11th May 2017

MetroLink Consultations
Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8 D08 DK10

Re: MetroLink Public Consultation

Dear Sir/Madam,

Fingal County Council (FCC) supports the development of the MetroLink project and very much welcomes the opportunity to engage with Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA) to ensure that the final design is the optimal alignment for MetroLink within Fingal.

1. Introduction

Project Ireland 2040 makes clear the future development strategy of Swords and Fingal as a sustainable Metropolitan urban extension in the context of the Metrolink and the economic functional unit of Swords-Dublin Airport. This written submission set against the Project Ireland 2040’s ambitious set of goals, the National Strategic Outcomes, focuses on five conditions required for delivering sustainable mobility in an efficient and integrated way to leverage the potential in Swords and Fingal in accordance with Project Ireland 2040.

In summary, the conditions are:

a) Integrate with land-use policy

- MetroLink, in conjunction with the on-going and future planned regeneration of historical Main Street including Swords Civic Centre and Cultural Quarter, provides a unique opportunity to bring a new dynamic and cohesiveness to Swords and ensure the realisation of the long term development strategy for Swords as outlined in ‘Your Swords - An Emerging City Strategic Vision 2035,’ published by the Council in 2008, in line with the current Fingal Development Plan 2017–2023 and supported in Project Ireland 2040 to deliver more sustainable transport, economic development and just society over time for Swords. FCC would support the re-examination of MetroLink serving Swords Main Street as an alternative option to facilitate the optimal regeneration and development of Swords into the future. In support of this re-examination, we note the figures and data contained in the TII’s reports indicate the Main Street Option is the best value for money and the additional capital cost produces the highest category of value for money.
• To support growth and success of Dublin, as Ireland’s leading global city of scale and principal economic driver, acknowledging the importance of the economic functional unit of Swords-Dublin Airport as a key location for population and employment, MetroLink should be modified to provide for an additional station centrally within the extensive Metro Economic Corridor (ME) zoned land bank in Lissenhall.

• The proposed depot buildings as shown in Appendix B ‘Estuary Depot’ (Lissenhall future development lands) should be located north of any proposed MetroLink station servicing the centre of these lands, closer to the northern boundary of the ME zoned lands, adjacent to the proposed Swords Western Ring Road (SWRR) and further west from the M1.

• Estuary station should be relocated south of Lissenhall Bridge to a similar location approved by An Bord Pleanala (ABP) under the approved rail order. This station location will serve a very large catchment area which will be increased significantly with the development of the following ME zoned lands which are subject to Masterplans: Estuary West (MP 8.A); Estuary Central (MP 8.B); Estuary East (MP 8.C); and Watery Lane (MP 8.D).

• A MetroLink station at Dardistown must be integral to the initial phase of route design and operation, to ensure the delivery and implementation of the strategic employment district at the core of the Dardistown Local Area Plan which is in place until 2022.

b)  Minimise community severance

• On the basis of the available information FCC is not in a position to make a comprehensive determination on the magnitude of change resultant from the proposed structural elements of the emerging preferred route. There are concerns regarding both the potential adverse physical visual impact of the elevated structures and the potential for elevated structures to reinforce severance within Swords along the R132 route. In addition, there are concerns with respect to the potential negative impact of perceived and real inaccessibility issues to the stations and potential for significant community severance by the MetroLink corridor.

• If the Swords Bypass R132 route option is confirmed then a route option comprising an at-grade alignment (with grade separation at junctions) along the R132 should also be re-considered as part of this assessment. Any assessment of the appropriate vertical alignment along the R132 should be progressed under a number of headings including:
  - Visual impact;
  - Maximising the potential to successfully integrate MetroLink with future development on lands immediately adjoining the route (including at Fosterstown; Barriysparks; Estuary and Seatown MP lands);
  - Traffic impact;

2 of 10  fingal.ie
- Station accessibility; and
- Community severance.

Regardless which route option is selected, pedestrian and cyclist facilities including crossing facilities along the entire corridor will need to be closely examined, in addition wider pedestrian and cycle accessibility and permeability improvements will be necessary to maximise the potential catchment of each MetroLink station and new facilities provided in advance of MetroLink.

c) Place–making and design

- An alternative route serving Swords Main Street, in conjunction with the proposals for the new Civic and Cultural Quarter, would act as a catalyst for consolidation and strengthening of the role of Main Street and help to realise the development aspirations in order to achieve Swords ‘place potential’ and deliver an integrated economic, cultural and social vision over time for Swords. Such an approach responds to the new policy emphasis on renewing and developing existing settlements as contained in Project Ireland 2040 (National Planning Framework), which calls for physical consolidation of our urban centres.

