefits of the Dublin Port Tunnel project assumed that there would be an integrated three line LRT network in Dublin. This included a line through Drumcondra to connect the City Centre to Ballymun see section 1. p. 28
- 5.2. Government approved the Port Tunnel after a sworn public inquiry. The project was promoted by the then Dublin Corporation and the National Roads Authority (NRA)
- 5.3. After the Minister signed the order to approve the 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.

6. Streetscape, Community Severance, Place Making

- 6.1. If this project goes ahead as proposed, it will be a permanent monument to the abject failure of urban planning in this state. It will serve as very real evidence of the double-think which dominates the management of our capital city.
 - 6.1.1. As proposed, MetroLink will be in tunnel under what is Ballymun's amin street. This is now a 6 lane roadway for through traffic. It is simply incredible that our public service imposed such a barrier on a urban area which was being regenerated having been first built some 40 years previously. Such a roadway is a recognised major form of community severance.
 - 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.
- 6.2. In determining on this application, An Bord Pleanála has a unique opportunity to begin the process of restoring public confidence that planning permissions are little more that very limited forms of building control.

Donal O'Brolcháin Donal O'Brolcháin Submission

Presentation Railway (MetroLink - Estu**∆arşıltble∆riang⊳Mertto\ián®**ublin Airport) Order 2022 ABP-314724-22

14/14 41/106

6.3. In asking An Bord Pleanála to reject this application, I hope that it will help us all to re-learn what was known about place-making when Marino and Griffith Avenue were developed by our new state 100 years ago. I also hope that it will assist us to reset our way of governing ourselves to apply those lessons consistently and with equal force in all parts of our capital city's region.

Addeendum to Appendix 1
Presenatation
Oral Hearing MetroLink
ABP-314724-22

<<A1/n>>

Addendum

to

Appendix 1

of

Comments

on

Transport Infrastructure Ireland responses (TII No. 067 or 064)

to

my submission

on

the TII application

to

An Bord Pleanála

for a

Railway (MetroLink – Estuary to Charlemontvia Dublin Airport) Order ABP-314724-22

Donal O'Brolcáin

19 March 2024

Submission	No.		067	
Organisation Submitter	n Name or Nan	ne of	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Railway (Me	trolink-Estuar	y to Charle	mont 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;	Till 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 network. EIAR Chapter 9, Traffic and Transport, presents an analysis of the capacity of existing public transport corridors, indicating that the Ballymun bus corridor is a 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		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 Selection 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 in April 2019 (al

Submission No. 064		064		
Organisation Submitter	n Name or Nan	ne of	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Railway (Me	trolink-Estuar	/ to Charle	mont 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 r
4	Letter		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 stray of the proposed Project is diriven 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

Submission	No.		064		
Organisation Submitter	n Name or Nam	ne of	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Railway (Me	trolink-Estuary	to Charle	mont 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. Itl analysis demonstrates that the MSO/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.	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	
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. 064		064			
Organisation Submitter	n Name or Nam	ne of	Donal O'Brolcain (100 Griffith Avenue, Drumcondra, Dublin, D09 T6K3)		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Railway (Me	etrolink-Estuary	/ to Charle	emont 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 exist; 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 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.	

Appendix 2

Eastern Variation Route 2006

METRO NORTH

COMPARISON OF ALTERNATIVES

Development Potential within 1 km of alternative routes

Central Route	Eastern	Route	6

Residential Potential	Units	Units	% of Central
DCC	5701	9118	160%
FCC	<u>823</u>	0_	0%
Total	6724	9118	136%
Commercial Potential	'000 sa m	'000 sa	m

Commercial Potential	'000 sq m	'000 sq m	
DCC	201	791	394%
FCC	<u>1730</u>	<u>1047</u>	61%
Total	1931	1838	95%

Source McGill Planning

Total

Ownership of Land with Development Potential 45/106 within 1km of Metro Routes

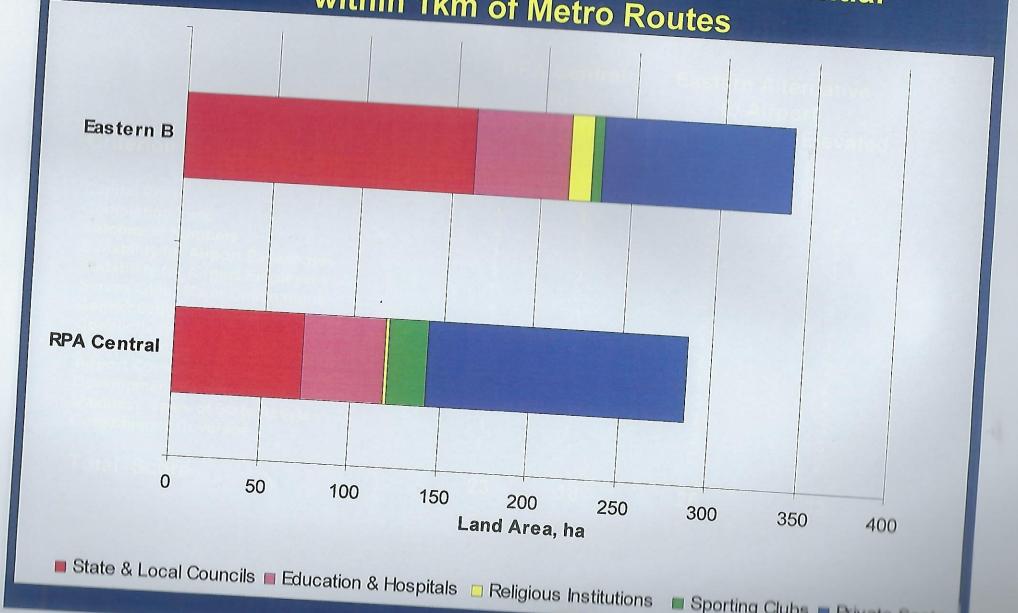
Land Owner	RPA (Central	Easte	rn B
	ha	%	ha	%
State & Local Councils	72	25	162	48
Education & Hospitals	46	16	53	16
Religious Institutions	2	1	13	4
Sporting Clubs	22	8	5	1
Private Sector	145	51	<u>106</u>	31

287

Source Mc Gill Planning

339

Ownership of Land with Development Potential within 1km of Metro Routes



Metro North-Multicriteria Analysis of Alternative Routes

		Central to	Eastern Alto to Airpo	
	GSH	Airport	Underground	Elevated
Criterion				
Capital Cost	4	1	2	3
Completion Time	4	1	2	3
Catchment Numbers	1	1	2	
Suitability for Airport Passengers	1	2	2	3
Suitability for Airport Employees	1	2	3	4
Serves Other Major Destinations	1	1	2	4
Connectivity with Orbital Metro	2	2	1	4
Connectivity with Dart	1	7	2	1
Airport Disruption During Construction	3	1	1	2
Airport Constraints Post Construction	2	3	3	2
Development Potential	1	1	2	1
Maximise Value of State Assets	1	4	2	3
Constituency Coverage	1	1	2	3 2
Total Score	23	18	26	32

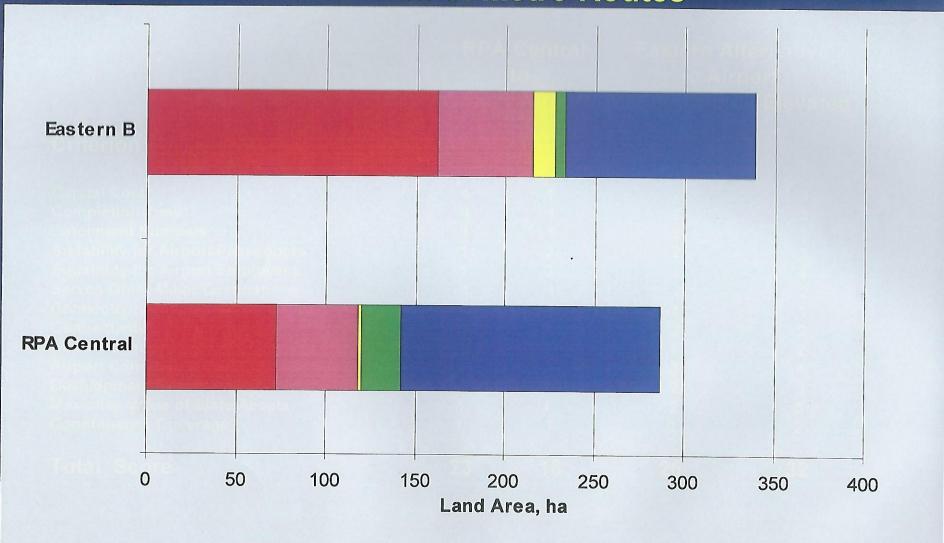
Conclusions

Selecting the Eastern Route for Metro North would

- Permit Direct Access to the Airport Terminal
- Provide Access to Beaumont & Clonshaugh Ind Est
- Provide Access to Croke Park
- Increase Metro Ridership Significantly
- Substantially Improve Development Opportunities
- Maximise the Value of State Owned Assets
- Reduce Capital Investment Requirements by €187-317m
- Significantly Reduce the Time to Completion

Provided the Elevated connection to the Airport is Selected

Ownership of Land with Development Potential Comment Potential within 1km of Metro Routes



Metro North Route Selection

Submission to the Railway Procurement Agency in Response to Public Consultation

June 2006

William Murray and Associates
Planning and Development Consultants
Roughan and O'Donovan, Consulting Engineers
KHSK, Economic Consultants
McGill Planning, Chartered Town Planners



WILLIAM MURRAY & ASSEDIATES Planning & Development Consultants

Rory O'Connor Railway Procurement Agency Parkgate Business Centre Parkgate Street Dublin 8

5.06.2006

Re: Metro North Route Selection - Submission in Response to Public Consultation

Dear Mr O'Connor,

Introduction

This submission has been commissioned on behalf of a grouping of a wide range of institutions, public bodies and private interests located along the catchment of the Eastern Route. These include Beaumont Hospital, the GAA, and the owners/developers of hotels and developed and undeveloped lands along the route. In particular the owners of Northside Shopping Centre (central to the proposed Cromcastle redevelopment) and Clonshaugh Industrial Estate are represented in the group. Dublin City University would also be served by the route.

