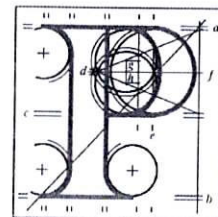


Our Case Number: ABP-316119-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

Dublin Commuter Coalition
5 Abbeyfield
Killester
Dublin 5

Date: 01 June 2023

Re: DART+ South West Electrified Heavy Railway Order - Hazelhatch & Celbridge Station to Heuston Station,
and Hesuton Station to Glasnevin
County Dublin and County Kildare

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,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

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Dublin Commuter Coalition
5 Abbeyfield
Killester
Dublin 5

ABP case ref: 316119

DART+ South West submission

Who we are

Dublin Commuter Coalition was established in 2018 as a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and the surrounding counties. The Coalition acts as a unifying voice for commuters in these areas so that they may express their concerns, their hopes and their vision of a Dublin that works for all users of sustainable transport.

New Stations

We are delighted to see the Heuston West station included in the DART+ South West project. The inclusion of this station shows that it was possible to construct stations at Cabra and Kylemore as part of the DART+ South West project and that a decision was made to not include them. Both Cabra and Kylemore stations are included in the Greater Dublin Area Transport Strategy 2022-2042:

Measure RAIL6 – New Rail Stations

The NTA, in conjunction with Irish Rail, will develop new rail stations at Cabra, Glasnevin, Heuston West, Kylemore, Woodbrook, west of Sallins, west of Louisa Bridge and west of Maynooth. Kishoge station will also open in the short term as development of the Clonburris SDZ is realised. Other stations will be considered where development patterns support such provision.

This makes the omission of the two stations within the proposed area of works inexcusable. At the very least, a programme to build Cabra and Kylemore stations should be done in parallel to the DART+ South West project to avoid future disruption to the rail line. We ask that the Board attach a planning condition that the Kylemore and Cabra stations be built before the DART+ South West line is operational.

Accessibility

While we welcome the greater accessibility of the new DART fleet, this accessibility won't be of any use if passengers cannot reach the platforms due to the lack of lifts. While ramps may serve a purpose as an alternative to lifts, they cannot be the only accessible provision for platform access as it has been proposed for the Heuston West station.

The Greater Dublin Area Transport Strategy 2022-2042 aims to ensure that public transport infrastructure in the GDA is accessible for all users:

Measure INT15 – Accessible Infrastructure

During the period of the Transport Strategy, the NTA will ensure that public transport infrastructure, and facilities in the GDA are made accessible for all users.

The Strategy goes further and specifically recognises that lifts "*are essential for some passengers being able to access a platform or station building*".

We would like to highlight that there is a programme of ongoing work to upgrade and replace lifts in existing stations. This project also resulted in new lifts being installed at Dalkey and Gormanston stations where there none before with similar works now happening at Little Island and Banteer stations. This in itself is a welcome admission by Irish Rail that installation of lifts are necessary to make train stations accessible for all. <https://www.irishrail.ie/en-IE/news/Major-lift-investment-programme-at-larnrod-Eireann>.

It is noted that the Heuston Station design includes a ~4m ramped incline from the Clancy Quay side which would be followed by another ~6m ramped incline and decline to access the DOWN Platform. We ask that the project team liaise with accessibility groups on the design of all stations to get a greater understanding of the design impact.

