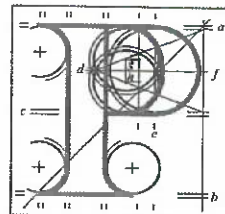


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

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

Date: 09 December 2022

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 (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

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. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

Objection to the MetroLink

Submission by:

Tom Newton & Caitríona McClean

**6 Weston Avenue, Weston Park, Lucan, Co. Dublin
K78 YA39**

A.C.R.A. (Association of Combined Residence Associations)

Submission (01/12/2022)

We object to the proposed MetroLink on the basis that there is a better alternative which can be delivered quicker with less environmental disruption, and with far greater impact in reducing car usage. This alternative would serve a much wider population, and would represent a greater value for public money. Because of the MetroLink's location in a small sprawl city most users will have to use public transport to get to the MetroLink bringing them into an already congested part of the city in a radial pattern, wasting vital capacity. The MetroLink is not an effective tool in reducing car usage for this very reason.

If the MetroLink was built, the city would need another double rail track from Malahide next to the existing Dart line to the city centre as well as an underground Dart to Heuston station. Even this huge capital expenditure would still have a minimal effect on car usage due to its location.

If the MetroLink was built as far as Charlemont, it would put massive pressure on the existing Sandyford line for the MetroLink to extend underground to Sandyford. The consequences would be having an underground and overground rail system on same route from Sandyford to the Airport, servicing only a fraction of Dublin. The rest of Dublin and adjoining counties would have to wait many decades to get serviced or may not at all, due to large amount of resources that have already been expended on the MetroLink. The MetroLink is not an efficient use of public money, and in fact it would delay a transport solution for the vast majority in the greater Dublin area. We strongly object on this basis.

If Climate Change is as serious as we believe it is, air pollution as bad as we are told and traffic congestion is so prominent, we must act immediately by putting forward a solution that addresses most of the problems in Dublin and surrounding counties, in a relatively short time in a cost-effective way.

Our organisation A.C.R.A. (Association of Combined Residence Associations) has come up with such a plan, the Newton Transport Plan, that meets most of the requirements of the Capital to operate successfully while addressing the aforementioned problems. The Newton plan is a fully integrated plan linking up all areas and incorporating all forms of public transport and accommodating active travel. The plan incorporates a common theme of

The Newton Transport Plan

The Newton Orbital Luas: This plan is designed to take users directly to all parts of the greater Dublin area with flexibility and has many advantages over the car. The Orbital Luas opens up huge possibilities for housing development. Transport and housing must be planned in conjunction and the Newton Orbital Luas creates the potential for combined planning. The MetroLink in contrast offers very little opportunity for new housing as the plan serves a very developed space which is already well served by housing and transport. The Newton Orbital Luas has the potential to reduce car numbers by up to 80% and can be completed quickly. It is a cost-effective attractive solution to the deficit in public transport. *(See figure 1)*

Additional Luas: The plan creates two additional Luas lines into city centre (Lucan Luas and Rathfarnham Luas) and has other areas serviced by extending existing Luas lines.

The G-Link: By linking up the Luas in the city centre in an inner orbital ring, it can take all users in the city centre to within walking distance of their destination. (See figure 2)