The RPA are in the process of public consultation in relation to three alternative routes for the Metro North line. Of the three routes, the Western Route is 30% longer and is easily rejected for that reason. The decision to be made therefore is between the Central and the Eastern Routes.

The group on whose behalf this submission is made came together as a result of concerns that the RPA appeared to favour the Central Route on the basis that it has a catchment, in terms of annual passenger journeys 20% larger than the Eastern Route and that it would be easier to construct. Another key issue appeared to be the desire that the Metro should serve Ballymun, currently in the course of regeneration.

An expert team was put in place to examine the comparative advantages of the Eastern and Central Routes in terms of key planning, transportation and socio-economic issues.

The team consisted of the following consultancy firms: -

1

Roughan & O'Donovan Consulting Engineers

McGill Planning Chartered Town Planners

KHSK

Economic Consultants

The full reports prepared by each consultant, included herewith, should be read part of this submission. The submission therefore consists of this summary report together with the following technical studies

- A. Socioeconomic Analysis of Proposed Metro North Routes, prepared by Kevin Hannigan of KHSC, Economic Consultants
- B. Metro-Link Assessment Land Budget and Services/Facilities Survey, prepared by Colin McGill of McGill Planning, Chartered Town Planners
- C. Transport and Engineering Review, prepared by Seamus McGearailt of Roughan and O'Donovan, Consulting Engineers

2. Structure of Submission

Key Issues have been set out by the RPA as criteria for deciding the preferred route.

These issues are: -

- Transport and Land Use Strategy
- Reducing Congestion and Pollution
- Environmental Impacts
- Social and Economic Benefits
- Transport System Integration
- Capital Cost / Availability of Funding
- Operational Efficiency
- Ease of Construction

The RPA believes that the Central Route is stronger from a number of points of view, including fulfilling transportation needs and capital cost. This submission which is based on extensive technical planning, socio-economic and engineering research challenges these beliefs. It is presented in summary form under the same 'key issues' headings as used by the RPA.

In the course of the research it became obvious that whilst both the Central and Eastern Routes converged at the Great Southern Hotel in the Airport, the preferred station location at the airport would be at the terminal building itself. This is provided for in the RPA 'Options' plan by way of an underground link under the south apron, to the terminal and under the north apron to emerge at grade at the northern airport boundary.

It should be noted that the Eastern Route can be similarly adjusted to provide for direct access to the terminal. This can be done by way of an underground link similar to that proposed by the RPA for the Central Route or by way of an elevated structure. This latter option, which is outlined in more detail in the Transportation Report by Roughan O'Donovan, would result in substantial savings on construction costs. The alignment adjustments necessary to provide the link to the terminal result in the line running through Clonshaugh Industrial Estate. The proposed provision of a new station within the estate brings a large residential area into the catchment of the Metro which under the Eastern alignment proposed by the RPA would not be served. This adjusted alignment is described as the East Route Variant.

3. Key Issues

3.1 Transport and Land-Use Strategy

Central to the government's transportation strategy is the delivery of the benefit of Metro to the maximum number of people. The findings of this submission are that a higher catchment population will be delivered along the East Route Variant corridor of up to 17% because of the greater existing and potential future population in the catchment.

The East Route Variant also delivers an excess of 3.5 million passengers over the Central Route as proposed by the RPA.

The East Route Variant has 52 Hectares more land available for development than the Central Route and can deliver an additional 2,400 residential units by development of zoned lands and redevelopment of underutilized lands. 80% of these lands with potential for residential development are zoned either Z12 - Institutional Land - Future Development Potential or Z15 - Long Term Institutional Use (where residential is open for consideration) in the City Development Plan. The zoning of these lands could be enhanced in the future to provide for specific higher densities and more sustainable land use within the corridor.

Even without adjusting the line to the East Route Variant, an additional 30 Hectares of land is available for development in the Eastern, over the Central Route.

3.2 Reducing Congestion and Pollution

The Eastern Route fills a major gap in the Dublin Transportation Network whilst the Central Route merely duplicates the already effective Ballymun Quality Bus Corridor.

The East Route Variant can deliver metro service to a substantial area (Clonshaugh / Kilmore / Beaumont) at present unserved by quality transport. In this area the research has shown that car usage is higher than in the Central Corridor reflecting the relative under-development of public transport. If car usage were reduced in the Eastern corridor to the level seen on the Central Route then 2,300 journeys each way each day would be diverted from cars.

Park and Ride at Clonshaugh, accessed from the proposed new N32 parallel road, would be ideally located to reduce congestion for traffic from North County Dublin and beyond.

3.3 Environmental Impacts

It is considered that the environmental impacts of the Metro would be generally similar for the two routes. The exception to this would be in the Ballymun area where there are significant design issues. The original urban design framework for Ballymun was predicated on a street running Luas type tram system which could co-exist with pedestrian and other traffic. The Metro requires to be grade separated so that it must be placed on an elevated structure or underground. It is understood that the overground option has been rejected by Ballymun Regeneration as it would have seriously adverse effects on the amenities and functionality of the new main street.

It is also understood that the environmental impacts are considered to be so negative that it will be necessary to put the line underground to mitigate them. The substantial additional cost of the underground option has not, however, been factored into the comparative cost figures of the alignment options.

3.4 Social and Economic Benefits

The population at present living in the catchments of the Eastern and Central Routes are of a similar size. Nevertheless the East Route Variant option provides access to a much larger population base and one with a significantly lower socio-economic status, making it a preferable route from the socio-economic perspective.

The East Route Variant facilitates sustainable development of the substantial Dublin City land banks at Santry and Whitehall and the redevelopment of Northside/Cromcastle. In addition the development of major IDA and private commercial/industrial lands including Clonshaugh Industrial Estate (in excess of 220 acres in all) would benefit from the East Route Variant. It is noted that there is significant benefit to State lands in both the

Eastern and East Route Variant corridors arising from the presence of a Metro which does not arise in the Central Route.

The Eastern Route provides access to key community and national facilities at DCU and at Beaumont Hospital, Croke Park, St Patrick's Training College, and Santry Stadium which otherwise would not have the benefit of quality public transportation. Traffic congestion and parking difficulties on days of major events would be greatly improved through the provision of park and ride facilities. Also, the provision of a link between Beaumont Hospital and both DCU and Swords would ease nursing student travel difficulties and travel burdens on patients and their families.

Four existing important tourist and business hotels are also served by the Eastern Route – Regency, Skylon, Bewleys and Croke Park Jury's. Existing services and facilities on the Central Route are fewer in number and benefit already from the presence of a Quality Bus Corridor.

3.5 Transport System Integration

The Central Routs crosses the Maynooth Rail Line at Phibsboro without an interconnecting station. The Eastern Route by contrast has provision for an interchange station with the Western Arrow service (Maynooth Line) at Drumcondra leading to a wider network for flexible journey planning. Three QBC routes pass Drumcondra Station facilitating transportation integration.

The Central Route only connects to a single QBC - the Finglas service - at Botanic Road. The Eastern Route is clearly superior under the heading of integrating transport systems. Construction of the Metro along the Eastern Route will enable the Western Route to be constructed as a later project, perhaps as a Luas whereas if the Central Route is selected it is unlikely that the Western Route will also be given a rail based service due to its proximity.

3.6 Capital Cost / Availability of Funding

There is little difference between the capital cost of the two routes as proposed by the RPA. Nevertheless substantial savings (10%) could be made in the cost of the Eastern Route by following the existing road level for much of the route beside the motorway between Whitehall and Santry.

Significantly lower construction costs would also arise, potentially of up to €100 million, according to the provision of tunnel or viaduct through Dublin Airport. This saving could not be made on the Central Route which requires a crossing in tunnel of the runway apron. The East Route does not require a tunnel to reach the main airport terminal area.

In relation to funding, it has been pointed out above that an additional 2,400 housing units could be provided along the East Route Variant. This, at a rate of €10,000 per unit would raise an additional €24 million by way of a levy on the additional dwellings to be provided in the catchment. This additional source of funding would not be available on the Central Route

3.7 Operational Efficiency

There is no significant difference between the two routes in relation to operational efficiency

3.8 Ease of Construction

The Eastern Route is considered to have advantages over the Central Route in terms of ease of construction and giving rise to less disturbance to local population. This is because the route generally follows a line through open spaces or industrial lands or along the M1 motorway corridor and it can utilise the existing construction depots arising from the construction of the port tunnel.

It is considered that difficulties anticipated by the RPA in constructing the Metro close to the port tunnel are overstated.

Lengthy disruption / disturbance will be caused by the construction of the 3 km elevated (or indeed underground) stretch at Ballymun which is unlikely to be readily accepted by the residents who have lived in an on-going construction site for a number of years already.

