

Paul Hogan, Chief Planner (Acting),
National and Regional Planning Policy Section,
Department of Housing, Planning and Local Government,
Custom House,
Dublin 1.
D01 W6X0

Dún Scéine, Lána Fhearchair
Baile Átha Cliath 2, D02 WT20

Dún Scéine, Harcourt Lane
Dublin 2, D02 WT20

t 01 879 8300

info@nationaltransport.ie
www.nationaltransport.ie

24th July 2019

Re: Making of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly Area

Dear Paul,

I refer to your letter of 5th July in relation to the making of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA) Area by the Members of the Regional Assembly, and, in particular, the inclusion of Amendment Nos. 69 and 113 in the RSES.

Legislative Background

The overall legislative framework seeks to integrate land use planning and transport planning through the mechanisms set out in planning legislation and in transport legislation.

In the transport area, Section 12 of the Dublin Transport Authority Act 2008 requires the preparation and adoption of a statutory transport strategy for the Greater Dublin Area. The making of a transport strategy for the region is a core function of the National Transport Authority (NTA).

In making that transport strategy, the NTA is required, in accordance with Section 12(6) of the Dublin Transport Authority Act 2008, to “ensure that the transport strategy is consistent with” the relevant land use strategy for the region. Prior to the making of the RSES by the EMRA, the relevant land use strategy for the region was the “Regional Planning Guidelines for the Greater Dublin Area (GDA) 2010-2022”.

Planning and land use legislation is primarily set out in the Planning and Development Act 2000, which contains reciprocal arrangements to ensure that strategic land use planning is aligned with transport planning. Section 23(7)(c) of the Planning and Development Act 2000 states: “When making a regional spatial and economic strategy the regional assemblies in respect of the GDA shall ensure that the strategy is consistent with the transport strategy of the NTA.”

Through the inter-dependent approach set out in the Planning and Development Act 2000 and the Dublin Transport Authority Act 2008, the legislature has ensured that land use planning and transport planning are able to proceed on an integrated and coordinated basis.

Transport Strategy

Section 12 of the Dublin Transport Authority Act 2008 requires the preparation and adoption of a statutory transport strategy for the Greater Dublin Area. Pursuant to that section, the Transport Strategy for the Greater Dublin Area 2016-2035 (the “Transport Strategy”) was approved by the Minister for Transport, Tourism and Sport on 24th February 2016. As set out in the legislation, the objective of the Transport Strategy is to provide a long-term strategic planning framework for the integrated development of transport infrastructure and services in the Greater Dublin Area. Under the provisions of Section 12(16) of the Dublin Transport Authority Act 2008, the Transport Strategy must be reviewed every six years. It is intended that a review of the current Transport Strategy will commence next year and will be completed in early 2022.

The Transport Strategy was developed using an evidence-based approach, involving comprehensive data sets, extensive analysis and input from public consultation. Underpinning it was a sophisticated transport model that facilitated forecasting and evaluation of likely travel demand and travel patterns. That transport demand forecasting has, at its core, the population and employment forecasts set out in the relevant land use policies – the central targets set out at Governmental level and the subsequent distribution established in the Regional Planning Guidelines (now replaced by the RSES) and the various local authority development plans. As such the resultant strategy represents a coherent and integrated plan for the development of transport across all modes throughout the region.

Consistency Issues Between the RSES and the Transport Strategy

It is understood that the Members of the EMRA made the RSES for the EMRA area on 28th June 2019 and that the RSES contains a number of amendments from the original draft, including, in particular, the text of amendments numbered 69 and 113.

Having carefully considered these amendments, it is view of the NTA that three of the bullet points in each of the above referenced amendments are not consistent with the Transport Strategy. The relevant bullet points are worded the same for both amendments and state:

- *“Implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy.”*
- *“Complete construction of Metrolink from Swords to Sandyford, including underground extensions to UCD and Knocklyon from Charlemont.”*
- *“Appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg, Hazelhatch, Booterstown and Blessington.”*

Rail Line to Navan

In the case of the first bullet point above, *“[i]mplement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy”*, the Transport Strategy sets out the following position in Section 4.2.2:

“The extension of the commuter rail line to Navan has been previously proposed and has been assessed in the examination of this corridor. Based on current population and employment forecasts, the level of travel demand between Navan, Dunshaughlin and various stations to the city centre is insufficient to

justify the development of a high-capacity rail link at this time. To serve this corridor, it is proposed to provide an enhanced bus service along the M/N3 in conjunction with the development of a bus hub in Navan. Bus services on the N2 will also be enhanced and a core bus corridor will be provided to Tyrellstown via Ballycoolin from the N2 at Finglas.

