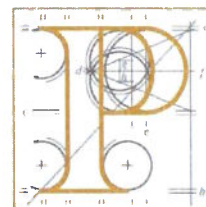


**Our Case Number:** ABP-314724-22



An  
Bord  
Pleanála

ACRA Association of Combined Residence Association  
C/O Caitriona McClean and Tom Newton  
6 Weston Avenue  
Weston Park  
Lucan  
Co. Dublin  
K78 YA39

**Date:** 25 March 2025

**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 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.

If you have any queries in the meantime please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

pp   
Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

RA05

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D01 V902

## Sinead Singleton

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**From:** LAPS  
**Sent:** Monday 24 March 2025 10:01  
**To:** Eimear Reilly  
**Subject:** FW: Case Number: ABP-314724-22 Metrolink Response from ACRA  
**Attachments:** ACRA Response March 2025 V1.pdf; Bus Map.pdf; Luas Orbital A4 v2.pdf; Transport Plan V3 - PRINT (1) (1) (1).pdf

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**From:** Caitríona McClean <cmaemcclean@hotmail.com>  
**Sent:** Sunday, March 23, 2025 5:40 PM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Case Number: ABP-314724-22 Metrolink Response from ACRA

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it may concern,

Please see attached submission document and accompanying maps, as relevant to the submission text.

We would be grateful if you could confirm receipt of this submission as we are approaching the deadline of 27th March, 2025.

Kind Regards,

Caitríona McClean and Tom Newton  
on behalf of ACRA

[cmaemcclean@hotmail.com](mailto:cmaemcclean@hotmail.com)

6 Weston Avenue  
Lucan  
County Dublin  
K78 YA39

Telephone: 086 3898327

**FOUR ATTACHMENTS**

**CASE REFERENCE: ABP-314724-22 Railway ( Metrolink - Estuary to Charlemont via Dublin Airport) Order (2022) Metrolink**

Our Name and Address: ACRA Association of Combined Residence Associations, C/O Caitríona McClean and Tom Newton, 6 Weston Ave, Weston Park, Lucan, Co Dublin, K78 YA39

Regarding responses from Transport Infrastructure Ireland in relation to impact of Metrolink on other transport projects, paragraph 30.2.5.2 refers to the All-Island Strategic Rail Review (AISRR) but dismissed connecting Dublin airport to the inter-urban rail network and makes no reference to the opportunity cost of proceeding with the Metrolink or the commitment to AISRR in The Programme for Government.

We reject the Transport Infrastructure Ireland response as it contains misinformation of a serious nature pertinent to this case.

1. It is not correct to suggest that the Metrolink does not negatively impact other transport plans and options. There is currently another plan in Department of Transport lodged via the Minister of State at the time, Jack Chambers who is currently the Minister For Public Expenditure and Reform. ABP is already aware of the Newton Plan but we would like to provide an update, please.
2. The Metrolink project has not been developed with reference to EU Transport policy, TEN-T, as was acknowledged by Transport Infrastructure Ireland in oral replies to questioning by us during the oral hearing. Compliance with TEN-T has not been indigenous to the Metrolink proposal nor has funding been sought from the EU. Unfortunately the opportunity cost of proceeding with the Metrolink as presented is both compliance with EU policy and precludes initiatives to comply and to engage in the TEN-T project.
3. Irish MEP Cynthia Ní Mhurchú, is actively engaging with Ireland's compliance and the Newton Plan as a potential in this. She has been appointed on election to the EU Transport Committee. This is a new development since the oral hearing and places the Newton Plan on a significantly new footing relevant to ABP because the opportunity cost of proceeding with the Metrolink as presented is the Newton Plan.
4. As ABP is aware, the Newton Plan allows access to Dublin Airport from all main line stations including Belfast. It uses existing track and fills in missing links. This is compliant with TEN-T EU aspirations in as far as they can apply to us as an island. Financially, the cost to the state of the Newton Plan is a fraction of that projected for Metrolink and the delivery time is rapid as the extra track is approximately 18kms. If the Metrolink proceeds this will not be possible. Metrolink uses similar routing but with non-standard gauge. Using continental gauge poses huge difficulties and delivers no additional connectivity with other EU countries as we

are an island. It discommodates passengers from outside Dublin getting to Dublin Airport from their place of abode and obliges all to travel to Dublin City Centre first, including those in Fingal, in order to go to the airport to travel to our EU neighbours. Financially it eats up capital and denies the expansion of the Luas in Dublin and other major cities that could be financed instead, for example.