4. Conclusions

- There is a compelling case for the selection of the East Route Variant having regard to most of the key issues set out by the RPA
- In particular the route scores better under the strategically important headings of fulfilling transportation needs and capital cost
- It will serve 17% more people in its catchment than the Central Route
- It also delivers an excess of 3.5 million passengers over the Central Route.
- It will facilitate the development/ redevelopment of an additional 52 Hectares of land
- Additional new residential development can generate levies of the order of €24 million
- There is considerable gain to the State by the uplift in value of State lands along the route
- Operators of national community related institutions and support facilities along this route are fully in support of its selection.

- The East Route fills a major gap in the Dublin Transport Network, while the Central Route duplicates the Ballymun QBC.
- The Metro project provides an ideal opportunity to bring a high quality public transport service to the Beaumont/Kilmore/Clonshaugh areas of north Dublin that would otherwise be difficult to serve appropriately.
- The East Route provides access to key facilities including Croke Park, St. Patrick's College, Dublin City University, Beaumont Hospital and 3 major hotels;
- The East Route would be better integrated with other public transport routes, such as the Maynooth Rail Line, leading to a wider network for flexible journey planning;
- There would be a lower construction cost for the East Route potentially in the order of to €100m according to the provision of tunnel or viaduct through Dublin Airport.
- It would be easier to construct the East Route with less disruption for the local population as the route follows the M1 motorway and passes through industrial lands or open spaces, rather than the Central Route which would bring several more years of construction disruption through the middle of Ballymun Town Centre.

For the above reasons, and as elaborated in the technical reports following, the RPA is asked to re-examine its stated position favouring the Central Route and consider the points made in the detail of this submission.

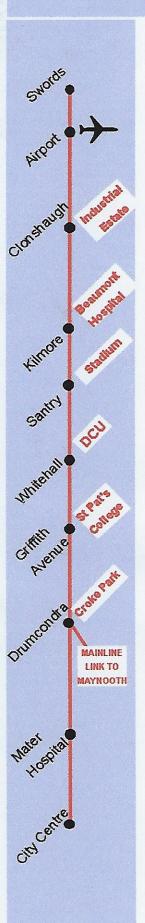
The proposers of this submission are convinced that the merits of the case in favour of the East Route Variant are so strong as to justify its selection for the Metro North Line to Swords.

Yours sincerely

Willie Murray FRTPI MIPI Chartered Town Planner

Drumcondra Presenta P

more passengers - lower cost - key destinations



Appendix 3

- 1. Letter from AECOM dated 23rd September 2014
- 2. My PowerPoint presentation to AECOM at the meeting on 6th October 2014
- 3. Record of meeting held on 6th October 2014
- 4. My email to AECOM on $8^{\rm th}$ December 2014 complaining as strongly about the Fingal/North Dublin Transport Study November 2014



Grand Canal House, Upper Grand Canal Street, Dublin 4 T +353 (0)1 238 3100 www.aecom.com

23 September 2014

Mr Donal Ó'Brolcháin
Griffith Avenue
Drumcondra
Dublin 9

Dear Mr Ó'Brolcháin,

I am writing to you in relation to the Fingal/North Dublin Transport Study which the National Transport Authority has commissioned AECOM to prepare. The objective of the study is to identify the optimum medium term / long term public transport solution connecting Dublin City Centre, Dublin Airport and Swords.

The study is currently underway and we are identifying suitable public transport options for the study area. I understand that you have previously made proposals to the NTA in this regard and as such, they have suggested it would be advantageous for us to meet with you to discuss.

As I do not have an email or phone contact for you, I would be grateful if you could contact me in the coming days to arrange a meeting. We welcome your participation in the study and look forward to hearing from you in the coming days.

Kind regards,

Elaine Brick
Associate Director

P.

Drumcondra (AT

CITY ACCESS TRANSIT

Donal O'Brolchain

AECOM

6 October 2014

62/106

Presentation Oral Hearing MertroLink

ABP-314724-22

Dublin Port Tunnel

Volume 1 - General

Appraisal Method

Principal Highway and Public Transport Schemes Within the DTO Forecast Year Table 4.1: 2006/2016 **Do-Strategy Model**

Highway S	Public Transport	
Northern Cross Route (M50)	Blackhorse Avenue	QBC City Centre to Bray
Northern Cross Route extension to Malahide Road(M50)	Ballybrack	QBC City Centre to Churchtown
Southern Cross Route (M50) inc. Green Route	Ratoath Road	QBC City Centre to Tallaght
South Eastern Motorway Southern Section	Coombe Relief Road	QBC City Centre to Clondalkin
Northern Motorway, Airport to Five Roads (M1)	Cork Street to Dolphin's Barn	QBC City Centre to Lucan
• Lucan to Kilcock (N4)	Dundrum Relief Route	QBC City Centre to Blanchardstown
N7 Interchanges	Macken Street Bridge	QBC City Centre to Finglas
Kilmacanogue - Glen O'Downs (N11)	Naas Road – Blessington Road	QBC City Centre to Swords
Tallaght By-Pass Extension (N81)	Newlands/Fonthill Road	QBC City Centre to Malahide
• Dublin Port Tunnel	Nangor/Fox & Geese	• LRT City Centre to Ballymun /Airport
North Road Finglas (N2)	• Walkinstown – Saggart	• LRT City Centre to Tallaght
White's Cross - Knocksinna (N11)	Grange Road	• LRT City Centre to Cabinteely
Ballinclea/Wyatville Road	Kilmahuddrick Road	

QBC - Quality Bus Corridor,

52

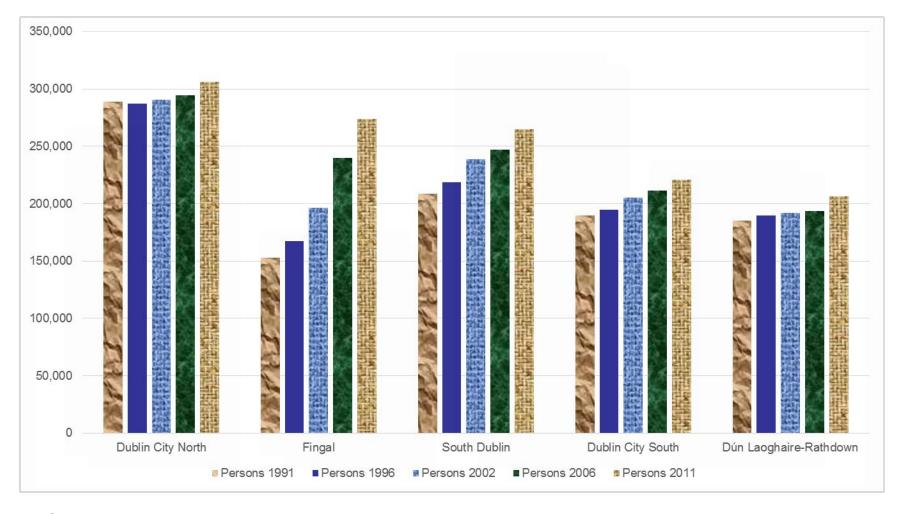
Geoconsult-Arup JV

July 1998

Drumcondra (AT

NORTH DUBLIN

Population Dublin 1991 - 2011



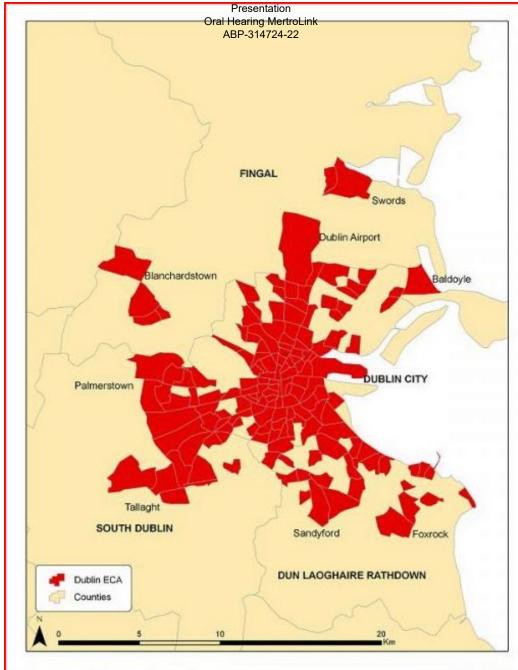
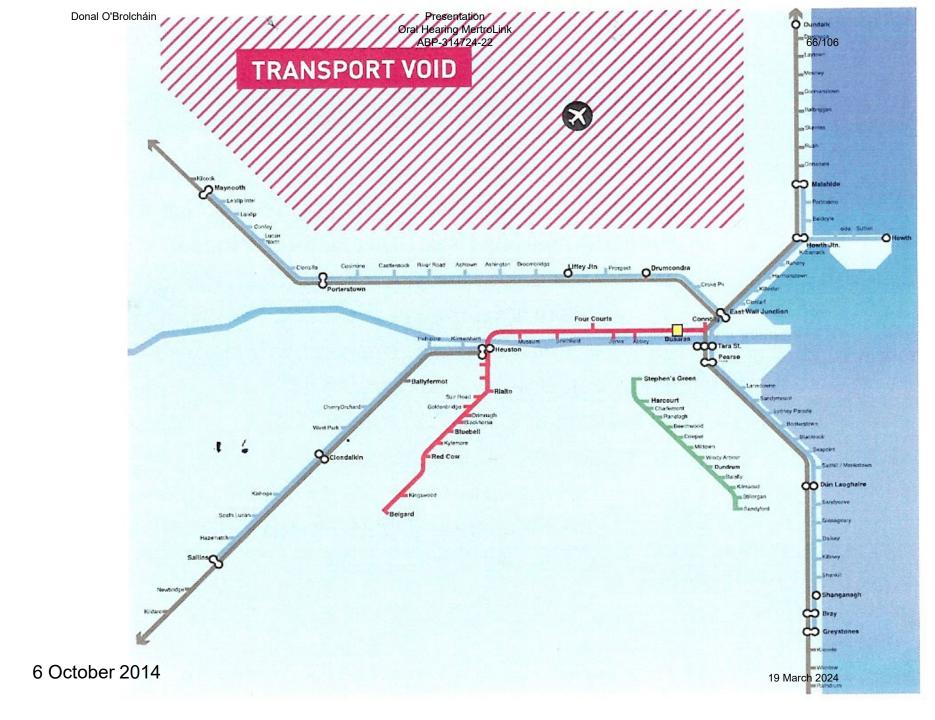