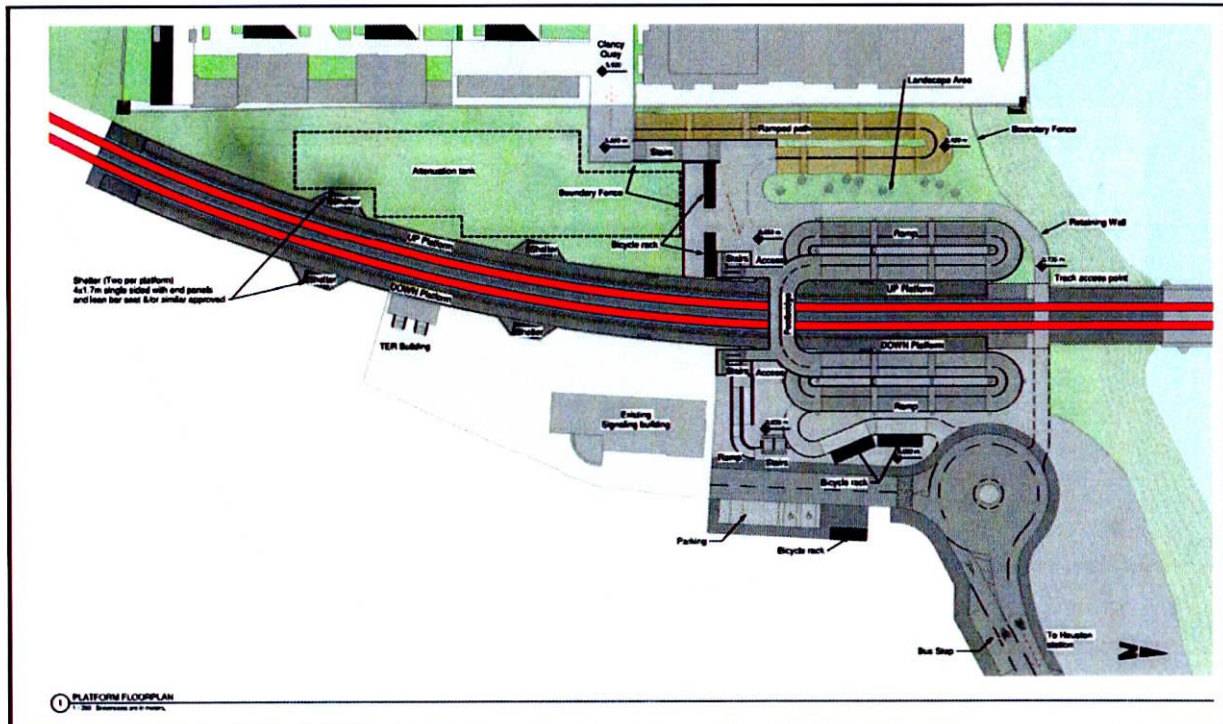


Figure 1: Elevation change across Heuston West Station

The ramp-only design included in these plans has been most recently shown to be discriminatory and impractical at the new Pelletstown station built in 2021. One wheelchair user told us that it takes her five minutes to move from one side of Pelletstown station to the other when pushed. It's completely unacceptable that Irish Rail would propose to continue discriminating against people with reduced mobility in a brand new station. It is vital that lifts are included in the designs for Heuston West, Cabra, and Kylesmore stations, and in any other future stations.

Permeability

The Heuston West station is a considerable distance from Heuston Station, the Heuston Luas stop, and surrounding areas. A convenient and safe walking and cycling route needs to be built to ensure ease of access to the new Heuston West station. From the plans, it is not clear if access to Heuston West station from Clancy Quay is open to the public or just to residents of Clancy Quay. Public access through Clancy Quay is crucial for increasing access to the station from both sides of the river.

It is also noted that there is no pedestrian access from Conyngham Rd to Heuston West station. This is a missed opportunity to link the Residential and commercial Developments along Conyngham Road with high frequency public transport. It is noted that the CIE masterplan for Heuston includes the Liffey Railway Bridge Link as a potential pedestrian/cycle link. Introducing this as part of Dart South West would expand the catchment population with access to the new Heuston West station and would not preclude other options being pursued while offering alternative access during future Heuston Masterplan development – referenced on the CIE website under <https://www.cie.ie/CIECorporate/media/reports/Heuston-Masterplan-final.pdf>

