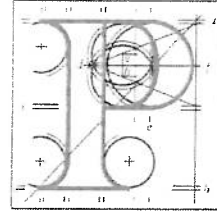


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

Dublin Commuter Coalition
36 Birch Grove
Kill Avenue
Dun Laoghaire
Co. Dublin

Date: 17 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,

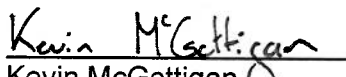
An Bord Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted

Please be advised that there is no fee to make an observation on this case for any member of the public who has already made a valid observation, therefore, a refund of €50 will be issued by cheque in due course.

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 the meantime 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

RA05

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
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Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

AN BORD PLEANÁLA	
LDG-	<u>075401 - 24</u>
ABP-	_____
08 OCT 2024	
Fee: €	<u>50-</u> Type: <u>CARD</u>
Time: <u>12.56</u>	By: <u>HAND</u>



Dublin Commuter Coalition
36 Birch Grove
Kill Avenue
Dun Laoghaire
Co. Dublin

Metrolink Railway Order - 2nd Consultation

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. We will outline and expand on a number of points relating to the changes as a result of the Oral Hearings, 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, but 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 positive 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

On day 21 of the Oral Hearings, there was a new cycle provision document¹ submitted, and presented to active travel campaigners which further identified the severe lack of cycle parking provision across the network.

¹ <https://downloads.metrolink.ie/oh/Cycle%20Parking%20Overview.pdf>

Table 5.3: Shortfall of Peak Demand Accommodated by Spaces based on Dynamic Analysis

Station	Proposed Spaces	Peak Demand	Shortfall
Estuary	254	-	-
Seatown	480	363	-
Swords Central	942	749	-
Fosterstown	422	553	131
Dublin Airport	72	-	-
Dardistown	-	-	-
Northwood	204	393	189
Ballymun	292	570	278
Collins Avenue	370	276	-
Griffith Park	176	119	-
Glasnevin	120	264	144
Mater	70	59	-
O'Connell Street	0	121	121
Tara Street	256	705	449
St Stephen's Green	82	745	663
Charlemont	162	446	284

There is an under provision of 2,259 parking spaces across the MetroLink network, and that is based on current expected demand, rather than what the demand will be ten years from now. In fact, in their own presentation² we can clearly see how poor the provision will be even five years on from delivery

Station	National Cycle Manual Requirement (2.5% of 12hr boarders)			Demand-Led Approach	
	Location	Opening Year-2035	Opening Year +5 years	Potential Cycle Demand—Opening Year	Potential Cycle Demand – Opening Year +5
Estuary	Outer Dublin	-	-	-	-
Seatown	Outer Dublin	109	113	765	819
Swords Central	Outer Dublin	138	148	1233	1320
Fosterstown	Outer Dublin	169	181	788	843
Northwood	Outer City	71	76	686	734
Ballymun	Outer City	210	225	973	1042
Collins Avenue	Outer City	190	203	1157	1238
Griffith Park	Outer City	56	60	411	440
Glasnevin	Outer City	170	182	496	531
Mater	City Centre	119	127	164	175
O'Connell St	City Centre	239	256	236	253
Tara St	City Centre	403	431	973	1041
St Stephen's Green	City Centre	283	303	871	932
Charlemont	City Centre	372	398	808	865

² <https://downloads.metrolink.ie/oh/Cycle%20Parking%20Provision%20For%20Transfer.pdf>

It is very clear that the provision of Active Transport parking is woefully under what will be necessary at these stations and we would implore an Bord Pleanála to require an appropriate level of parking for bicycles at all stations as a condition of planning permission. It is simply unbelievable that Transport Infrastructure Ireland, and the National Transport Authority would attempt to deliver transit hubs with such poor cycling provision. Building this under provision into the project at this stage, will force more people into cars, in order to get to their Metro station, rather than using active transport, simply because they've nowhere to park a bike.

Furthermore; 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 Síochána have an opportunity to respond, if the incident is seen and reported in a timely manner.

We would urge an Bord Pleanála to require that TII and an Bord Pleanála revisit the cycle parking within the entire plan and update it, to not only include an appropriate amount of 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 Accessibility (Lifts)

We note the response from TII, which states that this plan has been designed on the principle of 'Access for All and we'd like to highlight an excerpt from Article 9.11.1 of the Greater Dublin Area Transport Plan³ 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.

The response during the Oral hearings was that, should there be a failure in the lift system, then people who need access could use the emergency services lifts. However this will require anyone using the Metro system to contact the operator with advanced notice. We have seen over many years that this situation is frequent on our DART network, with many wheelchair users having to pre-plan journeys days in advance just in case the lifts are not working on a particular day.

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)

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 TII are choosing to not install them is due to safety concerns.

³ <https://www.nationaltransport.ie/wp-content/uploads/2023/01/Greater-Dublin-Area-Transport-Strategy-2022-42-1.pdf>

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'⁴, 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 be a significant issue to women, who may 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 Pleanála 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

⁴ <https://www.london.gov.uk/sites/default/files/2023-08/TfL%20Toilet%20Report%20FINAL.pdf>