- FCC will work with the NTA and TII to ensure that the detailed design and aesthetic quality of the MetroLink scheme is acceptable and reasonable and reflects the emerging architectural character of Fingal and Swords, in particular, having regard to the potential significant visual prominence MetroLink may have as it travels through Fingal, including its associated depot buildings and Park and Ride Facilities.

d) Coordination with other transport proposals and maintaining traffic capacity

- Coordination of MetroLink with the various other transport proposals including but not limited to the Swords Western Distributor Road, Swords Western Relief Road, Bus Rapid Transit (BRT)/BusConnects, South Fringe East-West Distributor Road and Dublin Airport western access proposals will be critical in achieving the optimum solution for the region.

- Maintain the capacity of the road network in Swords, including junctions, if MetroLink is to be built at grade along the median for the most part.

- Safeguard the current and future operational, safety, technical and development requirements for Dublin Airport.

FCC in making this submission wish to preface that this submission is based on the available information to date including the emerging preferred route, with alternative options, as contained in the ‘MetroLink Public Consultation 2018’ document and supplementary information contained on www.metrolink.ie. As such, on the basis the available information
FCC is not in a position to make a comprehensive determination on the magnitude of change resultant from the proposed structural elements of the emerging preferred route. There are concerns regarding both the potential adverse physical visual impact of such elevated structures and the potential for elevated structures to reinforce the severance of Swords by the R132. In addition, there are concerns with respect to the potential negative impact of perceived and real inaccessibility issues to the stations and getting across the MetroLink corridor.

The following submission, expanding on the conditions noted above, outlines the relevant policy context highlighting the key elements that must be taken into account in the evaluation (section 2); and provides the critical considerations for MetroLink with specific reference to Swords Main Street and Swords, Lissenhall and options at Northwood/M50/Dardistown (sections 3, 4 and 5).

2. Policy Context

Project Ireland 2040 provides the development strategy to shape our national, regional and local spatial development in economic, environmental and social terms to 2040. Within the National Planning Framework (NPF) document MetroLink is defined as a key future growth enabler for Dublin. Fingal County Council has long advocated the strategic need for a metro link from Dublin City Centre to North County Dublin and has, in anticipation of such a key piece of infrastructure, put in place the appropriate policy tools to guide new development and identify the essential social and physical infrastructure to facilitate development in a planned, coordinated and sustainable manner.

Acknowledging the comprehensive record of planning context contained in the Alignment Options Report (dated 15th March 2018) as prepared by Arup for the National Transport Authority and Transport Infrastructure Ireland (Volume 1 and Appendix 1.1, Volume 2) it is not intended as part of this submission to restate the established policy. Instead we would like to take the opportunity to highlight the relevant key elements that must be taken into account when evaluating the route alignment, route design and location of associated facilities such as depot buildings and park and ride facilities in order to fully integrate transportation planning with land use planning.

FCC in accordance with the policies and objectives of the Fingal Development Plan 2017-2023 seek to encourage the future development and growth of Fingal in accordance with the overarching hierarchy of settlement centres, as per the Core Strategy, and by integrating land use with transportation allow higher density developments along the higher capacity public transport corridors.

Swords and Blanchardstown are both identified as the Metropolitan Consolidation Towns within the settlement hierarchy for Fingal County. Under objective SS01 FCC seek to “consolidate the vast majority of the County’s future growth into the strong and dynamic urban centres of the Metropolitan Area...” MetroLink, in conjunction with the on-going and future planned regeneration of historical Main Street including Swords Civic Centre and
Cultural Quarter, provides a unique opportunity to bring a new dynamic and cohesiveness to Swords.

The long term vision for Swords is as a sustainable urban extension with commensurate level of jobs, services and infrastructure to support a potential population of 100,000. In order to achieve this vision lands have been zoned at Lissenhall future development area to accommodate a full range of needs of the residential population, business community and visitors. The strategic planning policy framework facilitating this vision is contained within Your Swords – An Emerging City – Strategic Vision 2035 and Swords Masterplan. Project Ireland 2040 supports the future development of Swords in Fingal. The NPF expressly refers to Swords in the context of National Policy Objective 67, which relates to the provision of Metropolitan Area Strategic Plans (MASP) and outlines that in the MASP context it is reasonable that a proportion of up to 20% of the phased population growth targeted in the principal city and suburban area, could potentially be accommodated in the wider metropolitan area. This would be in addition to growth identified for the Metropolitan area and subject to any growth relocated from the city and suburbs comprising compact development, such as infill or a sustainable urban extension, served by high capacity public transport and/or significant employment and amenity provision. “The future development of Swords in Fingal, Dublin, in the context of a new Metro line and proximity to Dublin Airport, is an example where this will be applicable.” Section 3 and 4 below provides detail in respect to the critical considerations for Swords and Lissenhall respectfully.

