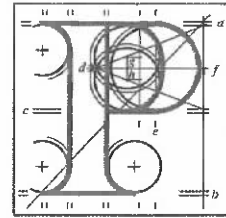


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

LOKRA Lower Kimmage Road Residents Association
C/O Joan Moore
200 Kimmage Road Lower
Dublin 6W
D6W R298

Date: 18 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.

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Yours faithfully,



Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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Lower Kimmage Road Residents' Association

200 Kimmage Road Lower

Dublin

D6W R298

Submission to An Bord Pleanála

16th January 2023

Ref: Case reference: NA29N.314724

314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin

Introduction

LOKRA (Lower Kimmage Road Residents' Association) is fully supportive of the immediate implementation of the MetroLink Project from **Estuary to St. Stephen's Green**. Our concerns relate only to the portion of the proposal south of St. Stephen's Green to Charlemont / Mander's Terrace.

In this regard LOKRA endorses the submission of MSWG (Metro South West Group), of which we are a member.

Main Concerns

Limitations of Charlemont as an appropriate terminus:

MSWG (along with many others) has clearly outlined the unsuitability of Charlemont as a terminus and a major city centre transport hub for MetroLink. We believe that if the tunnel boring machine is parked at Mander's Terrace, it seriously compromises the ability to include some highly populated city suburbs such as Portobello, Lower Rathmines, and Harold's Cross in any future potential extensions to the line. This creates **an embedded bias** in favour of east bound, over south west bound, projects from the perspective of cost / benefit analysis. We believe this can only be fairly balanced by evaluating a more neutral (central) starting point (eg. Saint Stephen's Green) for alternative south bound extension route analysis (south east or south west).

On the decision to choose Charlemont as the MetroLink terminus, Frank McDonald (former environmental editor for the Irish Times), wrote in a recent Irish Times article:

"This issue was raised by An Bord Pleanála representatives during pre-application consultations with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) when they queried "the appropriateness of the selection of Charlemont as the end-point in the light of the decision to omit the Luas Green Line upgrade". That question has never been satisfactorily answered."

Ref: Irish Times 2nd Jan 2023

Climate action:

While the current climate-change budget calls for a massive reduction in carbon emissions from the transport sector, as James Wickham (*Fellow Emeritus of TCD and author of European Societies Today: Inequality, Diversity, Divergence (Routledge 2020)*) states in a recent article:

"The lack of urgency involved in rail projects is exemplified by the continued delays of the MetroLink project. First suggested in the Dublin Transportation Office's Platform for Change in 2001, a proposal was finally submitted by the National Transport Authority (NTA) to An Bord Pleanála on September 30th, 2022."

and:

"Investment in public transport is investment in a public good and a public service... A serious expansion of rail-based transport in the greater Dublin area is the single most realistic method of shifting journeys away from the private car. Precisely because this requires substantial investment, the obvious need is to make the investment immediately so the benefits materialise as early as possible."

Ref: Irish Times 14th December 2022

If climate action goals are to be achieved, LOKRA believes there is a huge opportunity with Metrolink and the initiation of an underground metro services for Dublin, to get the basics right at the start will allow for rapid and incremental roll-out of extensions to the service.

A core element of this is the choice of a future-proofed city centre terminus and progression of cost / benefit analysis of future extensions in parallel with the initiation of the MetroLink project. Underground metro is the only serious option that will ensure a modal shift from car to public transport for the 320,000 population of the south west of Dublin between the Red and Green Luas lines – with nothing to look forward to but busses up to and beyond 2042.

Healthier Neighbourhoods:

LOKRA believes that an underground Metro service should be the backbone of any integrated, multi-modal, transport system that aims to free up precious and already seriously limited road space in order to enable a healthy urban living and working environment. Yet, according to James Wickham:

"In 2030 there will be more cars on the road in Ireland than there are at present. As a direct result of current climate change policy, the private car will be more embedded in Irish society than ever before."

Ref: Irish Times 14th December 2022

The NTA has already accepted that even with the highest level of bus service provision possible, buses alone will be inadequate to support the forecast demand in south west Dublin and yet, as stated by James Wickham in a recent Irish Times Article:

"...the upgrading of Dublin's bus routes through the BusConnects project is presented by the NTA as obviating the need for other major rail investment for another decade"

Ref: Ref: Irish Times, 14th December 2022

The negative effects of extensive car usage are now well established. Low-traffic road environments optimise the efficiency and attractiveness of flexible public transport options (such as bus and shared modes of transport), cycling and other forms of micro-mobility as well as walking.

In the context of Kimmage Road lower, the NTA has proposed LUAS as the only possible additional option for services beyond 2042. The imposition of large capacity buses and / or LUAS lines on Kimmage Road Lower will do nothing to facilitate the aim of a healthier and safer neighbourhood and does not respect road user hierarchy. This proposal is still to be properly evaluated and LOKRA believes that a Metro option should be given equal and fair consideration and evaluation within the timeframe of the next Dublin Area Transport Strategy review, by 2028.

An underground metro service for the greater south west Dublin area, would allow for the re-imagining of road space in residential areas and significantly improving the quality of life for residents and commuters alike.

Recommendation:

It is our strong belief that the decisions made now will affect the provision of essential underground rail infrastructure, for the ever expanding population in south west Dublin, for generations to come and we respectfully request your serious consideration.

We submit therefore, that An Bord Pleanála should approve the full implementation of the MetroLink plan **as far as St. Stephen's Green** and defer the authorisation of the final section of MetroLink beyond the St Stephen's Green station, pending further comprehensive and comparative analysis of St. Stephen's Green vs Charlemont stations as preferred city centre hubs and starting points for future possible extensions. This and the evaluation of future south Dublin extension options, to be carried out within the timeframe of the next Dublin Area Transport Strategy review (by 2028).

Joan Moore (Dep. Secretary)

On behalf of LOKRA Core Group