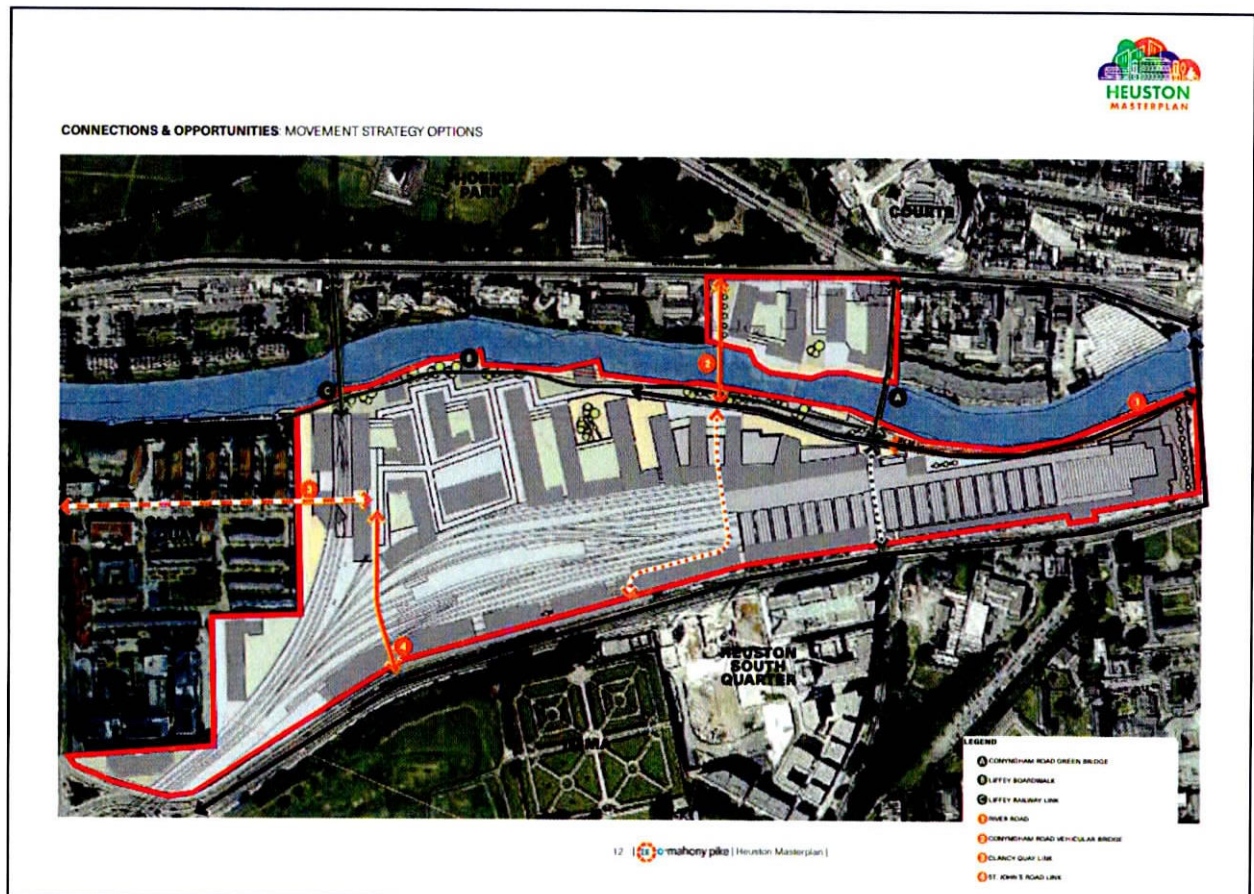


Figure 2: Heuston Masterplan

Line Speed

We note that the Line Speed between Heuston West and Glasnevin: a distance of almost 4km with no stations has the lowest speed limit of 30-40 km/h. This will impact journey times and the impediments to higher line speed should be investigated to enable a higher speed and therefore higher capacity service.

It is imperative that passive provision for electrification of the Dublin-Cork line is included as part of this project. This main line will ultimately have to be electrified in the coming years and while we are disappointed to not see it happening now, every effort must be made to make it easier in the future to avoid further disruption. The lack of provision for future electrification is particularly concerning at Memorial Road. This does not seem to have been update since the original proposal.



SCR/Chapelized bypass junction

The reinstatement of the Chapelizod and South Circular Road Bypass to the same road design is a missed opportunity to enhance active travel infrastructure linking Kilmainham and Islandbridge and to improve active travel connectivity to Heuston Station. There is currently no cycle provision on the Chapelizod Bypass road heading west through the roundabout or turning right onto the South Circular Road.

We note the lack of consideration given to the redesign of this junction included in the BusConnects application currently before An Bord Pleanála and seek clarification on which plan will be implemented.