Specific measures taken to integrate transportation with land-use planning includes the dedicated Metro Economic Corridor (ME) zoning which has been established along the anticipated route of the previously named ‘new Metro North’ and in strategic locations in Swords and including Lissenhall. The purpose of this zoning is to facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor.

Furthermore, the Local Area Plans (LAPs) and Masterplans, both adopted and proposed within the Metro Economic Corridor provide and will provide the vision for these strategically important lands. These include the adopted Dardistown LAP, Dublin Airport Central Masterplan and proposed Local Area Plans for the Airport and Lissenhall East and Masterplans within the Swords development boundary. Section 5 of this submission provides detail in respect to the critical considerations for the Northwood/M50/Dardistown route.

Whilst recognising MetroLink as a critical piece of strategic transport infrastructure for Fingal, Dublin and the wider region, FCC sees it as one part of the wider transport offering in the context of the ambitious objectives for Fingal, as set out in various policy documents including Fingal Development Plan 2017-2023 (Fingal County Council, 2017), Transport Strategy for the Greater Dublin Area 2016 – 2035 (National Transport Authority, 2016) and Project Ireland 2040 - National Development Plan 2018–2027 (Government of Ireland, 2018) and Project Ireland 2040 – National Planning Framework (Government of Ireland, 2018). In that context, the development of the MetroLink design needs to take full
cognisance of, and complement, future proposals and objectives within the MetroLink catchment as proposed within these documents. Projects such as the Swords Western Distributor Road, Swords Western Relief Road, Bus Rapid Transit/BusConnects, South Fringe East-West Distributor Road, and Dublin Airport western access proposals are all essential to the long-term sustainable development of Fingal and Dublin.

In relation to the critical area around the South Fingal fringe and Dublin Airport, Fingal County Council is currently undertaking the South Fingal Transport Study. This strategic level study will assess a variety of scenarios for various levels of development and transport infrastructure, with a view to prioritising specific infrastructure projects to be delivered whilst also guiding the quantum of development to be permitted in zoned lands in this area. In particular, as set out in the National Planning Framework, the study will consider how to “improve access to Dublin Airport, to include improved public transport access, connections from the road network in the west and north”. Coordination of MetroLink with the various other transport proposals set out above will be critical in achieving the optimum solution for the region.

3. Swords

Fingal’s connectivity role within Dublin City Region, it is reasoned, will inevitably involve us choosing a future that sees the functional economic unit of Swords-Dublin Airport and Dublin City dynamically develop with MetroLink in accordance with the best principles of sustainable growth to ensure Ireland remains within easy reach of Europe and the wider global economy.

The economic, social and environmental significance of MetroLink, providing transport mobility to an area experiencing rapid population growth, is such that Fingal County Council are fully embracing this “...limited window for real action to ensure that current and future generations can live sustainably in a low carbon and climate resilient world” (National Mitigation plan, 2017) and are advocating sustainable urbanism for Swords. The topography of Swords, the R132 and route of the M1 motorway has resulted in a large, established residential cohort to the west of Main Street with a prevalent ‘car-led’ system of movement.

The optimal regeneration solution, in other words, the ‘place potential’ for Swords has been set out in the document Your Swords - An Emerging City and Swords Masterplan. The strategic vision for Swords 2035, taking into account and planning for the arrival of MetroLink is a place that will cater for future sustainable growth and will promote:

- A thriving vibrant consolidated major town – An Emerging City – with a population of 100,000 and comparable increase in employment and services.
- A town with well-defined boundaries and a strong landscape setting.
- A ‘green city’ maximising the benefits and opportunities of Swords-Dublin Airport, it unique landscape setting, and a future high level of transport infrastructure and improved accessibility.
- A major transport hub.
• Improved road network integral with the provision of well-developed bus, pedestrian and cycle routes.
• Sustainable development through energy end-use efficiency and increased renewable energy in all building projects.
• A location for major social and cultural infrastructure facilities including the new Swords Civic and Cultural Quarter.
• High quality recreational, leisure and community facilities.
• High density and people intensive uses in the immediate vicinity of MetroLink, which will see Swords open up as a highly accessible and attractive location to live, work and do business.
• Opportunities for new businesses to relocate to and thrive within the town, ensuring a much expanded employment base.