Figure 1: Dublin Economic Core Area. Source: Census of Population 2006 POWCAR dataset OSi boundary datasets, OSi permit no. MP009006(c) Government of Ireland

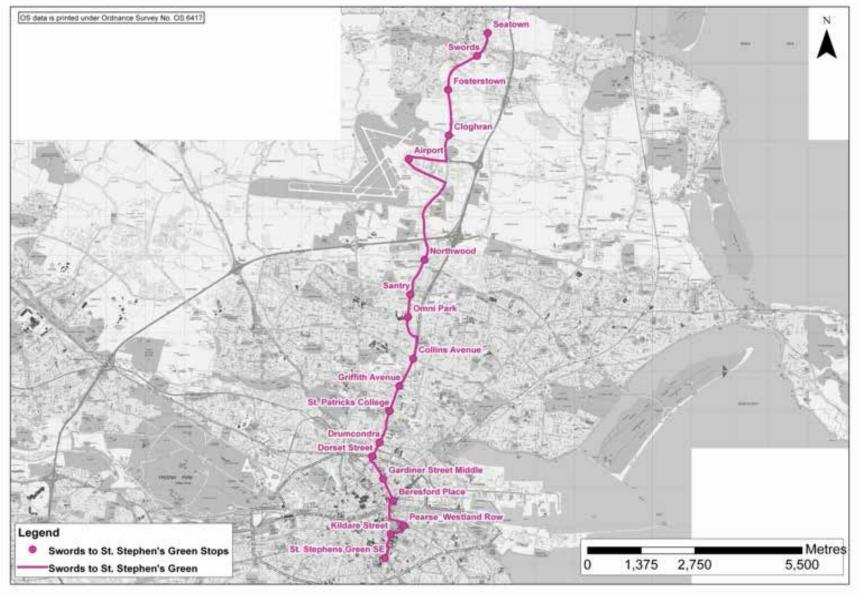


Drumcondra (AT

NORTH DUBLIN PUBLIC TRANSPORT DEMAND

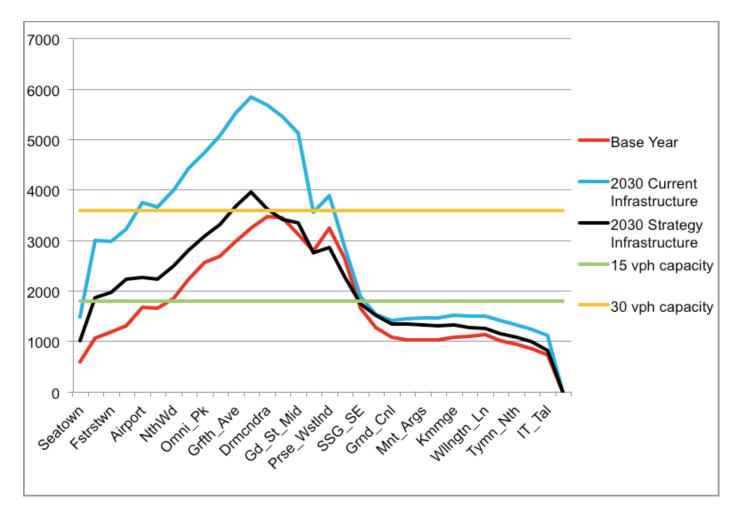
North Dublin Demand Analysis

Alignment	Scenario	Peak Lineflow	% above 15vph Capacity (1,800)	% above 20vph Capacity (2,400)	% above 30vph Capacity (3,600)	AM Peak Boardings
Blanchardstown to UCD	Base Year	3,369	87%	40%	-6%	9,482
	2030 Curr Inf	3,877	115%	62%	8%	14,577
	2030 Strategy Inf	2,564	42%	7%	-29%	11,838
Swords to Tallaght	Base Year	3,482	93%	45%	-3%	17,224
	2030 Curr Inf	5,845	225%	144%	62%	22,120
	2030 Strategy Inf	3,963	120%	65%	10%	17,828
Clongriffin to Tallaght	Base Year	2,754	53%	15%	-24%	11,899
	2030 Curr Inf	3,954	120%	65%	10%	14,618
	2030 Strategy Inf	3,638	102%	52%	1%	12,792



6 October 2014

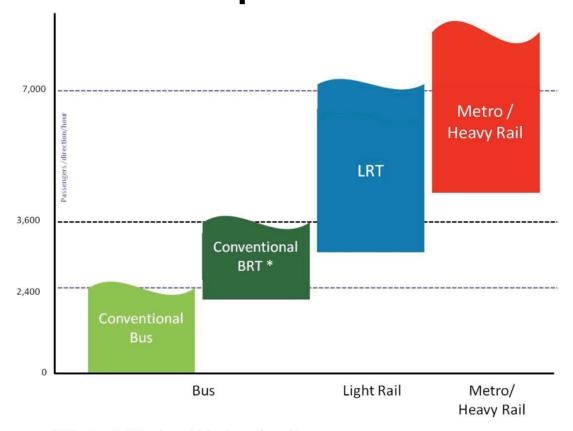
Airport – Drumcondura - City Centre Transport Demand



6 October 2014
Source: National Transport Authority: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. Figure 37 p.50

Meeting Northside Transport Demand 1

Presentation



^{*} Higher Capacity BRT can be provided under specific conditions:

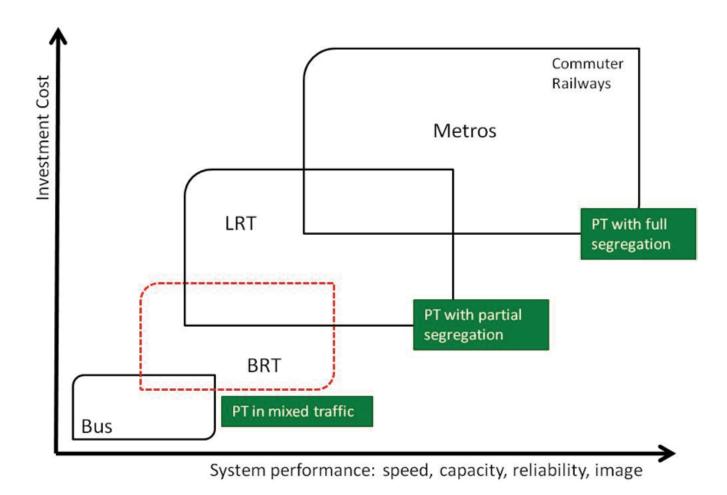
dedicated bus lanes

dual/overtaking BRT lanes

⁻ longer vehicles

[→] Not appropriate for Dublin.

Meeting Northside Transport Demand 2



Drumcondra (AT

DUBLIN AIRPORT TRIP ATTRACTOR/GENERATOR

Presentation Oral Hearing MertroLink _ABP-314724-22

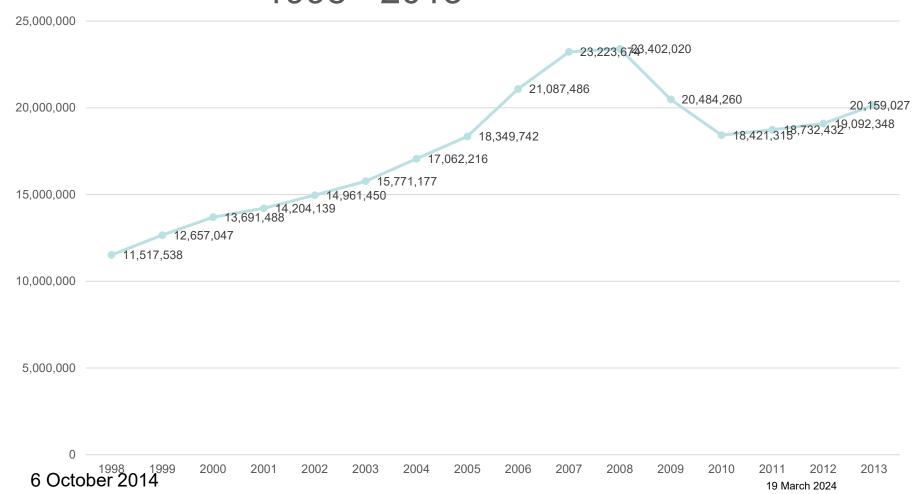
Dublin Airport - 1992

"Of all the locations in the Study Area, the Airport is the one site where it can be said with high levels of confidence that there will continue to be, year-on-year for a very long period, high increases in demand"

Source: Dublin Transportation Initiative. Interim Report. December 1992. par.11.47.

