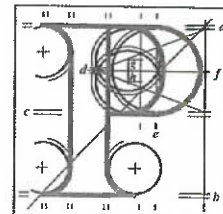


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Richard Guiney
43-45 Middle Abbey Street
Dublin 1
D01 X8R2

Date: 07 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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D01 V902	D01 V902

Metro Link

Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022

25th November 2022.

Introduction

Dublin Town supports the application made by Transport Infrastructure Ireland in respect of the Metro Link project. This is a vital piece of transport infrastructure which must be completed without further delay.

Transport Emissions

Ireland is obliged to reduce its transport related carbon emissions by 51% by 2030. Given the indicative timetable provided, it is unlikely that the scheme will be delivered by that time, however, Dublin Town would strongly advocate that the scheme be completed as quickly as possible in order to assist Ireland in reaching its ambitious but necessary carbon reduction targets. Without, investment in key infrastructure projects, it will be simply impossible for Ireland to meet its obligations.

Indeed, given the extent of our carbon reduction commitments, it is highly likely that Dublin will experience reductions in non-public vehicle movements within the city core. In order to maintain economic vibrancy and viability, alternative public transport and active travel arrangements will need to be available.

Capacity

As noted above we will have to increase capacity on our public transport systems. The fact that Metrolink will be able to carry 20,000 passengers per direction per hour, will assist considerably in this regard. Prior to the pandemic Dublin city centre had an average footfall of 450,000 per day (equating to 300,000 people). Footfall has averaged 85% of 2019 levels over the past number of months, a pattern that we anticipate will become the norm. This level of footfall requires the capacity offered by Metrolink. The lack of such options is an underlying reason for traffic congestion in the city. Indeed, Dublin Town believes that the additional lines should be added to the initial infrastructure to facilitate access to the city centre from various suburban points.

As was the case with the expansion of the London Underground, we believe that enhanced transport infrastructure will facilitate residential development along the route, with easy access to the city centre. It is not possible for Dublin to achieve sustainable development and appropriate levels of residential accommodation without an appropriate investment in sufficient public transport capacity.

We note the interaction between MetroLink and other forms of public transport and active travel. We would strongly advocate that metro stops house significant bicycle parking to further facilitate greater use of sustainable transport options.

Timescale for delivery

A metro plan for Dublin was first raised in the mid 1970's but will not be delivered until the mid 2030's. This is an unacceptable delay. The lack of an integrated metro system has been a played a key role in the low density highly dispersed nature of development in Dublin. We would urge the Bord to give speedy positive response to the project. We would further urge all relevant parties to

work closely together to consolidate the timescale for delivery of the project. Dublin can not wait any longer for such vital piece of infrastructure.

Based on our experience, we believe that this project can be delivered on time and within budget with minimum disruption to the commerce and use of Dublin city centre. Footfall rose in Dublin city centre, during the construction phase of the Luas Cross City Project. We believe that Luas Cross City had a greater potential for disruption than the underground metro system. We believe that co-operation between TII, contractors, Dublin City Council and the business community will provide a framework which will enable the city to continue to function during the construction phase of the project. In this context, the opportunity to align the O'Connell St. stop with the Hammerson Dublin Central development is very fortunate. This will minimise any potential disruption on O'Connell St. and is very much welcomed by Dublin Town.

Need to go underground

The fact that our entire transport system is situated above ground has been detrimental for the city. In addition to the obvious traffic congestion, the allocation of so much space for buses, trams and other forms of transport has limited the potential to develop plazas and meeting points within the city. Research in Ireland and abroad demonstrates the growing need for such recreational spaces and also the desire for outdoor dining and the development of parklets. Our ability to meet 21st century requirements has been hindered by poor transport choices which continues to limit our choices for active use of space within the city.

The heavier rainfall associated with climate change will necessitate greater greening of the city. This cannot be done where an excessive amount of space is required for hard landscaping to accommodate transport uses.

Anyone still advocating for road based solutions in Dublin simply does not understand the evolving city dynamic.

Route

Dublin Town was extremely disappointed by the decision not to extend Metrolink to the employment and residential hub of Sandyford. Like so many transport decisions taken in Ireland, post-independence, we believe that this decision will come to be seen a short sighted and counter productive. However, the city needs a metro system and we do not advocate for further delays to the commencement of the project to address this deficiency. However, we would strongly advocate that the extension to Sandyford be planned for now and delivered in the tightest possible timescale. We further believe that Metro south west is required and would yield additional passengers if delivered. We would like to see the Finglas Luas Line meeting the Metro in Ballymun to link 2 large population centres and provide access to the airport to a greater number of northside residents with only 1 interchange.

Dublin Town welcomes the moves to integrate the city's public transport provision. We are pleased to see moves to accommodate active travel access to the public transport system. We need greater innovation and interchange so that cross city and radial journeys are better accommodated through sustainable transport.

Conclusion

The proposals for a Dublin metro have been discussed planned, designed consulted on, replanned, redesigned and consulted on again and again over decades. It is now time to stop discussing and

start delivering. We cannot wait for decades to come for the most basic transport provision. This simply has be agreed and commenced without further delay.

Richard Guiney

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