



Opening Statement and Questions for TII at Metrolink Oral Hearing, March 2024

Introduction

Rethink Metrolink represents a local stakeholder in the project, namely the community based around the inner suburbs of the current Luas Green Line from Ranelagh through Milltown. Our original ambition was to support the development of effective public transport solutions for the wider Dublin region and an early intent was to engage with TII on their original and very flawed proposal to replace the current light rail in the area with a segregated Metrolink solution. This proposal was shelved due to stakeholder concerns and a recognition that the current LUAS green line could in fact accommodate all foreseeable traffic. Rethink Metrolink are concerned that the current Metrolink submission is another sub-optimal proposal both in terms of transport strategy and the human impact. We have two key concerns and we have two proposals for the consideration of TII. We have six questions arising from the TII response to the original Rethink Metrolink submission #264.

Two Key Concerns

Concern 1: Location of the Metrolink terminus and interchange at Charlemont

1. We are deeply concerned at the proposal to locate the Metrolink terminus at Charlemont. You will have already heard some considered detail on the problems with the proposed Charlemont interchange and we strongly support those other stakeholders (Charlemont and Metro Southwest) who have shared similar concerns with this oral hearing. It is wholly unsuitable for practical and logistical reasons and more importantly it compromises or limits the potential scope of very important decisions required to deliver a properly integrated public rail network serving the south and south-west of the city in the future.
2. We are not in a position to suggest alternative locations for the city-centre terminus: other stakeholders have assembled the resources and skill set to make proposals on that issue and have already done so very compellingly. However, we make the general observation that the choice of either Parnell, Tara Street or St Stephens Green will be hugely preferable on any number of criteria.

Concern 2: Lack of clarity on longer term plans for integrated public network service all of south Dublin

1. We are of the view that progressing the current Metrolink proposal in the absence of a longer term plan for an integrated public rail network for the greater south Dublin area is a fundamental mistake that ultimately will be paid for by taxpayers in terms of substantial investment in the future to rectify matters. Specifically, if the future transport needs of south and south-west Dublin, including communities and educational facilities, are to be provided with an integrated public rail service, it is clear that those needs will not be met by having the Metrolink terminus located at Charlemont. The Metrolink Railway Order, case reference NA29N.31474 makes repeated references to a 'second phase project' in several decades time aimed at upgrading the Luas Green Line to Metro (high-speed, limited stops). This 'second phase project' is then used to support the adoption of Charlemont as the terminus as well as tunnel boring as far as Manders Terrace. However, in November 2021, as part of the Greater Dublin Transport Strategy 2016-2035, the NTA announced that it planned to develop new Luas lines serving UCD Belfield and Knocklyon/Rathfarnham to take pressure off the existing Green Line – but only after 2042 – with the aim of removing the need for it to be upgraded to metro standard south of Charlemont. There is a contradiction between the 'second phase project' and the stated strategy of NTA and this lack of internal consistency in their thinking is worrying.
2. There is an overwhelming case (as a future phase) to extend MetroLink to serve Rathmines, Cathal Brugha Barracks and onwards via Harold's Cross, Terenure and Templeogue to Tallaght. There is an inadequate plan for the supply of public transport to South West Dublin and the critical need, at this juncture, for correct decisions to be made in relation to the MetroLink trajectory into South Dublin in the future. A proper feasibility study for continuing MetroLink to South West Dublin needs to be carried out urgently and should inform the current proposal especially in respect of the Charlemont terminus choice. In respect of the Terms of Reference for the previous study, the option of continuing MetroLink from St Stephens Green (rather than Charlemont) to South West Dublin needs to be within scope. If MetroLink were to go as far as Charlemont / Manders Terrace, under the current NTA proposal, the opportunity of serving Harolds Cross and Rathmines and other important inner suburbs would be lost. This is a serious and worrying flaw in the Terms of reference of the previous study.

By including the Charlemont terminus in this phase, the NTA is attempting to prejudice and limit the opportunity for future phases of MetroLink to support under-served areas to the southwest of the city centre.

