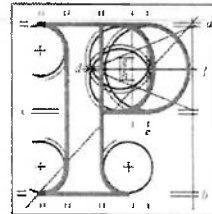


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

ACRA Association of Combined Residence Association
C/O Caitríona McClean and Tom Newton
6 Weston Avenue
Weston Park
Lucan
Co. Dublin
K78 YA39

Date: 03 October 2024

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

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned case.
The contents of your submission have been noted.

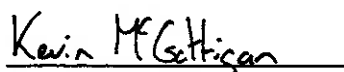
Please be advised that there is no fee to make an observation for any member of the public who has
already made a valid observation on this case, therefore, a refund of €50 will be made to the credit/debit
card to make the online observation.

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

If you have any queries in relation to the matter please contact the undersigned officer of the Board 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,


Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

RA03

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Glaó Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022

A written submission to An Bord Pleanála, the competent authority responsible for making the decision on whether or not to grant the order. This is a submission by ACRA, we already made a valid submission at the oral hearing and we are adding to that fresh material.

Caitríona McClean & Tom Newton

ACRA

6 Weston Avenue

Lucan

County Dublin

K78 YA39

Email: cmaemcclean@hotmail.com

Ireland is a member of the EU and as such it is relevant to consider EU transport policy with regard to public transport.

Context:

The Trans-European Transport Network (TEN-T) is a planned network of roads railways, airports and water infrastructure in the European Union for which funding is available.

TEN-T policy is a key infrastructure instrument for planning and developing a coherent, efficient multimodal and high quality transport infrastructure among the EU.

EU Transport Policy:

EU transport policy aims to ensure the smooth, efficient safe, and free movement of people and goods throughout the EU by means of integrated networks using all modes of transport (road, rail, water and water). <https://consilium-europa.libguides.com> Transport: EU publications-LibGuides

TEN-T urban nodes refers to areas where different components of the transport infrastructure of the TEN-T, such as ports, railway stations, bus terminals and logistics platforms are integrated with each other. (July 6th, 2024)<https://errin.eu:news, errin-and-p>

Integration and connectivity of existing infrastructure is the direction that EU Transport Policy is going. To be compliant with this, we in Ireland need to examine as a priority where we can link up existing infrastructure.

ACRA (Association of Combined Residence Associations) has identified a key project and it has been communicated to the Department of Transport at a meeting with the then Minister of State Jack Chambers. This model was outlined briefly at the oral hearing.

The project includes the provision of less than 20 kms of new track from Glasnevin to Dublin International Airport and onwards to Donabate and joining the Belfast line.

The consequences will be

1. Access to Dublin Airport by rail from all parts of Ireland served by standard rail. This includes Northern Ireland.
2. This is consistent with TEN-T policy for which there is funding.
3. If ABP grants planning permission for Metrolink, this vital project cannot be delivered because Metrolink proposes to use the same route from Glasnevin but using a different gauge to standard rail making it impossible to link up. This will put paid to access to Dublin Airport from mainline rail throughout the island of Ireland. This opportunity cost is huge and unjustified and must be taken into account economically as well as strategically as it flies in the face of TEN-T policy.
4. It should be noted that the proposed vital link by standard rail does not require destruction of buildings in Dublin city and can be delivered much quicker, serving the entire population and is consistent with TEN-T policy.
5. The Metrolink links nothing because it uses a different gauge and cannot be justified as a public spend. The cost and destruction is not justified.
6. It is a catastrophic error to suggest that because the Metrolink gauge is similar to rail lines in mainland EU, that there is any advantage in using it OR that it is consistent with EU policy.
7. ACRA proposes an integrated transport plan for the GDA which can be funded and delivered both quicker and with less public spending than the Metrolink. A copy was made available at the oral hearing and to Department of Transport via Jack chambers TD in his role as Minister of State for Transport.
8. Public spending is an issue of concern. The Metrolink capital project is similar the National Childrens Hospital where no benefit is experienced until the project is complete. And in the context of Metrolink, any benefit is limited to those travelling from Dublin City Centre to

Dublin Airport alone. In contrast, the model proposed by ACRA can deliver immediate returns as the projects are delivered and benefits all Ireland and is consistent with EU policy. The key ACRA project in the context of this submission is less than 20 kms of new track, using the drop-down method for linking incoming rail from all over Ireland with Dublin Airport at Glasnevin without forced change in the centre of Dublin. It also provides direct links from Cork to Belfast as the proposed line of less than 20kms links to the Belfast line.

Details of Metro Dart Route (ACRA model)

The Metro Dart, commencing at Glasnevin takes the same route as Metro Link except it is fully overground on street. Going through Swords Metro Dart uses same alignment as Metro North (that got full permission in 2009). It uses the open space on centre median of R 132. Metro Link is now going underground in this area with cut and cover. Metro Dart can link into main rail network at Glasnevin with no underground using the dropdown method for linking up purposes with Heuston rail line coming into Kilmainham.

Building the Metro Link (18 Kilometres or 11 miles) provides a new rail line into Dublin. This solves the existing space problems at Connolly, dead-end problem at Heuston and lack of rail connections to Dublin Airport for all areas of Ireland that has rail. The Metro Dart (ACRA option) will directly serve the main entertainment areas in Dublin, Croke Park, Aviva Stadium, Board Gas Theatre and Point Depot. If Metro Link (better known as the Metro) is built, it will not solve the Connolly space problem and another Dart line will need to be build beside existing Malahide, another unnecessary extra expense. It would be idle at off peak times.

Metro Dart also provides the city with the opportunity to link up all Dublin with a New Dart Corridor from Docklands Station to M50 link at Sandyford via UCD on lands already reserved. There is huge potential in the ACRA proposal Metro Dart, for all future rail expansion. It is consistent also with EU policy on linking public transport.

ENDS

Caitríona McClean and Tom Newton

ACRA

October 2nd, 2024