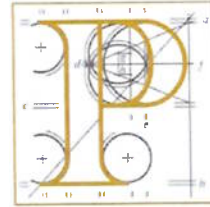


Our Case Number: ABP-317121-23



**An
Bord
Pleanála**

Donal O'Brolchain
100 Griffith Avenue
Drumcondra
Dublin 9
D09 T6K3

Date: 15 February 2024

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the meantime, please contact the undersigned officer of the Board on at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Breda Ingle
Executive Officer
Direct Line: 01-8737291

HA0

Teil
Glao Áitiúil
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Sinead Singleton

From: Breda Ingle
Sent: Friday 9 February 2024 10:27
To: Sinead Singleton
Subject: FW: ABP-317121-23 Response to NTA comments on my submission
Attachments: D. O Brolchain Response to National Transport Authority comments
ABP-317121-23 8Feb2023.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: LAPS <laps@pleanala.ie>
Sent: Friday, February 9, 2024 9:28 AM
To: Breda Ingle <breda.ingle@pleanala.ie>
Subject: FW: ABP-317121-23 Response to NTA comments on my submission

From: Donal O'Brollachain [REDACTED]
Sent: Thursday, February 8, 2024 5:11 PM
To: LAPS <laps@pleanala.ie>
Subject: ABP-317121-23 Response to NTA comments on my submission

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A chara,

I attach my response to the National Transport Authority's observations on submission made on BusConnects Swords to City Centre Bus Corridor Scheme ABP Case No. ABP-317121-23 as set out in your letter of 5th January 2024

Is mise

Donal O'Brolcáin

100 Griffith Avenue
Drumcondra
Dublin
D09 T6K3
8th February 2024

An Bord Pleanála
64 Marlborough Street
Dublin
D01 V902

Your Cast Number: ABP-317121-23

BusConnects Swords to City Centre Bus Corridor Scheme

A chara

In response to your letter of 5th January 2024, I attach my submission on the National Transport Authority (NTA) submission dated 23rd November 2023 available under the heading responses on www.pleanala.ie/en-ie/case/317121.

It seems that NTA It continues the practice of

- a. Ignoring evidence;
- b. downplaying the significance of any facts which does not suit the pre-conception of BusConnects on this corridor;
- c. arbitrary use of definitions to attempt to support what is clearly

Accordingly, as part of it consideration, I request that An Bord Pleanála

1. commission Roughan & O'Donovan to update the Genvest report based on the Census 2022 (see par 1.4 on p.2 of my submission)
2. publish this updated report – in full – prior to making a determination on this case;
3. invite submissions on this updated report.

In addition An Bord Pleanála

1. commission similar maps (using the same definitions) based on Census 2022 (see par 1.5 on p.2 of my submission)

2. publish this updated maps – in full – prior to making a determination on this case;
3. invite submissions on this updated maps.

As part of it due process in considering this proposal, I ask An Bord Pleanála to defer any further consideration of proposal until gaps in data collection has been filled.

One can only despair at NTA's lack of commitment to making proposals such as this easy to understand, when it states that a hard to find Appendix B is in fact Appendix B to Appendix I (see p. 158)

Is mise



Donal O'Brolcáin

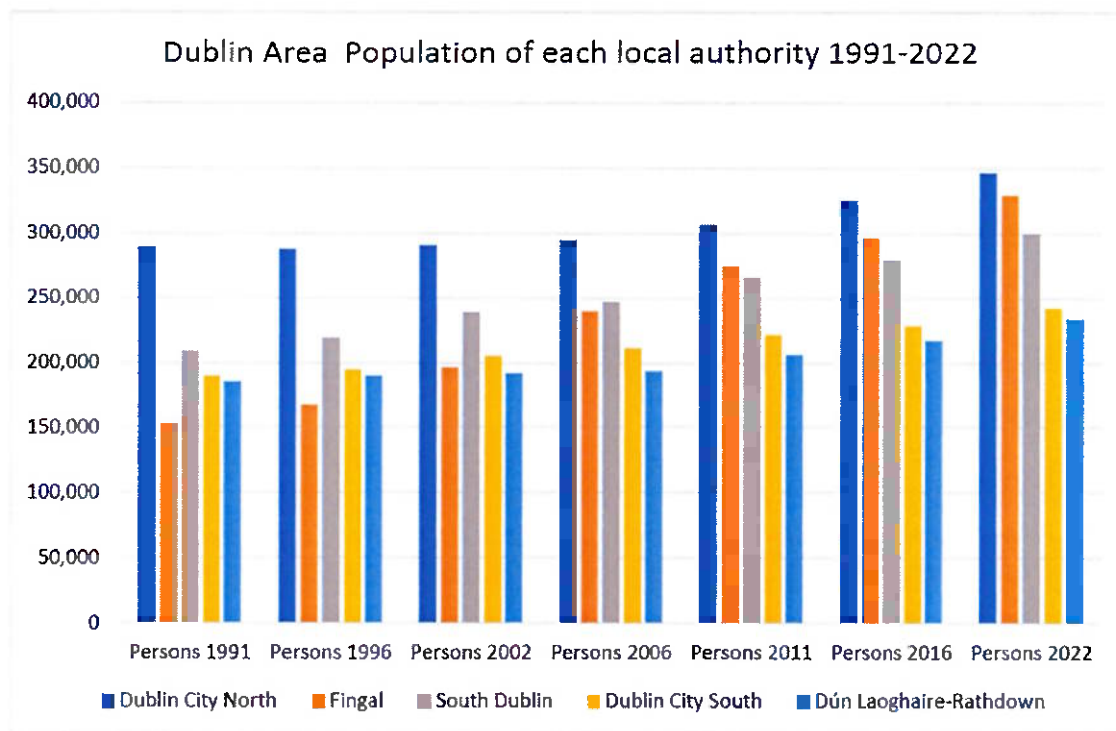
Response to National Transport Authority(NTA) responses on personal submission BusConnects Swords to City Centre Bus Corridor Scheme Case No. ABP-317121-23

1. Central Corridor in North Dublin

1.1. It does not consider the implications of the fact that the population of the Greater Dublin Area (GDA) has already reached the level assumed in the Governments National Planning Framework. This is not acceptable for the good proper planning of our capital city region

1.2. The north part of Dublin City has the highest population of any other part of the Greater Dublin Area and has had for over 30 years see Figure 1

Figure 1 North Dublin City has the highest population within the Greater Dublin Area



Source: CSO Census Data. For 2022, preliminary results

- 1.3. Drumcondra is the central corridor of this part of our capital city. For decades, it has been clear that this corridor needs enhanced public transport. This is one reason that I actively campaigned for the Dublin Port Tunnel as one of a mutually-reinforcing set of measures that would remove through traffic, thereby providing an alternative route between Dublin Airport and the city centre in addition to removing many HGVs from Drumcondra and other areas in the north part of Dublin City. Those promoting the Port Tunnel project recognised this as the Environmental Impact Assessment assumed that there would be an on-street Light Rail Transit (LRT – now LUAS) serving this corridor.
- 1.4. The NTA chose **NOT** to respond to the 2018 Genvest report that I attached to my submission (see p. 34-40). This private company commissioned Roughan & O'Donovan to compare the catchment areas, based on Census 2026 of the then emerging preferred MetroLink route with an Eastern Route Variation.
The Eastern Route Variation is more aligned to the corridor proposed for BusConnects than the current MetroLink proposal (see map on p.40 of my submission).
- 1.5. As I pointed out in my submission on this project (p.41-42)), MetroLink is routed to the west of areas of greatest population density and the core economic area (as measured by jobs per KM²) in North Dublin. Please note that I commissioned those maps based on Census2016. NTA did **NOT** make any comment on this part of my submission.

2. The National Transport Authority's response lacks merit on the following grounds

- 2.1. Some of the senior staff of the National Transport Authority were directly involved on the development of the Dublin Port Tunnel and gave evidence at the sworn public inquiry on that project. They are fully aware of the way in which a number of public authorities took measures, the effect of which was to make it impossible for the air/noise arising projections of that major project to be realised in Drumcondra (see p. 25-31 of my submission)
- 2.2. NTA chose not to comment on the very significant and deliberate omission from commitments made and implied in the Environmental Impact Assessment of that major project.

2.3. Misrepresents what I submitted on 12th September 2023

2.3.1. I did **NOT** state that this NTA decision was taken during the third round of public consultation on this scheme, as NTA claims (par. 2.6.6.1 p.154). ;

2.3.2. NTA refuses to accept evidence in its own and other reports that a bus based system does not have adequate capacity for the number of passengers in the Drumcondra area, even though I referred explicitly to such reports see.

2.3.2.1. *What I pointed out in my submission to the third round was that NTA had already concluded a bus-based was inadequate for this corridor when it assessed a core Dublin Bus Rapid Transit (BRT) Network in October 2012. (see p.11-12, p.18, 20 of my submission*

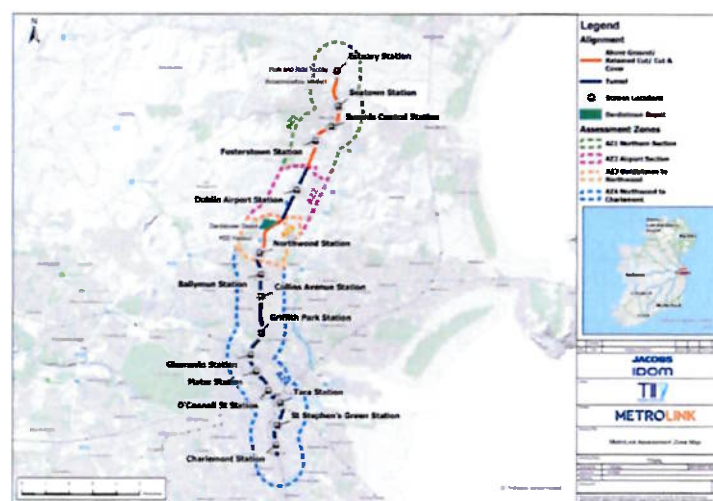
2.3.2.2. *the 1998 Inspector's report on the Dublin Line Rail Line A – Tallaght to Abbey Street (see p. 10., 19 of my submission);*

2.3.2.3. *the 1996 comparative socio-economic evaluation of the Tallaght-Ballymun/Dundrum Light Rail lines (see p. 29-30 of my submission)*

3. Metrolink

3.1. NTA attempts to justify the obvious lack of capacity on this corridor by references to Metrolink, ignoring that the latest proposal is a relic of the celtic craziness Transport21 nonsense does not serve the Drumcondra area;

Figure 2 3Map showing Metrolink Assessment



- 3.2. The NTA has deliberately tried downplay this **failure** to provide interchange at the existing Drumcondra Station with a claim that the current MetroLink proposal *will interchange with other rail and bus services in the vicinity of Drumcondra*....(see 156)
- 3.3. Contrary to what NTA claims (see. p.155), Metrolink as now proposed does **NOT** provide for interchange with the Sligo/Maynooth line at Drumcondra Station. If built. Metrolink plans to have a station at what it calls Glasnevin. It is not at all clear that this new station will have an interconnection with the Sligo/Maynooth line, given the escalation in the costs of the proposed Metrolink. This proposed Glasnevin station is at least 1km from Drumcondra Station.
- 3.4. Please note that NTA has applied for a railway order for what it calls DART+ West to electrify this line as far as Maynooth (see <https://www.dartplus.ie/en-ie/projects/dart-west>)
- 3.4.1. If built, this new electrified line is expected to more than double the number of trains per hour and more than double the passenger capacity on this route.
- 3.4.2. Note that passenger demand led to Iarnród Éireann stopping all trains, AFAIK, on the Sligo/Maynooth line at Drumcondra.
- 3.5. As appendices, I attach
- 3.5.1. Does Dublin's Core need more rail links? – paper presented at the Dublin Economic Workshop, Athlone, October 2015 – see p. 6 Appendix 1
- 3.5.2. The first part of my submission on Metrolink see p. 44 Appendix 2
4. **Defective Data**
- 4.1. It is simply not good enough for NTA to offer a lame excuse for data deficiencies by claiming that
- 4.1.1. list provided is *non-exhaustive* (p.157);
- 4.1.2. labels on drawing are *included as high-level identifiers...not all developments or land marks are depicted on the drawings*.
- 4.1.3. NTA and the consultant it employed have absolutely no excuse no excuse for this kind of over-simplification, given that I had drawn their attention to some of these gaps in a previous submission.
- 4.2. By any reasonable standard, this is a complete dereliction of the duty of care and shows a complete lack of systematic consideration of this project. In short, this is thoroughly unprofessional work. Take for example
- 4.2.1. The omission of any comment on Croke Park (about 600m from the proposed corridor) as a major trip attractor/generator for all kinds of events (eg. sports, concerts, conferences) apart from direct employment;

4.2.2. The disregard of Tolka Park(p. 157) which is less than 300m from the proposed corridor. Given that NTA considers Santry Stadium (Morton Stadium) to be relevant for assessment purposes, it is beyond believe that any one can take this proposal to be anything other than a shoddy piece of work.

4.2.3. On this basis, I do not give much credence to NTA assessments of various developments to which I drew attention (p.157-158)

4.3. Similarly, NTA relies of its own (unspecified) use of CSO Census 2022 parish boundaries to assess the impact of schools. It has conveniently classified some schools as being in Drumcondra, others as being in Marino and one in Larkhill-Whitehall-Santry community area (p.158).

4.3.1. The least I expect from NTA is that it collect anonymised data on the addresses of each pupil and staff member of each school in order to assess the possible impact on travel demand arising from these major trip attractors/generators on the possible demand for public transport services in the a mainly residential/educational Drumcondra district.

5. Trees

It is an abuse of language to state that it is *not accurate* to claim that trees will be removed (p.159). The next sentence states *that the proposal is for the trees to be transplanted*. In what way can trees be transplanted without being removed? Given the penchant for the public authorities to remove trees at seemingly every opportunity, how can we trust that any trees will be transplanted or even replaced with mature trees?

Appendix 1
Does Dublin Economic Core need
more rail links?

Paper presented at the
Dublin Economic Workshop

Athlone

October 2015

Does Dublin's Core need more rail links?

Donal O'Brolchain

Dublin Economic Workshop Athlone 17th October 2015

The planning of Dublin's transport should be founded on a clear sense of priorities, based on (a) travel patterns and population, (b) the optimum use of resources available eg. street space, land use, finance, (c) investing in sustainability.

Dublin's economic core is set out in Figure 1¹. This is one of two maps I commissioned from the All-Island Research observatory in NUI Maynooth when I was trying to understand what the National Transport Authority (NTA) was actually doing about enhancing public transport in the north part of our capital city (see p. 3). At the time it seemed not to be planning transport in accordance with evidence, as claimed the Robert Watt, Secretary General of the Department of Public Expenditure and Reform as evidence of civil service reform. (*Commentary on public service reform is mired in the past* Sunday Business Post 22 February 2015).

I asked AIRO to superimpose the existing and proposed railway lines in Dublin. This included

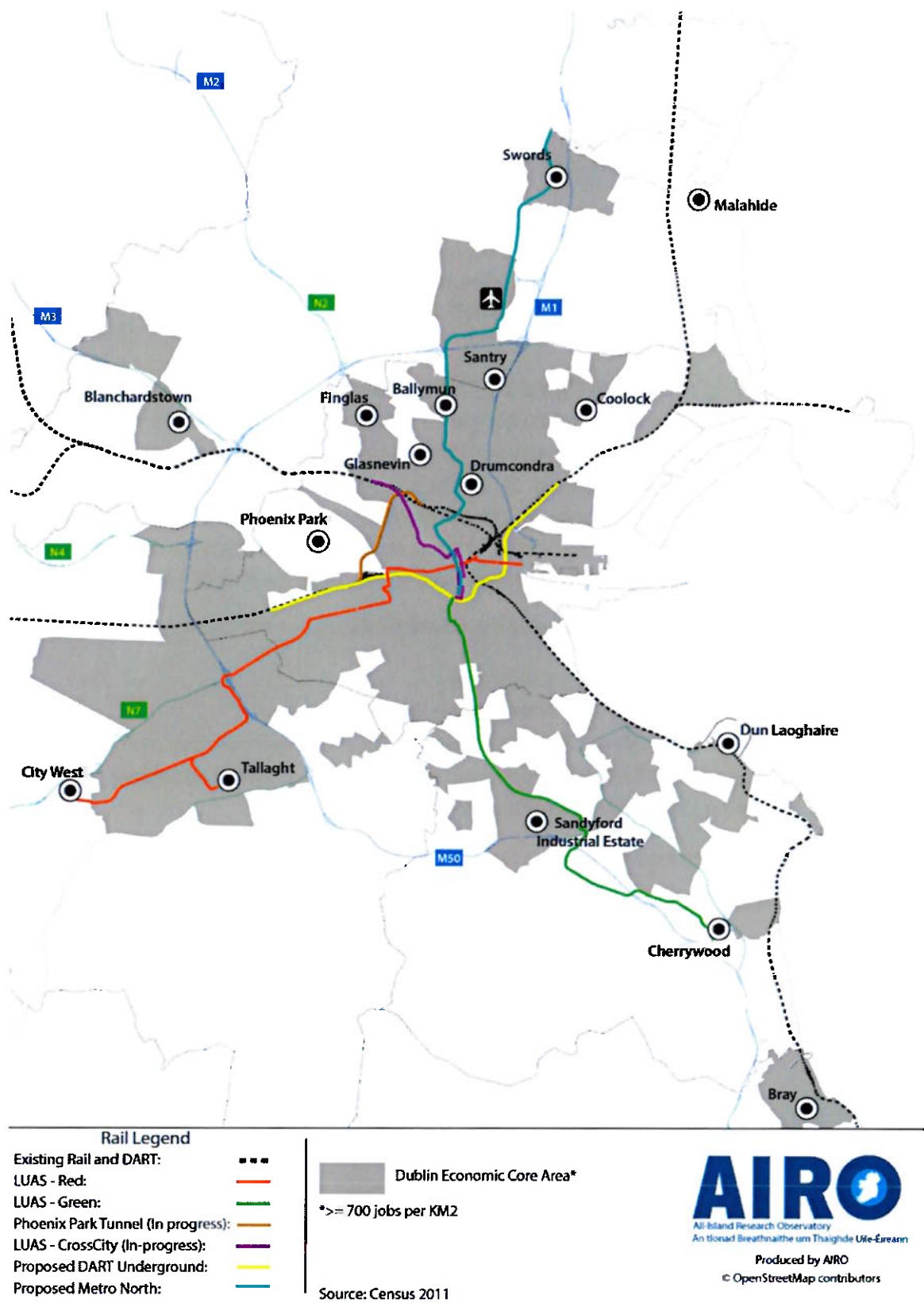
- the heavy rail commuter lines including DART;
- LUAS including LUAS Cross City now being built;
- the Phoenix Park Tunnel which is due to reopen for passenger services next year;
- the now deferred DART Underground. At the time, I had been led to believe that the public authorities had decided on this project.

