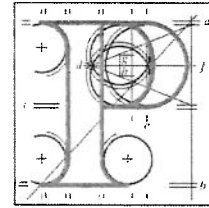


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

Dublin Cycling Campaign
5 Foster Place
Co. Dublin
D02 V0P9

Date: 10 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 letter in relation to the above mentioned case. The contents of your letter have been noted.

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

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Wednesday 9 October 2024 11:44
To: kevinb@dublincycling.com
Subject: RE: MetroLink Oral Hearing Material Consultation Response

A Chara,

The Board acknowledges receipt of your email, official correspondence will issue in due course.

Kind regards,

Lauren

From: Kevin Baker <kevinb@dublincycling.com>
Sent: Tuesday, October 8, 2024 4:18 PM
To: LAPS <laps@pleanala.ie>
Subject: MetroLink Oral Hearing Material Consultation Response

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi there,

Please find attached the MetroLink oral hearing additional materialconsultationresponse.

Dublin Cycling Campaign previously paid for a submission and presented at the oral hearing so no fee should apply this time.

If you could acknowledge this email itwould be appreciated.

Thanks,

--

Kevin Baker
Infrastructure Group
Phone / +353831497474

DublinCycling Campaign
Registered Charity Number:20102029
Dublin Cycling Campaign, % Tailor's Hall, Back Lane, Dublin 8
Twitter/Facebook/Instagram





Dublin Cycling Campaign

5 Foster Place

Dublin

D02 V0P9

8th October 2024

Metrolink Oral Hearing Follow-up

Dublin Cycling Campaign is a volunteer-led charity, founded in 1993, with the goal of creating a liveable Dublin where people of all ages and abilities can safely enjoy everyday walking and cycling.

We appreciate the opportunity to respond to the materials presented at the oral hearing, in particular the pretty significant change to the bike parking assessment presented in the final few hours of the oral hearing just before we were scheduled to ask questions of the applicant.

In the oral hearing we asked one major question:

Does the board feel the proposed level of cycle parking provided as part of this planning application meet the threshold of proper planning and sustainable development?

In our opinion it does not and the oral hearing materials and answers did not adequately describe why.

1.0 Analysis Target Year

Producing new cycle parking demand analysis the day we presented to the oral hearing definitely caught us off guard. We have now had a chance to examine it in detail. The new cycle parking analysis is for:

Passenger demand has been modelled for both 2035 (Opening Year) and 2050 (Design Year/Opening Year + 15 Years), with a 21% growth between the scenarios, resulting in a 7% growth between Opening Year and Opening Year + 5 Years.

The analysis provides data for Opening Year and Opening Year +5 Years. The analysis has not been provided for the Design Year (2050) but this one sentence shows that TII knows there will be future demand growth for cycle parking after Opening Year +5 Years.

In Appendix 1 we have added a detailed table showing the Design Year and the unmet demand percentages. Unmet cycle parking demand is as follows:

Location	Opening Year	Opening +5 Years	Design Year (2050)
Outer City	68.8%	70.8%	74.2%
City Centre	81.3%	82.5%	84.6%

Only a few years after opening the proposed cycle parking will not meet 70-82% of demand. It only gets worse over time.

The applicant knows they have significantly under provisioned cycle parking. Instead of turning up to the oral hearing with revised plans they provided an updated analysis that massaged the numbers. For example, the original planning application provided did not provide for 29% of demand. Instead of increasing the area of the underground cycle parking their new analysis shows there is less demand.

When you lay them out plainly it is clear they have significantly under provisioned cycle parking in the Outer City and City Centre locations. They have also only provided numbers through 2035. Every other part of the transport impact analysis provided as part of the EIAR looks at scenarios through Design Year 2050 and further to 2065. Providing numbers for later years, like done for walking, public transport and car use, they avoid showing just how measly the cycle parking provision really is.

2.0 Role of Local Authorities and National Transport Authority

The applicant provided a letter in the latest "Cycle Parking Overview" from the National Transport Authority that said the NTA will work with the local authorities and other relevant stakeholders to ensure that appropriate cycle parking provision is provided as part of other projects and initiatives.

The board is empowered to only examine the planning application in front of them. In our opinion it would not be within the power of the board to attach any conditions to secure this promised future cycle parking delivery.

I draw the board to Dublin City Council's application for College Green Plaza (JA0039) where the inspectors report (pg 97) noted:

This confirms that the NTA reserves the right and has the power to revise the bus routes following any grant of approval by the Board. Furthermore, it is my opinion that the Board cannot attach a condition requiring two-way bus movement on Parliament Street, as this would not be within the power of the applicant (DCC) to implement.