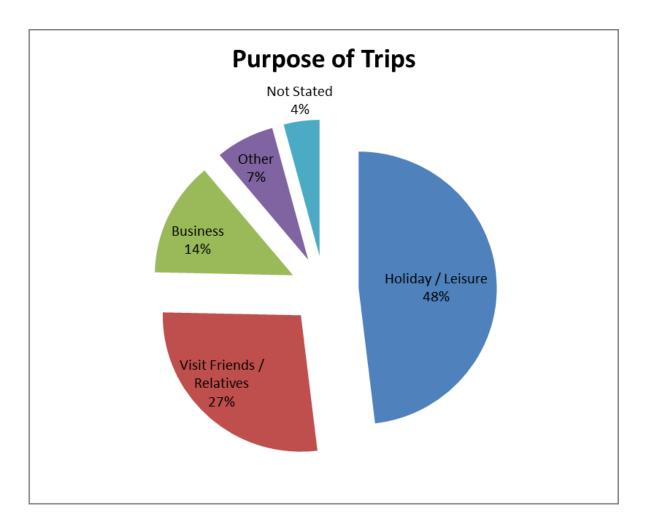
74/106

Dublin Airport Passengers (excluding Transit) 1998 - 2013



Dublin Airport Passengers Purpose of Trips

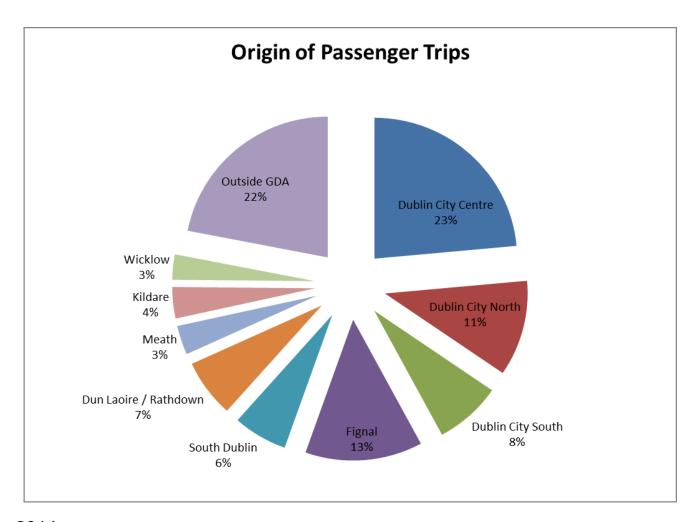
Source: National Transport Authority . Survey at Dublin Airport 2011



Presentation Oral Hearing MertroLink

Dubîlîn Aîrport Passenger Origins – landside

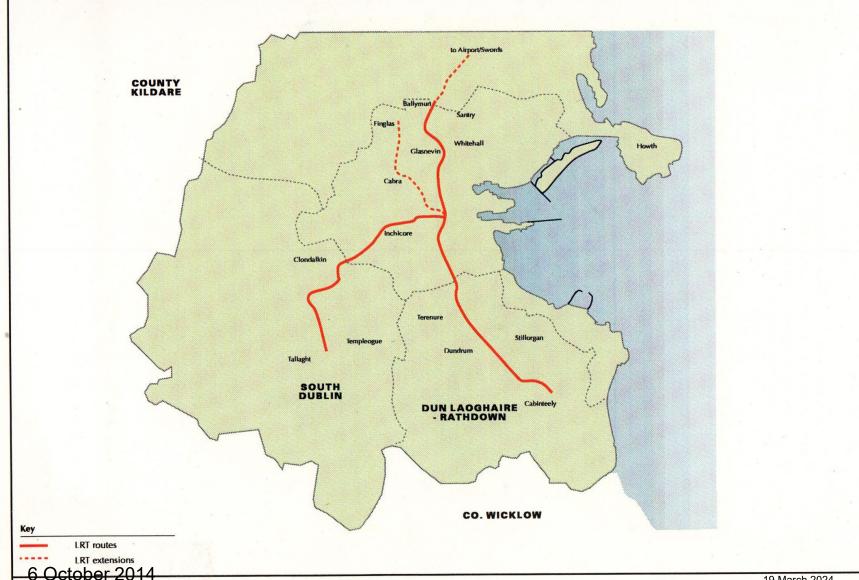
Source: National Transport Authority . Survey at Dublin Airport 2011



Drumcondra (AT

NORTH DUBLIN PUBLIC TRANSPORT OPTIONS

1994 – Dublin Transport Initiative



3

19 March 2024

Dublin Transportation Initiative - Phase 2 : Light Rail Transit

Figure 2.3: Light Rail Transit Network

1996

An Oscar Faber study found that there was greater potential demand (measured on trip attractors-generators/km) on a Light Rail Route from O'Connell Street to Ballymun than on the then proposed routes from O'Connell Street to Dundrum and Tallaght.

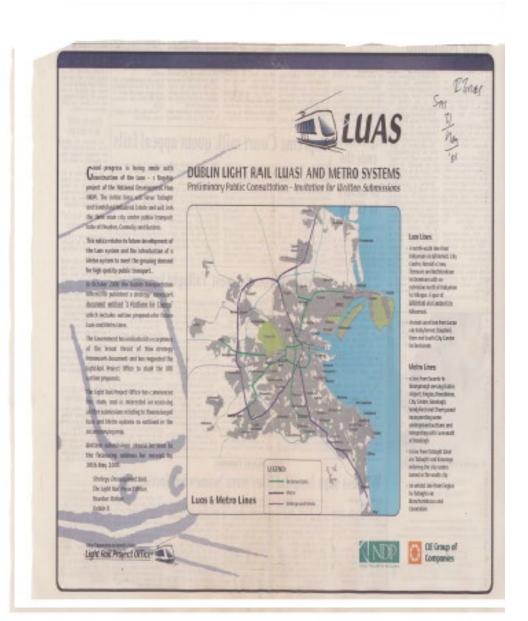
Source: Department of Transport, Energy & Communications. A Comparative Socio-Economic Evaluation of the Tallaght-Ballymun/Dundrum Light Rail Lines. Final Report 1996. Oscar Faber. Table 4.3