Last week, I asked AIRO to update this map by adding Metro North.

Note that Metro North goes to the west of the main part of the Core Economic Area in the north city.

¹ The Dublin Economic Core definition is effectively a 2011 update of the work done by Cormac Walsh and Brendan Whelan in UCD. See *Cormac Walsh, Brendan Williams and Ian Boyle* Mapping the true extent of Dublin's functional urban region – What the best available evidence tells us. Posted 21 December 2010 on IrelandafterNama : <https://irelandafternama.wordpress.com/2010/12/21/mapping-the-true-extent-of-dublins-functional-urban-region-what-the-best-available-evidence-tells-us/>

Figure 1 Dublin's Core Economic Area Census 2011



National Transport Authority's odd behaviour

In an October 2012 report on Bus Rapid Transit(BRT), NTA stated

It is on the northern section of this corridor – between Swords and the City Centre – that the high levels of demand arise.... Overall, the link between the city centre and Swords has demand levels that exceed the capacity of a moderate capacity BRT system, in the longer term. While BRT may provide an interim partial transport solution in the shorter term, a higher capacity rail solution, such as a metro system, will ultimately be required on this corridor. In light of this, the Swords to City Centre BRT section has not been progressed to the later costing and appraisal sections of this feasibility study report.

The demand on the Swords to City section greatly exceeds the capacity that can be provided by a BRT system. Based on this level of demand a BRT solution does not cater for the public transport needs of the northern section of this corridor over the longer term. Accordingly, the Swords to City Centre section was not progressed further within this report

Bus Rapid Transit (BRT) Core Dublin Network (BRT Report). National Transport Authority October 2012.
<http://www.nationaltransport.ie/wp-content/uploads/2012/11/Bus-Rapid-Transit-Core-Network-report.pdf>

The September 2012 NTA Board Minutes noted

The Authority will now start work with a view to securing statutory approval in 2013 for two cross-city BRT corridors which have been identified as feasible. The implementation of those corridors will be subject to the availability of the necessary funding in the future

<http://www.nationaltransport.ie/wp-content/uploads/2012/04/Minutes-of-Board-Meeting-21st-September-1.pdf>

Less than one year later, the June 2013 NTA Board minutes report that

4. Serving Swords by Bus Rapid Transit

Mr Gallagher outlined the work currently being undertaken by the Authority to upgrade the existing Quality Bus Corridor between Swords and Dublin City Centre, which is one of the busiest bus corridors in Dublin. An outline business case has been completed and is very positive. Detailed planning work, including the preparation of an Environmental Impact Statement will now be progressed in preparation for the submission of an application to An Bord Pleanála under the Strategic Infrastructure Act.

<https://www.nationaltransport.ie/wp-content/uploads/2013/04/Minutes-of-Board-Meeting-June-21st.pdf>

Two years later, NTA stated

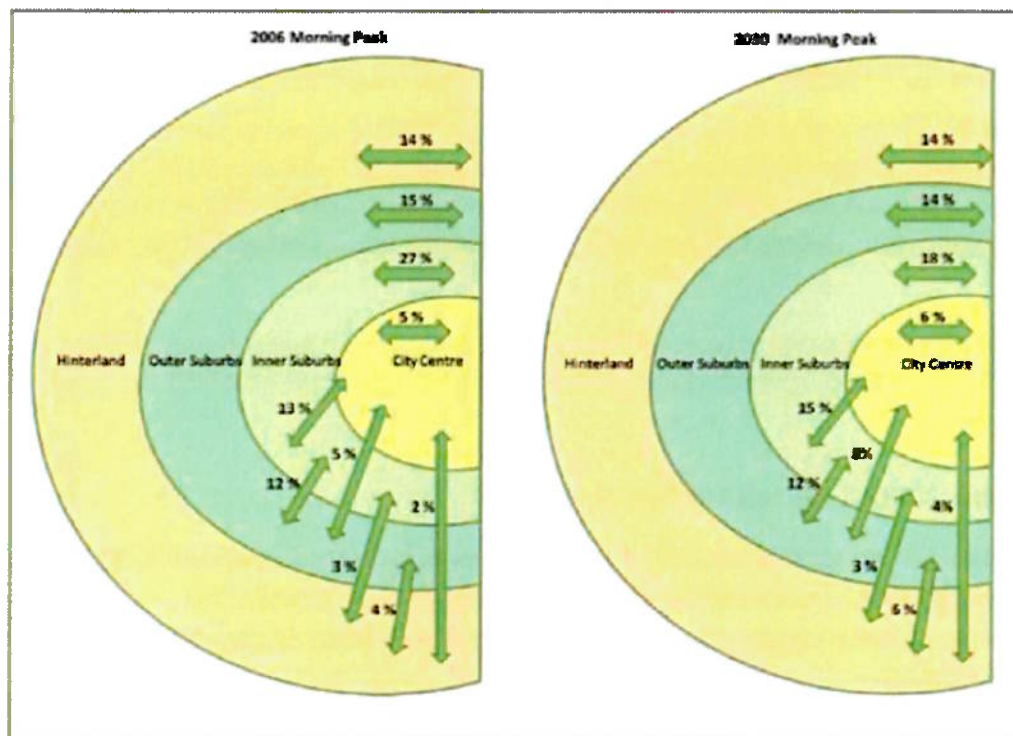
Later in 2014, we will apply for permission to An Bord Pleanála for the Swords/Airport to City Centre scheme, with applications for the Blanchardstown to UCD and the Clongriffin to Tallaght schemes to follow in 2015.

NTA employed three major consulting engineering firms to draw up a Route Options Assessment Report for BRT on the Swords/Airport-Drumcondra-City Centre.

What are the broad travel patterns within Dublin's Core Economic Area?

Earlier this year, NTA sought comments a re-published *Greater Dublin Area Transport Strategy 2011-2030 2030 Vision*, first published in April 2012^{2 3}

**Figure 2 Travel Patterns in the Greater Dublin Area (morning peak period)
2006 and 2030**



Source: National Transport Authority Greater Dublin Area Draft Transport Strategy 2011-2030 2030 vision April 2012. Chap 4 p.9
https://www.nationaltransport.ie/wp-content/uploads/2011/12/Draft_Transport_Strategy_for_the_Greater_Dublin_Area_2011-2030.pdf

This NTA report (Figure 2) shows that travel demand is greatest inside the M50 during the morning peak ie.

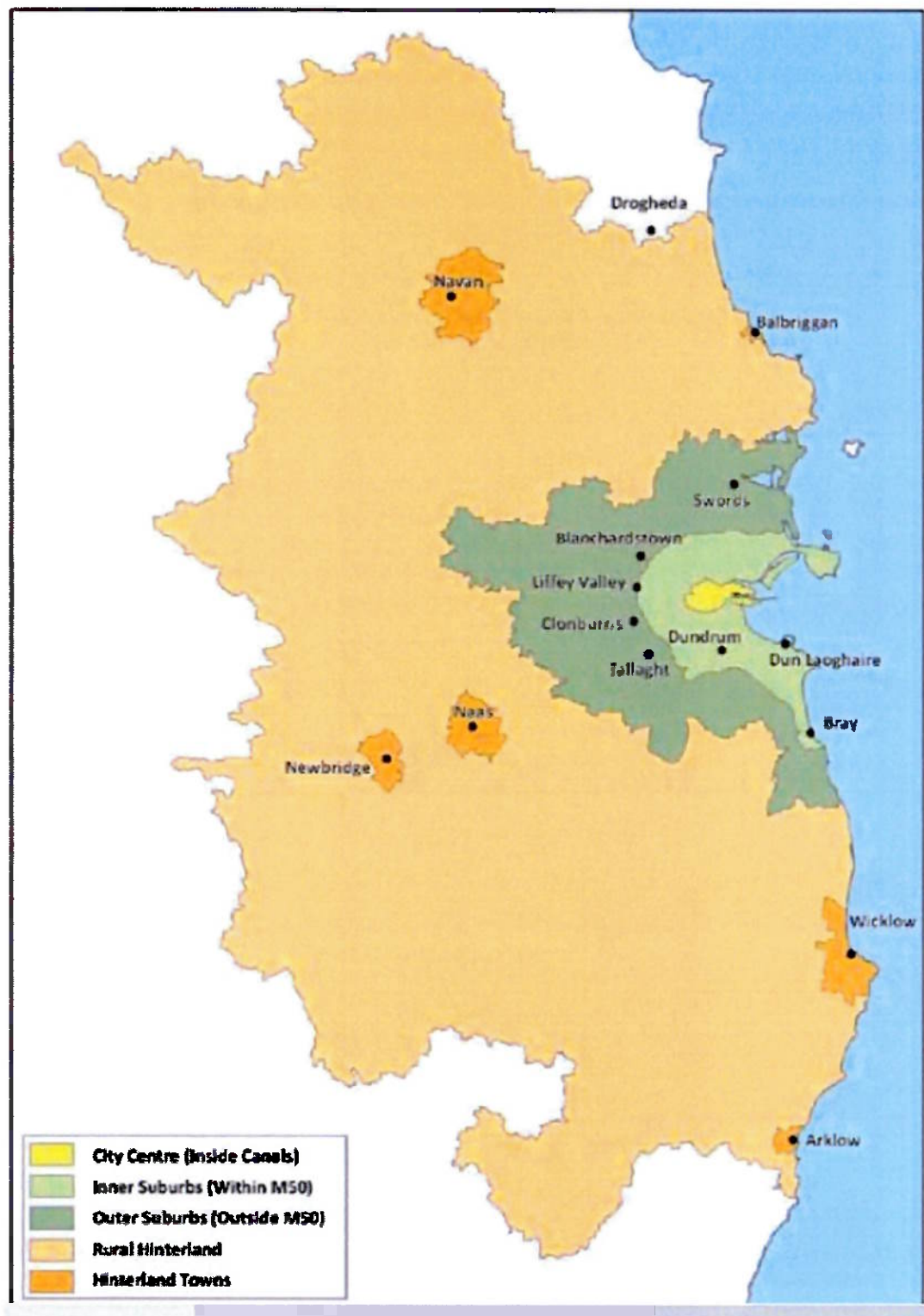
1. between the canals and the M50 - the Inner Suburbs - with
27% of journeys in 2006;
18% in 2030;
2. inside the canals - between the Inner suburbs and the City Centre with
13% in 2006;
15% in 2030.

Figure 3 shows what these areas are, in spatial terms.

²www.nationaltransport.ie/consultations/public-consultation-on-the-preparation-of-a-new-transport-strategy-for-the-greater-dublin-area/

³ www.nationaltransport.ie/wp-content/uploads/2011/12/Draft_Transport_Strategy_for_the_Greater_Dublin_Area_2011-2030.pdf

Figure 3 Greater Dublin Area

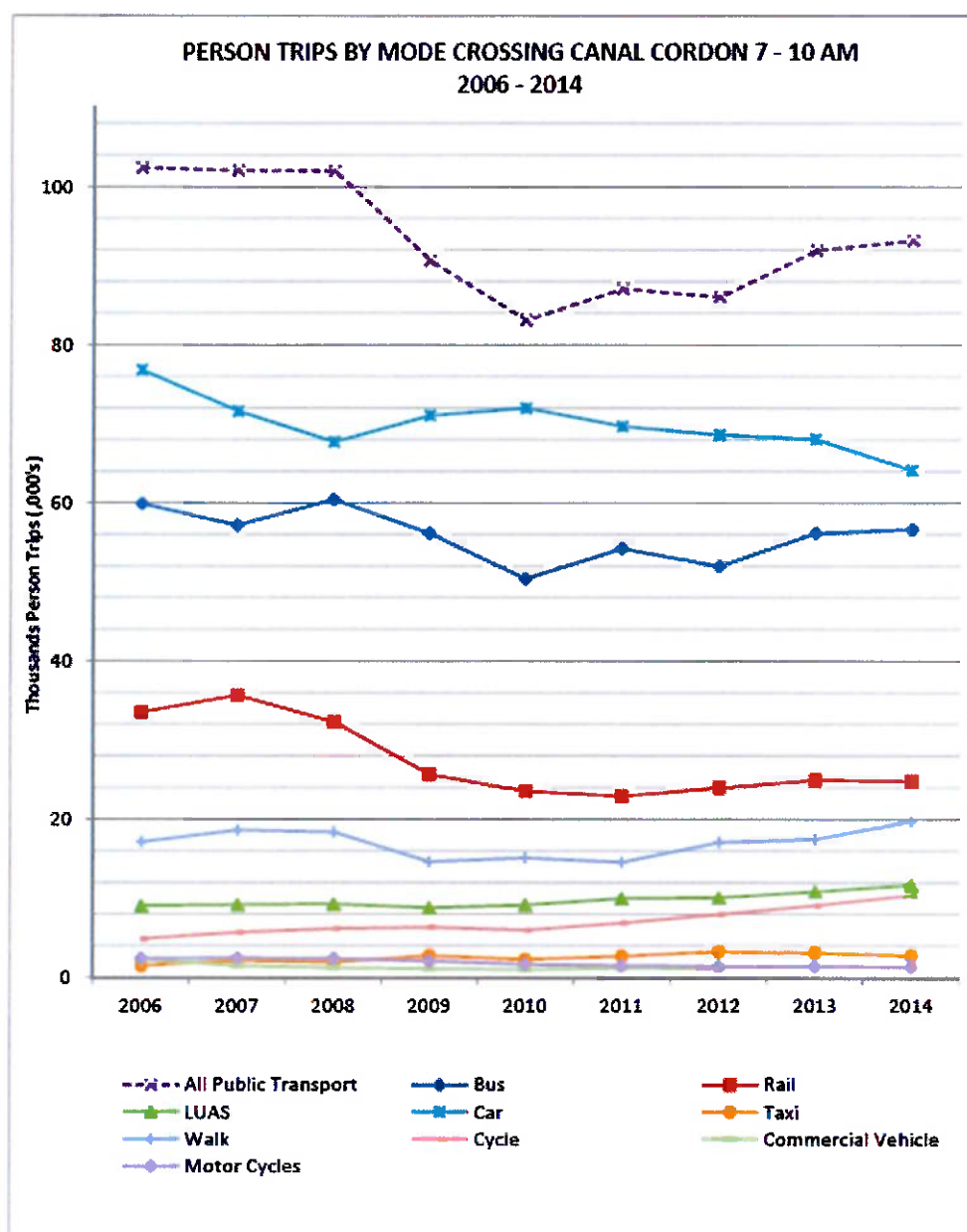


Source: National Transport Authority Greater Dublin Area Draft Transport Strategy 2011-2030 2030 vision April 2012. Chap 4 p.3
https://www.nationaltransport.ie/wp-content/uploads/2011/12/Draft_Transport_Strategy_for_the_Greater_Dublin_Area_2011-2030.pdf

So how are people travelling?

The largest single group travel by car, but has decreased by 16% since 2006. The next largest group travel by bus. Walking has increased such that in 2014 it was at the highest level since the 1997 Cordon Canal Count started. Both the number of cyclists and the number of people using taxis have more than doubled, even if the share of taxis is small in overall terms. This is summarised in Figure 4

Figure 4 How people crossed the canal cordon during morning peak 2006-2014



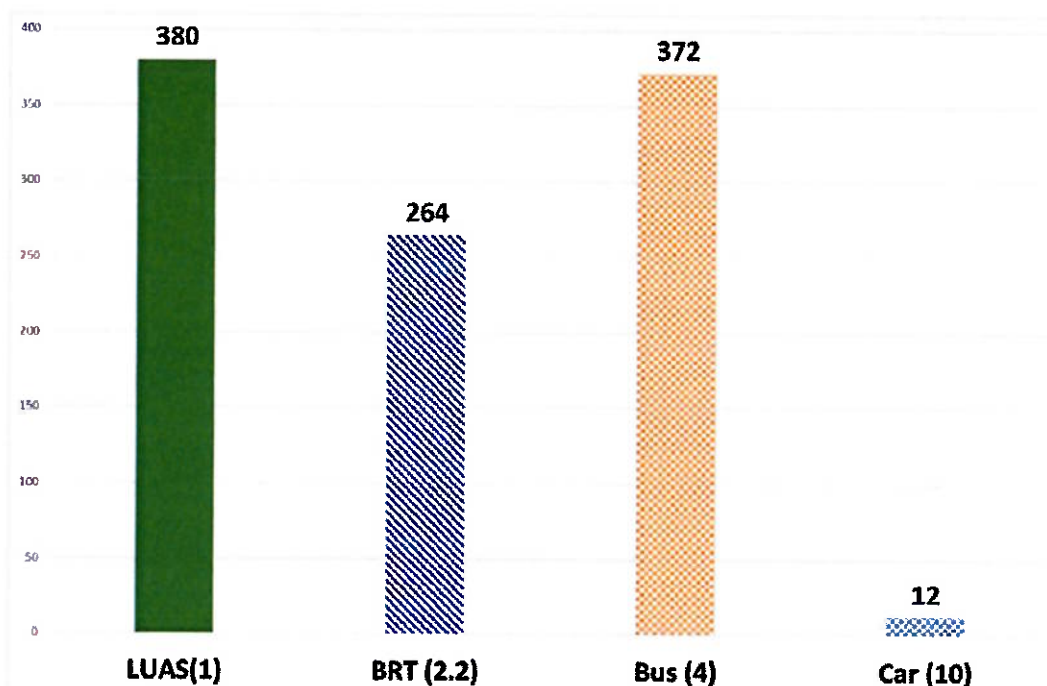
Source: Dublin City Council National Transport Authority. Report on trends in mode share of vehicles and people crossing the Canal Cordon 2006 -2014 March 2014 Fig. 2.3 p.14

https://www.nationaltransport.ie/wp-content/uploads/2013/10/Report_Canal_Cordon_Trends_2006-2014.pdf

Most people are travelling by car.

Let us just compare the use of streetspace by cars, buses the proposed Bus Rapid Transit and LUAS. See Figure 5

Figure 5 Passengers on one 40m LUAS tram compared with capacity of buses, BRT vehicles and cars using the same street space.



