

MetroLink Railway Order - Oral Hearing

Who we are

Dublin Commuter Coalition was established in 2018 as a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and surrounding counties. The Coalition acts as a unifying voice for commuters in these areas so that they may express their concerns, their hopes, and their vision of a Dublin that works for all users of sustainable transport.

Overview

We strongly support the MetroLink project, and we are glad to see the many years of planning and public engagement finally result in a Railway Order Application. We believe this project will be transformative for Dublin, and how people travel to, and interact with, the City Centre; resulting in greater usage of public transport and active travel along the route. I will outline and expand on a number of points relating to the Railway Order Application and the responses from Transport Infrastructure Ireland that we believe should be addressed. Our main point, however, is to call for increased speed in all stages of planning and building MetroLink.

Regarding Operational Hours

An average of 65 flights land at Dublin Airport each night between the hours of 11pm and 7am. MetroLink is to be the key transport link between the airport and the city centre, and by not operating between the hours of 12:30am and 5:30am, you leave passengers and staff continually reliant on bus service operators who will likely have even lower frequencies than they already do as a result of the MetroLink service.

Over the past number of years, we have seen an increasing reduction in the level of AirCoach service, up to 78% on some routes, which may well continue into the future, so it's very short-sighted to not provide a 24 hour service on the Metro.

At the very least, MetroLink should be providing an overnight service in both directions 2-3 times an hour to service Dublin Airport, but a 24 hour operational service would have an added benefit to the night time economy. Plans are already in place to extend licensing hours in the City Centre, so the city's transport sector needs to be meeting that demand ahead of time.

Anyone who has found themselves in the City Centre late after work, or after a night out, has experienced how challenging it is to find some form of public transportation to take them home. Nitelinks are infrequent, only operate on certain days, and in many cases are filled to capacity. 24 hour bus routes are only starting to roll out, and don't

cover the entire network, and the reduction in Taxi numbers are making it very challenging to hail one on-street or through an App. A 24 Metro service would have an immediate impact on Dublin's night time economy, helping to increase business into our entertainment and arts spaces, while also giving people a safe, reliable mode of transportation to get them home afterwards.

We would ask that the operational hours be reconsidered at this stage, requiring a 24 hour service be provided. Leaving Dublin Airport, and the Northside of the city disconnected for a portion of the day will just further perpetuate a car reliant society, which MetroLink is designed to address.

Regarding Secure Bicycle Parking

Bicycles are highly targeted for theft in Dublin. Between 2021 and 2023, 26,026 bikes were reported stolen. 1 in every 59 cyclists has reported a bike theft in the past year, and far more go unreported.

It is essential that we provide adequate safe storage for bicycles at mobility hubs and transit stations. This can be achieved through both parking garages and bicycle lockers, or a combination of both. Every single bike locker available to rent on the DART line stations are permanently booked out, showing that demand considerably outstrips supply.

Thanks to the bike-to-work scheme, daily commuters have greater access to more expensive eBikes, making their travel easier, but making their bike a greater target for theft. If we want to see a real shift in how commuters in Dublin address the 'last-mile problem', we need to provide the appropriate level of secure bike parking.

We appreciate the response from TII, that anti-social behaviour will be discouraged through open sight-lines and an attractive setting, but that sadly does not stop bicycle thieves who have demonstrated time and time again that they are happy to steal bikes on busy streets, even in the city centre. Respectfully, nice benches and good lighting don't stop thieves from robbing bikes - lockers and security staff do.

CCTV is only useful after a theft has occurred, and the bike will already be stolen by the time an Garda Siochana have an opportunity to respond, if the incident is seen and reported in a timely manner.

We would urge TII and an Bord Pleanála to revisit the cycle parking within the entire plan and update it, to not only include cycle parking for all types and manners of cycles, but also that an

adequate level of secure bike parking be provided at each station, to ensure cyclists have a bike to return to, after their trip into the city centre.

Regarding Traffic Management during construction

We appreciate the acknowledgement by TII in their response, that they will be respecting the hierarchical approach to traffic management during the construction phase of the project. We would like to refer them to DMURS, article 2.2.2. - the Hierarchy of road users, and insist that they follow this when any temporary measures are installed.

It will not be acceptable for construction contractors to place 'Footpath or Cycle lane closed' signs in places where motor traffic is not being displaced. Any alternative routes for pedestrians and cyclists should not be extended to facilitate private vehicular access and we would ask that there be some method of measurement included in any tender agreement with contractors, to ensure they are compliant with this instruction.

Regarding Accessibility (Lifts)

We note the response from TII, which states that this plan has been designed on the principle of 'Access for All and I'd like to read an excerpt from Article 9.11.1 of the Greater Dublin Area Transport Plan to that effect:

"There are a number of grounds under which people can experience discrimination and inequality in transport, in particular on the grounds of disability, gender and age. Transport agencies and operators are required under legislation to design and operate infrastructure and services in a manner which does not lead to such discrimination."

At its core, transport becomes inaccessible for some people with mobility issues when the lifts fail on a platform and there is no ramped access. It is completely redundant to have multiple lifts from Concourse to Platform at a station, if the single lift from street to concourse level is out of service and the only alternative is a staircase.

We do not accept the response from TII that the reason not to provide additional lifts was due to footfall or economic reasons. Not only are there legal responsibilities to provide an adequate level of access for people with disabilities, there is also a moral responsibility on society, to ensure those with mobility challenges have full access to it.

Whilst we appreciate efforts are being made to upgrade the constantly breaking lifts on the DART and LUAS networks, that issue would be far less impactful if the appropriate amount of lifts were installed in the first place.

We would hope that the voices of those within the disability community are truly listened to, and that multiple lifts are installed to access each level of a station as necessary.

Regarding Welfare Facilities (Toilets)

An activist group should not need to stand in a room like this and ask for toilets to be installed in a public place in 2024. We are very disappointed by the response from TII, that toilet facilities will only be installed at main interchange stations, and not across the entire network. To be frank, we do not accept that the reason you're choosing to not install them is due to safety concerns.

At a very basic level, people need to use the toilet, and they do not always have the convenience of choice of when that need will arise. Whilst we appreciate that it is currently not part of the plans to have each one of these stations staffed at all times, choosing now to not install welfare facilities now means that we will not have them in the future.

20-30 years from now, these stations may become mobility hubs, as transit oriented development leads to greater density, but these stations, if built as planned, will still not have toilets... leaving commuters in potential distress.

In London, Mayor Sadiq Kahn has recently pledged to spend £3 million, retrofitting toilets into tube stations, where on some lines, only 27% of stations have toilets. A 2023 report 'The London Loo League Table', recommended investing in fully accessible, well maintained toilets at existing stations, and to ensure that all new stations include toilet provisions.

The lack of public toilets can also be a significant detriment to women, who generally need to use toilets more frequently for hygiene, health and pregnancy related reasons. In countries that have not included toilets in their public transit, research shows that the lack of facilities can deter women from using public transport, limiting their mobility and access to the city.

The principle of inclusivity in urban planning requires that the needs of all users, including women, are considered. Facilities like toilets are not just amenities but essential features that ensure the accessibility of public transport to everyone, including those with medical conditions or disabilities that necessitate frequent restroom use.

We would urge an Bord Pleanalla to insist that welfare facilities be included at all stations, so that parents have a place to change their children, and people can use the toilet in a public place when the need arises.

Summary

In summary, we would again like to reiterate our overall support for the MetroLink plan and urge the swift installation and delivery of the project. We hope you will make the adjustments we have suggested, to ensure that MetroLink serves everybody, at all times, equally.

Thank you