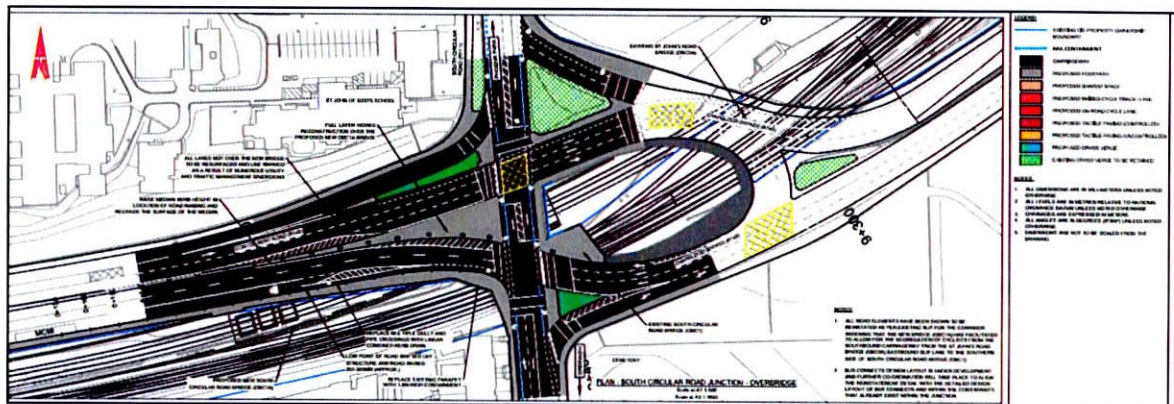


Figure 5: SCR/Chapelizod Updated Road Layout

Pedestrian Bridge at Inchicore Works- Khyber Pass

The New Pedestrian Bridge being built at Inchicore Works should be designed to allow public access in order to improve permeability for the area.

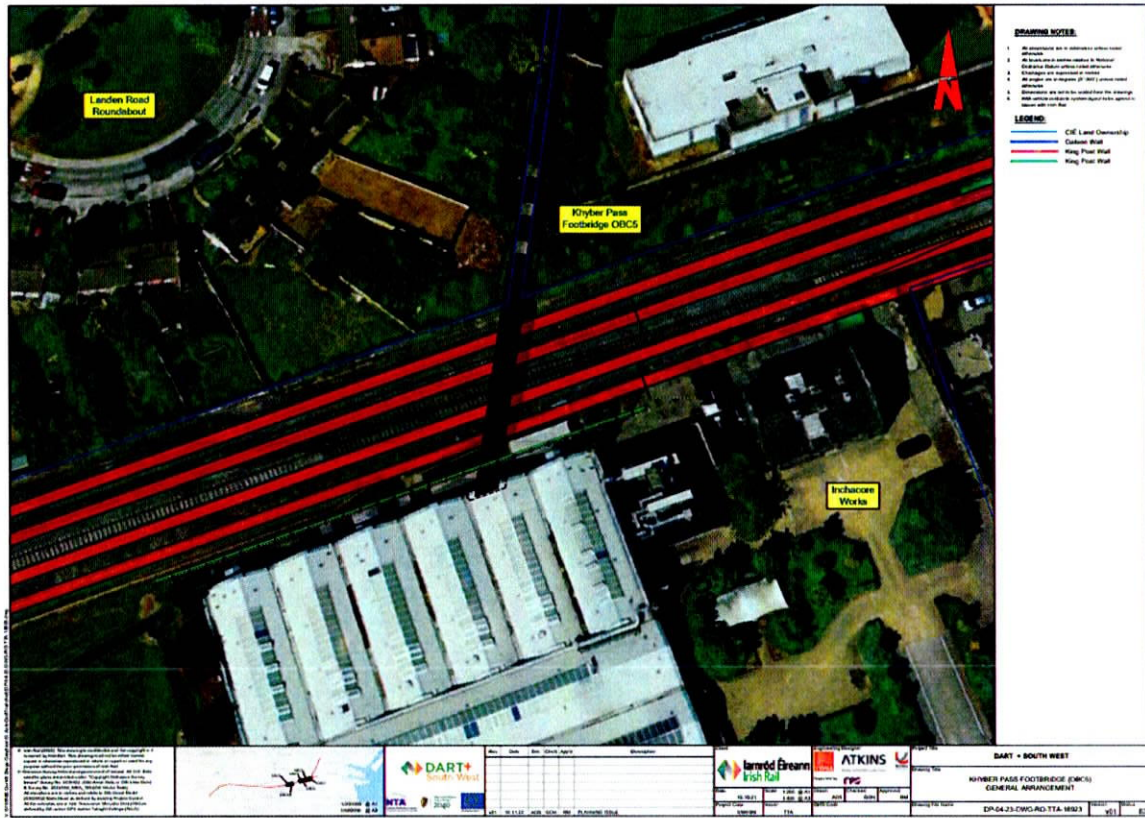


Figure 6: Current Khyber Pass Design

Bike Shelter and Bike Lockers

The current provision of Bike shelters at the Heuston West Station is welcomed but as a new station which should cater for more active travel there should be a provision for Bike lockers included in the plan. It is noted that Heuston has 69 bike lockers in place but Heuston West needs its own provision given the distance from the main Heuston station. The provision of bike lockers should be included in the station design. It is noted that the CIE Heuston Masterplan includes provision for extensive bike parking with 5,000 bike parking spaces but the current station design for Heuston west only offers standard bike shelters. We think that the Heuston West station design should be built with a provision for secure bicycle parking as has recently been completed at the Amsterdam Central station. This offers a secure bike parking location for those taking longer trips and includes double racks to enhance bike parking capacity and a variety of racks/spaces to facilitate mobility options including cargo bikes.