It is intended that, as part of the next Strategy review, the likely future usage of a rail connection to Navan will be reassessed, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs. Pending that review, the corridor previously identified for a rail link to Navan should be protected from development intrusion.”

This re-assessment will take place as part of the cyclical review of the Transport Strategy by the NTA, which will commence next year. However, the RSES seeks to pre-judge the outcome of that review and require the implementation of a heavy rail line to Navan irrespective of that review.

Contrary to the assessment undertaken in the development of the Transport Strategy, there is no analysis put forward to justify the incorporation of this objective in the RSES. With a very substantial cost in the order of several hundreds of millions of Euro, the inclusion of this rail extension on a non-evidenced basis is not an appropriate transport planning approach. In including this provision, it appears that the Members of the EMRA have assumed a responsibility for regional transport planning, which, under the relevant legislation, is a key part of the statutory role of the NTA

As a result there are now two competing regional policies in relation to this item – a decision that the rail line to Navan has insufficient travel demand to justify its development at the present time plus a commitment to re-evaluate this assessment as part of a review of the Transport Strategy, and a separate policy in the RSES that the rail line is to proceed. These policies are inconsistent and it is the view of the NTA that the RSES policy must be amended to reflect the position in the Transport Strategy.

Metro Projects

The second bullet point referenced earlier comprised the incorporation of the following text into the RSES: *“Complete construction of Metrolink from Swords to Sandyford, including underground extensions to UCD and Knocklyon from Charlemont.”*

The inclusion of *“extensions to UCD and Knocklyon from Charlemont”* in the RSES is a major deviation from the strategic transport framework set out in the Transport Strategy. The Transport Strategy includes for the development of a metro scheme from the south city centre to Swords and serving Dublin Airport, which is being advanced as MetroLink, and Metro South, being the upgrading of the Luas Green Line to a metro system.

The RSES amendment, while incorporating the Transport Strategy metro provision, adds an additional two metro lines. One metro line would extend from Charlemont to Knocklyon and the second metro would extend from Charlemont to UCD.

Metros are major infrastructure projects. Their cost is not measured in thousands or millions of Euro, but in billions of Euro. Metros represent the top level of the public transport spectrum in terms of carrying capacity, and are only applicable for areas with high densities of population and/or high density employment centres. To be economically justifiable, the volume of passengers must exceed the carrying capacity of a bus/bus rapid transit system or a light rail system.

Given their enormous cost, it is imperative that statutory proposals for metro schemes are underpinned by comprehensive analysis establishing their need and identifying their corridor routing. There is no evidence available to the NTA to indicate that any significant level of analysis was undertaken in relation to the proposals in the RSES for these additional metros. Developing transport policy for projects costing billions of Euro without proper assessment and evaluation is fundamentally flawed and completely negates the rationale of putting in place a statutory Transport Strategy.

The inclusion of the additional metro lines in the RSES creates a major inconsistency between land use policy and transport policy. Without a change in one or other of the policies, it is no longer possible to progress the current MetroLink project through a planning approvals process. If the MetroLink project were required to align with the RSES proposal, it would have to be fundamentally changed in relation to its engineering (both capacity and station sizing), its delivery and, potentially, its routing.

This is because the RSES proposal seeks to have three metro lines converging at Charlemont, the southernmost station for the current MetroLink scheme. The three lines are:

- Metro to Sandyford – provision for this is part of the MetroLink design;
- Metro to Knocklyon – this has not been provided for in the MetroLink design; and
- Metro to UCD – this has not been provided for in the MetroLink design.

Notwithstanding the questionable logic of three southern metro lines converging at Charlemont station, it is undoubtedly the case that the combination of passenger loadings from these lines will exceed the currently planned passenger capacity of MetroLink. If it were required to accommodate such an arrangement, a fundamental redesign of MetroLink would be required. At a minimum, train lengths and the size of the metro stations would have to be substantially increased from the current design, which would require significant changes. Those changes would include, by way of example, the issue of the Na Fianna GAA pitch on St. Mobhi Road, which was an item of major concern during a recent MetroLink public consultation process. The resolution of that issue was an optimised metro station layout which was able to fit under an adjacent sports ground without impacting the Na Fianna grounds. The much larger metro station that would be required under the RSES proposals would make the earlier solution infeasible and would require the development of a larger station which would impact on the Na Fianna property.

