Our Case Number: ABP-314724-22

Planning Authority Reference Number:

An Bord Pleanála

Rail Users Ireland
C/O Thomas J Stamp
Clonboo
Templetouhy
Thurles
Co. Tipperary

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.

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Yours faithfully,

pp EM

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Rail Users Ireland

Ireland's National Rail User Organisation
A member of the European Passengers Federation

Metro Link Railway Works Order Submission

16 January 2023

About Us

Rail Users Ireland is Ireland's National Rail Users Organisation, We are objective observers and customers of Ireland's rail transportation network. We want the provision of excellent customer service to rail transport users and international best practice applied to the development of Mainline, Suburban, Metro and Light Rail transport in Ireland. We are ordinary rail users just like you, and we aspire to being your voice in the media and at Operator/Government level. We are a member of the European Passenger Federation and are thus recognised at EU level.

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Summary

We express our support for the Metro Link project, a significant and long overdue contribution to the provision of a world class urban transit for Dublin.

We note with thanks that the Metro Link team has incorporated the Glasnevin interchange previously ruled out as technically infeasible by the former Metro North team. This will become a critical modal interchange for Dublin in years to come.

We are however obliged to call attention to the fact this proposal is a compromised solution with poor integration. It will not only be inconvenient to passengers but plain embarrassing that for several billion spent, we ended up with a disjoint and poorly integrated solution.

The failure to progress the DART Underground project has resulted in the awkward diversion of the Metro via Tara Street.

Integration

All interchanges except Glasnevin are "out of station" and require passengers to exit, cross public footpath and in the case of Dublin Airport interact with road traffic. This is unacceptable. This has accessibility impacts by complicating the connection. Claims that others will "fix" these issues later are not acceptable.

Accessibility

A minimum of two lifts should be provided at each station entrance, and for the transition from each platform to mezzanine level. Given the frequency of service and passenger numbers two lifts will be needed and this provides redundancy in event of breakdowns.

Single Bore Tunnels

The choice of single bore tunnel is at odds with normal practice globally. Twin bore has significant safety and operational benefits as engineering works on one track do not impede traffic on the other. In a worst case scenario of a fire or derailment the single bore option offers considerably worse outcomes for both passengers and infrastructure.

Twin bore provides for a central island platform and thus the station box required is narrower also savings can be made in terms of number of escalators and lifts. This is the most common design used in modern systems e.g. Munich, Stockholm, Prague, Amsterdam, Vienna, Budapest.

Train Length

64m is restrictive and is well below the length of typical metro trains elsewhere which are typically around 100m. This is a one way decision, platform extensions are not a later option which has badly impacted metros elsewhere. As we are building for the next 100+ years starting with the assumption that 90 minute headways are going to be by design is not a good starting point.

It is likely in the fullness of time there will be a Metro West branching off the route south of the airport and a possible Green line upgrade and south west metro to Tallaght.

We have consistently under specified capacity in Dublin, noting the original Green line was

specified for 30 metre trams, later revised to 40m and now 52m. Station platforms of a minimum of 80m should be built to allow for future scope to expand.

Charlemont Station

The reversing section at Charlemont appears to be able to store only a single train while allowing one track for reversing. As the metro will be fully automated it would be operational helpful to be able to store several trains at Charlemont to dynamically manage frequency so the stub section would need to be 140-150m long not that current ~70m.

Proximate is not integrated. Single flight of stairs to provide connection to Luas at Charlemont is insufficient in capacity terms given we expect a large turnover of passengers at this location given lack of integration at St Stephens Green.

Dedicated separate lifts and stairs should be provided for each Luas platform side to Metro station mezzanine level below, avoiding the need to walk on the street.

St Stephens Green

Single pedestrian entrance is insufficient given significant demand from Lesson Street end, a second entrance should be provided. It's confusing that Charlemont gets two entrances yet St Stephens Green which clearly will have a greater flow of passengers has only one.

Tara Street Station

Zero integration with Irish Rail at Tara Street. Given the curved platform at Tara Street it is a poor location for high volume interchange of passengers. No amount of work will address the Irish Rail platform interface issues at Tara Street.

Stating it is future work for Irish Rail is not acceptable, everything needs to be included in the works order to avoid issues and to minimise the duration of construction on site.

With the long term plan to build DART underground, Glasnevin and St Stephens Green would provide connections to all rail routes and thus Tara Street would not be needed at all as an interchange.

There are significant long term benefits to not connecting at Tara Street

1. Remove one station and a provide a more direct alignment cost and construction time saving
2. Shorter alignment and fewer stops, fewer trains required to maintain frequency
3. Shorter alignment and fewer stops, shorter end to end journey time which drives passenger demand and modal transfer
4. Eliminates significant and disruptive residential and commercial property demolition
5. Reduced construction impact on city
6. Eliminates subsidence risk or other construction risk on Loop line viaduct, see recent incident in Berlin at Alexanderplatz on line U2 where nearby construction has shut the line as an example.

O'Connell Street

Provision for direct access from the Luas platform into the Metro station is desirable. A simple stairwell at the end of the platform would suffice. The south end of the platform would appear logical.

Dublin Airport

Zero integration at Dublin Airport for arriving or departing passengers, external walk requiring interaction with vehicular traffic is required to reach the station which is unacceptable for integration and accessibility purposes. This is not best practice and represents a substandard solution. Stating it will be the DAA's problem is not a solution.

Options for an underground walkway from both T1 and T2 need to be considered to ensure good integration and to avoid pedestrian interaction with road traffic. T1 seems feasible given the existing basement/Area 14. T2 will require an option exercise likely option is to leverage the existing bridge to the short term car park and build access via the T2 short stay car park.