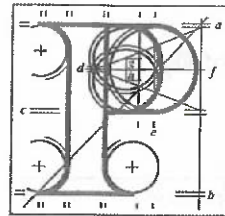


Our Case Number: ABP-314724-22
Planning Authority Reference Number:



**An
Bord
Pleanála**

James Wickham
23 Pleasants Street
Dublin 8
D08 N40F

Date: 26 January 2023

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Yours faithfully,

PP EM

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Teil
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Metrolink Observation

To

The Secretary
An Bord Pleánála
64 Marlborough Street
Dublin 1

Re: Case reference: NA29N.314724 - MetroLink. 314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin

From:

Professor James Wickham

23 Pleasants Street

Dublin 8

D08 N40F

Contact details:

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Mobile: 087 238 1874

Date:

16/01/2023

Introduction

This observation is to support the construction of Metrolink as soon as possible. However, there needs to be recognition that it is a second-best project which results from the political failure to recognise the necessity for substantial and sustained rail investment in the GDA (Greater Dublin Area).

Outstanding controversies: (1) Tara Street and Stephens Green

Both of these are changes from the original plans for Metro North as originally approved by ABP which had no Tara Street station and Stephen's Green station was on the West side of the Green. These changes have been partly justified in terms of reducing construction disruption, but appear in fact to derive from the assumption that Dart Underground (the 'Interconnector') will never be built. This necessitates some interchange with suburban rail, hence the Tara Street station. Given the effective abandoning of Stephens Green as an underground station for the Interconnector the Stephen's Green Metrolink station can be more easily constructed on the East side of the Green. It is claimed that this 'interconnects' with the Luas but this is an exaggeration and stretches the meaning of 'interconnection'. Passengers wishing to change from Metrolink to Luas will have to walk the length of Stephens Green in the open air.

Outstanding controversies (2) Termination at Charlemont

One reason for the opposition to the upgrading of the Green Line through Ranelagh and further South was the complete failure of the NTA to consider the extent of 'community segregation' (XXX) that this would entail. Thus while a light rail / tram can weave through streets and even enhance the streetscape, an above ground metro with ATO has to be completely separated from its immediate surroundings. The NTA has to understand that transport systems inevitably involve issues of urban design... The proposed routing of the Metrolink extension to the South West as a primarily underground route would not raise these issues. However, such an extension cannot remain just another fantasy on the NTA's maps. Such an extension would make it more logical for there to be a genuine interconnection with the Luas at Stephen's Green with the station (see above) located on the West side of the Green.

A good but isolated project instead of connecting GDA

Discussion of Metrolink has become just another isolated project justified purely in terms of the predicted numbers travelling along and within this specific corridor (see the NTA GDA plan). It is only marginally part of any broader transport network. By contrast the interconnector was the centrepiece of a proposed transport network for Dublin as a whole. It is important to notice that a 'Midterm Review' of Transport 21 back in 2010 suggested that given the new (then) financial constraints, the T21 programme should be re-configured with DART Underground and Luas Cross-City prioritised over Metro North. This was in terms of value for money, equity and the impact on the city as a whole.

Nearly twenty years ago a study used interviews with transport experts to explore possible future scenarios for Dublin in 2026. The experts' 'realistic' scenario suggested that by then the 'prestige project' of a metro to the airport would:

'Ensure that the city centre remains attractive enough and accessible enough to serve as a recreational centre and tourist destination. However the city centre is an island in a vast suburban sprawl for expanding the rail network for inhabitants has been defined as too expensive compared with a single line to the airport for visitors' (Wickham, 2006. p. 205).

In all fairness Metrolink as currently planned will give accessibility North of the airport (Swords etc). However that does not detract from the key point that the current route will make creation of a public transport network even more disjointed. It is too late to change it, but there should be a public recognition – not least by transport ministers – that prioritising Metrolink over the Interconnector has removed a key component of any public transport system for the GDA as a whole.

Delays have made the need for investment even greater

International experience shows that the possibility of shifting large numbers of car journeys to more sustainable modes is greatest where there is a transport network which makes much of the city accessible to as many people as possible without a car. This is possible not only in very large metropolitan areas (e.g. London) but also in somewhat smaller metropolitan areas such as Dublin (Newman et al, 2013). Consequently meeting Ireland's climate change targets for transport requires sustained investment in rail in the GDA. Further delays exacerbate the problem and increase the need for such

expenditure down the line. Cancelling and postponing transport projects has already made the situation for worse than it need be (Caulfield et al, 2020).

References

- Caulfield, B., Carroll, P. and Ahern, A. (2020) Transitioning to low carbon and sustainable mobility Climate Change Advisory Council Ireland.
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- Newman, Peter, Kenworthy, Jeffrey and Glazebrook, Gary (2013). Peak car use and the rise of global rail: why this is happening and what it means for large and small cities. *Journal of Transportation Technologies* 3.4.
- Smyth, Austin; E. Humphreys and S. Wood (2010). 'T21 Midterm Review' Chartered Institute of Logistics and Transport (Ireland).