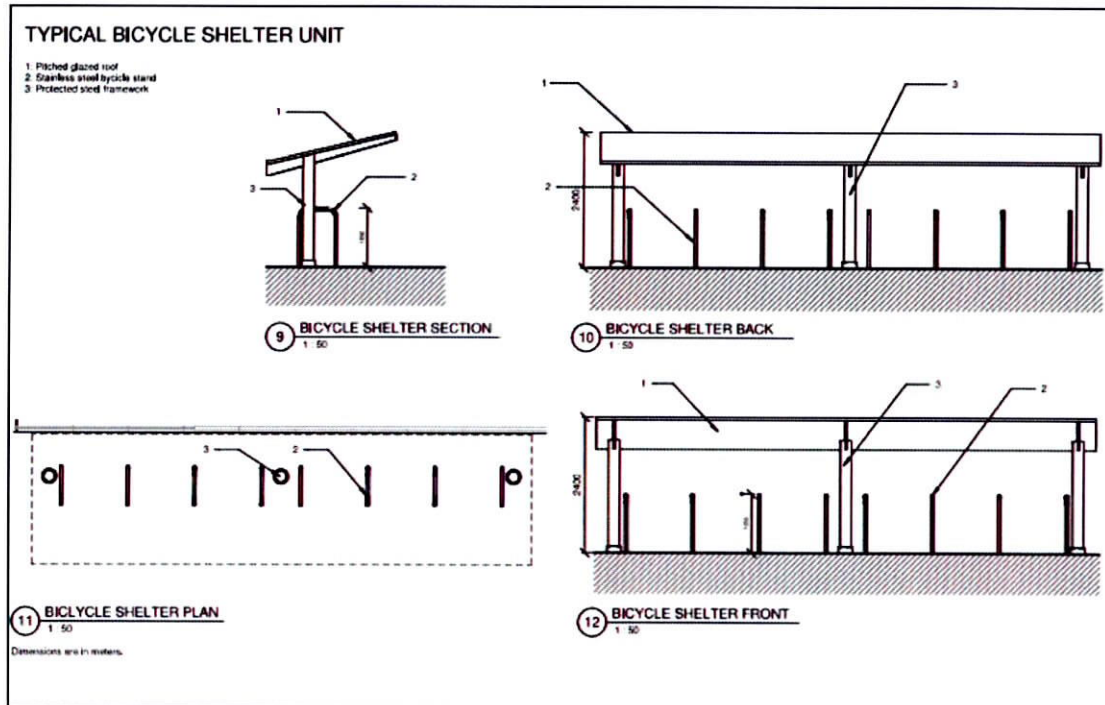


Figure 7: Current Bike Shelters



Figure 8: Amsterdam Central Station Bike Parking

Station Amenities

We note there are no plans to enhance the amenities within stations along DART+ South West. This is a missed opportunity to enhance the passenger experience. For example, there are no toilet facilities included in the plan for the new Heuston West station. DART+ South West will see a large increase in passenger numbers, and stations along the route should include retail and passenger amenities or at a minimum facilitate their opening in the future. It is noted that the Heuston West Station only includes Small Temporary Shelters when a platform length roof would provide better passenger protection given the expected volume of future passengers with the Heuston TOD Completion. It also noted that there is no retail space provision within the station meaning that passive surveillance within the station will be limited and commercial revenue which would support station operation/improvement have been foregone.

Station access and Car Parking

The proposed access to Heuston West station through to Heuston Station Road features unsafe roundabouts, cyclists mixing with bus parking bays and an unnecessarily wide road. This design simply does not comply with the Design Manual for Urban Roads and Streets or the National Cycle Manual. Irish Rail must be made to redesign it.

This project has provided for an abundance of car parking at Heuston West. This is a crucial public transport link in the city centre and the number of car parking spaces should be limited to service vehicles and blue badge holders. This will free up space to construct appropriate sheltered and secure cycle parking with the necessary bike maintenance and charging facilities. Encouraging people to drive to this location is antithetical to the project's stated goals of reducing transport emissions as part of the State's Climate Action Plan 2023.

