



An
Bord
Pleanála

Our Case Number: ABP-314724-22

Planning Authority Reference Number:

John Lawlor
17 The Close
Highlands
Rathmullen Road
Drogheda
Co. Meath
A92RW8X

Date: 06 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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Case reference NA29N.314724

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I am writing in connection with the above case, i.e. Metrolink. This will be a very important addition to Dublin's public transport infrastructure. However, a major weakness is that it does not link with Connolly Station. This impacts negatively at three levels:

- Interconnectivity
- Construction
- Operations

Interconnectivity

Connolly is the most important railway station in the country, being the terminus for most mainline and Dublin commuter services (all of them if there is a link from Heuston in the future), as well as linking with both DART and LUAS. It is also adjacent to Busáras. Therefore, in terms of connectivity, it is the most important station to link the new service with. Interconnectivity is a key prerequisite of successful public transport and is regularly highlighted at Irish Government¹ and EU level².

Including a station at Connolly would not eliminate the potential to include a station at Tara Street also.

Construction

Another important factor from a planning perspective is disruption during construction and the socioeconomic costs thereof. Urban transport developments, including metro infrastructure, are internationally recognised as generating largescale disruption during their construction phases³. In this regard, Connolly has advantages over the proposed city centre stations (O'Connell Street and Tara Street) as follows:

- There are two large surface car parks immediately to the east of Connolly station (see image overleaf), which could:
 - be utilised to accommodate Metrolink surface access and
 - greatly facilitate the construction of and tunnelling for Metrolink. If this were to be done, the material dug up could also be removed by rail, greatly reducing or eliminating road traffic disruption in the city centre during construction

¹ <https://www.transportforireland.ie/news/minister-ryan-announces-transformative-metrolink-project/>

² <https://cordis.europa.eu/article/id/86858-connecting-transport-networks>

³ <https://www.irishtimes.com/news/luas-link-line-set-to-disrupt-traffic-in-city-centre-1.1020112>
<https://csengineermag.com/construction-challenges-of-rail-in-an-urban-environment/>

- Connolly is a better candidate for a city centre Metrolink station than Tara Street, because the latter is closer to the river. That means its station would have to be deeper, taking longer and costing more to construct and generating more dig spoil.

Operations

Operationally, Connolly has advantages over the proposed city centre stations, as follows:

- A new metro station at Connolly could be linked by underground passageway to Busáras, effectively creating an intermodal public transport hub.
- Being underground, a Metrolink station at Connolly would be unconstrained for space; underground capacity at Connolly could potentially cater for other services currently terminating at the station, relieving pressure on the surface.
- Because a Connolly Metrolink station would not be as deep as a Tara Street Station, it would be quicker and more convenient to use.
- Maintaining public safety at Connolly would be easier than at a station on O'Connell Street, as it would be contained within an existing station facility.

In summary, I believe a Metrolink that does not link with Connolly is a major missed opportunity for the city, and would be sub-optimal from a planning and transport policy perspective.

Surface carpark space to east of Connolly Station