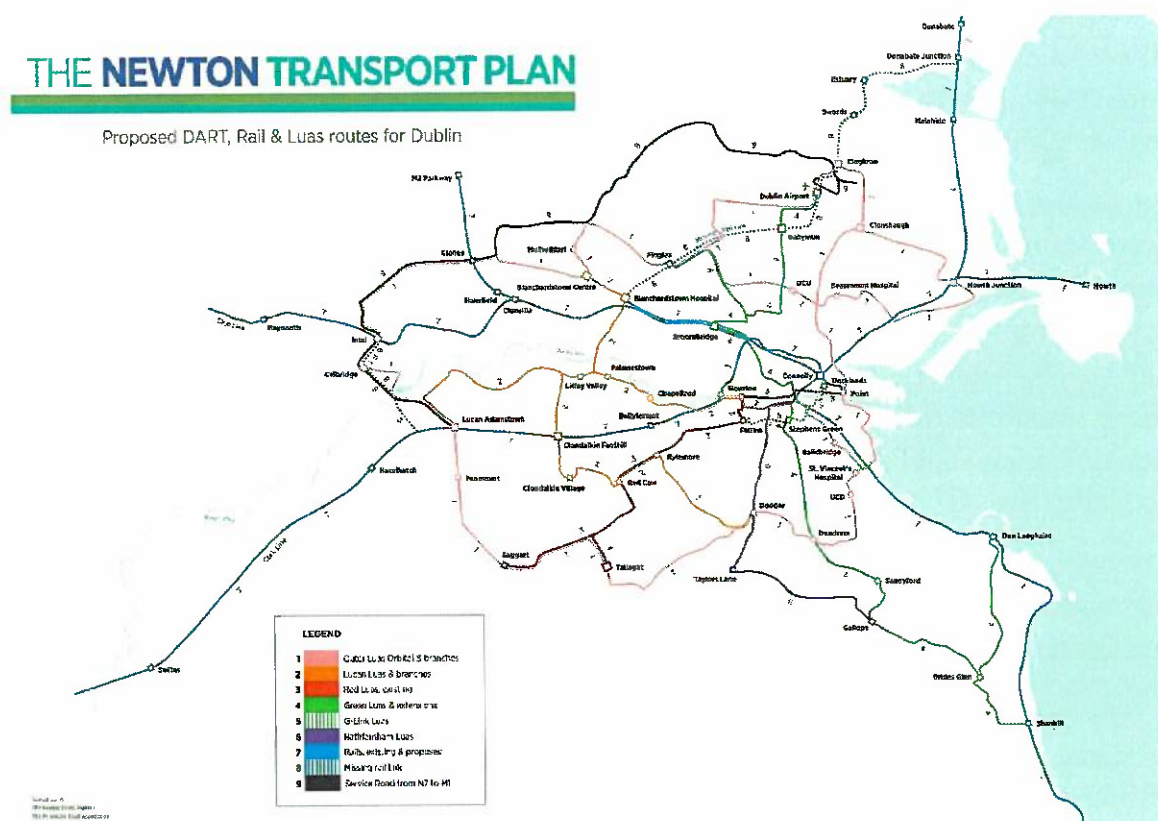


Figure 1 Newton Orbital Luas & Rail plan

THE NEWTON TRANSPORT PLAN

Luas City Orbital

G-Link in Orbital

Main Benefits

- All Dublin centre area within walking distance of a rail or Luas line
- Accommodates all arriving at Dublin's three rail stations and bus station
- Maximises bus use, reduces congestion
- Makes city more accessible, especially for users with a disability

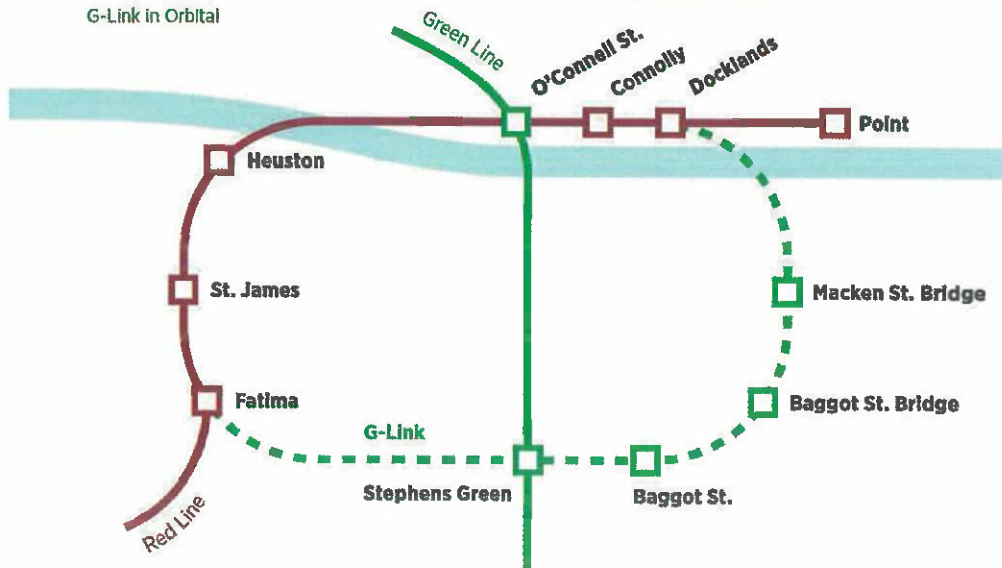


Figure 2 The G-Link Orbital.

Rail: The G-link Luas described above maximises rail use because it has the potential to accommodate all users arriving at Dublin's train stations, even if train numbers were doubled. Crucially, by building the missing section of rail from Blanchardstown to Donabate via Dublin Airport on the edge of M50, the Newton Plan links up the full rail network in Dublin. This gives direct access to Dublin Airport to everyone arriving in Dublin by train without having to go through the city centre. It also creates a direct Cork to Belfast rail link. This allows for the number of trains into Dublin to more than double and for a trebling of trains on the Belfast line. There are also more country rail lines in the plan. (See figure 1)

City Centre Bus: A contraflow loop interchange plan on the Quays. This addresses the over one hundred (100) flaws in the city centre, the simple solution is a bus contraflow along the river. Details of this have already been submitted to Dublin City Council (see figure 3).



Figure 3 City Centre Contraflow Bus Plan.

Buses Outside the City: There are two bus orbitals on Dublin's outskirts.

1. The CORE bus loop on the M50, with main Interchange at Liffey Valley. This orbital loop links all outlying estates to each other.
2. The Outer orbital on the outskirts which is a new concept to maximise bus use with a high frequency.

Country Bus Loop: This is a bus loop to maximise bus use into Dublin for up to 100 kilometres.

The NTA have been made aware of the Newton Plan but have not responded. We object to public money being spent on the MetroLink and ask that ABP refuse permission to proceed on the basis that the MetroLink is wasteful and does not address the climate change crisis in an adequate manner. It does not provide public transport in an acceptable time frame for the greater Dublin area but serves only a small section in an inefficient manner that will give rise to further spending, disruption and delays. We ask ABP to require the NTA to look at alternative plans in a transparent manner in keeping with EU legislation.

ENDS