Basically, in the street space taken by a 40m tram(as used on the Green Line) carrying 380 people, we can get

- just under 2.2 buses (18m long) of the type proposed for Bus Rapid Transit (BRT), each of which carries 120 people;
- 4 of the latest buses (each 10m long) which Bus Átha Cliath bought, each of which carries 93 people;
- 10 cars (assuming each car is 4m), each of which carries 1.21 people⁴ ⁵.

⁴ Based on the average length of the top 10 selling cars in Ireland. Independent 4 May 2015 (VW Golf 4.255m, Ford Focus 4.36m, Nissan Qashqai 4.379m, Toyota Corolla 4.385m, Skoda Octavia 4.659m, Hyundai ix35 4.41m, Ford Fiesta 3.969m, VW Passat Saloon 4.767m, Toyota Yaris 3.95m, Kia Sportage 4.44m)

⁵Source: Dublin City Council National Transport Authority. Report on trends in mode share of vehicles and people crossing the Canal Cordon 2006-2014 March 2014 p.16

https://www.nationaltransport.ie/wp-content/uploads/2013/10/Report_Canal_Cordon_Trends_2006-2014.pdf

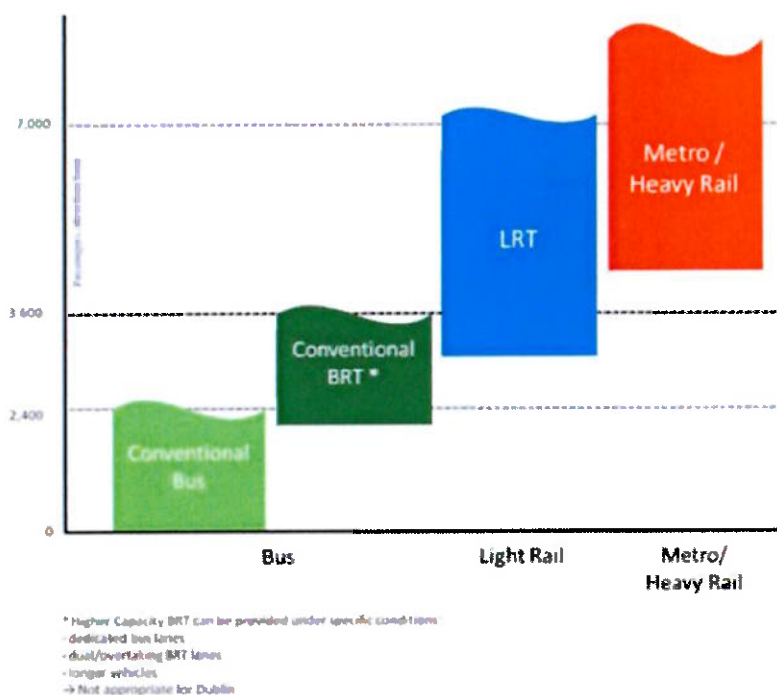
This comparison shows that there are higher operational and maintenance costs for buses (eg. more drivers needed to provide the same capacity as one tram, the life of a bus is not as long as a tram, other current costs are high).

In addition, being electrically driven, trams pollute less than at point of use. There are options for generating electricity, the emissions of which can be measured and controlled at point of generation.

The issue then becomes how best to allocate the limited street space, including consideration of adding another plane to that space and not ignoring the extra investment needed for both BRT and LUAS.

Figures 6 – 8 set out a basis for comparing various public transport modes in urban areas.

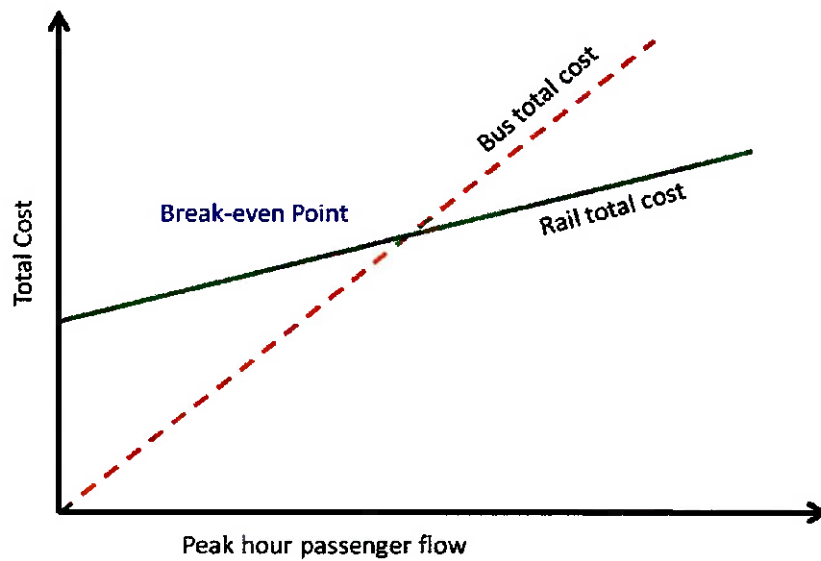
Figure 6 Passenger Capacity of urban public transport
(passengers per direction per hour ppdph)



Source: National Transport Authority: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. Fig.3 p.4
<http://www.nationaltransport.ie/wp-content/uploads/2012/11/Bus-Rapid-Transit-Core-Network-report.pdf>

At some point, the total cost of investing in and operating trams is justified by the extra carrying capacity compared to buses.

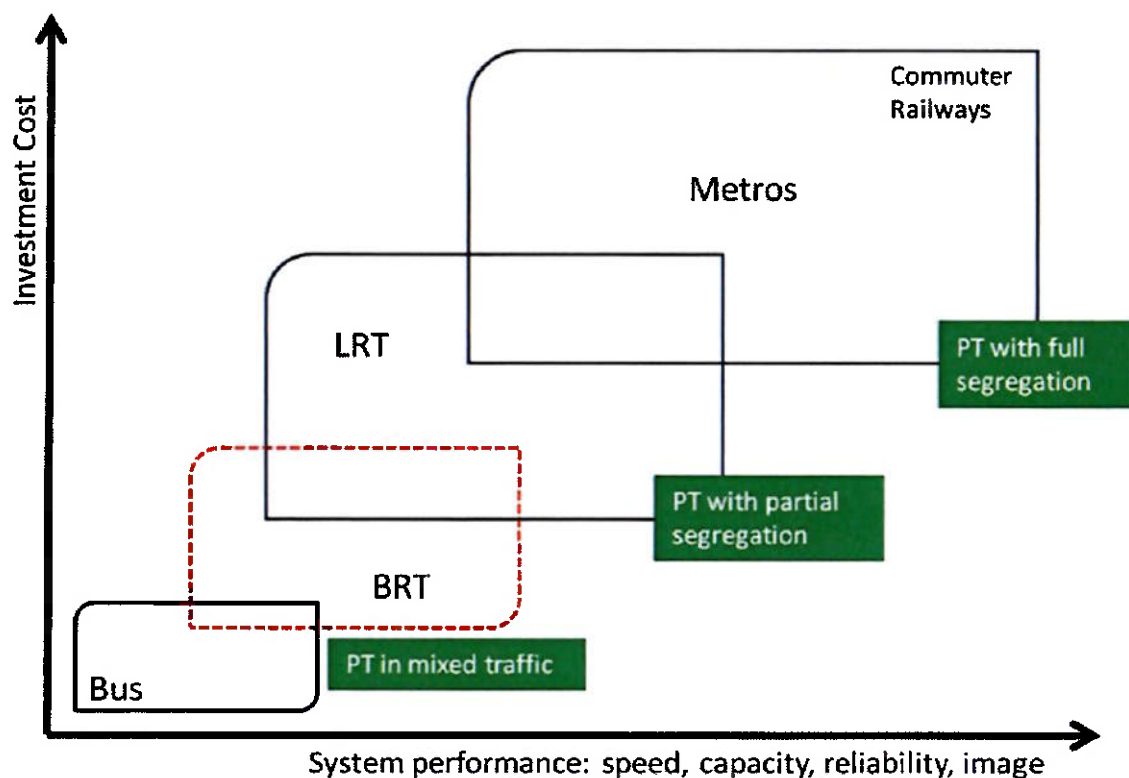
Figure 7 Cost of Peak Hour Passenger Flow Rail v Bus



Source: National Transport Authority: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. Fig.21 p. 27

<http://www.nationaltransport.ie/wp-content/uploads/2012/11/Bus-Rapid-Transit-Core-Network-report.pdf>

Figure 8 Investment cost versus performance (speed, capacity, reliability)



Source: National Transport Authority: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. Fig.2 p.3

<http://www.nationaltransport.ie/wp-content/uploads/2012/11/Bus-Rapid-Transit-Core-Network-report.pdf>

Figure 9 Transport Demand on Swords-Airport-Drumcondra-City Centre-Tallaght Corridor

4.6 Summary of Results

Figure 41 presents a summary of the results of the demand analysis. These results include the AM peak hour demand presented in the previous section together with a summary of the % above or below different capacities. The AM peak period boardings are also included.

Alignment	Scenario	Peak Uniflow	% 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

Figure 41 Summary of Results

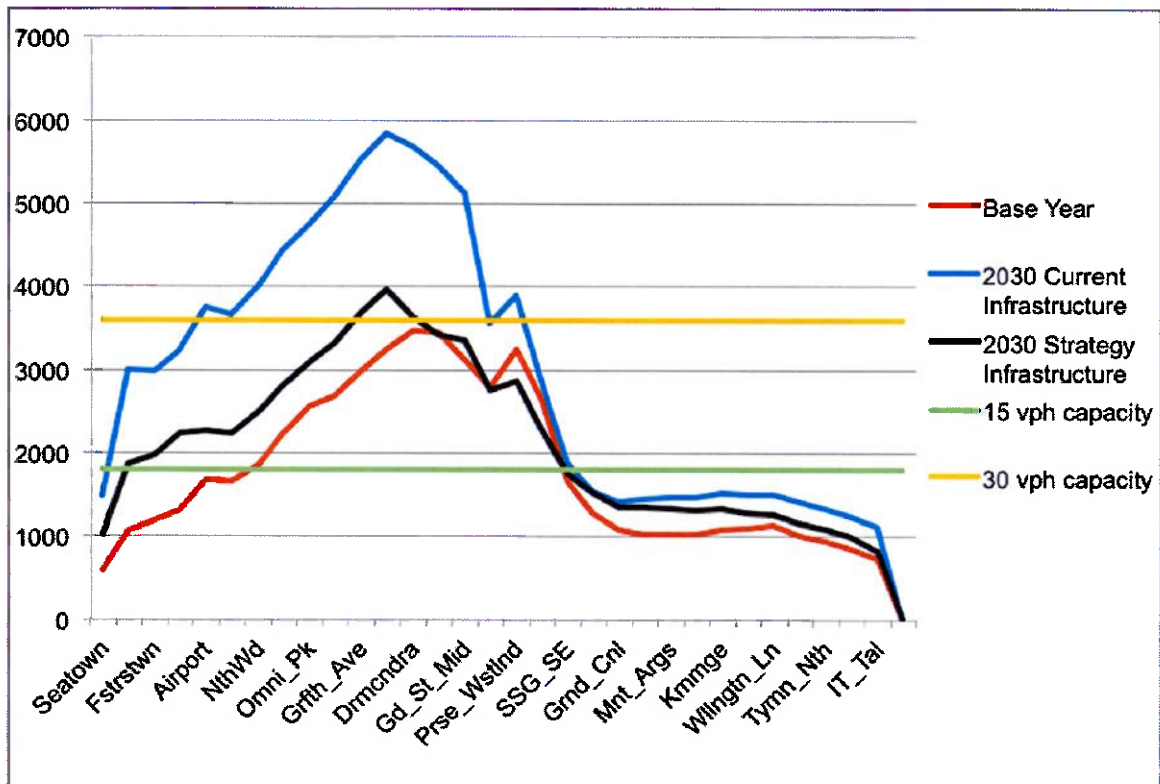
The results show that the Swords to Tallaght cross city alignment has the highest overall forecast demand, particularly in the 2030 Current Infrastructure scenarios. Demand to/from the Swords area and the Airport is high in these scenarios, resulting in a peak demand of nearly 6,000 ppph, which far exceeds the capacity of the proposed BRT service. Forecast demand on the Clongriffin to Tallaght and the Blanchardstown to UCD service also exceeds capacity in the 2030 Current Infrastructure scenario by 8% and 10% respectively. The Blanchardstown to UCD service has the lowest demand of the alignments tested.

Source: National Transport Authority: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. Figure 41 p.53
<http://www.nationaltransport.ie/wp-content/uploads/2012/11/Bus-Rapid-Transit-Core-Network-report.pdf>

Figure 9 summarises the passenger demand on options which NTA studies in its Core Network Report for a Bus Rapid Transit system in Dublin. A later study (ie.a Route Options Assessment on the Swords/Airport-City Centre BRT November 2014) shows that, with one exception, passengers forecast exceed the proposed BRT capacity. This report assumes that the present bus network will still be in place. This means that regular bus services will still run on the same roads as the two separate BRT services on the Dublin Airport/Sword-Drumcondra-City Centre route.⁶ Figure 10 shows that Drumcondra is the point with the highest peak for passengers on the Swords-Dublin Airport-Drumcondra – City Centre corridor.

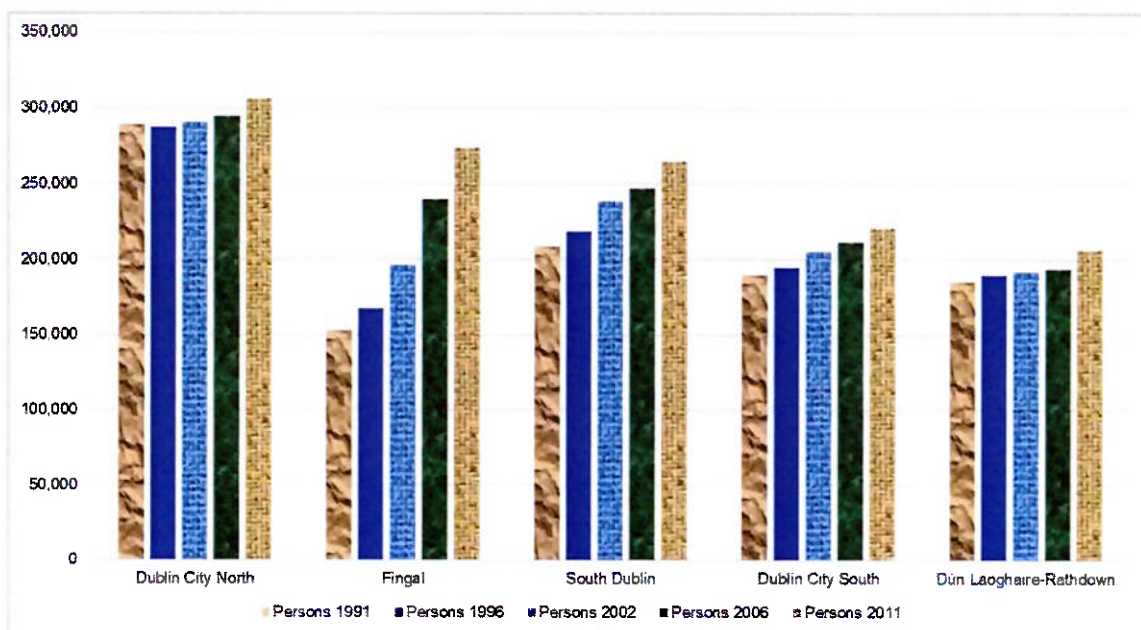
⁶ Summary tables 10.5 and 10.6 for the result for the opening year 2018 and the forecast year 2033 for 2 route options. National Transport Authority Swords/Airport to City Centre. Route Options Assessment Volume 1 : Main Report (October 2014 p. 187
http://www.nationaltransport.ie/wp-content/uploads/2014/10/Route_Options_Assessment_Report.pdf

Figure 10 Transport Demand in key North Dublin corridor



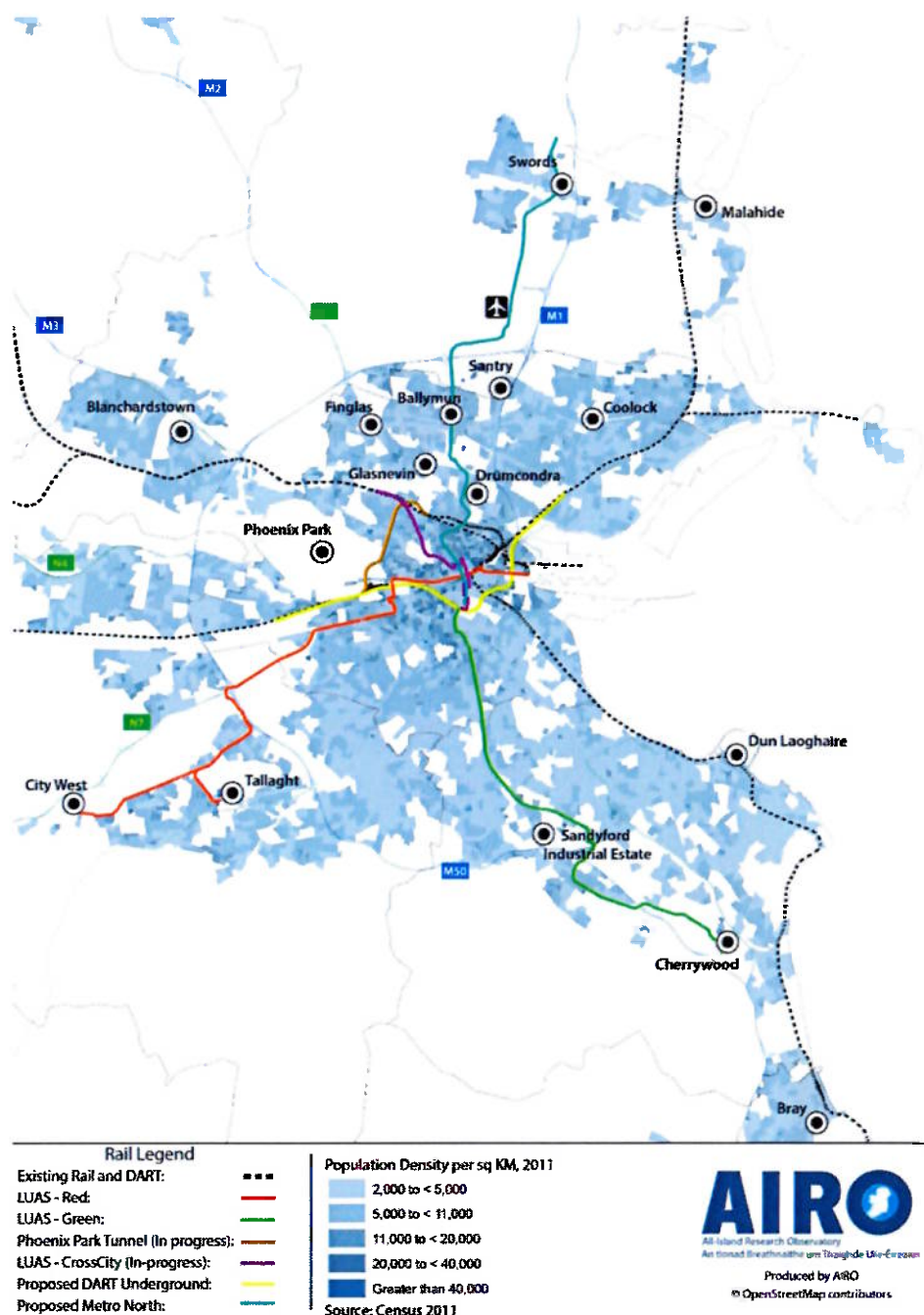
Source: National Transport Authority: Bus Rapid Transit (BRT) Core Dublin Network. October 2012. Figure 37 p.50
<http://www.nationaltransport.ie/wp-content/uploads/2012/11/Bus-Rapid-Transit-Core-Network-report.pdf>

Figure 11 GDA Population 1996-2011



More people live in the north part of Dublin city (306,425 in Census 2011) than in either the south city (221,186), Dun Laoghaire/Rathdown (206,261), South Dublin (265,205) or Fingal (273,991). Figure 11 shows that this has been so for the last 20 years.

