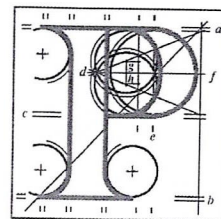


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



An
Bord
Pleanála

Orwell Park (Templeogue) Residents Association
23 Orwell Park Rise
Templeogue
Dublin 6W

Date: 18 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.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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January 2023

Submission by Orwell Park (Templeogue) Residents Association on the MetroLink Proposal

This submission concerns only that portion of the proposal which goes south of St Stephens Green. The *MetroLink* proposal from St Stephens Green is based on bad analysis. This bad analysis relates to public transport in the area between the Red and Green Luas lines ("South West Dublin") and the related proposal to continue *MetroLink* to Charlemont / Manders Terrace rather than to South West Dublin.

1 Transport Modelling and the demand for public transport in South West Dublin

The analysis in the *Strategy Development and Modelling Report*, NTA, November 2021, estimated public transport demand for the peak hour in-bound on the Rathmines and Harolds Cross corridors in 2042. The Report estimated that if there were very good public transport provision along these corridors, in-bound demand in the peak hour would amount to 15,900 (page 91). This is almost four times the existing supply of public transport¹. However, the *Modelling Report* concluded that, with *BusConnects*, demand for public transport in 2042 would be *less* than the current supply (buses) on these corridors. Rather than trying to supply as much as possible of the underlying demand for public transport, the NTA is sticking rigidly only to *BusConnects* for the next 20 years in South West Dublin! Indeed, the Modellers acknowledged the overriding constraint on their work as follows:

"Objectives are considered achieved in Phase 3 if the lower end of the plausible future demand estimates can be accommodated on the public transport schemes currently in planning, (i.e. BusConnects) given these schemes must be delivered to meet climate goals to 2030." (page 89)

Clearly, this constraint was inappropriate and led to the ridiculous result whereby public transport demand in 20 years' time was projected to be lower than current supply!

2 *BusConnects* and the proposed supply of public transport in South West Dublin

The *BusConnects* proposal involves a trivial increase in bus supply for South West Dublin. The following table shows the proposed supply of public transport in the peak hour, in-bound.

¹ Submission of the Metro South West Group to An Bord Pleanála re *MetroLink*, dated 22 November 2022, paragraph 3.3

Public Transport: peak hour, in-bound

Bus corridor	Current No. of Buses	Current Passenger Capacity	<i>BusConnects</i> No. of Buses	<i>BusConnects</i> Passenger Capacity
Kimmage-City Centre (at Mount Argus)	9 (3X54a; 6X9)	720	18 (6XF1; 6XF2; 6XF3)	1,440
Tallaght-Terenure (at Terenure College)	19 (12X15; 4X49; 2X65; 1X65b)	1,520	10 (5XA1; 5XA3)	800
Rathfarnham-City Centre (at junction with Rathdown Park)	12 (6X15b; 6X16)	960	18 (5XA2; 5XA4; plus 2X74; 6X85))	1,440
Greenhills-City Centre (at Crumlin Hospital)	23 (6X27; 1X56a; 5X77a; 1X77x; 6X123; 4X151)	1,840	24 (4XD1; 4XD2; 4XD3; 2XD4; 2XD5 plus 2X72; 6X73)	1,920
Totals	63	5,040	70	5,600

The NTA has contended that many more buses could use these corridors². However, this is not plausible. Due to the narrow corridors in South West Dublin, there is very little scope to increase the supply of buses. For example, Corridors 10 and 12 (from Tallaght and Rathfarnham) merge at Terenure Road East – currently a very narrow 2 lane stretch of road – see the photo. It has been reported that this would be the busiest corridor in Dublin³.



Under *Busconnects*, buses would turn right from Rathfarnham Road into Terenure Road East. That road would also receive buses and general traffic from Terenure Place, which is right opposite Terenure Road East. Terenure Place would receive buses from Templeogue Road, which would only contain buses and bikes. General traffic which now uses Templeogue Road

² Letter NTA to Minister Eoghan Murphy, 2 December 2019

³ *Dublin Area Bus Network Redesign, Revised Proposal*, Jarrett Walker and Associates, October 2019 page 96

would be diverted at Templeogue Bridge and Templeville Road to the KCR. There they could go to town via Crumlin (Stannaway and Clogher Roads) or they could turn right and access Terenure via Terenure Road West; it is likely that many motorists would choose this option. In addition to receiving 20 'A' buses in the peak hour, Terenure Road East would be expected to also receive 6 'S4' orbital buses and 4 '81' buses via Terenure Road West, giving a total of 30 buses per hour. This is a bus every 2 minutes, in addition to cars, vans, taxis, bikes etc.

Currently, Terenure Road East receives 19 in-bound buses in the peak hour and is highly congested in peak periods. To increase the number of buses in the peak hour by over 50 per cent, as proposed in *BusConnects*, would be a formidable challenge. The notion, as proposed by the NTA, that even more buses could be accommodated is difficult to comprehend.