Other stations would also have to be enlarged and in the case of Glasnevin Station, this would be likely to require the acquisition of an additional apartment block which was avoided in the recently revised MetroLink design. At Charlemont, the station would have to cater for three metro lines as well as the surface Luas line continuing to Broombridge. To accommodate this level of interchange, the station would have to be dramatically different in size, scale and layout and is likely to have substantial and new implications for this area.

At a more fundamental level, the completely changed circumstances envisaged under the RSES document would require the MetroLink project to recommence at the start of the route options assessment stage. To ensure a robust planning application that complies in full with all legislative requirements, in particular those relating to the consideration of alternatives, a complete route assessment process would need to be undertaken. Without this, there would be a high risk that, given

the new parameters triggered by the RSES objectives, a challenge to the adequacy of the assessment process would be successful. A new procurement process would need to be undertaken to appoint a new design team – the procurement process for the existing design team did not contemplate, and would not facilitate, changes of this magnitude to the engagement contract. Based on the time taken for the previous route options assessment process, inclusive of procurement, survey work, analysis, design development and public consultation, it is likely to take between two and three years to get back to the same position as the MetroLink project is currently at, ignoring the additional time likely to be added as a consequence of the required revisions to the Transport Strategy.

In parallel, it would not be possible to bring a planning application to An Bord Pleanála for a revised MetroLink project on the basis set out in the RSES, until such time as the Transport Strategy has been reviewed and revised and the related Integrated Implementation Plan (required under Section 13 of the Dublin Transport Authority Act 2008) is replaced. These are both statutory plans which have to be developed sequentially, and both require substantial analysis and preparatory work, in addition to public consultation and strategic environmental assessment.

Summarising the above, the incorporation of the additional metro proposals in the RSES requires the replacement of the Transport Strategy, the adoption of a new Integrated Implementation Plan, the procurement of a new MetroLink design team and the stepping back to restart the route options process from the beginning. While there are monetary impacts arising from such an approach, there are very significant time implications that arise for the MetroLink project. It is the view of the NTA that the transitional process to accommodate the new transport objectives inserted into the RSES would delay the project by between three and four years and potentially longer.

Luas Projects

The third bullet point referenced earlier incorporated into the RSES an objective for the “Appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg, Hazelhatch, Booterstown and Blessington.” While four of these lines are identified in the Transport Strategy, the three additional Luas lines to Hazelhatch, Booterstown and Blessington do not form part of the Transport Strategy.

Again, it appears that these additions have been incorporated into this statutory plan without any substantive assessment of transport demand, feasibility or cost. In addition, the locations of these proposed lines are unrelated to the future land use development patterns as set down in the RSES itself, which seeks to direct growth to locations served by existing rail lines and those provided for by the Transport Strategy.

One of the additional RSES Luas lines is to Blessington, which is located at a distance of almost 30 kilometres from Dublin City Centre. It is not evident to the NTA that land use projections for such an extension are anywhere near the level that would justify the passenger capacity of a Luas line, nor the hundreds on millions of Euro that would be required to deliver this line. The proposal has no evidence-based analysis supporting it, and with the potential to induce further urban sprawl deviates completely from the National Planning Framework objective of ensuring compact growth in our cities.

Recommendation

The RSES as made by the Members of the EMRA is not consistent with the Transport Strategy in the following three areas:

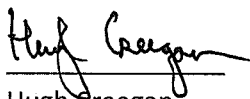
- The incorporation of the objective to *“[i]mplement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy”*;
- The incorporation of metro *“underground extensions to UCD and Knocklyon from Charlemont”*; and
- The objective for the *“[a]ppraisal, planning and design of LUAS network expansion to Hazelhatch, Booterstown and Blessington.”*

As a result of that non-alignment, the incorporation of these objectives fundamentally undermines the legislative framework for the achievement of integrated transport and land use planning for the region.

None of these amendments that have been inserted into the RSES appear to be supported by any evidence-based assessment which is essential for any major transport intervention, particularly so when the cumulative cost of these interventions will be a number of billions of Euro. Nor do they align with proper transport planning principles, which provides high capacity metro and light rail lines where there is sufficient transport demand to support such a service. The amendment relating to additional Luas lines is at variance with EMRA’s own land use policy as set out in the RSES, and with national planning policy. The inclusion of the metro amendment fundamentally impacts the MetroLink project, imposing a likely three to four year delay to the project and effectively requiring a complete recommencement of the scheme.

It is strongly recommended that the Minister issues a direction to the EMRA to remove the above referenced three items from the RSES.

Yours sincerely,



Hugh Creegan,
Deputy Chief Executive.