Figure 12 Population Density (2011 Census)

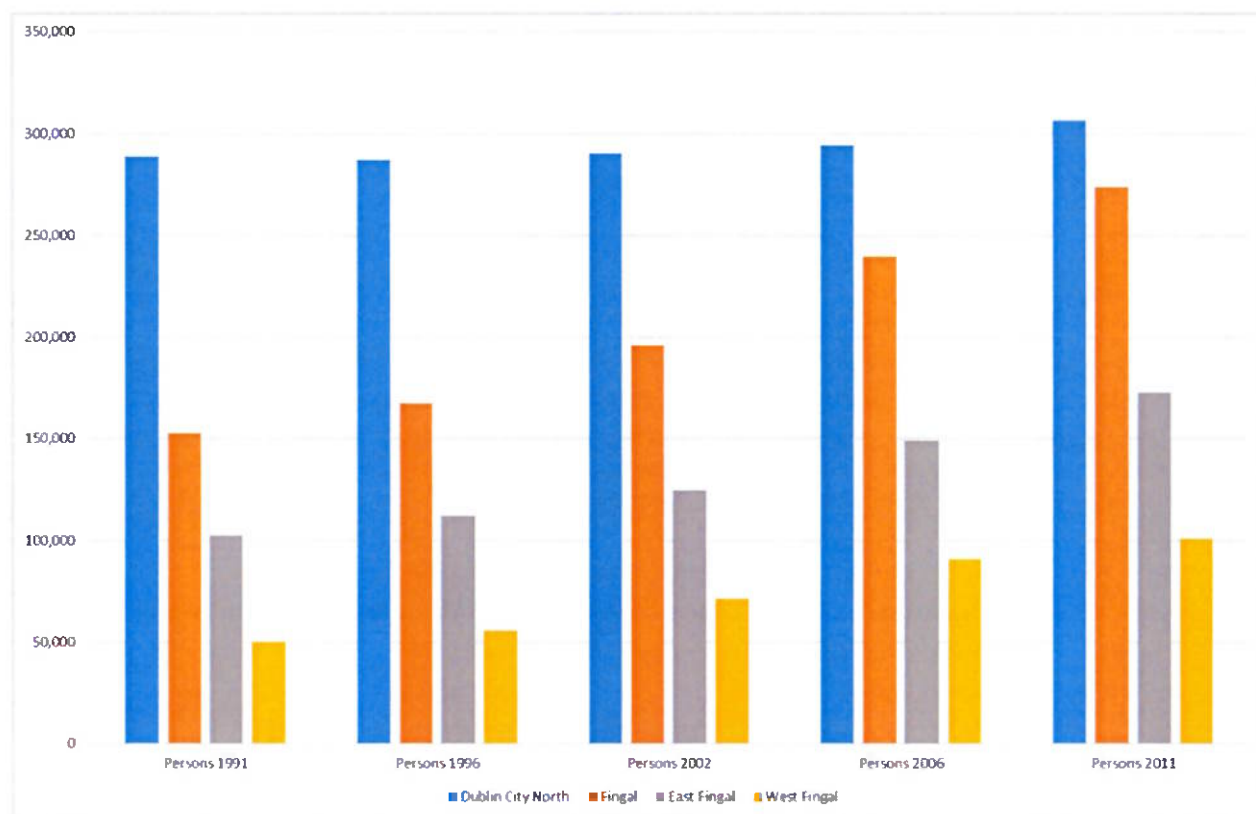


One justification for Metro North is that Fingal is the fastest growing county in Ireland. True. Asserting that alone hides the fact that Fingal can actually be split in what I call Fingal West and Fingal East, using the Ashbourne Road (M2/N2) as the border. Fingal East is the

only part of Fingal which the NTA focused on when it commissioned the Fingal/North Dublin Dublin Transport Study.

Note that West Fingal has doubled in population in the last 20 years. Blanchardstown has nearly 70, 000 people whereas Swords has 40,000 people.

Figure 13 Population Dublin City North, Fingal East and West



Swords is obviously *noisier* than Blanchardstown. Despite the origins of urban transport policy making in elections, how is it that this government won one of the two by-elections in West Dublin since 2011, without promising to electrify the Maynooth commuter line ie. bringing the DART to Blanchardstown?

Many of you realise that

- DART - the first electrification of rail transport in the Republic was promised in the first direct elections to the European Parliament in 1979;
- DART was extended to Greystones as a result of a by-election in Wicklow in 1995⁷;
- The LUAS we got – the early 21st century non-networked phenomenon was the result of the 1998 North Dublin by-election following the resignation of Ray Burke. This came about as the PDs – then in government- introduced a Dublin Transport policy for that election, despite not having any transport or environmental policy in the 1997 General Election manifesto. This audience will be amused when I tell that the ad-hoc transport policy had about a page and half entitled covering economics and finance. But there were no figures or calculations in that section.

Dublin Airport

Swords gets attention because it is near Dublin Airport. Dublin Airport is a major employment centre with about 15,000 servicing the 22m passengers who travelled through the Airport in 2014

An NTA study of Dublin Airport passengers found that:

1.
 - a) Less than one seventh of trips (14%) were business related;
 - b) Three quarters of all trips were either for holiday/leisure (nearly half) or visiting friends/relatives (over one-quarter);
See Figure 14
2. Less than one third of the trips originated in City Centre/South part of Dublin City;
See Figure 15
3. Three quarters (75%) had a journey time of less than one hour to the Airport, with almost half (46%) having a journey time of less than 30 minutes;
See Figure 16

All this suggests that the vast majority of passengers using Dublin Airport may not be very time-constrained in how they access the Airport. Most passengers are not bound for our capital's Central Business District. Those passengers who are time-constrained have the option of taxis (which can use bus lanes) and/or using the Dublin Port Tunnel to access Central Business District.

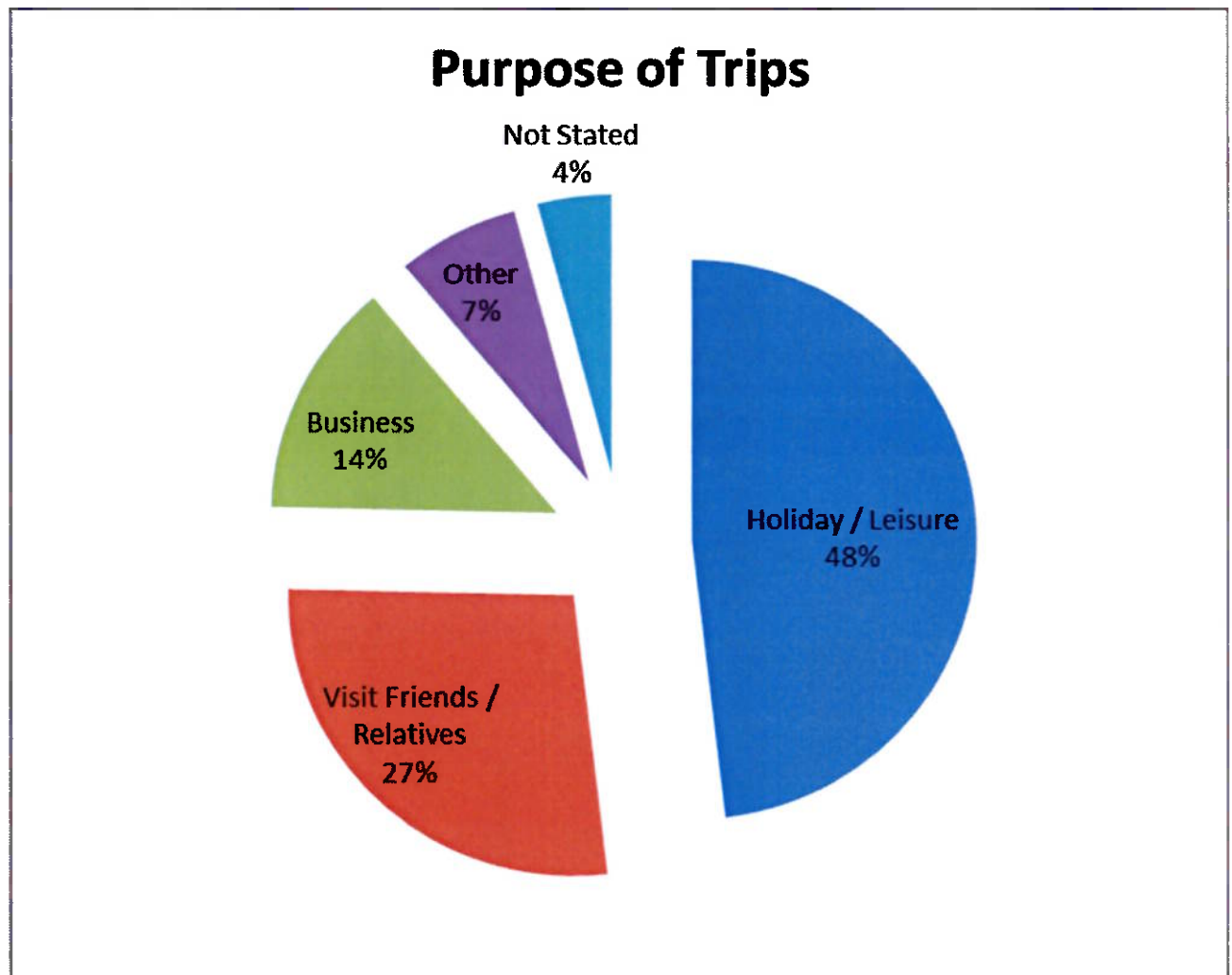
⁷ In July 1995, I wrote about this in an OpEd piece in the Irish Times. While I cannot be sure, I gather it this article had three effects. 1) Nora Owen, then Minister for Justice and living in Malahide set about ensuring that DART was brought to Malahide. 2) Bertie Ahern saw to it that Drumcondra Station (on the Maynooth line) was reopened. 3) Some nudging from the EU commission led to a study of the planned LUAS system which found that there were more trip attractors/generators on the proposed line from the City Centre through Drumcondra to Ballymun than there were on the then planned networked lines Dundrum through the City Centre to Tallaght. 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

Why do the public authorities insist that travel times between the City Centre and the Airport should be the major criterion, if not the sole criterion?

Is it really worth spending €2.5bn on a single channel which is to the west of the central part of the Dublin's Economic Core?

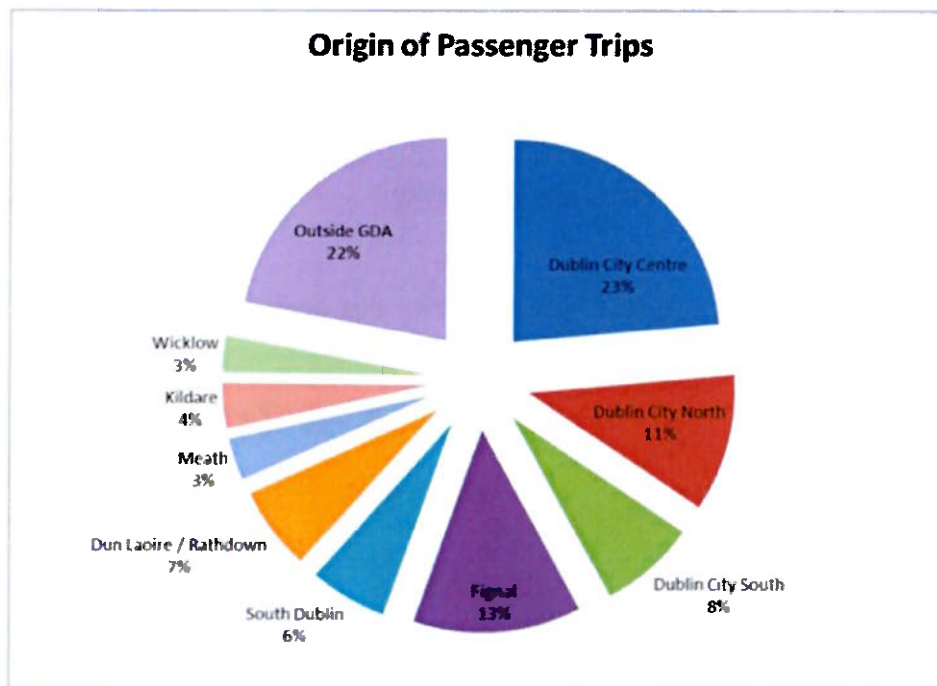
What is it about our transport policy makers that they opt to build yet another non-networked urban transport railway in our capital city?

Figure 14 Dublin Airport Why did people travel?



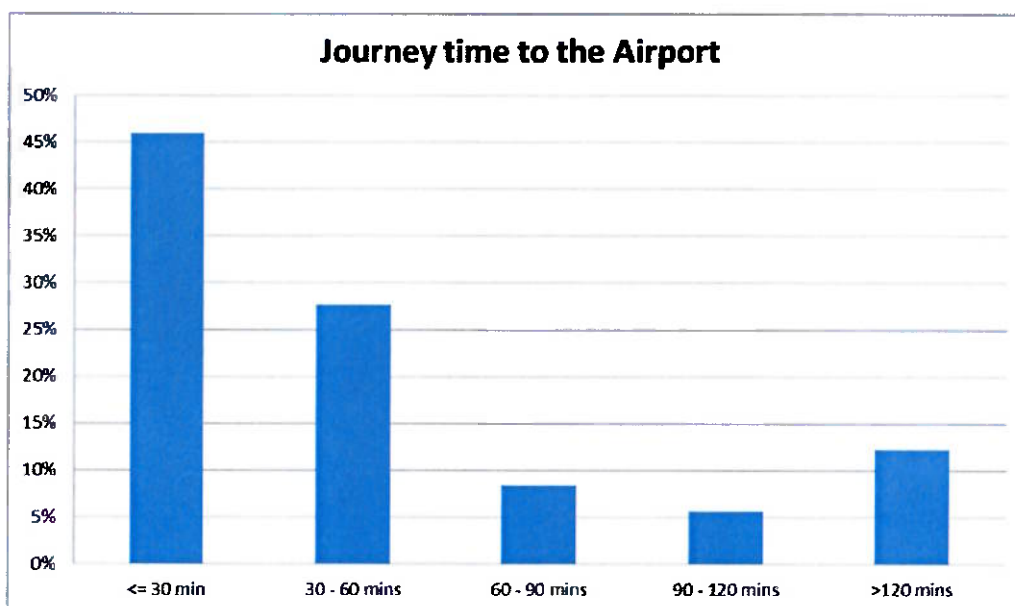
Source: National Transport Authority Survey at Dublin Airport 2011. Fig. 3.11 p. 22
<http://www.nationaltransport.ie/wp-content/uploads/2012/04/NTA-Survey-at-Dublin-Airport-20112.pdf>

Figure 15 Dublin Airport. Where in Ireland do they come from?



Source: National Transport Authority . Survey at Dublin Airport 2011 Figure 3.6 p. 15
<http://www.nationaltransport.ie/wp-content/uploads/2012/04/NTA-Survey-at-Dublin-Airport-20112.pdf>

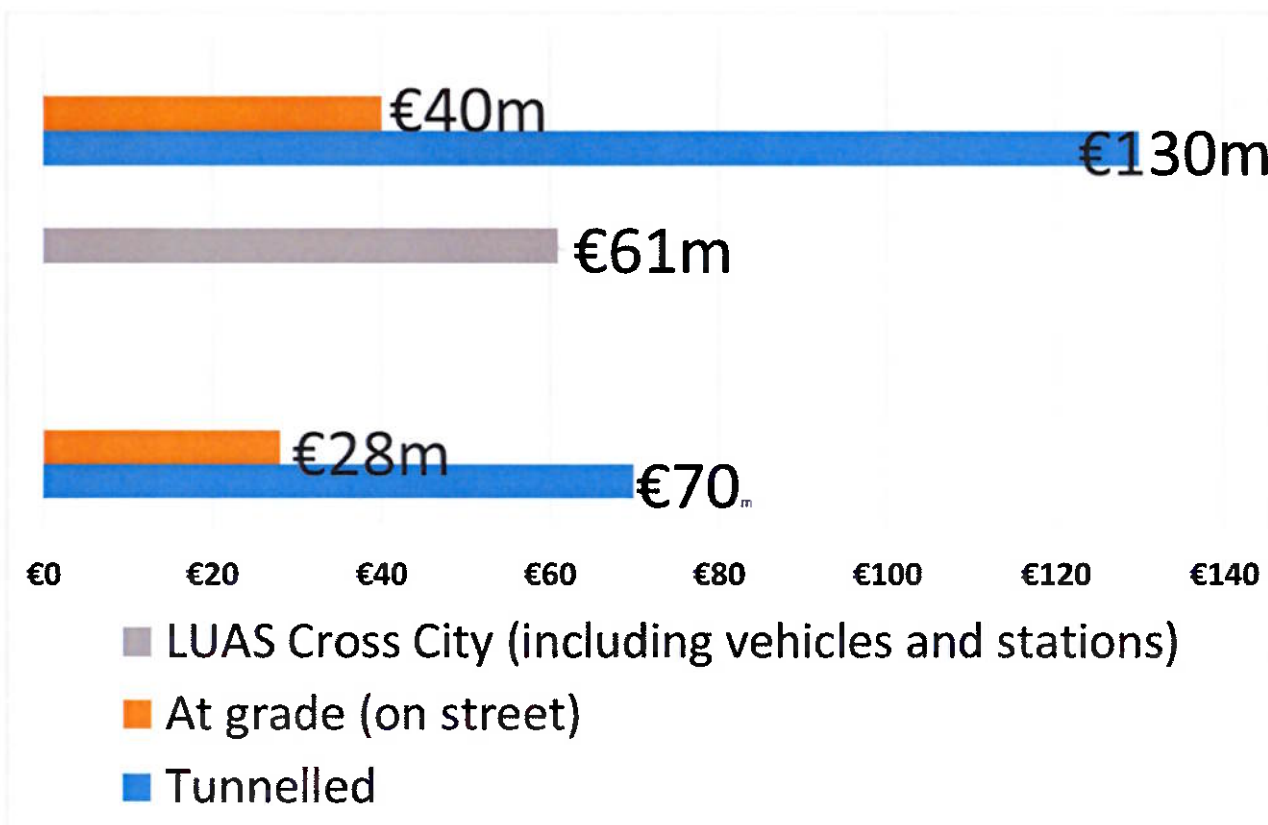
Figure 16 Dublin Airport. How long to get there?



