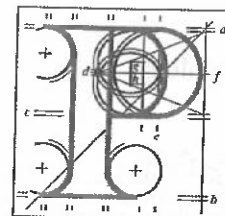


**Our Case Number:** ABP-314724-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

**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](http://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.

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Dublin 1  
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Yours faithfully,

PP EM

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

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ABP case ref: 314724

## METROLINK

### 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 has the potential to be a catalyst for greater usage of public transport and active travel along the route. Below, we outline a number of points relating to the Railway Order Application that we believe should be addressed. Our main point, however, is to call for speed in all stages of planning and building MetroLink. Given the many cancelled plans and delays in building a metro in Dublin over the past decades, as well as the urgent transport needs of hundreds of thousands of residents, MetroLink needs to be built as swiftly as possible.

## 24hr Operation

According to Volume 2 Chapter 6.4.3 MetroLink Operations and Maintenance of the EIAR, the hours of operation will be 5:30-00:30. Globally, a number of cities operate metro lines 24 hours a day. Examples include New York, Tokyo and Copenhagen. Copenhagen's is the most similar to MetroLink, as it has a modern, driverless metro system. We strongly believe that Dublin's MetroLink should emulate Copenhagen's operating hours. Even if 24-hour service is not attainable, the 5:30am start is too late, given Dublin Airport's first wave of departures sees dozens of flights depart between 06:15 and 07:30. We believe the MetroLink should facilitate airport staff and passengers arriving before the morning wave of departures. Furthermore, MetroLink will connect to a number of 24-hour orbital buses. It will also be the only direct way to travel between Ballymun/Glasnevin and Dublin Airport.

Existing 24-hour buses have shown strong demand and the 41 bus is regularly full from Abbey St, leaving passengers stranded in the middle of the night.

## Cycle parking

We have three main concerns surrounding cycle parking provision. *First*, while we are pleased to see that there are some bike parking facilities at most of the stations, it is concerning that there in 12 of the 15 stations, the cycle parking provision will not meet the predicted demand. In four stops, the applicant predicts that there will be cycle parking provision for fewer than 1/5<sup>th</sup> of the cyclists predicted to be looking for a place to park their bike. We understand that in some locations there are constraints on the space available for cycle parking, but for these cases, we would insist that the applicant provides the needed cycle parking. *Second*, we could not find specific information about accessible cycle parking. There should be bike parking for accessible bikes – including pedelec bikes and wheelchair bikes – at all stations. *Third*, some of the bike parking will be 'semi-enclosed', but the rest will either have a roof or overhang over it, or will have no protection at all. Given that theft of bicycles is common in Dublin, we would like to highlight the need for regular monitoring of these cycle parking areas. We would suggest that, where there is room, provision be made for more secure types of cycle parking.

## **Pedestrian and Cyclist Priority During Construction**

We understand that a major project like MetroLink will require temporary changes to traffic patterns and other inconveniences during the construction phase. We would ask that the applicant makes a positive effort to ensure that these temporary measures are consistent with the Hierarchy of Road Users set out in section 8.11 of the Greater Dublin Area Transport Strategy 2022-2042, which calls for design and planning decisions to prioritise the needs of pedestrians and cyclists first and private cars last.

Too often, in Dublin, construction works will close or restrict access to footpaths, cycle lanes, and bus priority lanes, in order to maintain uninterrupted access for private cars or for free public parking. This approach is not consistent with the hierarchy of road users and can be dangerous as well as disruptive.

We ask that any temporary changes during construction respect the Hierarchy of Road Users and ensure that access for pedestrians and cyclists is retained as a first priority, even if this means restricting or rerouting motor vehicle traffic.

## **Real accessibility and the lessons from DART**

It is important that all Metrolink stations are accessible to all Dubliners, including wheelchair users and others with limited mobility. It is important to avoid a repeat of the current accessibility crisis plaguing the DART system, where multiple lifts have been out of service across the network for weeks at a time, necessitating a new multi-million-euro refit of lifts across the Irish Rail network.

In order to ensure that Metrolink is accessible to all, we suggest that the applicant:

- Monitor the ongoing "Big Lift" project and ensure that all MetroLink lifts are built to the highest standards the first time;

- Ensure that station designs include redundancies to ensure continued access, for example, including both lifts and ramps at surface-level stations, or multiple lifts at each deep-level station with access to both platforms, so a single out of service lift does not leave a wheelchair user stranded; and
- Prepare for and provide contingency plans so that, if a passenger lift is out of service, wheelchair users may be allowed supervised access to fire brigade lifts until it is repaired.

Specifically at Glasnevin Station, there are only steps and lifts between the Irish Rail platforms and the street level entrance and the MetroLink concourse. Given the significant transfer patterns predicted between DART and MetroLink services, we believe the Irish Rail platforms should be built with escalators.

## **Public Toilets**

According to Volume 2 Chapter 6.8.1.5 Welfare Facilities for Passengers of the EIAR, public toilets will be provided for passengers at the main interchange stations. However, many key stations such as Estuary are missing public toilets. We believe that all major stations should have public toilets.