5. To be clear, the opportunity cost of proceeding with a project is what is foregone as a result of that project proceeding. This is not just measured in money terms. All business cases, especially in the public realm, should include explicit reference to opportunity costs.
6. In the case of the Metrolink, leaving aside the absence of reference to opportunity cost and the misinformation pertaining to same and the enormous and unnecessary capital spending some of which Transport Infrastructure Ireland refused to disclose at the oral hearing as deals were made and objections withdrawn, the opportunity cost of proceeding with the Metrolink clearly exceeds any benefits derived.
7. On that basis, we ask ABP to suspend decisions until the EU transport Committee have heard our case in terms of policy compliance and potential EU funding. ABP, mindful of the bigger picture, will grant this we hope because it's prudent to do so and in the national interest.
8. We call on the Transport Infrastructure Ireland meanwhile to produce a business case that properly identifies all costs including opportunity costs for the Metrolink. All deals and agreements to be included in a transparent manner.
9. We reject paragraph 30.2.5.2 of Transport Infrastructure Ireland response and refer to The Programme for Government in which the first item under Transport is a commitment to the AISRR. The Metrolink project as currently configured must be reviewed in light of this. The Newton Plan is compliant with The Programme for Government.

## **The Newton Transport Plan explained:**

### ***1. What is it?***

The Newton Plan is an integrated public transport plan for the Greater Dublin Area which complies with EU public transport (TEN-T) policy to link up existing tracks and facilitate EU citizens travelling by rail to other EU member states. Our nearest EU neighbour was UK until Brexit and we had a rail link from Dublin to Belfast. However, since Brexit we are less compliant.

There are three components to the Newton Plan: Rail, Bus and Luas.

## ***2. How does this relate to the Metrolink project?***

Unfortunately, the Metrolink Project is incompatible with the Newton Plan because it uses similar routing from Glasnevin to airport but cannot be linked up with existing rail because it uses a different rail gauge. The Newton Plan links all mainline rail with Dublin Airport including the Belfast line. The Opportunity Cost of proceeding with the Metrolink is not just the capital cost of doing it, it's what we are losing out on by going ahead with the Metrolink as currently configured.

## ***3. How is this possible?***

We are extremely fortunate with the existing rail network in Dublin, especially the rail lines to the Docks and the **Glasnevin rail junction** (which is the key for a rail solution for Dublin and access to Dublin Airport by rail for everyone outside Dublin too ) with its four directional use and its location. The rail line to Glasnevin junction and onward to the Docks makes a solution possible.

## ***4. Why is this not in the Metrolink Plan?***

The Metrolink uses a radial model which brings everyone in to Dublin City Centre in order to go out again to Dublin Airport. It's this approach which starts by assuming passengers are travelling to Dublin City Centre first that has brought about the configuration of a rapid rail from the centre of Dublin with no capacity to link to Dublin Airport for incoming rail from outside Dublin. The Newton Plan uses a different model which facilitates those travelling from outside of Dublin as well as those starting in Dublin.

## ***5. Which plan is more forward looking in facilitating greater passenger use of rail?***

The Newton Plan is a gateway to enhanced rail network in Ireland. It builds on the existing track system ( compatible with EU vision for greater rail usage) by both filling in missing links and facilitating the expansion of the network. It provides access to Dublin Airport from

outside Dublin but also smooth access from all existing Dublin stations. It also facilitates access to the Dublin Ferry Port in keeping with EU policy direction which supports train and ferry combination travel. This dockland access is essential to maximize future rail travel for the whole of Dublin. It facilitates a new Dart rail link to the outskirts of Dublin on reserved land beside UCD. The immediate gain from this is an extra rail line to the city serving UCD and also southwest Dublin. Potential for additional rail service to Sandyford and eventually enhancing the Rosslare line. The Newton Plan is forward looking, in keeping with EU policy direction and mindful of best use of capital resources.