Source: National Transport Authority . Survey at Dublin Airport 2011 Figure 3.5 p. 15
<http://www.nationaltransport.ie/wp-content/uploads/2012/04/NTA-Survey-at-Dublin-Airport-20112.pdf>

Assume that €2.5bn is the budget for enhancing public transport in Dublin's Core Economic Area with a focus on Airport-City Centre links, what could be done for the money?

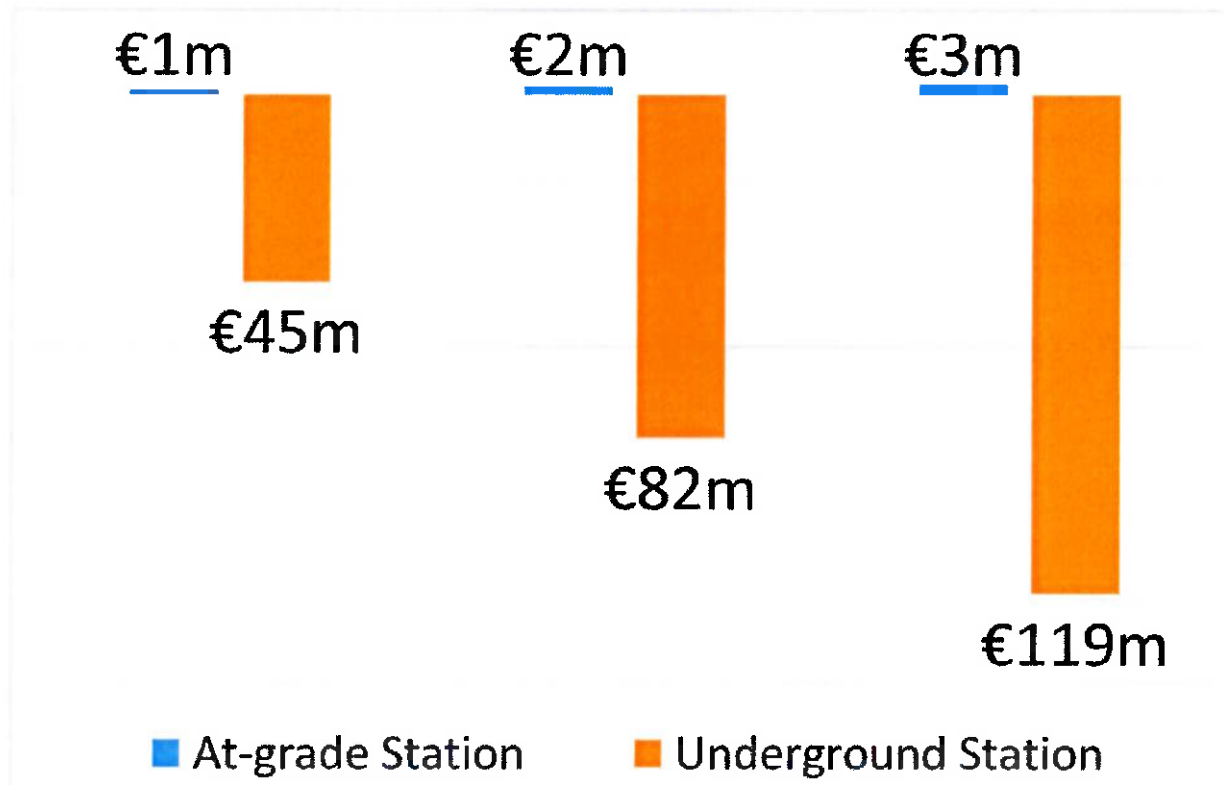
Figure 17 Comparative costs. LUAS CrossCity (including vehicles and stations) with estimated costs for on-street and tunnelled rail (excluding vehicles and stations) (€/km)



Source: National Transport Authority AECOM. North Dublin/Transport Study. Stage One Appraisal Report Nov 2014. Table 6.5 p. 82

Figure 17 compares the max and minimum costs (€/km) of on-street and tunnelled LUAS (as set in an NTA AECOM report) with the reported costs of LUAS Cross City now being built. While LUAS Cost City costs include stations and trams, the NTA/AECOM estimates do not. The costs of stations and vehicles have to be added to costs which the NTA/AECOM estimated. Figure 18 shows the comparative costs of stations only. Suffice to say that an underground station costs 40 times more than an on-street station. Of course the less stations you have, the less attractive it is for passengers.

Figure 18 Comparative Costs of LUAS stations onstreet and Metro stations underground



Source: National Transport Authority AECOM. North Dublin/Transport Study. Stage One Appraisal Report Nov 2014. Table 6.5 p. 82

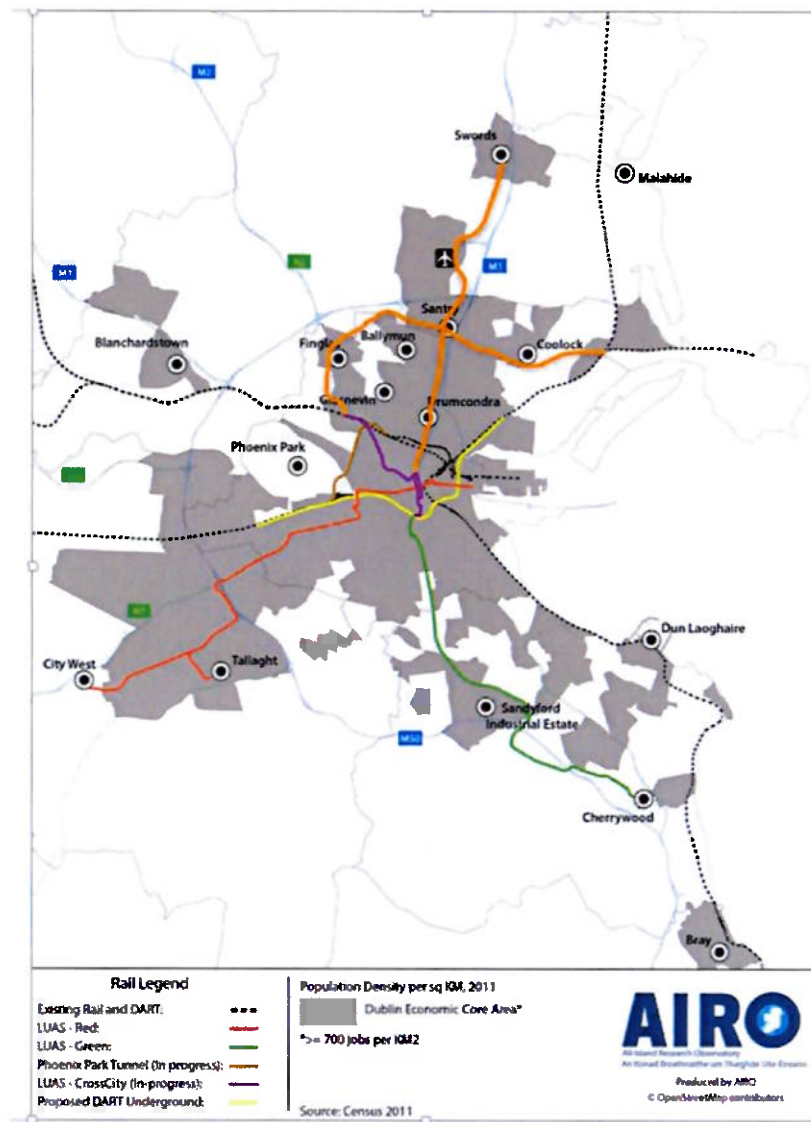
In Figure 19, I present a LUAS loop around North Dublin, with spurs to Airport, Swords and Howth Junction. Howth Junction is the station where the DART to Howth splits from the main northern line. It is also a station at which non-DART commuter services (eg. Skerries, Drogheda, Dundalk) stop.

Using the LUAS CrossCity cost of €61m per kilometre (including vehicles and stations), I estimate that this 35km line would cost just under €2.2bn.

The advantage is that

- It serves the northern part of Dublin's Core Economic Area comprehensively;
- Integrated with what already exists;
- It offers 3 rail-based ways of getting to/from the City Centre from the Airport;
- It links with
 - DART at Howth Junction;
 - Northern Commuter services also at Howth Junction;
 - The Maynooth line at both Drumcondra and Broombridge;

Figure 19 A North Dublin on-street LUAS Loop with spurs to Airport, Swords and Howth Junction



To promote competitiveness and social cohesion, Dublin needs integrated and sustainable public transport. Achieving this needs quiet, consistent competence to bring working and living conditions to the levels of well-run European cities. It would be a start if our public authorities drew the appropriate conclusions from their own reports and invested accordingly.

The case for extending LUAS in North Dublin is very well summarised in Figure

Figure 20 The case for extending LUAS throughout North Dublin.

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.

Source: National Transport Authority. AECOM Fingal/North Dublin Transport Study. Stage One Appraisal Report November 2014 p.39
https://www.nationaltransport.ie/wp-content/uploads/2014/12/Appraisal_Report_19112014_final.pdf

Appendix 1

Wrong Steer on city's traffic needs

Irish Times 19 July 1995

Wrong steer on city's traffic needs

Responses to A. B. B. are available in full on the NTA website. For more information on the Dublin City Centre scheme, visit the website at www.nta.ie.

It was bad. 19 July 1995

THE recent decision to extend the DART to Greystones raises questions on how decisions on Dublin's public transport are made.

By-elections aside, why give Greystones, with a population of 13,000, priority for a DART extension over Malahide/Portmarnock (20,000), Clondalkin (38,000), Blanchardstown (49,000) or Maynooth/Leixlip (19,000)?

And how closely do the public authorities monitor and respond to changes in traffic? Take the situation regarding access to Dublin Airport. Passenger numbers at the airport have increased by over one million in the past year and now

total almost seven million per year.

Since all land access to the airport is by road, it is thought that up to 2,000 *additional* cars used the airport every day last year. And yet the Greystones DART is justified on the grounds that it may take about 600 cars off the roads daily!

What hope does official thinking offer to north Dublin? Not much, if the last available Dublin Transport Initiative (DTI) report is anything to go by. It gave no weight to traffic

generated by Dublin Airport in terms of improved access by road or rail during the current EU-funded National Development Programme.

Yet the DTI noted that the airport was the single largest employment complex in the east region, with 8,000 staff. As DTI has not yet published the annex on Light Rail (LRT), we still don't know the basis for the Government's apparent decision not to build LRT lines linking the city-centre to Ballymun, Dublin Airport and Swords during the cur-

The development of public transport in north Dublin has failed to keep pace with the reality on the road, argues Donal O Brolcháin

15,000 and continuing growth of industry in Santry, Coolock and Swords.

North Dublin is not the only place that transport authorities seem to deal with in a less than balanced way.

It is worth looking at what DTI said about DART. In contrast to other DTI documents, the latest available working copy of the Final Report (May 1994) did not specify any priority regarding DART ex-

tension. The Interim Report (December 1993) noted that "the distances involved between the city-centre and the western towns which are prime candidates for new DART services (approximately 9 km) are too short to allow more than a few conveniently-sited intermediate stations on a metro-type system; in consequence, the economics of DART lines to Tallaght, Blanchardstown and Clondalkin are poor."

The question now is this: are the economics of a DART extension to Greystones better than one serving the growing population and industrial centres around Blanchardstown and north Kildare, using the Maynooth line and its intermediate stations? Why did DTI suggest that Leixlip/Maynooth — on a single rail track (just like Greystones) — get an improved diesel service instead of a DART extension?

The rapid growth in north Dublin and north Kildare demands that the Government re-examine the priorities assigned to public transport investment. Improving access to the

country's major international airport is critical, given that the aim of EU cohesion and structural funds is to improve our capacity to trade internationally in the single European market.

Prioritising the north Dublin LRT and DART projects is essential if public investment is properly focused on, and consistent with, securing what DTI called a "European model of the urban region, with a strong city-centre at the heart served by a balanced transportation system in which public transport provides for mass transportation needs".

How does the Greystones DART provide better balance in the transportation system than an LRT linking Ballymun (population 22,000), Swords (population 20,000) and Dublin Airport?

Why not bring the following forward during the current national development programme?

- * LRT to Ballymun, Dublin Airport and Swords.
- * DART extension to Portmarnock/Malahide with a fast, frequent link (possibly LRT) to the airport and Park 'n' Ride at the proposed Marino/Fairview station.
- * Reopening Drumcondra station on the Blanchardstown-Leixlip-Maynooth line.

I see these as complementary to the Northern Cross section of the M50 (now being built) and the four-lane port access tunnel agreed by the Government last October.

At present, it seems that some decisions are being taken without regard to what is happening to traffic on the ground.

Donal O'Brolcháin

ABP-317121-23

Donal O'Brolcháin is secretary of Drumcondra 2005, an environmental project organised by seven residents' associations.

Appendix 2

The Drumcondra

CITY ACCESS TRANSIT (CAT)

A response to a call for submissions in 2001



DRUMCONDRA 2005

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

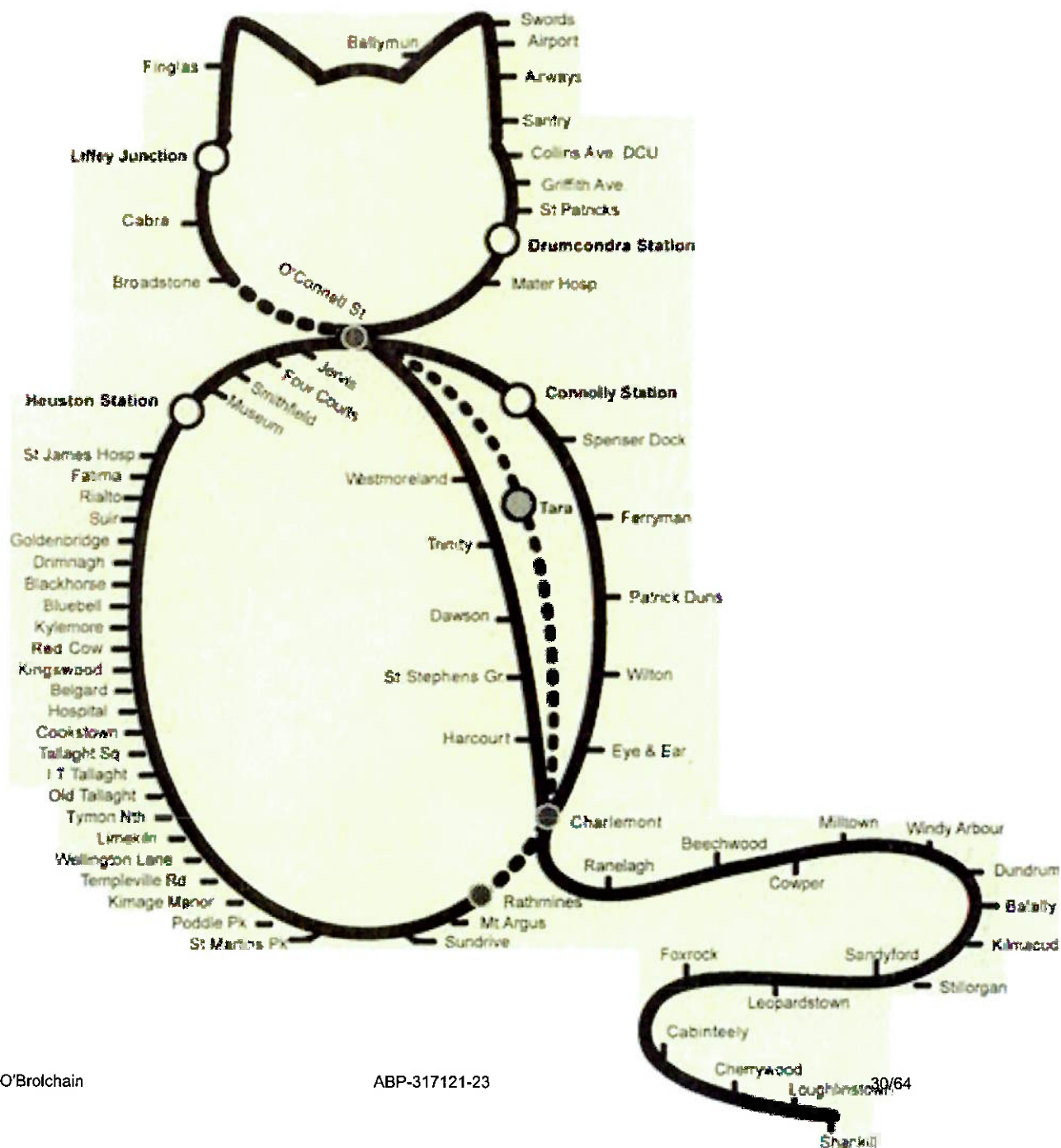
CITY ACCESS TRANSIT

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 putt with this CAT.