Initial concepts are currently being developed for Swords Civic Centre and the Cultural Quarter and a public planning process is anticipated later this year. A major civic space, cultural centre and hub building are proposed in the around Swords Castle. Furthermore, the Main Street has great development growth and redevelopment potential in the back land areas and key strategic infill sites. An alternative route serving Swords Main Street, in conjunction with the proposals for the new Civic and Cultural Quarter, would act as a catalyst for consolidation and strengthening of the role of Main Street, while ensuring the integration of any Town Centre expansion.

Key to the success of Swords is recognising the interactions between spatial planning and transport planning policy that will help to achieve Sword’s ‘place potential’ and deliver more sustainable transport, economic development and just society over time for Swords. FCC would support the re-examination of MetroLink serving Swords Main Street as part of the alternative options to facilitate the optimal regeneration and development of Swords into the future.

As part of the re-examination of MetroLink serving Swords Main Street, we note the following:
• From the ‘Alignment Options Report, Volume 2’, Appendix 7.1, Stage 1, MCA Tables, Page A7.1-54, it appears that Option C4 (R132) has a Capital cost of €349M compared with a capital cost of €463M for Option C11 (Main Street), a difference of €114M.
• Appendix 8.2 Stage 2, MCA Tables, Page A8.2-23, shows capital cost for whole Route Option 9 (A4-B12-C4) of €4262M compared with a capital cost of €4369M for whole Route Option 10 (A4-B12-C11), a difference of €107M.
• From the Transport Modelling and Economic Assessment Report by Systra, (Table A-11 on page 57/59), the benefits of Route Options 9 and 10 are €6274M and €6544M respectively, a difference of €270M.
• In summary, the additional capital cost of €107M or €114M produces an additional benefit of €270M, which is a Benefit Cost Ratio of 2.38 or 2.53. It is noted the Systra document ‘MetroLink Scheme — Cost Benefit Analysis’, a BCR greater than 2.0 represents “high VfM” (i.e. value for money), which is the highest category of VfM. Therefore, based on the data in TII’s reports, the Main Street Option is the best value for money and the additional capital cost produces the highest category of value for money.
Notwithstanding, if the Swords Bypass R132 route option alignment is to be selected as the confirmed route alignment, a robust assessment of the two published route options should be undertaken, given the significant differences between the two options, in particular the amount of elevated track proposed. We would suggest that a route option comprising an at-grade alignment (with grade separation at junctions) along the R132 should also be reconsidered as part of this assessment. The assessment of the appropriate vertical alignment along the R132 should be progressed under a number of headings including:

- Visual impact;
- Maximising the potential to successfully integrate MetroLink with future development on lands immediately adjoining the route (including at Fosterstown; Barriysparks; Estuary; and Seatown MP land);
- Traffic impact;
- Station accessibility; and
- Community severance.

The role and function of the R132 will need to be considered more fully in this regard, and we will be keen to work with your designers in achieving an acceptable and holistic design outcome. For any chosen route option along the R132, pedestrian facilities including crossing facilities along the entire corridor would need to be closely examined and new facilities provided in advance of the scheme opening. We note that the previously publicised Bus Rapid Transit proposal for Dublin City Centre-Dublin Airport-Swords has been subsumed into the overall BusConnects proposal. It would be beneficial for further clarity on the nature and detail of the BusConnects proposal as it relates to the areas served by MetroLink, to facilitate timely consideration of planning, traffic management and other design interactions around these schemes.

No matter which route option is selected, wider pedestrian and cycle accessibility and permeability improvements will be necessary to maximise the potential catchment of each MetroLink station. Whilst the route corridor does serve a number of areas where high density development will take place in the coming years, much of the existing residential stock is traditional low-density housing. To maximise the passenger catchment of each station we would welcome a targeted investment package in walking and cycling infrastructure. For example, the full completion of the NTA’s Cycle Network within Swords, in tandem with the MetroLink development, would have a transformative effect on the urban mobility of the town whilst significantly increasing the impact of MetroLink to areas outside of the walking catchment. Given the possibility that an R132 alignment will be chosen, and the preponderance of residential development on the western side of Swords, this is considered an essential tool to enhance MetroLink’s attractiveness to potential users.

