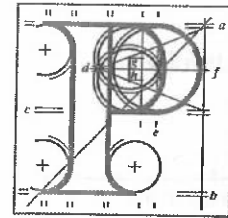


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Ciaran Cuffe
Green Party
12-14 Mount Street Lower
Dublin 2
D02 W710

Date: 26 January 2023

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.

Teil	Teil	(01) 858 8100
Glaó Áitiúil	LoCall	1890 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

Yours faithfully,

PP EM

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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Irish Welcome - *Cuirim Fáilte Roimh Ghaeilge*

Designated Public Official under the Regulation of Lobbying Act 2015
Oifigeach Poiblí Ainmnithe faoin Acht um Brústocaireacht a Rialáil 2015

16 January 2023

The Secretary

Via online portal <https://online.pleanala.ie/en-ie/housing/observation>
Bord Pleanála, 64 Marlborough St, Dublin 1
D01 V902

Submission on NC06F.302010 - Railway Order from Estuary to St. Stephen's Green, Dublin

Dear Sir or Madam,

I welcome the construction of Metrolink as a transformative piece of infrastructure for Dublin. Metrolink represents a major modal shift towards sustainable transport. This investment must be pioneering in its sustainability, emphasis on active and low-carbon travel and commitment to achieving our climate goals as laid out in the 2021 Climate Action Plan.

New public transport infrastructure has the potential to reduce the 1,500 annual excess deaths in the State that are attributed to transport emissions, improve road safety, and reduce transport greenhouse gas that account for one fifth of our total emissions.

Pedestrian and Persons with Disabilities Infrastructure

The Walk21 Conference on active travel this year in Dublin showed us what could be achieved regarding pedestrian infrastructure and catering for the needs of those with disabilities. Seamless pedestrian access and level access should be a priority where feasible, as well as well-designed, adequately sized and managed lifts where level changes are needed. Catering for the needs of persons with disabilities should be a key aspect of the project from the outset. Advice should be sought from disability organisations, as well as the Irish Centre for Universal Design and the Trinity Haus Project.

1. I welcome the new pedestrian crossing planned at the Swords Central stop and encourage a greater rollout of zebra crossings along the route, along with lower speed limits. Long and frequent pedestrian crossings are central to ensuring safety and accessibility.
2. The notable footpath widening at Stephen's Green East is welcome. Footpath widening must be prioritised. As a rule, half the width of a street in the city centre should be designated for pedestrian use.
3. I am pleased to see the canopies featured in the Retained Cut Station design - offering a communal space for passengers as a meeting point.
4. Funding provisions for pedestrian and cycling infrastructure must be integrated into the Metrolink project.

Cycling Infrastructure

Metrolink must be developed in tandem with active modes of transport. The following suggestions are made for cycling infrastructure:

1. Cycle lanes near planned metro stops should be safe and segregated from heavy traffic by planting, level changes and road markings, rather than unsightly plastic bollards.
2. Segregation of pedestrians and cyclists will encourage active modes of transport. A place-making approach involving segregated space for pedestrians, cyclists and public transport should be implemented where possible.
3. It is important to provide adequate cycling parking at metro-stations to meet demand, as much at grade as feasible.
4. The cycling infrastructure on the R108 Ballymun Road should be reinstated and improved
5. Adequate provisions should be made on Metrolink carriages for bicycles and other micro-mobility devices along with integration to existing bike-sharing schemes across the city. The approach taken on Danish commuter trains that have bicycle storage with flip up seats that can accommodate bikes or seated passengers depending on demand should be used.

Integration with other Public Transport Modes

1. Metrolink provides significant opportunities to improve bus, commuter rail, Luas and DART connectivity. Each station should maximise the possibilities for inter-modal journeys with easy to follow transfers where appropriate.
2. During the construction process, there should be constant communication and integration between the Metro project and developing proposals for other forms of public transport.
3. It may be appropriate to put in place a public transport users group to advise on, and assist in the successful delivery of the project.
4. It may also be appropriate to put in place a project lead member charged with the integration of transport modes.