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

May 2001

Donal O'Brien
Organisers include the Residents Associations of All Hallows, Courtlands, Drumcondra, Gaeltacht Park, Grasspark, and Lona & District

City Access Transit

SUMMARY

CAT is **street wise and clean**. It offers a coherent framework for

- **Park 'n Ride sites on all the main national roads**
- **Interchange with DART, Arrow and other mainline rail services**
- **access to Dublin Airport and Port**
- **redesigning bus services**
- **becoming fatter, with bells, whiskers and even kittens.**

CAT serves all the main road, rail and air access points to Dublin. It links many industrial, office and commercial areas with residential areas. The network also links many educational and cultural institutions as well as hospitals. CAT makes it easy to run continuous services in a single system.

Dublin's public transport (including buses) needs a **current cost subsidy** at the same level as other European capitals. A Dept. of Public Enterprise paper reported that Dublin's public transport gets less than one quarter of the subsidy rate in Helsinki and Stockholm. Other studies suggest that European capital cities have public transport subsidy rates of about 50 per cent.

We need **quiet competence - not grand gestures**. We must have a coherent strategy for the next 20 years. During that time, further options for the future can be developed, studied, designed, costed, debated and decided. By having three different policies in the three years since it took office, this government has shown itself incapable of coherent thought, competent planning and considered action on Dublin transport. Consider the following

- The proposal for a LUAS line linking Ballymun, Drumcondra to Broadstone! At present buses from these areas go into the city centre. If Broadstone did not exist, who would create this place well away from the city centre!
- The proposed LUAS link with DART near Shankill. This seems to assume using an old rail junction. This area is now built up. Does this new plan imply demolition of houses in Shanganagh?
- "The future of urban transport policy lies not in expansion but in the intelligent use of existing traffic areas. The objective of ensuring mobility for people when travelling to work and shopping and during leisure time requires imaginative urban traffic management based on modern information technology". Ernst Joost, Deputy Director, Zurich Transport Authority, speaking in Dublin in June 1999.

Both the **motoring and taxi lobbies want better public transport** instead of more parking charges and road-pricing. Judge Sean O'Leary, Inspector for the LUAS public inquiries, found that **buses alone cannot do the job**. John Henry, DTO Director told the same inquiries that light rail has a proven capacity to attract car drivers. As citizens of the Celtic Tiger, CAT **improves our standard of living** by making it easy to travel around our capital in **less polluting** ways.

CAT links different parts of Dublin using a mainly surface light rail transit. Many centre city stops are those already approved for the Tallaght and Sandyford lines, as are the stations on those lines. Government consultants studied a line linking Tallaght to Kimmage, going underground to Rathmines, Ranelagh, Tara St, O'Connell St and Broadstone. CAT includes that line. The LUAS vehicles already ordered are being built for underground running.

CAT is **cost effective**. Surface LUAS is **costs one-seventh** that of underground (see p. 5). The Government has already committed over 20 per cent of the cost by deciding to build the Tallaght and Sandyford LUAS lines at a cost of £353m for 23km. This CAT will cost £1.628bn. as follows:

On-street LUAS 70kms @ £15m per km	=£1,050m
Underground LUAS 6kms @ £38m per km	= £228m
Underground stations say 5 @ £70m each	= £350m

GET ON WITH IT!

CLEAN AND HEALTHY

Being electric-powered, CAT pollutes less at point of use and is quieter. Given the different ways of generating electricity, CAT need not contribute to climate change, as it does not emit any environmentally damaging greenhouse gases directly.

CAT will help Dublin to become a healthier city. Traffic is now the largest single air pollutant in urban areas. Some have estimated that traffic-generated air pollution causes over 20,000 deaths in Europe every year.

PARK 'N RIDE ON THE MAIN ROADS.

CAT provides a clear framework for Park 'n Ride sites. It links all the main roads into Dublin with much of the city, as follows

- Airport/Belfast road(N1) at Swords, the Airport, Collins Ave and Drumcondra;
- Ashbourne/Slane/Derry road (N2) at Finglas;
- Navan/Cavan road(N3) at Cabra;
- Lucan/Maynooth road(N4) along the quays e.g. Museum on the Tallaght LUAS;
- Naas/Kildare road(N7) between Red Cow and Grand Canal (with stations at Kylemore Road, Bluebell and Blackhorse on the already approved Tallaght line)
- Blessington/Tullow(N81) road at Tallaght;
- Bray/Wicklow(N11) at Loughlinstown and Cabinteely;
- M50 at two places, ie. between Kingswood and Red Cow(on the Tallaght line), between the Airport and Finglas between CAT's ears.

INTERCHANGE WITH DART, ARROW AND OTHER RAIL SERVICES

CAT has direct interchanges to the existing rail services at four different places. It links with

- DART by underground stations at Tara St or Connolly (Tara St station cannot cope with existing peak hour passengers. It is not clear that CIE's development plans for Tara St. include increasing the capacity for passengers).
- Heuston. This links with Kildare Arrow services and mainline rail services from Dublin to all parts of Ireland.
- The Western line at Drumcondra Station and a proposed station at Liffey Junction. Liffey Junction is between Cabra and Finglas. It where the railway line under the Phoenix Park joins the Western Suburban (Kilcock-Maynooth-Barrow St) line. This serves such rapidly growing areas as Blanchardstown in North-West Dublin and Leixlip in North Kildare.

DUBLIN AIRPORT

CAT serves Dublin Airport directly. It does so from two directions, as the Airport is on a loop. One part of this loop is mostly off street ie. from Harold's Cross to the Airport via Rathmines, Ranelagh, Tara Street, Broadstone, Cabra, Finglas. This would make it easy to run express and/or limited stop services to/from the Airport. This means a predictable travel time to and from the Airport. It shortens the total journey time, including the time spent looking for parking at Dublin Airport. CAT gives people another option on the cost and inconvenience of Airport parking.

For years, all Governments have ignored key facts about the Airport in planning Dublin transport. A recent Ove Arup report confirmed what the Dublin Transportation Initiative found in 1993 - that there is a lot of traffic to the Airport during the morning peak commute hour. This complements the city bound flow making this an ideal route for public transport.

A 1998 Aer Rianta/CIE Air-Rail study reported that over three-quarters of Dublin Airport passengers are making journeys for leisure purposes.(see p.6) Passengers who want non-stop Airport access would have the options of their own cars or taxis or bus services. All could use either the Port Tunnel or the complete M50 or the Eastern By-Pass, if it is ever built!

BUSES

Dublin needs a redesign of bus services. Bus drivers need comfortable places to work from and in which to take breaks. One Dublin Bus depot (Broadstone) is on CAT, while another three (Ringsend, Summerhill, Cunningham Rd) are very near it. This would help get rid of bus parking on city centre streets.

A FATTER CAT - BELLS AND WHISKERS, EVEN KITTENS

By adding bells and whiskers, and a kitten or two, CAT could serve other areas. One obvious area is between the M1 and the northern railway line. This whisker would take in industrial areas at Clonsillaugh and Coolock in addition to Northside Centre and Beaumont Hospital. An extra bell could take in the Point, East Wall and the ferry terminal at Dublin Port, perhaps connecting with the Coolock whisker! Similarly, a west side kitten could take in Clondalkin and Citywest.

BEING STREET WISE,

CAT makes better use of the space available. (see p.7). A 30m CAT vehicle carries 60 people seated in the same street space as 6 cars. These 6 cars carry less than 9 people as each car carries an average of 1.42 people during the morning peak in Dublin according to the DTO.

100,000 new vehicles were registered in Dublin between January and October. Traffic planners allow over 5 metres per car. This suggests that Dublin needs over 12 km (7.5 miles) of street space each week to cater for these vehicles. On this basis, you might have to go to Cork to park!

CAT OR A WOMBAT?

CAT is a single network. As all parts are connected, there will be no need to build maintenance depots for the separate lines needed by this government's policy. Why build two separate depots for the Tallaght and Sandymount lines? The present policy does not to connect these lines. This repeats the mistake made when railways were first built in Ireland. The lines into Dublin did not interconnect then. Continuing this is a waste of money, brains and time - a wombat. Approving this "in principle", means dithering! This indecisiveness drives up costs. It makes life uncomfortable and unpleasant!

A PURRING CITY

All public transport has to be pleasant, easy to use, predictable and reliable. This means easy access for all and being clean.

Ease of use will be greatly enhanced when the Dept. of Public Enterprise brings in **integrated ticketing** for public transport. Smart cards (like telephone call cards) may be used. This will allow people to use a single card for any public transport journey within the Greater Dublin area, regardless of how many changes of mode (eg. from CAT to bus, DART, Arrow or suburban and vice versa) are needed.

Predictability means having up-to-the-minute information on the next service arriving at each public transport stop. DART has this. But CAT will run mainly on streets, where traffic conditions can make time tables more aspirational than real. **Real-time information** is necessary at each stop as in cities like Gothenburg.

Reliability demands that all public transport (CAT, buses) in Dublin must get **automatic priority at traffic lights**. Dublin Corporation staff resist this, despite the lessons of wealthy cities like Zurich.

GET ON WITH IT!*

CAT is one of a set of mutually-reinforcing measures which should make it easy for people to move around the Greater Dublin Area. We need the Government to get on with CAT by deciding, immediately, to

1. hold a public inquiry on a surface link (via Dawson, Nassau, Grafton and Westmoreland Streets) between the Sandyford and the Tallaght lines
2. fund full detailed design on
 - the northside loops serving the Airport, Swords and the suburbs between them and the city centre;
 - the Docklands loop linking Connolly to Ranelagh via the new Guild Street - Macken St. bridge;
 - a new line from Tallaght (via Templeogue, Kimmage, Harold's Cross Rathmines) to the city centre and Broadstone outlined by Atkins in 1998. This includes a tunnel from Mount Argus through to Broadstone (with underground stations at Rathmines, Ranelagh, Tara Street);
 - extensions to City West, Clondalkin, Coolock, East Wall and the Dublin Port passenger terminal.
3. Provide an operational cost subsidy of at least 50 per cent for all mass public transport - regardless of who owns or operates it.

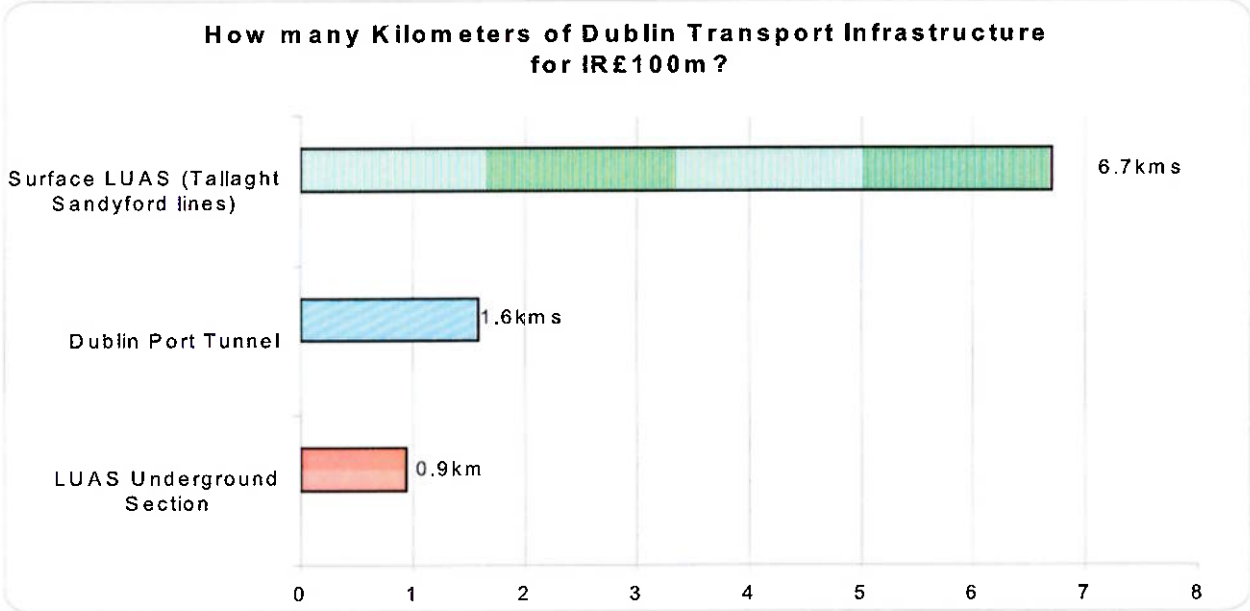
*CAT is based on the following:

- the 1994 Dublin Transportation Initiative (DTI) final report.
- the 1996 Oscar Faber comparative study on Dublin's LRT lines.
- the 1997 Dublin Docklands Master Plan
- the 1998 Atkins study on surface/underground options for Dublin's light rail.
- the 1998 CIE-Aer Rianta Air-Rail link Report.
- the 1998 Dublin Corporation Review of Existing Air Quality and proposals for additional monitoring of traffic related emissions in Dublin City. issued by the Office of the Director of Traffic
- the 1998 DTO Final Report on Park and Ride Strategy for the DTI area
- CIE - Light Rail Project Office. Environmental Impact Statements
 1. Line A. Tallaght - Middle Abbey Street. July 1998
 2. Line B. St. Stephen's Green - Sandyford Industrial Estate. December 1998
 3. Line C. Abbey Street - Connolly Station. September 1999
- Findings of Inquiry
 1. Dublin Light Rail Line A. December 1998
 2. Dublin Light Rail Line B. June 1999
 3. Dublin Light Rail Line C. January 2000
- the 1999 Dublin City Development Plan
- the 1999 National Development Plan
- the 1999 Strategic Planning Guidelines for the Greater Dublin Area
- the January 2000 Atkins McCarthy report on the underground section of LUAS/LRT between Stephen's Green and Broadstone.
- the June 1999 lecture Economy and Ecology are not Contradictions - Lessons in Transportation Planning from Zurich by Ernst Joos, Deputy Director, Zurich Transport Authority organised by the Swiss Embassy and others.
- the March 2000 Ove Arup report Dublin Suburban Strategic Rail Review.
- the April 2000 UCD report Comparison of Subvention levels for Public Transport Systems in European Cities, commissioned by the Dept. of Public Enterprise.
- the April 2000 report by Environmental and Transport Planning (UK)
Bus or Light Rail: Making the Right Choice.
- the May 2000 Dept. of Public Enterprise report on Regulation of the Bus Market in the Greater Dublin Area. prepared for the Cabinet Committee on Infrastructural Development and Public Private Partnerships.
- the June 2000 Dublin Corporation proposal for a bridge in the Docklands
- the September 2000 article on Public-health impact of outdoor and traffic-related air pollution: a European assessment Lancet (UK) 2 Sept 2000 (Vol. 356 No.9232)
- the September 2000 DTO Platform for Change Strategy 2000-2016
- the October 2000 National Greenhouse Gas Strategy published by the Minister for the Environment and Local Government.

Donal O Brolcáin

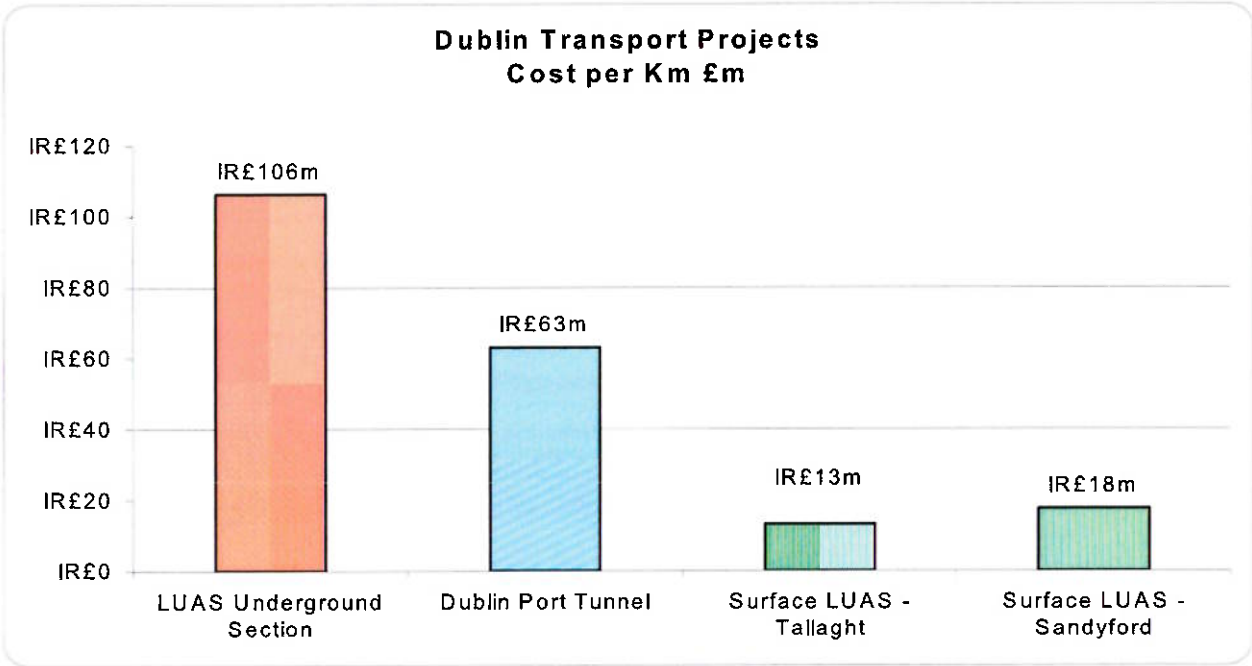
Secretary Tel:(H) 837 1753 (after 19.00) email: donalobrol@clubi.ie

It is still cheaper to put cars/trucks underground than to put LUAS/Metro underground, even with the doubling of the cost of the Port Tunnel!
Putting LUAS/Metro underground is the most expensive option.



Sources:

LUAS Underground Section:	3 underground and 2 surface stops.	2.85kms	£303m
	Atkins McCarthy report for CIE. January 2000		
Dublin Port Tunnel:	Dual carriageway with 4.5km in tunnel.	5.6kms	£353m
	Dublin Corporation Press Release. 11 October 2000		
Surface LUAS:	Tallaght-Middle Abbey St line.	14kms.	£185m
	Dáil Debates. 29 March 2000		
	Sandyford-Stephens Green	9kms	£158m
	Mary O'Rourke, TD Minister for Public Enterprise. 31 July 2000		
	CIE. Environmental Impact Statements.		