2001

LUAS

Public Consultation

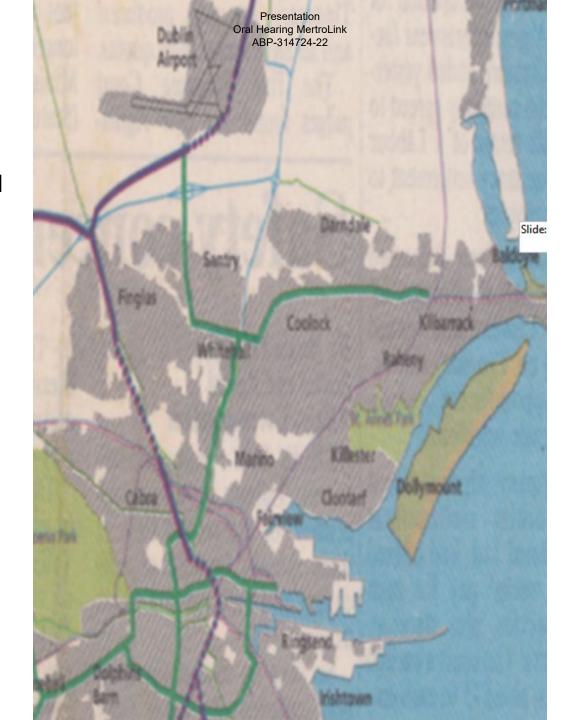
31 March 2001



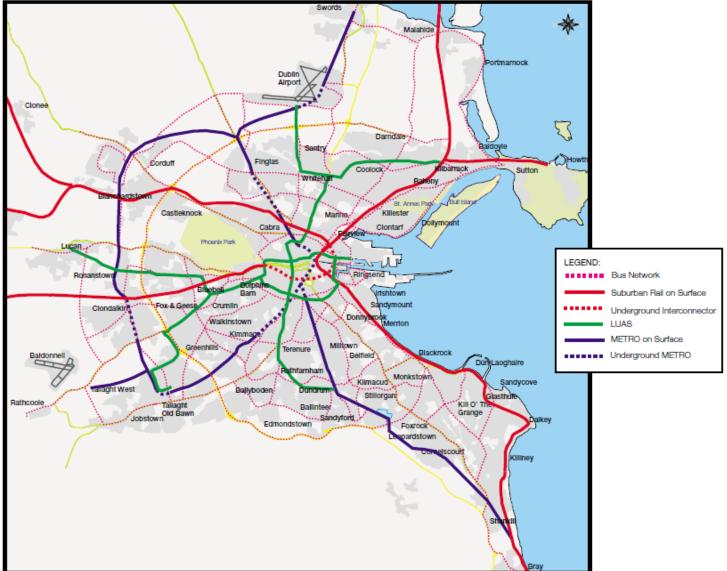
LUAS

Public Consultation

31 March 2001

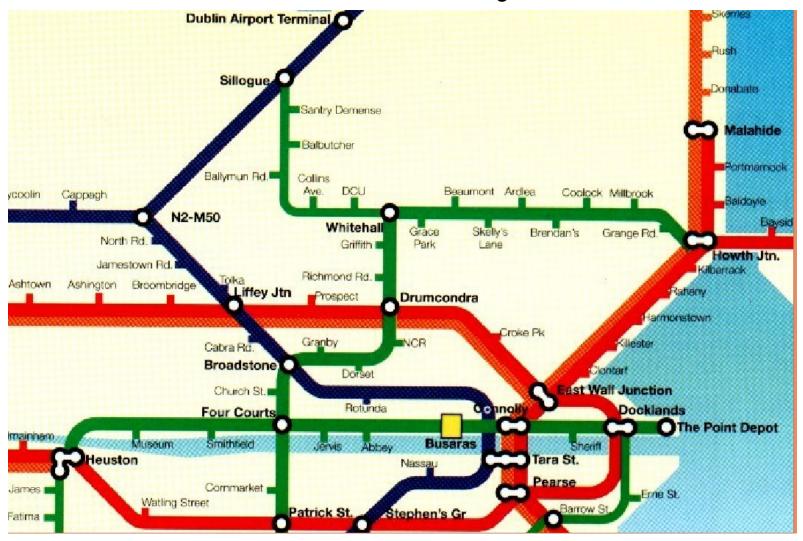


DTO A Platform for Change

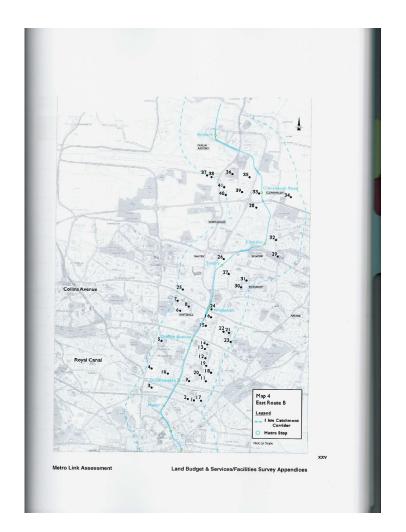


6 October 2014 19 March 2024

DTO A Platform for Change

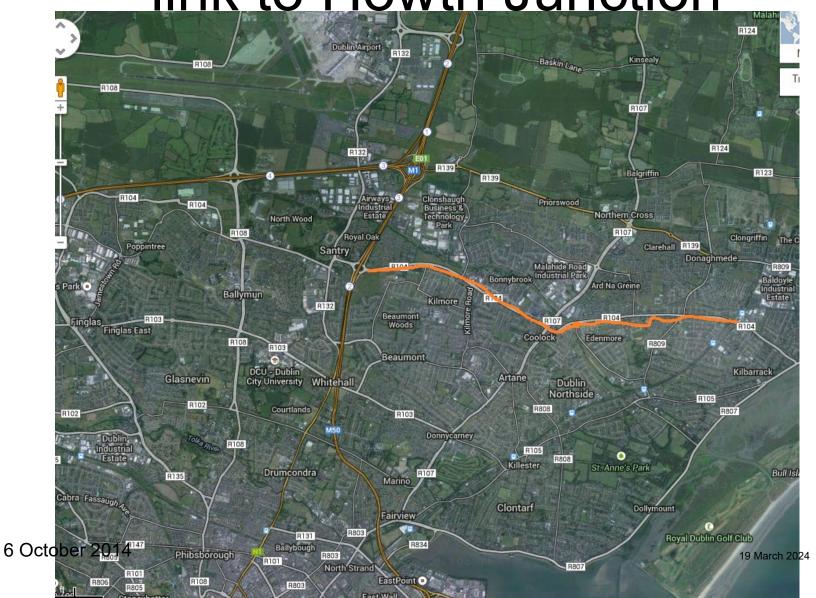


June Presentation Oral Hearing Metro Ink Office ABP-31472 22006 Metro East



Presentation lettroLink ast —

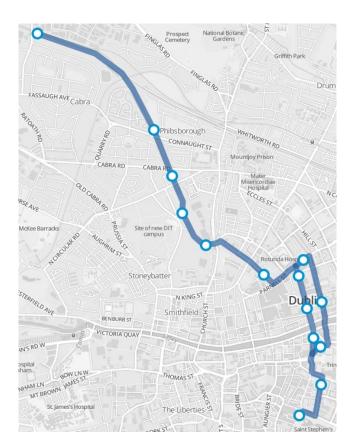
link to Howth Junction



Intelligence is not to make no mistakes, but quickly to see how to make them good

Brecht.

LUAS Crosscity Green Line Extension



A ten year project to help shape the future of Drumcondra and its associated districts

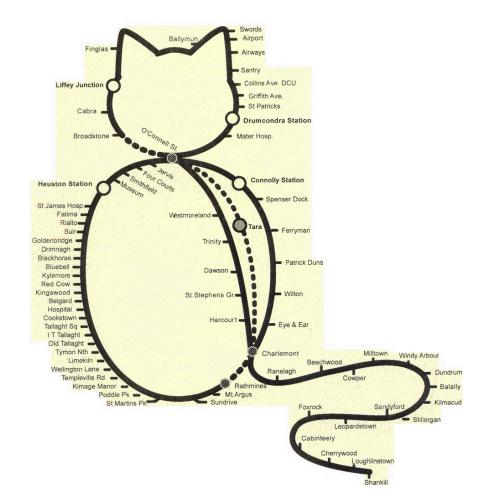
CITY ACCESS TRANSIT

The public authorities have been pussyfooting on public transport for Dublin for years.

Our capital needs a CITY ACCESS TRANSIT (CAT) system with a coherent design.

The CAT proposed here hits the ground running as 20 per cent of it is based on that part of LUAS which the Government has already approved.

Dublin can purr with this CAT.