The Metrolink provides rapid transport to Dublin Airport only from Dublin City Centre.

#### ***6. Which plan can be delivered sooner?***

The Newton Plan is less disruptive, requires less capital outlay and can deliver much sooner as the initial work is extension of track by approximately 18 kms. It is not an underground model depending on large capital outlay and complex configuration and destruction and hence it can be done much sooner. Works on other aspects of the plan can be done simultaneously and can be transformative in terms of both rail access to Dublin Airport and Ferry Ports for everyone and providing Luas and Bus solutions. The Newton Plan covers Rail, Bus and Luas enhancements. So far in this briefing we have only addressed Rail.

The Metrolink requires major capital spending and disruptions in Dublin city, takes longer to achieve and delivers only rapid rail to Dublin Airport from Dublin City Centre. It does not embrace the shared island initiative or compliance with EU policy (TEN-T) linking EU countries by rail and in our case as a island linking rail with international airport and ferry ports for all citizens.

#### ***7. What else does the Newton Plan offer that can be delivered quicker and for a fraction of the capital that would be tied up in the Metrolink?***

The Newton Plan contains an inner orbital loop in Dublin for the Luas. This is a game changer in terms of passenger load capacity and anticipates the growth in passengers arriving in Dublin at Heuston Station due to rail upgrades and greater suburban use of rail. It requires joining existing Luas in an orbital fashion and could be done simultaneously with the 18km rail extension already mentioned. This orbital Luas is a line around the city centre

serving the main rail stations and the existing main bus station. This orbit will take passengers arriving in Dublin to within minutes' walk of their ultimate destination anywhere in the city eliminating in many cases the need to bring a car into the city. This is compliant with the accepted direction of public transport policy internationally.

The Newton Plan also contains an outer orbital Luas for the Greater Dublin Area. This is a major player in planning Housing as it allows pockets of land to have public transport access and links parts of the Greater Dublin Area without travelling into the city centre and out again with multiple changes of mode of transport. Those arriving in Dublin by train can transfer at Adamstown, for example, to the Luas in this plan and travel to their ultimate suburban destination without having to change in the city. The radial system is inefficient in that it obliges passengers to travel where they don't wish to go using up passenger spaces before eventually travelling to their ultimate destination. This is an inefficient use of passenger time and public resources and a contributory factor to passengers' decision to travel by private car. The outer orbital Luas builds on the existing Luas system and can be constructed in stages, but each section serves a community and a need. This allows for rapid return on capital investment and is an ideal model in the context of need to deliver. Those wishing to travel to the far side of city during peak hours will no longer need to take a cross-city bus but will avail of the outer Orbital Luas and reduce the pressure on public transport to the city centre during peak hours.

Luas can be extended to other cities for which there has been a public outcry if huge quantities of capital are not sunk into the Metrolink.

A Dublin city bus solution also forms part of the Newton Plan. This is a loop concept to maximize the use of the fleet. The city must accommodate Luas and avoid duplication, but the bus is still the work horse of public transport in Dublin. The Loop bus system is made possible because of the river Liffey which allows for a bus lane going contraflow to the other traffic. Buses turn around on the quays and go out to pick up more passengers. Cross city buses are an inefficient use of the fleet and cause delays and hold up of Luas. This Loop concept reduces Luas obstruction with over 80% of buses not crossing the Luas line at peak times due to the left turn with bus contraflow and adds to the initiative of Dublin City Council banning through traffic in the city. Those wishing to continue their journey to the far side of the city can avail of bus hubs and the fleet is not held up mostly empty crossing the city. As the outer orbital Luas comes on stream, fewer passengers will be travelling by bus into Dublin Centre in order to go through city and outwards.

### ***8. Which model is more sensitive to security needs in the modern world?***

The Newton Plan is mindful of security and the need to avoid bottlenecks and trapping passengers in the vicinity of the airport. In the event of security issues in or around international airports, prudent planning allows an alternative exit and a means of moving passengers smoothly. The Newton Plan provides two exits by rail. The first is via Glasnevin to Dublin city or elsewhere in the country as required, and the second is routed via Donabate and onwards to Dublin (or Belfast) on the Belfast line in the event of a major security issue or hold up.