DUBLIN AIRPORT

Profile of Passengers (1)

1999 Passengers (excluding transit)(2) 12,657,047
(say 12.65m.)

Purpose of Journey(3)	Business	Leisure
	24.4%	75.6%
Irish	(11.7%)	(33.3%)
Non-Irish	(12.7%)	(42.3%)

Origin/Destination of Air Travellers(4)	Dublin	50.7%	(say 6.42m)
	Leinster	23.9%	
	Munster	11.7%	
	Connacht	7.9%	
	Ulster	5.8%	

Dublin Area 'air passenger'(5)(subject to note)

Contiguous to DART network	45%	(say 2.89m.)
Northside	15%	(say 960,000)
Southside	30%	(say 1,925,000)

Note. "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." (from par 4.3 of Source 1. Below)

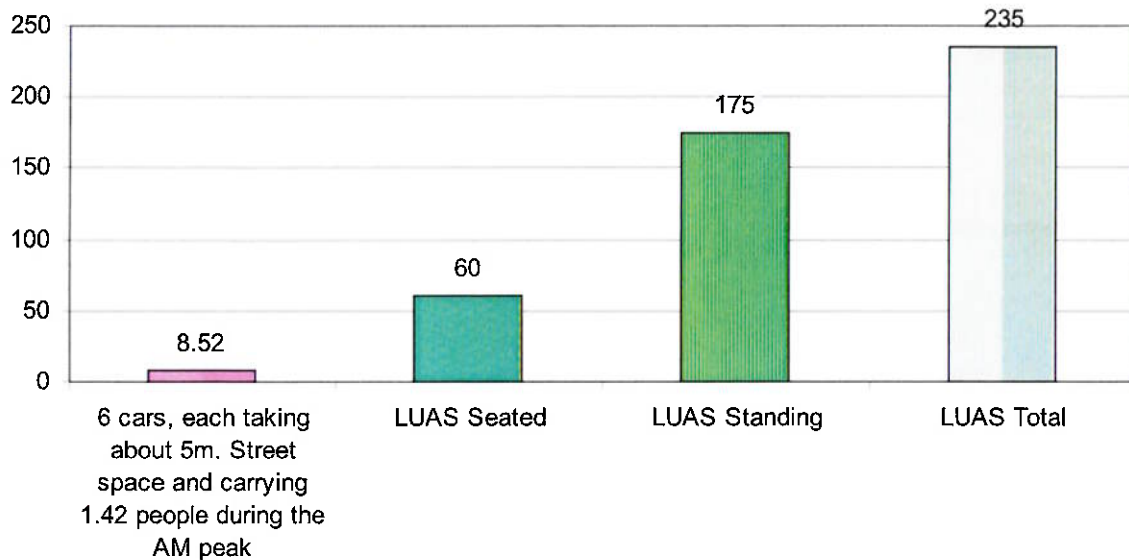
Surface Access (mode of use) by Air Passengers(6)	Private Car	67.6%
	Taxi	12.2%
	Bus/Coach	19.2%
	Other (HGV, Motorcycle)	1%

Sources

1. Drawn from CIE/Aer Rianta. Dublin Airport Air-Rail Link Study. Final Report. April 1998. (Air-Rail Link Study)
2. Aer Rianta Press releases on 1999 Passengers through its Airports. 28th January 2000
3. Air-Rail Link Study. Table 3.4. p.12
4. Air-Rail Link Study. Figure 4.1 p.19
5. Air-Rail Link Study. Section 4.3. p.19
6. Air-Rail Link Study. Table 4.4. p.25

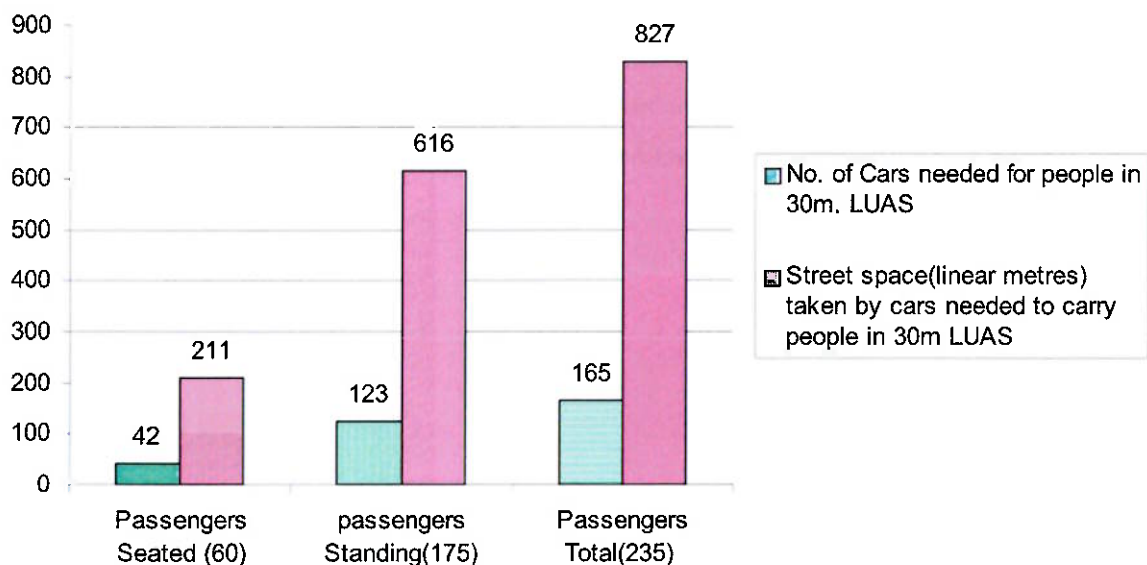
STREETWISE!

People per 30 metre street space
during the AM peak



If 1,000 new cars are being bought every week in Dublin, then these occupy 5km (3 miles) of street space. It is cheaper to provide new street space underground, in road tunnels, than it is to put LUAS/Metro/Rail/CAT underground (see p. 5)

Street Space needed by cars during AM peak to carry
same no. of passengers as one LUAS vehicle
(DTO. Each car carrying 1.42 people)



Plans
Sat 31/11/11



DUBLIN LIGHT RAIL (LUAS) AND METRO SYSTEMS Preliminary Public Consultation - Invitation for Written Submissions

Good progress is being made with construction of the Luas - a flagship project of the National Development Plan (NDP). The initial lines will serve Tallaght and Sandymount/Industrial Estate and will link the three main city centre public transport hubs at Heuston, Connolly and Busáras.

This notice relates to future development of the Luas system and the introduction of a Metro system to meet the growing demand for high quality public transport.

In October 2000 the Dublin Transportation Office (DTO) published a strategy framework document entitled "A Platform for Change" which includes outline proposals for future Luas and Metro lines.

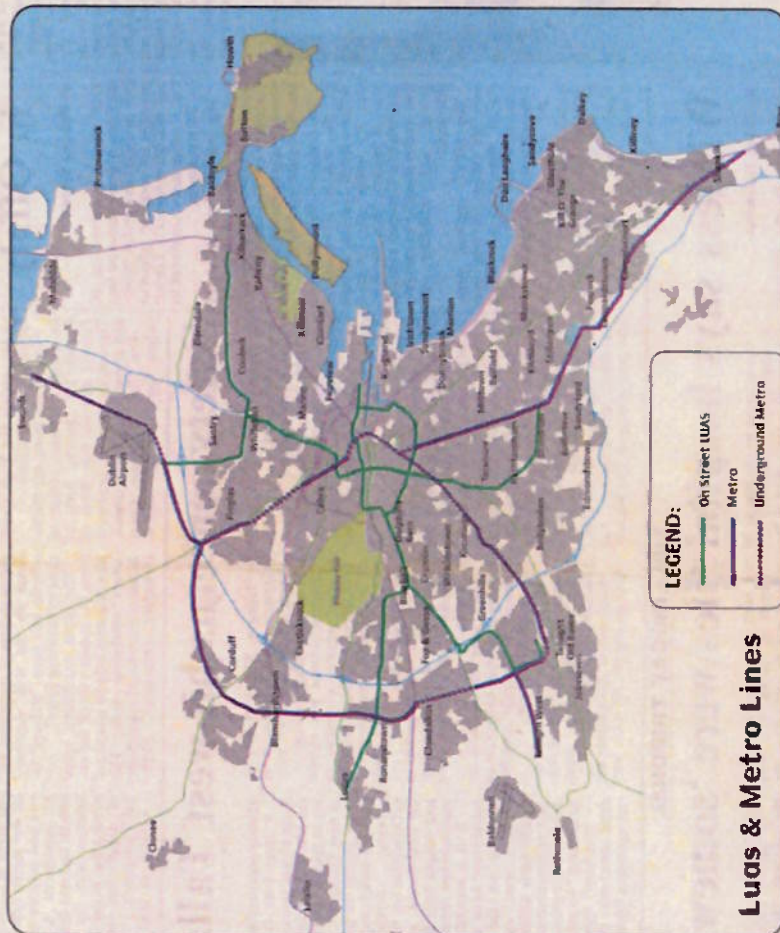
The Government has indicated its acceptance of the broad thrust of this strategy framework document and has requested the Light Rail Project Office to study the DTO outline proposals.

The Light Rail Project Office has commenced this study and is interested in receiving written submissions relating to the envisaged Luas and Metro systems as outlined in the accompanying map.

Written submissions should be sent to the following address for receipt by 30th May 2001:

Strategy Development Unit,
The Light Rail Project Office,
Heuston Station,
Dublin 8.

Óifig Chomhairle na hEirinn Seáide
Light Rail Project Office



Luas & Metro Lines

Luas Lines:

- A north-south line from Ballymun via Whitehall, City Centre, Harold's Cross, Terenure and Rathfarnham to Dundrum with an extension north of Ballymun to Sillogue. A spur at Whitehall via Coolock to Kibarrack.
- An east-west line from Luam via Ballyfermot, Dolphin's Barn and South City Centre to Docklands.

Metro Lines:

- a line from Swords to Shanganagh serving Dublin Airport, Finglas, Broadstone, City Centre, Ranelagh, Sandymount and Cherrywood incorporating some underground sections and integrating with Luas south of Ranelagh.
- A line from Tallaght West via Tallaght and Kimmage entering the city centre tunnel in the south city.
- An orbital line from Finglas to Tallaght via Blanchardstown and Clonsilla.

CIE Group of Companies

NDP
NATIONAL DEVELOPMENT PLAN

Appendix 3

LUAS needs joined-up thinking

Sunday Times 26th September 2010

- [1](#)
- [1](#)

[Next page](#)

[Show all](#)

Think tank: Luas needs joined-up thinking

Our governing classes refuse to learn from their mistakes. Spin, hype and bluster cannot disguise the fact that quiet competence is missing

Donal Ó Brolcáin

Published: 26 September 2010

- [Recommended \(1\)](#)



as cannot be a network without integrating the lines (Gareth Chaney Collins)

The property-induced economic crisis has given us an opportunity to scrap Metro North and the proposed Dart Interconnector, and instead expand the Luas system in Dublin. Within the next few weeks, the Railway Procurement Agency (RPA) will open the Luas Green line extension to Cherrywood. This includes two fully equipped stations that will not be used. Recently, Iarnród Éireann said it will not open a newly built station on the Kildare line. In both cases, the reason is that expected property development did not take place.

Metro North and the Interconnector are also predicated on development assumptions that no longer hold. Meanwhile, the government has dropped plans to link the two existing Luas lines for passenger services. This perpetuates the folly of the decision made in 1998 to build two separate Luas lines.

To meet the aims of government transport policy — to ensure the provision of a well-functioning, integrated public transport system that enhances competitiveness and contributes to social cohesion — I propose an integrated Luas, which would create an on-street loop around the central business district; access Dublin airport from all parts of the network, including a link to Dart; and fill the transport void in north Dublin with three Luas lines, all on the surface and cheaper per kilometre than Metro North.

Luas cannot be a network without integrating the Green and Red lines. This means a full interchange at the O'Connell Street-Abbey Street junction. This is no more radical a suggestion than the RPA-Iarnród Éireann proposal to uproot St Stephen's Green as part of their plans for two lines (Metro North, Dart Interconnector) underneath that part of Dublin.

Integrating the Green and Red lines needs two tracks on-street from Stephen's Green to Broadstone, as RPA proposes. It would transfer to the unused line that joins the Western line (Maynooth, with the new Dunboyne line) at Broombridge.

Last Friday, An Bord Pleanála was due to hold a preliminary hearing on RPA's application to build another Luas line, one that will not connect the existing lines for passenger services. The plan includes a bridge across the Liffey, joining Marlborough Street and Hawkins Street. This is silly, as it ignores the Samuel Beckett bridge, designed to take Luas vehicles. Why build yet another bridge that does not extend the Luas catchment area? Such a proposal goes against the notion of cost-effective improvement of public transport in the built-up parts of the capital.

The Docklands loop that I am proposing would use the Samuel Beckett bridge to integrate this new city quarter. Running on-street, it would connect the catchment areas of the Green line (Sandyford- Cherrywood) to the docklands, linking up the newly opened National Conference Centre, O2, Busaras, Connolly station and the Abbey theatre. It would connect the Red line (Tallaght-O2) to the south docklands, allowing easier access to the Grand Canal theatre, Shelbourne Park, the Aviva stadium, the Eye and Ear Hospital and National Concert Hall. It would require a new Dart interchange at Barrow Street on the southside, complementing Connolly Station on the northside.

The North Dublin loop would start from the joined-up Luas lines in O'Connell Street, run up Dorset Street, Drumcondra, Whitehall, Collins Avenue/DCU to Ballymun, onto the airport and back through Finglas to join the extended Green line at Broombridge. The airport can be linked to the Dart at Clongriffin, with a Luas line taking in Coolock, Beaumont Hospital and the North Fringe. That would put Dublin airport on a loop connecting it to the central business district from two directions. The airport can be also linked to the Dart at Clongriffin, with a Luas line taking in Coolock, Beaumont Hospital and the North Fringe.

Our governing classes love grand gestures, usually involving the feuding public-sector baronies of CIE companies, the RPA, National Roads Authority, local authorities, government departments and the newly created National Transport Authority. They refuse to learn from the mistakes made when railways were first built in Ireland.

Spin, hype and bluster cannot disguise the fact that quiet competence is missing. Dublin needs an integrated Luas network to show the “joined-up thinking” of which we have heard so much, and to get us out of the crisis caused by reliance on property development.

Donal Ó Brocháin was secretary of Drumcondra 2005, a group of residents' associations that campaigned to remove through traffic and for more public open space

Appendix 2

Submission on Metrolink

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 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

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.

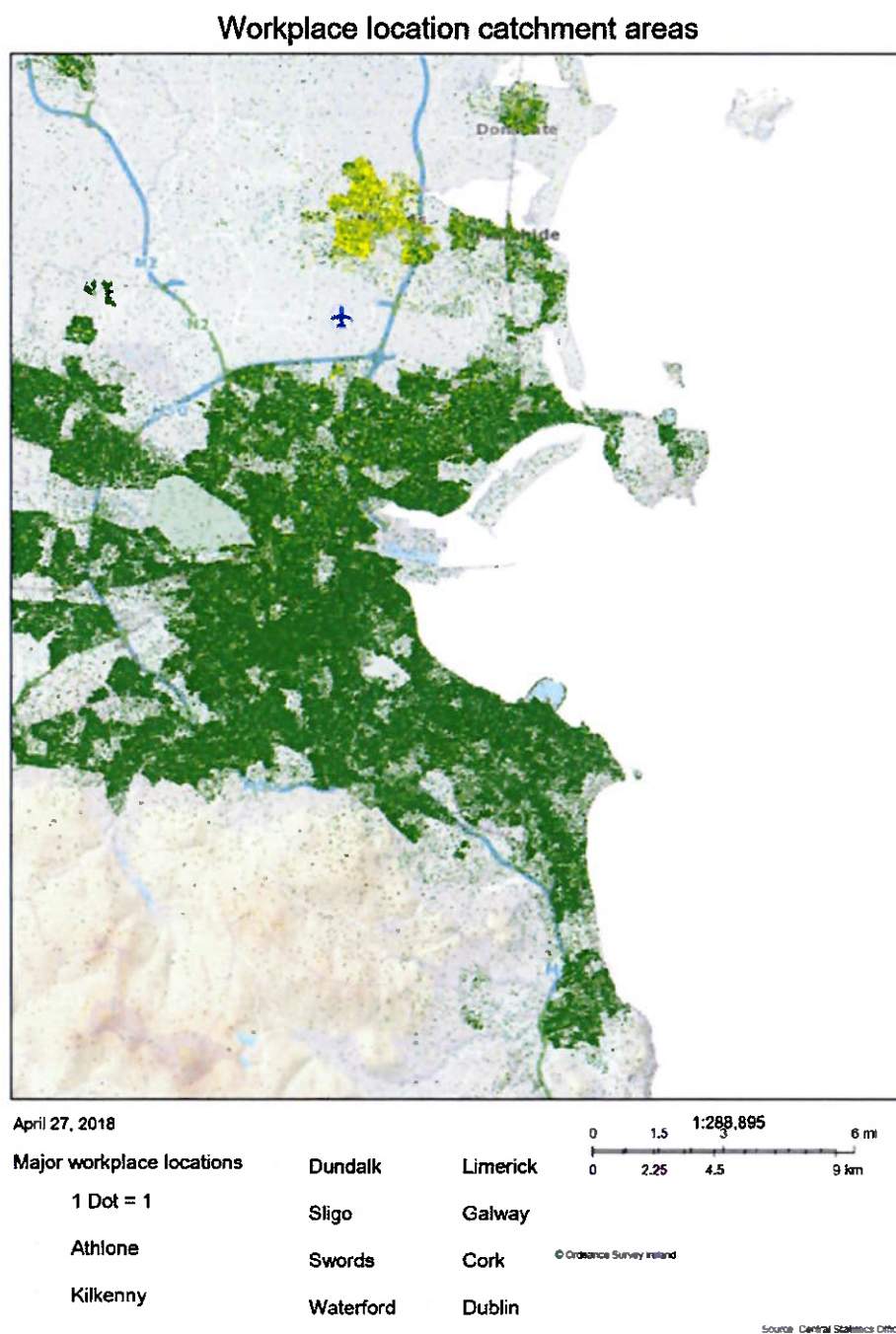
Our capital city does not need another stand alone public transport system which will not enhance our urban environment which is not well tended.

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.