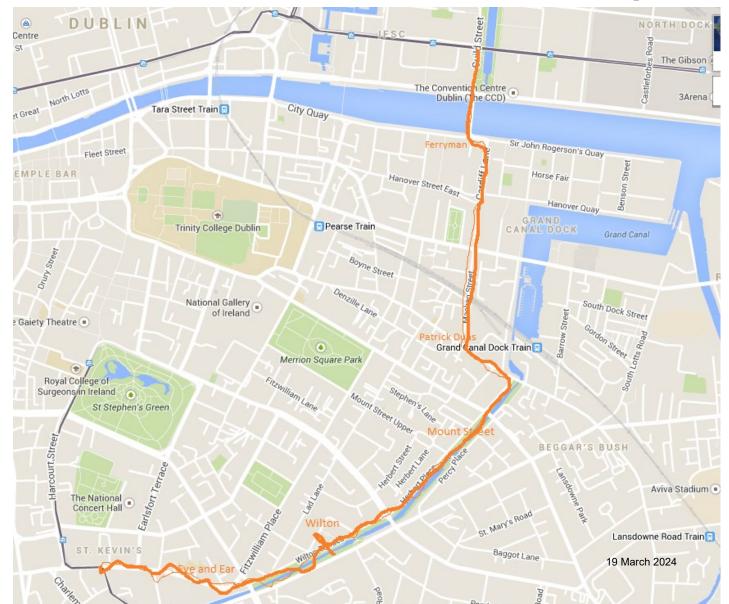


ACCESS ALL AREAS

City Access Transit for Dublin

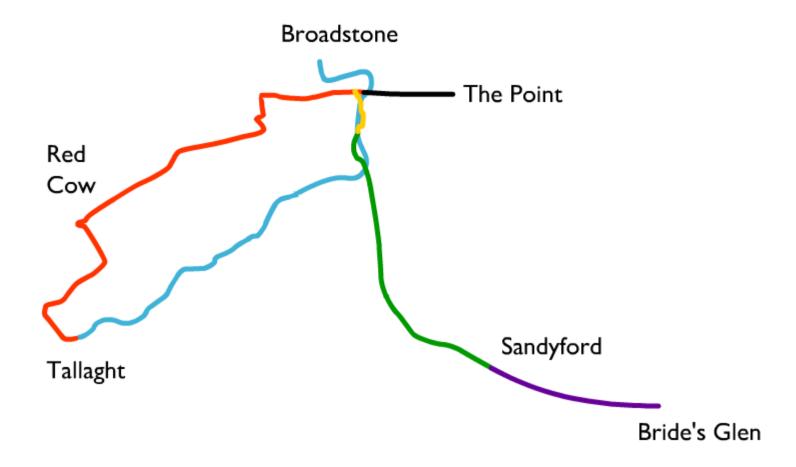
Draft Sept 2005

CAT Docklands Loop 3



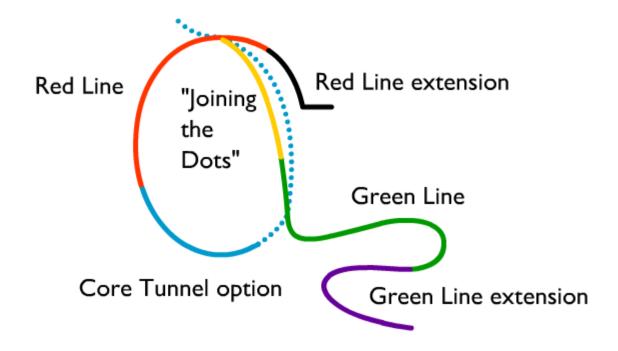
Bring them together





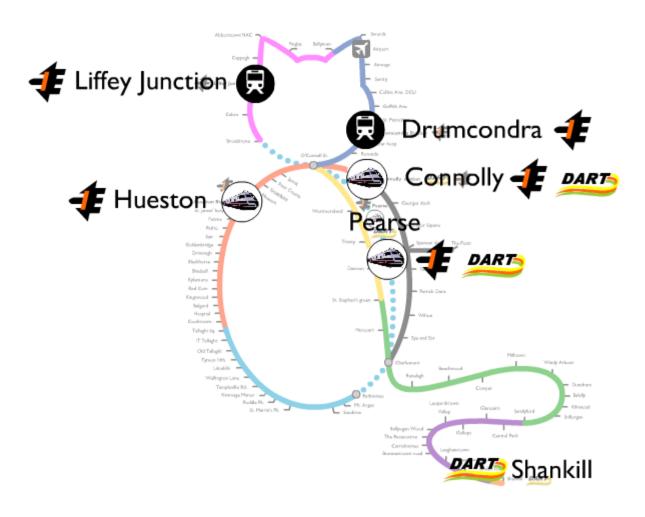
Bring them together





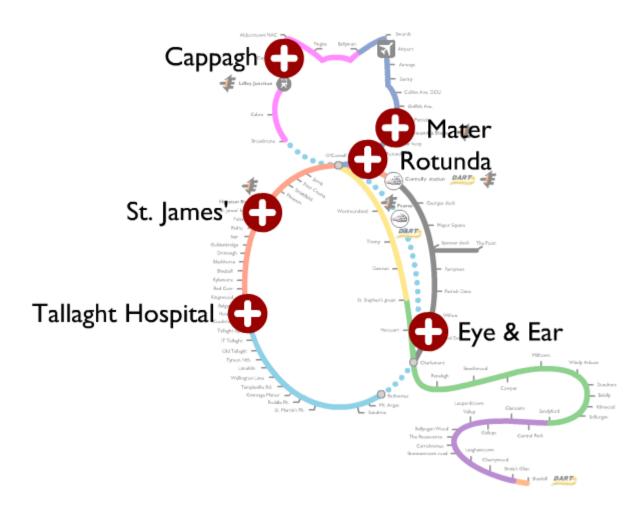
Rail Links





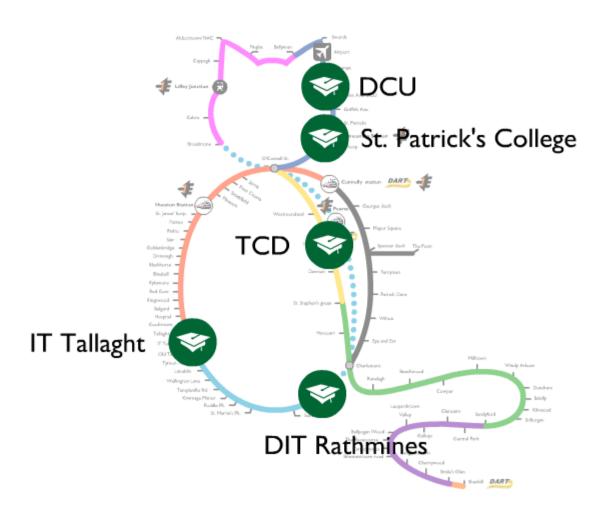
Hospitals

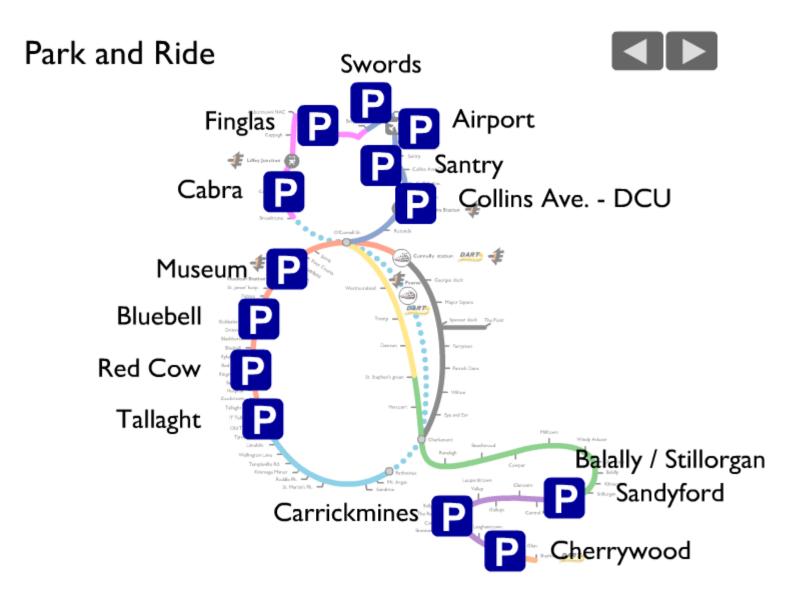




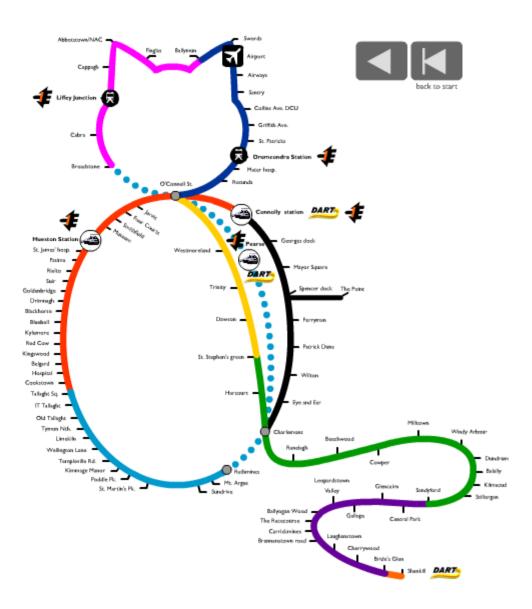
3rd Level











Meeting with AECOM 2pm Monday 6th October 2014 Grand Canal House, Grand Canal Street Upper, Dublin 4

Report

Present: Joe Seymour, AECOM (JS)

Dónal Ó Brolcháin (DÓB)

Tom Coffey (TC)

Michael N Howard (MNH) Michael J Howard (MJH) Brian MacEochaidhin (BMacE)

John Roden (JR)

The meeting arose from an invitation from Ms. Elaine Brick, Associate Director, Transportation, AECOM to DÓB to present the City Access Transit (CAT) proposal.

As Ms. Brick was unable to attend, Joe Seymour (JS), Regional Director, AECOM, took the meeting, as he is Project Manager for the study AECOM is currently carrying out into public transport options for the North Dublin area on behalf of the NTA.

DÓB introduced himself, followed by the others who joined the meeting at Donal's invitation, following Elaine's prior agreement.

JS explained the scope of the current AECOM study, which is focussed on public transport options between Dublin City Centre, Dublin Airport and Swords. He stated that all possible options were being considered, across all transport modes, and that so far his team had identified 24 different options.

These were being developed at a general, conceptual level. By Nov 20<mark>15, they hope to have narrowed these down to 5 or 6 routes, with a "Preferred Option" selected by early 2015</mark>

Options included variations to the Metro North proposal, "light metro", heavy rail, light rail, bus rapid transit, and indeed a combination of modal options. Many different routes are also being considered.

JS acknowledged that the Swords – Airport – City Centre BRT route being currently developed by the NTA (upon which public consultation is to begin in the next two weeks) is only a short-term solution. AECOM's current work was on developing medium- to long-term solutions in this area.

JS indicated that their work assumes the introduction of the DART Underground project. BMacE asked if their interpretation of this included the proposed heavy rail link to Dublin Airport, and JS responded that it did not.

DÓB then presented the Drumcondra City Access Transit (CAT) proposal. This presentation showed how the NTA's own data indicated that a BRT scheme did not have adequate capacity for the passengers projected on the Swords – Airport – City Centre corridor. DÓB's view is that this calls for two new LUAS lines looped around the northside. This loop would continue from the LUAS CrossCity terminus at Broombridge to take in Finglas, Charlestown, Ballymun, Santry, Clonshaugh, Coolock and back to the city centre via Whitehall and Drumcondra. There would be a spur to Dublin Airport and Swords as well as another to link with DART and Commuter services at Howth Junction, This would serve people in Dublin's north city, as well as Dublin Airport passengers and staff. The presentation emphasised, using previous DTI and DTO data, how similar LUAS proposals have been in existence for many years, and yet have been repeatedly ignored by government.

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The presentation highlighted the ongoing transport void in the Dublin north city area, which has the highest number of people in the Dublin area and has had for the last 20 years. It also showed that because only 14% of Airport trips were business-related, a dedicated high-speed metro-standard link was not actually required, and that LUAS would be a far better fit for City Centre – Airport journeys. Other options exist for those who need fast access to the Central Business District and IFSC.

MJH presented the Metro East proposal, developed in 2005/2006. This proposed a route from the City Centre through Drumcondra to Whitehall, Santry, Kilmore, Clonshaugh, the Airport and Swords. This privately funded proposal includes economic, land use and engineering data they had commissioned at the time, from Roughan O'Donovan and other consultants. (JS commented they often worked with them). MJH gave JS a copy of the Proposal, accompanied by a Submission made to the RPA at the time.

Concerned that AECOM may be focussing on a narrow "single corridor" approach, BMacE commented that the strong message coming through was that both the Beaumont / Kilmore / Clonshaugh and Ballymun / Finglas areas had to be served by high-quality public transport and that the standard approach was to consider a core route with one or more branches, a core route with a loop, or two or more distinct routes, rather than trying to follow a "one size fits all" approach.

JS asked DÓB about disruption in Drumcondra caused by LUAS construction. DÓB pointed out that there will always be objections and outlined his experience of campaigning, on behalf of residents' associations, for the Dublin Port Tunnel project.

TC outlined how the Dublin City Business Association (DCBA) (from which he has recently retired) supported on-street LRT from its inception. DCBA looked beyond the short-term disruption caused by its construction to the great benefits it conferred on retailers and life in the city centre. He also explained how younger people, especially today, were becoming more urbanised, preferring to live in cities like Dublin, or emigrating abroad, and more and more did not need or want access to cars in urban areas, preferring instead high-quality public transport and taxis.