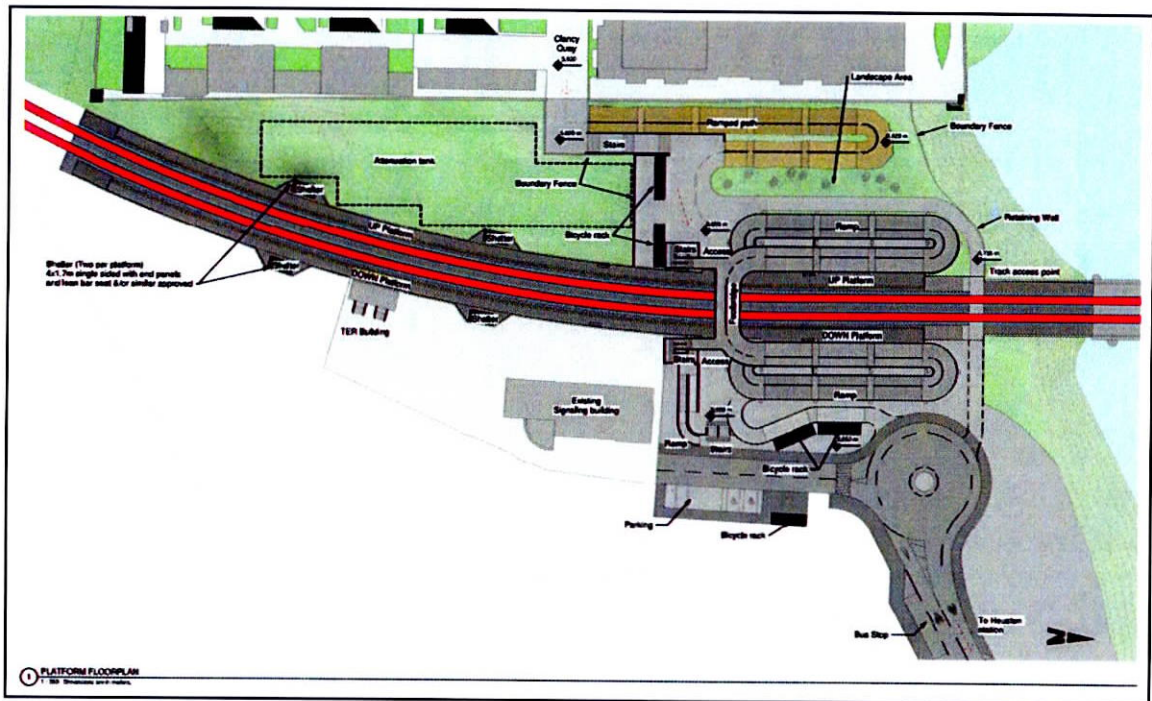


Figure 9: Houston West Station

Kylemore Road/Memorial Road Bridges

The road design proposed for Kylemore Road and Memorial Road fails to meet the minimum requirements set out in the Design Manual for Urban Roads and Streets (DMURS). The current design of the Kylemore Road dedicates 9.0m to carriageway and just 1.0m to footpath and 1.75m to cycletrack. The carriageway should be a maximum of 6.0m wide at this location with significant road space reallocation for walking and cycling. Raised crossings at unsignalised side roads should also be provided.

Dublin Commuter Coalition advocates that the road design for this section follow the recently completed "Rapid Build Scheme - Brookeville Ave to Ivans Cross" by the Active Travel team at Limerick City and County Council. This project utilised an existing 9m wide carriageway to provide two way general traffic and a bi-directional cycle path (Figures 11, 12). This approach calms traffic, improves local connectivity, and creates a safe cycling environment for all ages and abilities.

The current design for Memorial Road is also substandard in terms of width, segregation, and it does not include any provision for cyclists to cross the Chapelizod bypass - except to mix with vehicular traffic or pedestrians. This junction update should include clear segregation for cyclists making the right turn. The signalisation should also include a cycle priority signal to enable safe crossing ahead of vehicular traffic. Again, there is no acknowledgement of the redesign of this road and junction currently proposed as part of the BusConnects program.