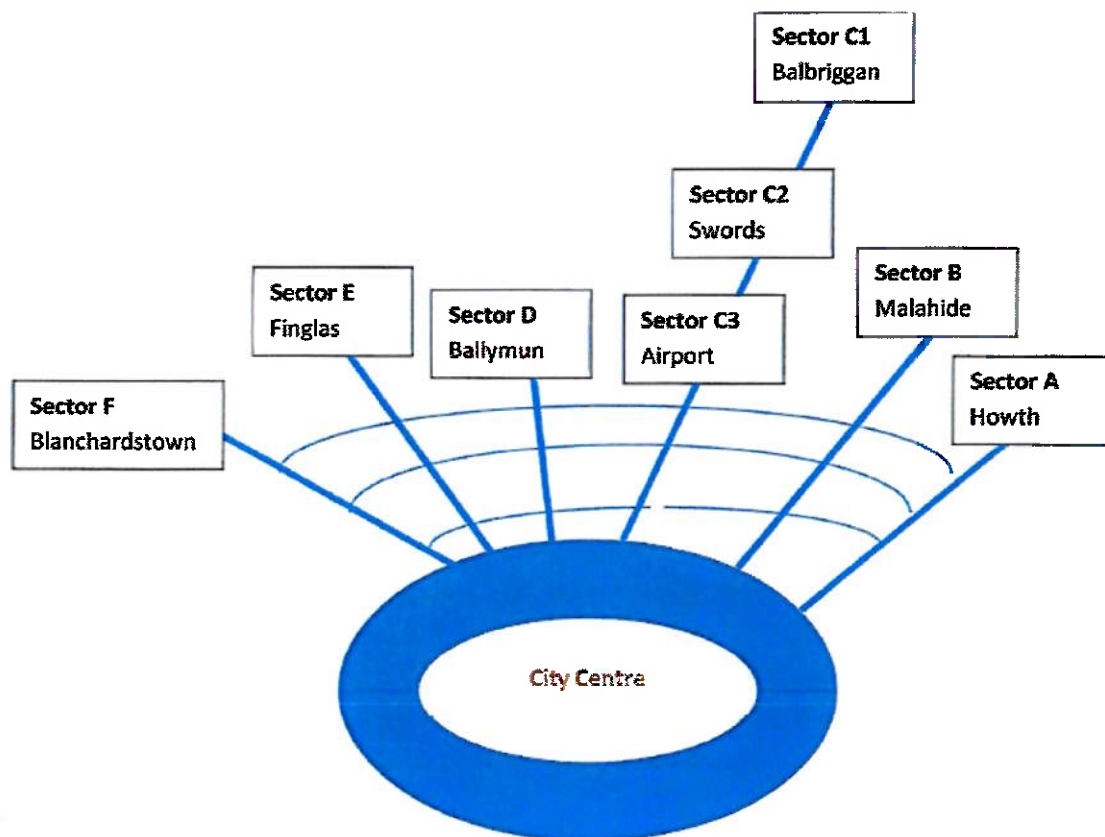
3. North LUAS Loop

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 ≥ 700 jobs km²

3.6.3. population density;

See Figure 3

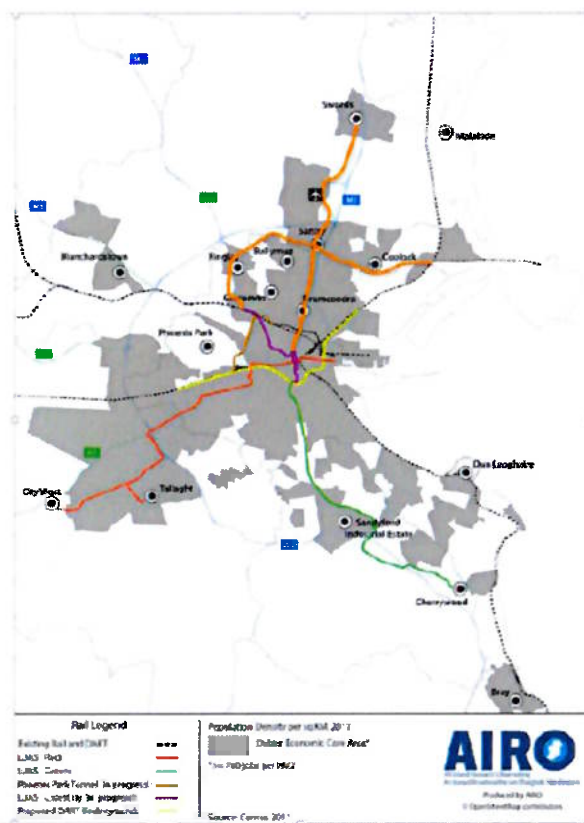
3.7. These maps formed the basis for a proposed LUAS Loop around the North City with spurs to the Airport, Swords and Howth Junction. This built on the proposal to extend LUAS from Broombridge to Finglas.

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

[Does Dublin's Core Economic Area need three rail links between the Docklands and Heuston Station/Inchicore?](#)

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

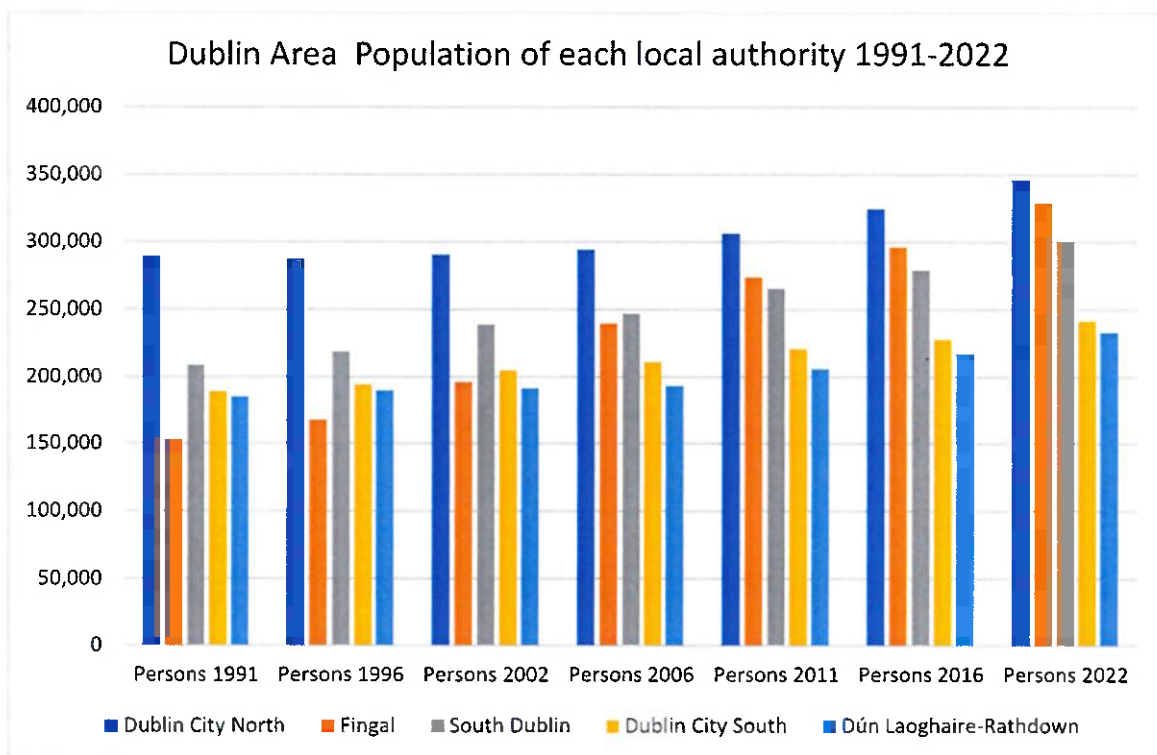


- 3.10. The proposed North Dublin LUAS loop would
- 3.10.1. serve the northern part of Dublin's Core Economic Area comprehensively;
 - 3.10.2. be Integrated with what already exists;
 - 3.10.3. offer 3 rail-based ways of getting to/from the City Centre from the Airport;
 - 3.10.4. link with the existing heavy rail commuter services at 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 it 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

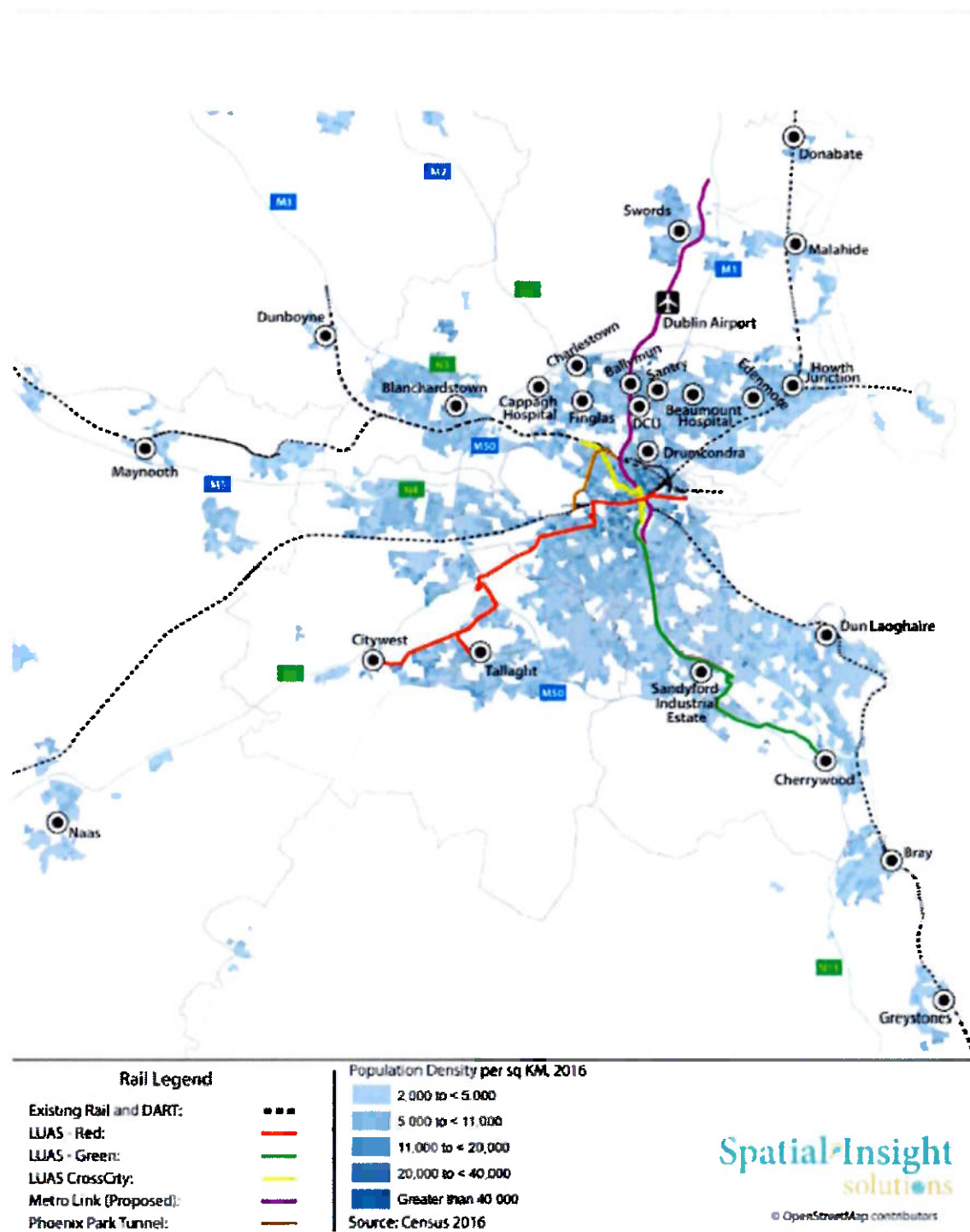
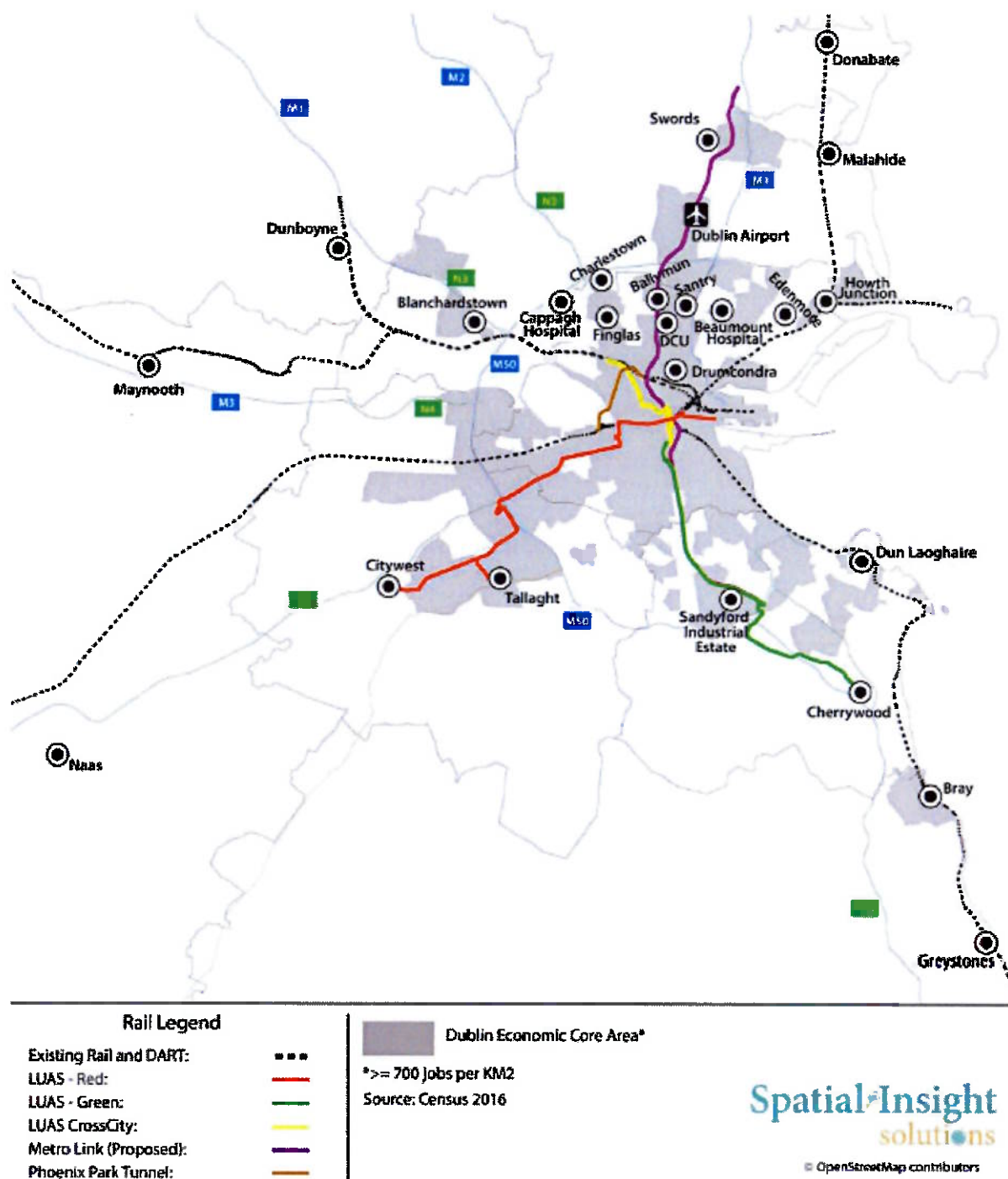


Figure 6 Dublin Core Economic Area 2016 with the 2018 proposed Metrolink and other rail based transport



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	<u>Emerging Preferred Route</u> <u>Catchment</u>	<u>Eastern Route Variation</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 main 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 than very limited forms of building control.

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.

Appendix 3

Letters to newspapers on the poor state of planning in our capital city

Letters

Keeping the Luas on track

Thu Dec 14 2017 - 01:16



Sir, – Allocating the limited space inside the M50 has to start by looking at how much streetspace each travel mode takes and how many people fit in vehicles taking that streetspace. (“Teething problems or a challenge too far?”, December 11th)

During the morning peak, more people travel by car than by any other single mode. About 13 cars fit in the same street space as a 55m Luas tram with one driver. On average, each car takes no more than 1.25 people during that peak time, according to canal cordon counts.

These 16 people represent less than one-twentieth of the 380 passengers on a Luas tram.

Double-deck buses are 10m long and carry 93 passengers. Five buses (with five drivers) with 465 passengers take the same space as one Luas vehicle and 13 cars.

Given that all vehicles need some assured stopping space between them, Luas makes better use of the available streetspace on high traffic routes.

Operational costs are lower than buses. There are less emissions at point of use. It is far easier to monitor and mitigate emissions at electricity generating stations than it is for the 2.5m vehicles on our roads.

A recent IMF report assessed management of public investment here (*Irish Times*, November 10th). It found that there is a very big efficiency gap between us and other countries.

We in Dublin need to learn from well-run cities like Zurich. A good start would be to extend Luas Cross City to create a north city Luas loop together with Luas on Drumcondra Road as planned originally. A north city Luas loop would be faster and cheaper to build than Metro North. This €2bn relic of the Celtic tiger craziness is the same kind of solution to ease movement as is relying on private cars during peak commuting times in urban areas. – Yours, etc,

DONAL O'BROLCAÍN,

Drumcondra,

Dublin 9.

Letters

Planners in Dublin need to consider streetscapes

Regeneration of Ballymun is an excellent example of planning failure

Tue Nov 1 2022 - 00:05



Sir, – Streetscape and **place**-making has long been overlooked by architects, developers and builders. Over decades, the public authorities (elected and appointed) have not acted as a countervailing force to these vested interests, as Michael McDowell pointed out (“Dublin’s planners are failing to help our capital to flourish”, [Opinion](#), October 26th).

Unfortunately, the regeneration of Ballymun is an excellent example of this failure. The main street is a now six-lane highway for through traffic. Such traffic is a major form of community severance. National and local politicians, policymakers and planners support this. Yet the same people are actively restricting such traffic from the city centre.

One part of that effort is MetroLink if it ever goes ahead. But this policy is not being applied to Ballymun. The latest proposal is to tunnel under Ballymun’s main street for MetroLink, instead of putting motor vehicles underground.

This is an example of physical planning being reduced to a very limited form of building control instead of being focused on the creation and maintenance of places which are pleasant to be in, for living or work or leisure.

Not only to we have to re-learn what was known about place-making when Marino and Griffith Avenue were developed by our new State 100 years ago. We also have to reset our way of governing ourselves to apply those lessons consistently and with equal force in all parts of our capital city.

– Yours, etc,

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