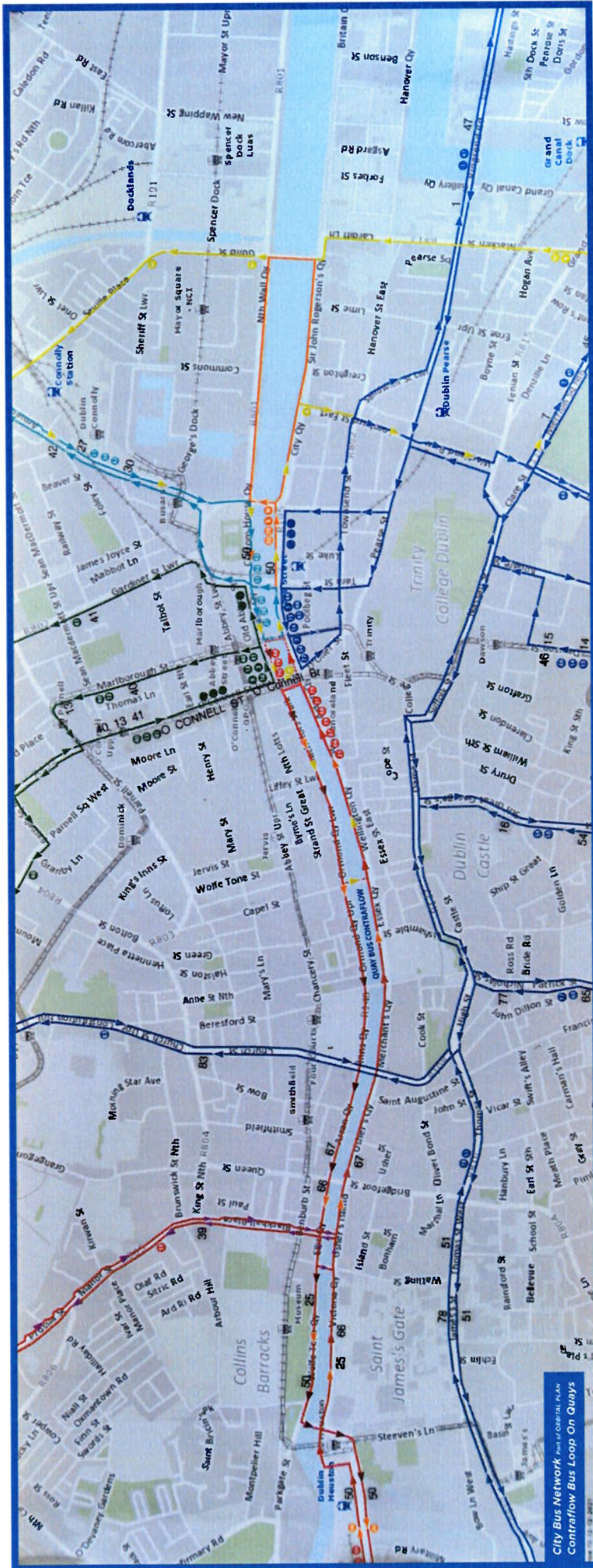
In areas of mass movements such as Airports etc. it is essential that there is more than one exit by rail. If one is out of order the other is available. This is a vital component in the Newton Plan. The Newton Plan provides later for a third exit by rail at Dublin Airport to meet the extra demand that is expected. These exits are needed when you encourage so many users to use public transport.

The Metrolink provides only one line, and is vulnerable in the event of an incident causing disruption of service.