3 Local impact in the Templeogue area

This is one example of the effects of failure to provide substantial public transport capacity in South West Dublin. Traffic congestion is set to become **much worse** in the absence of metro in South West Dublin. Essentially, the forecast for the whole GDA under the *Draft Transport Strategy for the Greater Dublin Area 2022-2042* is that, following the full implementation of all elements of the *Strategy*, car trips will decline by only 1.8 per cent by 2042. In South West Dublin, which has no high capacity public transport, it is highly likely that car traffic will increase over the coming years. The highly populated areas of Knocklyon, Firhouse, Scholarstown etc. currently have three car routes into the city:

- Via Cypress Grove Road onto Lower Kimmage Road:

Under *BusConnects* Lr Kimmage Road would be closed to general traffic.

- Via Templeogue Road:

Under *BusConnects* this would be closed to general traffic.

- Via Wellington Lane, Whitehall Road, Stannaway Road, Clogher Road.

Under *BusConnects* this would remain open to general traffic.

Under *BusConnects* this would be the only one of the three routes that would remain open to general traffic.

The *Wellington Lane Walking and Cycling Scheme, Part 8 Report* (DBFL, 2022) has some interesting statistics regarding traffic congestion on the one remaining route for general traffic. According to survey data in the Report, in the morning 8am-9am peak, **1,008** vehicles entered Wellington Lane from the Spawell roundabout. In the same hour, **1,052** vehicles went from the Spawell roundabout towards Templeogue Village; let us assume that the vast majority of these were city-bound. If *BusConnects* proceeds as planned, very few of the 1,052 vehicles will proceed towards Templeogue Village as their options will be severely limited as described above. Most of them will enter Wellington Lane. In other words, the volume of traffic on Wellington Lane is likely to double. This would mean that the volume of traffic on Wellington Lane – with one traffic lane in each direction – would match the volume of traffic on the Tallaght Bypass – with two lanes plus a bus lane in each direction!

The inevitable result of the lack of high capacity public transport in South West Dublin between the Red and Green Luas lines (in effect, metro, as the streets are too narrow for Luas⁴) coupled with the funnelling of the general traffic from three routes onto one road under *BusConnects* would be that the volume of traffic along Wellington Lane would be at least twice its current level. Wellington Lane would turn quickly into a slow moving car park.

This would have severe, negative implications for:

- The proposed F2, 81 and 82 bus services along Wellington Lane;
- The functioning of the Spawell roundabout / intersection;
- The build-up of traffic on the Tallaght Bypass and on the link road between the Tallaght Bypass and the Firhouse Road.
- Emissions from slow moving 'stop-start' traffic.

The continuation of *MetroLink* towards Tallaght would remove many cars from the streets of South West Dublin and thereby facilitate cycling and buses.

We have seen above that *BusConnects* would lead to a trivial increase in the supply of public transport; now we see that it would bring about increased congestion.

The futility of relying solely on buses to address the public transport needs of South West Dublin was pointed out 22 years ago by the Dublin Transportation Office, which reported that:

*"the bus mode cannot provide the necessary capacity to cope with the forecast demand"*⁵.

This Report went on to recommend a metro service for South West Dublin.

4 The Metro to Knocklyon Feasibility Study, NTA/Jacobs, 2021

The *Metro to Knocklyon Feasibility Study*, NTA/Jacobs, 2021 rejected the continuation of *MetroLink* to South West Dublin. However, this Report had many flaws, including

- (a) The proposal that was made by the Metro South West Group was not examined. This proposal is that *MetroLink* would proceed directly from St Stephens Green to a new station at Portobello, with the Tunnel Boring Machine being parked under Cathal Brugha Barracks; as a Phase 2, *MetroLink* would be continued to South West Dublin.

⁴ According to the current NTA *Transport Strategy for the Greater Dublin Area 2016 to 2035* "As such, a number of options, including Light Rail, have been examined. However, due to the land use constraints in the corridor and owing to the pressure on the existing road network, a Luas line was not deemed feasible." (page 56)

⁵ *A Platform for Change*, Dublin Transport Office, 2001, page 35.

- (b) No assessment was carried out of continuing *MetroLink* as far as Tallaght Town Centre (a major attractor and population centre). The option of examining the continuation of *MetroLink* to Tallaght was disallowed by the NTA⁶.
- (c) The radius around potential stations ("buffer zone") to determine their suitability and from which passengers are to be sourced was too small at 600m. This is just a 'rule of thumb'. It assumes that all passengers would access the station on foot. However, the Metro South West Group carried out research on this matter across the outer suburbs between the Red and Green Luas lines. This research shows that, based on just two potential stations with Park and Ride and Cycle and Ride, substantial time savings could be achieved from a wide area by cycling or driving to a metro station and completing the journey by metro. This research was not even referred to much less incorporated in the *Feasibility Study*⁷.
- (d) There was no provision for Park and Ride nor Cycle and Ride and they are completely absent from the *Feasibility Study*. Nor is there any consideration of orbital feeder buses to the metro.
- (e) No consideration was given to the opportunities to 'capture' motorists on the N81 to leave their cars at a Park and Ride at a location such as Spawell and complete their journey city wide by public transport.
- (f) Over 100,000 vehicles pass by the Spawell exit on the M50 every day. Many of these motorists are based in Dublin and they are cruising around the motorway as a way of accessing different destinations in the city. Why was no consideration given to the opportunities to 'capture' some of these drivers so that they might leave their cars at a Park and Ride at a location such as Spawell and complete their journey city wide by public transport. MSWG research shows that substantial time savings would accrue. For example, a motorist driving from Spawell to the city in the morning could expect a journey time of c. 40 minutes (per Google Maps); the same journey by metro would take 15 minutes.
- (g) Excessive reliance was placed on the Eastern Regional (Transport) Model. This model predicts behaviours based on current options. As metro has no precedent in Ireland, deeper analysis is required which goes beyond people's current transport decisions, which are based on current options.
- (h) Direct use of POWSCAR data, in conjunction with data on metro availability and speeds, would have enabled better forecasts to be made of metro patronage and Transport User Benefits.
- (i) Environmental benefits were excluded from the *Feasibility Study*.