Two Proposals

We are concerned citizens rather than transport planners – in fact the serried ranks of consultants and support staff with TII here today paid for by the public purses suggests the project is not short of intellectual heft and horsepower. From our perspective as non-expert but committed and concerned citizens we make the following two proposals:

1. Proposal 1: Task TII with developing a cohesive and fact-based analysis of the options on providing a truly integrated public rail network for south Dublin including a mix of light-rail and Metrolink. This will support facilitate a fully informed decision on the location of the city-centre terminus for the Metrolink.

2. Proposal 2: Progress the current Railway Order process but limiting it to a destination in the city centre. This will provide a window within which to evaluate a proper investigation of the future needs of south Dublin. At that time a supplementary Railway Order can be developed. This should not delay the overall delivery of the project and in particular it should actually accelerate the delivery of the critical Estuary to the city centre portion of the project.

Our (six) Questions Based on Your response to Rethink Metrolink Submission

1. You conclude from your Chapter 11 analysis that the impact of the proposed underground station at Charlemont in terms of population and land use is considered to be positive. Can you remind me which of the meetings with the 107 organisations you consulted with actually informed that conclusion: I am thinking more about population impact rather than land use impact and what type of positive endorsement you received during those consultations to substantiate the 'positive' conclusion you have drawn? *Page 1 of 6*
2. You assert that 'extending Metrolink to Charlemont future-proofs the Green Line by bypassing the capacity-constrained Luas on-street running section'. Can I remind you that your own analysis of capacity-constraints on the Green Line were proven to be very flawed by simple citizen-analysis in the earlier Metrolink high-speed overground plan through Ranelagh. On that occasion the use of a simple calculator with no modelling or third party analysis demonstrated that the capacity constraint you generated was in fact non-existent. Have you adopted a different and less error-prone analytic approach on this occasion and if yes, what is it? (For clarification, can I assume that the reference to BCR, the Benefit Cost *Ration* should read Benefit Cost Ratio?) *Page 2 of 6*
3. Charlemont station was chosen, you suggest, in large part on the basis of its positive interchange potential with local buses. The proposed Metrolink station has been deliberately designed, you say, so that 'all environmental impacts are mitigated such that the impact on amenity will be permanent and positive'. Can you explain how locating a large hub and spoke interchange station in the middle of a fully settled residential area with no derelict buildings or land centred around a public park can have a 'positive impact on amenity value'? *Page 3 of 6*
4. Having trenchantly defended the linear spine model in earlier Metrolink proposals, you now propose a hub and spoke model. There was no reference to hub and spoke or high quality interchanges generating the fabled network effect in your earlier proposals. Has there been a paradigm shift in transport thinking which means the linear spine model is no more. Remember hub and spoke is already a discredited model in aviation, having once been seen as the saviour of regional airports. *Page 4 of 6*
5. Perhaps I am becoming confused between *model* and *modal*, but do I understand that you truncated the modelling and have essentially assumed that situating a major hub interchange at Charlemont will reduce the modal share of cars. What is the pre- and post- modal share of cars. That is not to be confused with a reduction in traffic in the area – is it your assertion that the new interchange station at Charlemont will actually lead to *less traffic*? *Page 5 of 6*
6. Chapter 9 modelling and sensitivity tests allow you to conclude that even in a slow growth traffic growth pattern 'the range of BCR still indicates that the project will be of benefit to Dublin'. I am not sure you meant to suggest that there is *no* scenario under which this project doesn't wash its face, or did you? *Page 6 of 6*

Our Concluding Comment

Saint Patrick, whose month we are in, used the three-leafed shamrock to good effect to communicate his Christian message of three deities in one. As the shamrock has three leaves on one stem, the proposal from TII embodies three areas of failure in one proposition: it is inconsistent, inadequate and insufficient: inconsistent application of planning and transport design principles; inadequate meaningful consultation with stakeholders and insufficient analysis of the impact of this planned major infrastructure project.

The current proposal including the major terminus/interchange at Charlemont is wholly unsuitable for practical and logistical reasons and more importantly it compromises or limits the potential scope of very important decisions required to deliver a properly integrated public rail network serving the south and south-west of the city. We propose a modification of the current Railway Order truncating the line at the city centre so as to allow the future needs of south Dublin to be better understood. At that time a supplementary Railway Order can be developed. This should not delay the overall delivery of the critical Estuary to the city centre portion of the project which Rethink Metrolink fully supports.

Ronan O'Connell

ronan.f.oconnell@gmail.com

Peter Nash

nashpet@gmail.com