Similarly, in this case it is not within the power of the board to attach conditions to either the local authorities, National Transport Authority or other potentially relevant bodies like Irish Rail to provide cycle parking to accommodate the cycle parking demand as they are not the applicant. TII as the applicant has no legislative role in the provision of cycle parking in local authority lands.

Without conditions the board is relying on a promise, separate from this application, to ensure this application meets the definition of "proper planning and sustainable development".

3.0 Providing More Cycle Parking

We asked a number of questions at the oral hearing related to alternative approaches that the applicant could have taken to increase the provision of cycle parking.

3.1 Two-tier Cycle Parking

Two-tier cycle parking stands are a common approach used by private developers to accommodate high density cycle parking demand. It was an approach we recommended in multiple of our submissions over the last few years.

The only response at the oral hearing was that this would have a negative visual impact but that doesn't appear to have been assessed anywhere in the EIAR documentation. There are multiple places where two-tier cycle parking racks could have been used. For example, at the Charlemont station there is cycle parking along the Green Luas Line embankment that could be two-tier cycle parking with negligible impact.



The cycle parking tucked away at the back of Glasnevin train station in the pub car park is hardly in a visually sensitive area and similarly could be two-tier cycle parking.

The underground cycle parking at the Griffith Park station could be two-tier cycle parking if the head height allows.

In our opinion, the applicant provided vague answers on why not. There are multiple places where two-tier cycle parking could be accommodated without causing undue visual impact. This alternative has not been adequately considered by the applicant.

3.2 Additional Space for Cycle Parking

Generally the main reason the applicant stated for not providing enough cycle parking was a lack of space. This is definitely true at some stations like Mater, O'Connell Street and St Stephen's Green where they are constrained by national monuments, sensitive receptors or protected structures and need to minimize impacts as much as possible.

At the oral hearing we raised the questions around the TII controlled land surrounding the Tara metro station. But were provided no answer as to why this land wasn't used.

At Glasnevin, where provision is short by 376-480 cycle parking spots, TII could have attempted to incorporate cycle parking on the first storey of the metro station building above the ticket hall. There is no floor plan for this storey in the "Structures Details Book 2 of 3" submitted with the original planning application, so it is unclear what usage this space will have.

It is not clear that the applicant has considered alternatives that would have provided for the necessary cycle parking. Instead they have thrown up their hands if there wasn't superfluous space adjacent to stations.

4.0 Conclusion

The applicant has not provided for a public transport project that sufficiently integrates with cycling because of the underprovision of cycle parking. Instead of examining options and alternatives to provide more cycle parking the applicant has instead attempted to come up with a new analysis and unenforceable side promises to hide away from this issue.

What options this leaves the board with is up to the inspector and the board. It might be possible to secure additional cycle parking at multiple stations along the route via conditions, or it might require more further information from the applicant that explores the alternatives.

Kevin Baker

Infrastructure Group, Dublin Cycling Campaign

Appendix 1: Demand Analysis Expanded

This table contains the data from “Table 4.1 Potential Cycle Demand Accommodated by Project Proposals” and adds the Design Year with 21% predicted increase in demand, unmet demand percentages and summaries for the areas “Outer City” and “City Centre”.

Station	Location	Demand			Spaces Proposed	Demand Unmet			Demand Unmet Percentages		
		Opening Year 2035	Opening + 5 Years	Design Year		Opening Year	Opening +5 Years	Design Year	Opening Year	Opening +5 Years	Design Year
Northwood	Outer City	686	734	830	204	482	530	626	70.3%	72.2%	75.4%
Ballymun	Outer City	973	1042	1177	292	681	750	885	70.0%	72.0%	75.2%
Collins Avenue	Outer City	1157	1238	1400	370	787	868	1030	68.0%	70.1%	73.6%
Griffith Park	Outer City	411	440	497	176	235	264	321	57.2%	60.0%	64.6%
Glasnevin – Metro+Rail	Outer City	496	531	600	120	376	411	480	75.8%	77.4%	80.0%
Total	Outer City	3723	3985	4504	1162	2561	2823	3342	68.8%	70.8%	74.2%
Mater	City Centre	164	175	198	70	94	105	128	57.3%	60.0%	64.6%
O'Connell Street	City Centre	236	253	286	0	236	253	286	100.0%	100.0%	100.0%
Tara Street	City Centre	973	1041	1177	256	717	785	921	73.7%	75.4%	78.2%
St. Stephen's Green	City Centre	871	932	1054	82	789	850	972	90.6%	91.2%	92.2%
Charlemont	City Centre	808	865	978	162	646	703	816	80.0%	81.3%	83.4%
Total	City Centre	3052	3266	3693	570	2482	2696	3123	81.3%	82.5%	84.6%