These are major shortcomings. All of them have a similar effect: to reduce Transport User Benefits and adversely affect the Benefit to Cost ratio. There is little doubt that if these shortcomings were addressed, the Benefit to Cost ratio would increase significantly from the 0.8, which was reported in the *Feasibility Study*, and exceed 1 by a substantial amount.

⁶ Email of 19 November 2020 from the NTA to MSWG

⁷ *The Continuation of MetroLink to South West Dublin: Improvement in Commuting Times*, MSWG, 2020.

<https://documentcloud.adobe.com/link/review?uri=urn:aaid:scds:US:4013503d-9fe7-4f65-b8d1-a380eafdb0c7>

5 Why An Bord Pleanála should not approve of *MetroLink* going to Charlemont/Manders Terrace

From the above flaws in the NTA/Jacobs *Feasibility Study*, it is clear that this *Feasibility Study* provides no basis for rejecting the proposal that *MetroLink* should proceed from St Stephens Green to Portobello/Rathmines, pending its continuation to South West Dublin as a Phase 2 project.

The NTA/TII proposal that *MetroLink* would proceed to Charlemont / Manders Terrace:

- Would seriously deplete the Transport User Benefits of continuing *MetroLink* to South West Dublin, as the highly populated and attraction-rich areas of Portobello, Harold Cross and most of Rathmines would be bypassed;
- Would merely duplicate the existing Green Luas line from Charlemont to St Stephens Green for negligible additional Transport User Benefits;
- These negligible benefits would cost around €650m;
- This would represent serious pre-funding of one southside option: converting the Luas Green Line to metro;
- There is no Government nor civil society approval for converting the Green Line to metro.

Indeed, according to the NTA's *Draft Transport Strategy 2022-2042*:

"The challenges associated with the upgrading of the Luas Green Line to a metro standard of service have led to the emergence of an alternative proposal which seeks to meet travel demand from south of Sandyford along a new light rail corridor which serves UCD post-2042⁸..

Thus, there will be no need in the future to convert the Luas Green Line to metro, as there is a wide road all the way from Stillorgan to St Stephens Green, which could accommodate a Luas service; this would be a cheaper alternative and it would not require the closure of the Green Line for an extended period.

In the absence of

- Any justification for including the advance subsidy of the conversion of the Green Line in the *MetroLink* proposal, and
- A proper evaluation of the Rathmines / South West Dublin alternative,

⁸ Page 139. Amazingly, the NTA suggested that this Luas line would terminate at the 'non-destination' of Charlemont rather than St Stephens Green.

there is no basis for An Bord Pleanála to approve sending *MetroLink* to Charlemont / Manders Terrace, as this would diminish the substantial economic, social and environmental benefits of continuing *MetroLink* to South West Dublin, while increasing its capital cost. Therefore, An Bord Pleanála should adopt a conservative approach.

If An Bord Pleanála gives its approval for *MetroLink* to go no further than St Stephens Green, the Government will have many options. For example, Government may wish to apply for a further Railway Order, or a Variation of an existing Railway Order

- To continue to South West Dublin (The *MetroLink* TBM to continue to South West Dublin “running through”)
- To continue to Rathmines as an interim measure (with its good bus connectivity).

Neither of these options would be possible if *MetroLink* goes to Charlemont / Manders Terrace as set out in the application for a Railway Order.

6 Conclusion

OPTRA agrees with Frank McDonald⁹:

“Although the thorny issue of whether MetroLink would consume most of the Luas Green Line has been “parked” for another day, there is an overwhelming case to extend it to serve Rathmines – including Cathal Brugha Barracks, now the subject of a Government-sponsored feasibility study for a major housing scheme – and onwards via Harold’s Cross, Terenure and Templeogue to Tallaght.”

He goes on to say:

“In November 2021, 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. What all of this indicates is that the NTA is making it up as it goes along.”

OPTRA recommends that An Bord Pleanála should approve the Railway Order minus its continuation to Charlemont / Manders Terrace.

NOTE: OPTRA is a founding member of the Metro South West Group and supports its analysis which was submitted to ABP before the original deadline in November 2022.

Yours sincerely

Betty Collard
Secretary
Orwell Park (Templeogue) Residents Association

⁹ Irish Times, 7 January 2023.