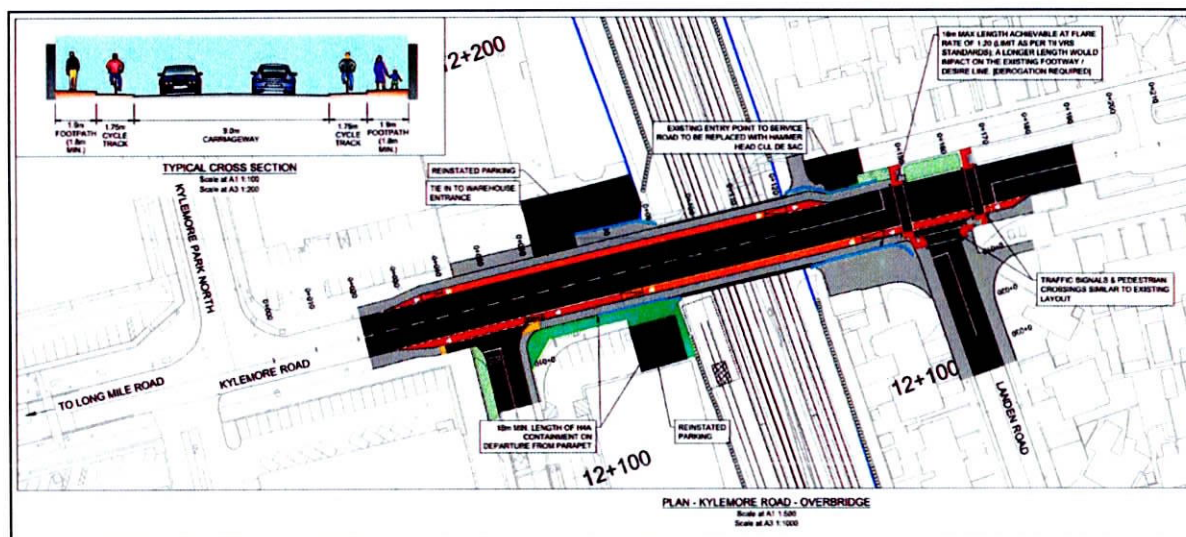


Figure 10: Kylemore Road

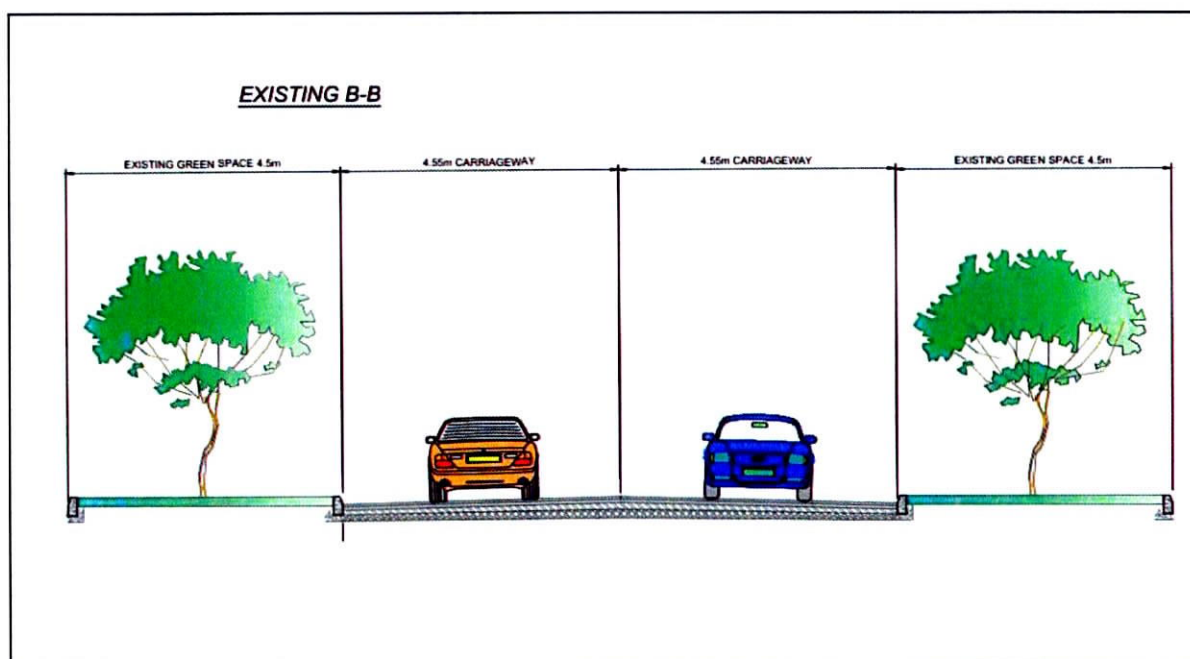


Figure 11: Rapid Build Scheme - Brookeville Ave to Ivans Cross, Limerick (Existing)