The treatment of the junctions will need careful consideration. Both Metro North as approved, and the Swords-Dublin City BRT as designed, included signalisation of the existing roundabouts on the R132. Given the importance of pedestrian permeability and accessibility to the stops, the existing roundabouts may not be fit for purpose with MetroLink in place. In any event, in terms of traffic impact our previous studies with regard to the Swords-Dublin City BRT scheme indicate that grade separation will be required through all four existing
roundabouts on the R132, and we are happy to see this included in the route options under consideration.

4. Lissenhall Area

By identifying Lissenhall as a key future development area (proposed sustainable mixed used urban district), the Council is seeking to maximise the opportunities created by the delivery of this key piece of strategic infrastructure in accordance with best planning practice and the principles of sustainable development. It is envisaged that this area could accommodate the development of a significant mixed use urban district providing for a significant level of employment in addition to approximately 6,000 – 7,000 residential units. These lands have been zoned in the current Development Plan (which gives the statutory development plan status noted as absent during the previous rail order application) and will be the subject of an approved Local Area Plan and be developed over the period of several Development Plans i.e. over the next 20 – 25 years.

The development of the area following the sequential development of the existing Swords envelope is also consistent with the Council’s long term strategic vision for Swords to develop as a sustainable city.

The stated vision for the ME zoned lands is to: Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the Metro within a setting of exemplary urban design, public realm streets and places, which are permeable, secure and within a high quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be development in phased manner subject to the necessary provision of social and physical infrastructure.

Given the potential future development capacity of this extensive land bank and the future number of people who will live and work in Lissenhall MetroLink should provide for an additional stop centrally within the Lissenhall ME lands. Furthermore, the proposed Estuary station should be relocated south of Lissenhall Bridge to a similar location approved by ABP under the approved rail order. This station location will serve a very large catchment area which will be increased significantly with the development of the following ME zoned lands which are subject to Masterplans: Estuary West (MP 8.A); Estuary Central (MP8.B); Estuary East (MP 8.C); and Watery Lane (MP 8.D).

The proposed depot buildings positioned at (Appendix B) Estuary depot ‘Indicative route and station map’ (1) are located adjacent to the M1 at Lissenhall. Vehicular access is provided off the R132 and the proposed access to the depots is shared with the access to the proposed Multi-storey Park and Ride facility (3000 spaces). Clarification is required with respect to the function and design of the extensive depot buildings within the Lissenhall key future development area. The location of the proposed depot buildings at the northern gateway to Swords immediately adjacent to the R132 and M1, by reason of size, scale and function
would likely be a very visually intrusive element. Such proposed uses would contribute little
towards the achievement of the ME zoning objective and vision for the zoned lands. Given
this limited contribution, if the depot buildings are to be located in the Lissenhall lands it
would be best located north of any proposed MetroLink station servicing the centre of these
lands closer to the northern boundary of the ME zoned lands, adjacent to the proposed
SWRR and further west from the M1, as per the recommendation above.

5. Options at Northwood/M50/Dardistown

The route and station maps provided in Appendix B of the Metrolink Public Consultation
2018 document indicate a future station at Dardistown. The adopted Local Area Plan (LAP)
for the strategic land bank at Dardistown is in place until 12th November 2022. A MetroLink
station must be integral to initial phase of the route design and operation to ensure the
delivery and implementation of the strategic employment district.

The emerging preferred route provides for MetroLink underground with underground
stations at Ballymun, Northwood and Dardistown. As an alternative to the preferred route,
further consideration is being given to Appendix C – Alternative Option B which emerges
from tunnel at Northwood Station, passes over the M50 to the proposed future station at
Dardistown and re-enters the tunnel immediately south of Old Airport Road. FCC consider
that tunnelling under the M50 as the best option in terms of ensuring that the constraints on
development lands at Northwood and Dardistown are significantly reduced and to minimise
potential adverse visual impacts.

6. Conclusion

We welcome the decision to progress with the MetroLink proposal and are confident of the
significant benefits that it will bring to Fingal and the wider Dublin region. Whilst there are a
number of areas that require further discussion, as set out in the foregoing, we look forward
to working with you to assist in the delivery of this key piece of transport infrastructure.

Yours faithfully,

[Signature]
AnnMarie Farrell
Director of Services
Planning and Strategic Infrastructure Department