There was further discussion on additional routes for northside LUAS, such as linking the proposed line through Drumcondra, Whitehall, Kilmore and Clonshaugh to the Airport with Howth Junction via Oscar Traynor, Tonlegee and Kilbarrack Roads.

BMacE also circulated an outline map that synthesised the CAT and Metro East proposals, illustrating how these could be implemented in LUAS form.

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Donal O'Brolchain

From: Donal O'Brolchain <donalobrol@clubi.ie>

Sent: 08 December 2014 23:35

To: Joseph Seymour

Cc:

'hugh.creegan@nta.ie'

Subject: Your report has some omissions

Attachments: CAT response to RFSubmissions 31Mar2001.pdf; Meeting with AECOM 2pm

Monday 6th October 2014 JSeymour corrections.doc

Dear Joe,

I have just scanned the AECOM report Fingal North Dublin Transport Study Stage One Appraisal Report issued by the NTA.

Frankly, I think you owe us an explanation for two things

- 1. The description of Drumcondra CAT is factually wrong;
- 2. The complete omission of the Metro East proposal developed independently by the Howards in 2005/2006, if I remember correctly.

1. CAT

As you know well from the documentation that I sent to your office following our meeting 6th October last, the Drumcondra City Access Transit (CAT) was first submitted in May 2001 as response to a request for submissions issued by the then Light Rail Office (see attached). As I see it, AECOM staff were well aware of the origin and timing of the proposal for the Drumcondra City Access Transit (CAT).

Please note that the Railway Procurement Agency did not exist then. So the Drumcondra 2005 CAT was not proposed as alternative to Metro North which was developed later by the RPA, for reasons that still remain unclear. As you probably know, Metro North was not part of the DTO Platform for Change which was dated November 2001 when published shortly later.

3.12 LR8. City Access Transit (CAT)

3.12.1 Scheme promoter or developer

This scheme was proposed by Drumcondra 2005, an amalgamation of Residents Associations from the Drumcondra, Dublin 9 area. It was proposed as an alternative to the Metro North

Scheme which was to run further west of Drumcondra which, in the Residents Association's view, was too expensive and was missing a significant catchment area. The route would serve both the Airport and Swords and is therefore in line with the brief for the project.

2. Metro East

As you know, the Howards developed this proposal completely independently of the Drumcondra CAT. In our meeting on Monday 6th October last, Michael Howard outlined how Metro East was developed. (see attached record of that meeting)

I look forward t	o getting a	written exp	lanation of	fthese	errors and	omissions
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Yours sincerely

Donal O'Brolchain

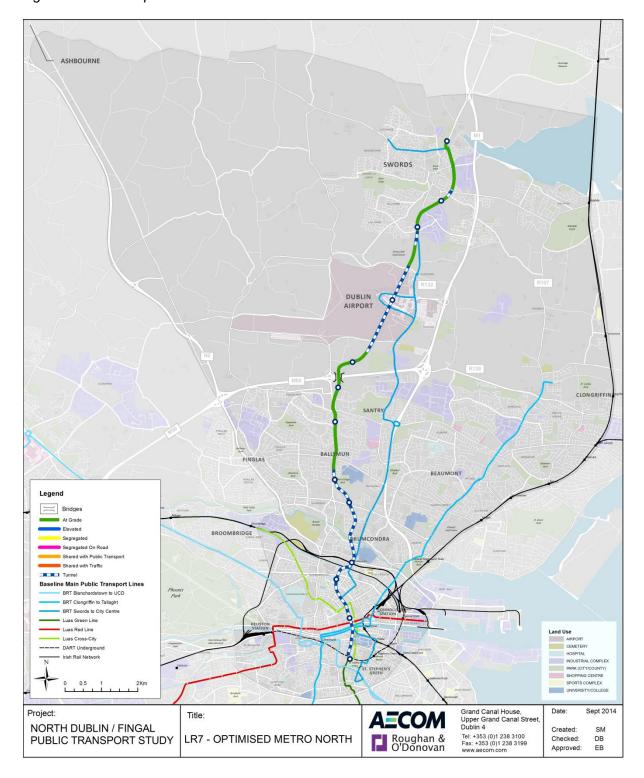
Appendix 4

Extracts from NTA/AECOM Fingal/North Dublin Transport Study First Appraisal Report November 2014

Figure 3.8: LR7 Optimised Metro North

Figure 3.9: LR8 – City Access Transit (CAT)

Figure 3.8: LR7 – Optimised Metro North



LR8. City Access Transit (CAT) 3.12

3.12.1 Scheme promoter or developer

This scheme was proposed by Drumcondra 2005, an amalgamation of Residents Associations from the Drumcondra, Dublin 9 area. It was proposed as an alternative to the Metro North Scheme which was to run further west of Drumcondra which, in the Residents Association's view, was too expensive and was missing a significant catchment area. The route would serve both the Airport and Swords and is therefore in line with the brief for the project.

3.12.2 General description of the scheme

The primary corridor is approximately 17km in length and is an extension of the Luas Cross-City route which is currently under construction. This route follows a similar route as the existing Swords Quality Bus Corridor, along Dorset Street and Drumcondra Road (R132), as far as Santry where it would be routed to the east to pick up employment zones in the Clonshaugh Industrial Area. The route would continue north from Clonshaugh and cross over the M1 to the Airport, and subsequently terminate to the north of Swords.

The CAT proposal also has a secondary routing in order to link the Finglas and Ballymun areas to the wider public transport network, through a further extension of the Luas Cross-City at Broombridge (Liffey Junction). This LRT route would run into Finglas on a similar routing to that of LRT1, proposed by the RPA. At Ballymun the routing would continue along Santry Avenue, Coolock Lane and Oscar Traynor Road until it reaches the DART Line at Howth Junction; although the routing of the last section following Oscar Traynor Road is complex. This extension would provide interchange options with the Airport/Swords LRT at Santry and also interchange possibilities with the DART. This scheme runs to a distance of approximately 12km.

The primary corridor, via Drumcondra, meets the brief in that it links the City Centre with the Airport and Swords. Therefore only the primary route would be considered as part of this assessment.

3.12.3 Infrastructure considerations

Dorset Street and Drumcondra Road are heavily trafficked routes leading to and from Dublin City Centre, currently carrying in the region of 35,000 AADT, with congestion evident for much of the day. The route also accommodates the existing Swords QBC and proposed Swords BRT. The implementation of a light rail scheme along this route would require the full removal of the QBC/BRT lanes along Dorset Street and Drumcondra Road, and would also require the removal of (mainly) right turning facilities at many junctions. While physically possible to provide the LRT route along this corridor the traffic impact would be significant, particularly for local movements due to the reduction in the number of turning facilities. In addition, the trees along this section of the route would be negatively impacted by the overhead cables and the possible widening of the carriageway.

After the Collins Avenue junction, space is available to provide LRT infrastructure to one side of the existing carriageway, to the east of the Tunnel Portals. Space is also available along Coolock Lane (R139) to provide LRT facilities, although existing bus priority facilities may need to be removed.

Along Clonshaugh Road the cross-section is much narrower with one lane in each direction and many houses fronting onto the street. As a result significant land expropriation would be required and some residential units may need to be removed. An alternative route via the IDA Park could be considered in order to avoid these constraints, although impact on businesses could be significant.

After Clonshaugh Road the routing primarily follows agricultural land to the East of the M1, and would have to cross over the M1 on a bridge before entering the Dublin Airport Long Term Car Parking Area. The route would then travel at-grade into the proposed Public Transport Hub between Terminal 1 and 2, although there are significant challenges with the construction of this route as space is significantly constrained due to the presence of utilities above and below the ground. As a result some impact on the traffic capacity of the routes within the Airport is envisaged with this route option.

On leaving the airport the route would turn north towards Swords and would follow the R132 alignment which has sufficient space to accommodate the proposed LRT, although some land expropriation is envisaged, and traffic impact, particularly around the Airside Park, is likely as a result of a reduction in capacity of the already congested junction.

3.12.4 Impact during construction

Construction impacts on Dorset Street and Drumcondra Road would be very significant as space to facility diverted traffic is not available over much of its length. From this initial assessment it is likely that these roads would have to be closed for a prolonged period to facilitate the construction of a central running LRT system.

North of Collins Avenue, the constructability of this option improves, although significant localised impacts can be expected around Clonshaugh Industrial Estate and the Airport.

3.12.5 Environmental issues

Through Drumcondra the route follows existing roads, which would limit environmental impact. However, there are listed structures along the routes some of which may be impacted by the proposed infrastructure. To the north, the route passes through agricultural land which may also generate some negative impacts. Overall, the environmental impact of this option is considered to be relatively low, although it would need to be reviewed in detail if this project was to proceed to the next stage.

3.12.6 Considerations for the appraisal process

The following characteristics of the CAT Alignment should be taken into account during scheme appraisal:

- The routing via Dorset Street and Drumcondra Road would be challenging to deliver, and would result in a significant loss of capacity for other modes on this important route into the City Centre;
- The route is relatively circuitous, and would probably need to share some sections with other services due to aforementioned alignment constraints, leading to journey times in the area of 1 hour from the City Centre to the Airport. This would not provide a competitive service as journey times are expected to be in the region of 40 minutes by bus and 20 minutes by taxi;
- The scheme does not respond well to the current transport and land use objectives set out in the Fingal and Dublin City Development plans, particularly in relation to the need for a north/south economic development corridor as it is located further to the east where development potential is limited; and
- Based on similar schemes being delivered in Ireland, the estimated cost of the scheme would be comparable with LR4 and LR5.

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Figure 3.9: LR8 – City Access Transit (CAT)