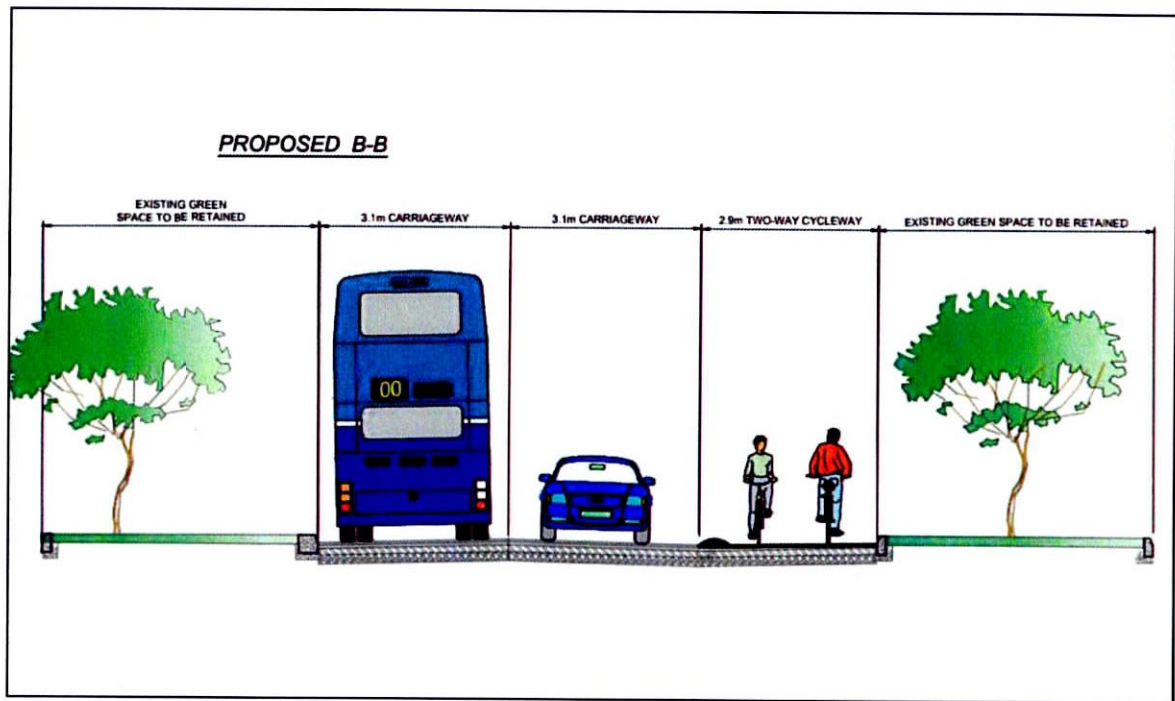


Figure 12: Rapid Build Scheme - Brookeville Ave to Ivans Cross, Limerick (Completed 2023)

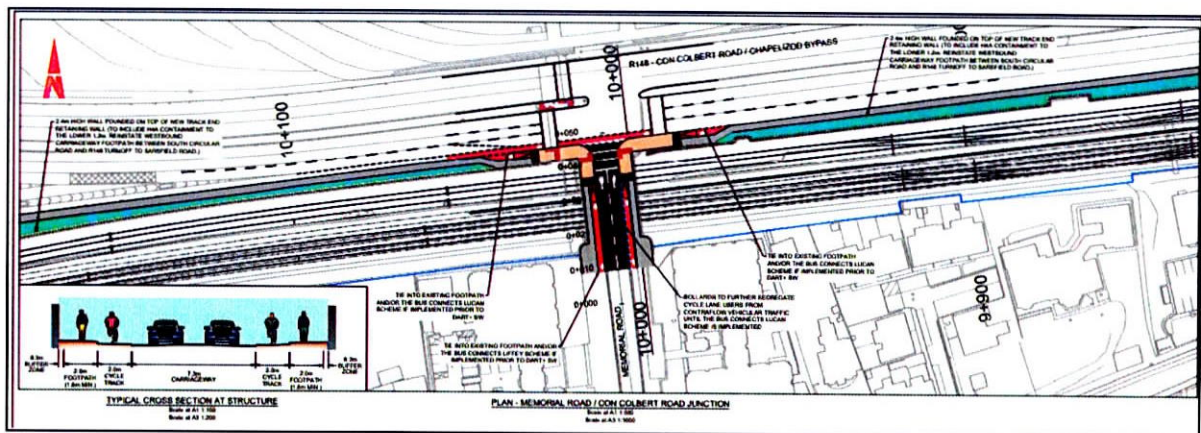


Figure 11: Memorial Road