Vehicular Infrastructure

The Metrolink project is an opportunity for a modal shift away from car-centricity and towards public transport. As is noted in the Environment Impact Assessment Report, *Inrix* has ranked Dublin the fifth worst city globally for time spent in traffic. (Those these surveys tend to focus only on car-based journeys). The benefits of a modal change span from increased social cohesion, lower levels of obesity and a reduction in transport emissions. On this matter:

1. With much of the route following the Ballymun Road and other main arteries across the city, there is an opportunity to provide state-of-the-art walking and cycling infrastructure and redesign carriageway sections and junctions to optimise this.
2. The scheme should provide for passengers coming from outside the Greater Dublin Area i.e. the Dublin-Belfast Corridor to alight at Donabate Railway Station and reach

Estuary in a timely fashion to continue their journey with Metrolink. Increased frequency on the 33B bus service can help provide this or the provision of a new shuttle service. This could aid in reducing long-distance commutes as sprawl reaches further areas outside the existing Greater Dublin Area.

3. The presumption must be against increased road capacity with any road maintenance or new interventions attributed to the Metrolink project possibly leading to induced demand
4. The provision of electric vehicle charging points at the Estuary Park & Ride is welcome. Electric Vehicle provision including charging and pro-cabling must exceed the requirements in the proposed AFIR Directive.
5. Kiss-and-Ride facilities that allow car drivers to drop off intending Metro passengers should be provided for beside the proposed stations.
6. It may be appropriate to provide for car-sharing facilities at or adjacent to the proposed stations.
7. If Park and Ride Facilities are provided, they should form part of mixed-use transport infrastructure with frontage development and other uses at, or above the proposed parking sites as part of an urban design and place making strategy.

Spatial Planning and Land use

The Metrolink allows us to envisage a Dublin well connected by active / sustainable travel modes - fostering an appropriate environment for transit-oriented development of medium to high density. The following is proposed:

1. Improved land-use strategies around Metrolink stops to reduce long-distance travel journeys should be a priority, with much potential for the development of new housing in the North Inner City in particular. A place-sensitive approach to higher density, well-designed development is required.
2. Operate under a presumption of at least six-floor height at well-served locations, as it is wasteful to allow one-storey developments along a quality route such as this. The airspace above stations should be utilised for development.
3. It may be appropriate to develop over stations using the 'air rights' associated with same as these stations by design will be well-served by public transport.
4. In new developments, adequate green, open or wild space should be an integral part of any scheme.

Other Issues

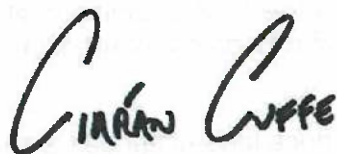
Beyond these five overarching themes, some other issues arise

1. I hope that in the outlined plan to reduce carbon emissions during the Construction Phase of the project that there will be a move to specify green, low-carbon concrete
2. I am pleased to see the emphasis on integration with the built environment - hoping that lessons have been learnt from the garish 'Luashenge' phenomenon of unplanned utility boxes. I note the integration of the Albert Park air duct in particular and hope this approach will feature elsewhere. Utility cabinets should be considered from the offset and fully integrated into the design.

3. There should be a concerted move away from the excessive signage seen on the Luas Red Line - as seen particularly between the Four Courts and Jervis Street stops.
4. Lighting should be sensitively designed, and should be designed to ensure the safety of all, particularly women and girls. It should also ensure that light is not projected upwards to avoid interference with the 'night sky' and should decrease in brightness later at night if there are no people present.
5. Operating hours seem to exclude 1am to 5:30am. To ensure a thriving night-time economy and reflecting the progress made by Minister Catherine Martin on the matter, services should be provided on a 24 hour / 7 days a week / 365 days a year basis.
6. The range of active mobility and sustainability challenges present are such that one individual should be assigned responsibility for climate action and to whom concerns can be brought. Given the building activity due to commence, better use of our existing assets is the most environmentally friendly approach. Where existing infrastructure can be repurposed or retrofitted, it should be done.

Metrolink can play a key role in improving access in and around Dublin, and setting Ireland on a path towards climate-neutrality. Many thanks for your consideration of my submission and I wish you well in your work.

Sincerely,

A handwritten signature in black ink, reading 'CIARÁN CUFFE'. The signature is stylized with a large, flowing 'C' at the beginning and a distinct 'E' at the end.

Ciarán CUFFE, MEP for Dublin