**SEE MAPS ATTACHED**

**ENDS**





City Bus Network  
Contrailow Bus Loop On Quays

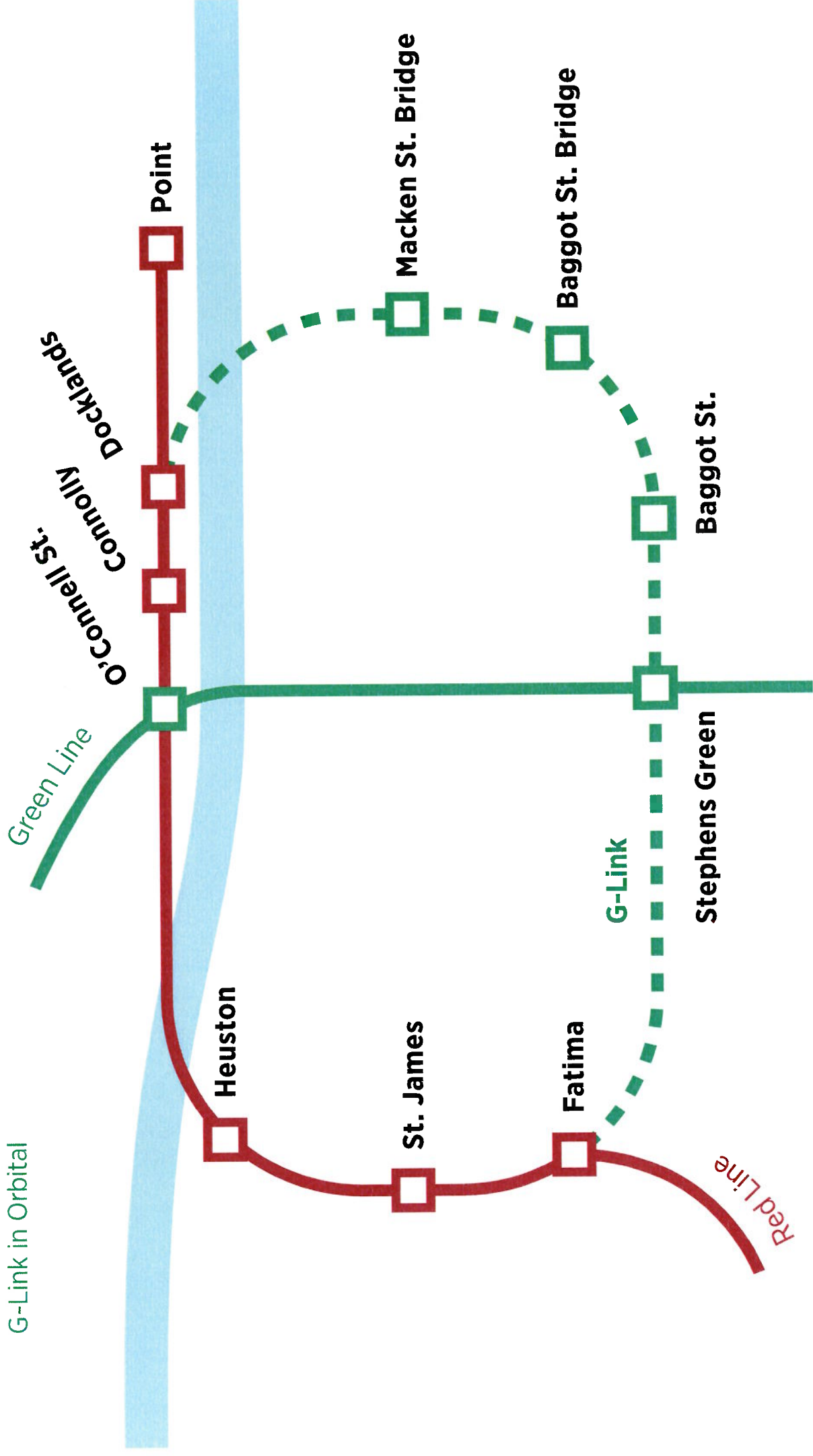
# THE NEWTON TRANSPORT PLAN

## Main Benefits

- All Dublin centre areas within walking distance of a rail or Luas line
- Accommodates all arriving at Dublin's three rail stations and bus station
- Maximises bus use, reduces congestion
- Makes city more accessible, especially for users with a disability

## Luas City Orbital

G-Link in Orbital





**METRO - DART MAP 3 - 121224**

Proposed DART, Rail &amp; Luas routes with trackless trams for Dublin

