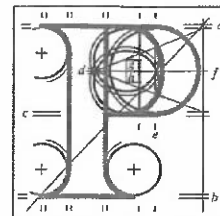


**Our Case Number:** ABP-314724-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Recorders Residents Association  
C/O Pauline Foster  
39 Whitehall Road  
Terenure  
Dublin 12  
D12 N265

**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](http://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.

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64 Marlborough Street  
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Yours faithfully,

pp em

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

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RECORDERS RESIDENT'S ASSOCIATION  
39 Whitehall Road,  
Terenure,  
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Ph: 01-455 5946  
Dublin

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

22<sup>nd</sup> November 2022.

Dear Sir/Madam,

**Re: Case reference: NA29N.314724 -MetroLink.  
314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to  
Charlemont, Co. Dublin.**

Dear Sir/Madam,

Statement:

The Recorders Residents' Association wish to make a submission which relates solely to that portion of the proposed MetroLink beyond the station located at St Stephen's Green East. Please note that we are fully supportive of the project from Estuary to St Stephen's Green, which we consider is long overdue.

Submission:

- We submit that Bord Pleanála should defer the authorisation of the section of MetroLink beyond the St Stephen's Green station, other than to create a turning section.

Our reasoning for this:

**Charlemont Station – no benefit to South West Dublin.**

The decision to locate the terminus at Charlemont is in our opinion, an extremely poor decision and would have no benefit to our sector of the city. Not in the short term or in the long term. It would appear that NTA/TII have 'boxed' themselves into a corner by continuing to opt for Charlemont as the terminus. When the decision was reached not to continue the connection to the Green Luas Line this station should also have been deleted from the proposal. An Bord Pleanála have a golden opportunity in their hands to pause this line at St. Stephen's Green whilst a fully informed, independent Feasibility Study is undertaken to assess an alternative line towards Tallaght, via Rathmines.

**Transport studies.**

As founding members of the Metro South West Group we have studied transport provision intensely, not just in the immediate vicinity but in the wider south side of the city. Living in a section of the city which has extremely poor connectivity to virtually every part of the city, other than the centre has been our tutor.

## **Highest car usage.**

We are acutely aware of the poor public transport decisions, down the years, particularly in the area between the Red and Green Luas lines, which have led to greatly increased private car usage. It is time now *to lay plans* to address this deficit. MetroLink should go no further than St. Stephen's Green and the construction time from Estuary should be used to do a proper assessment of continuing the line out south west, through Rathmines as requested by MSWG.

## **50 years evidence.**

The 1970's saw a massive increase in the expansion of housing in South West Dublin, *yet* this was accompanied *by a reduction* in the number of buses servicing the area. The 2001 studies showed that bus alone could not be meet demand into the future. We are in that 'future' now and it has been proven. The then mooted rail link from Stephens Green to Tallaght remains imaginary. Equally, BusConnects proposals in 2019 cannot, in our opinion, address the deficit in public transport for our area. The expected negative impact of traffic, *moved about like the chairs on the Titanic*, into the entire area west of Terenure and over to the Crumlin Road, will have a detrimental effect on life quality for those in the mid area. We would question the price the 'squeezed middle' will pay for arguable improvements (no time-constant journeys) in the extreme outskirts of the city.

## **Solution.**

MetroLink, continued to South West Dublin via Stephens Green, Rathmines etc. has the potential to resolve this scenario, with buses freed-up to do the job of connecting the suburbs – which is the current driver of much of the private car necessity.

The recent GDA review failed to consider an alternative routing of MetroLink - simply terminating it at the point where problems could not be surmounted and endeavouring to make the proverbial 'silk purse out of a sow's ear' out of a station at Charlemont. *Instead an alternative route should have been investigated.*

- We would submit therefore, that, in preference to Charlemont, the nearby Rathmines or Portobello area would be a far more suitable location for the MetroLink terminus.
- This would not interfere with the established use of the Luas Green Line. Passengers opting to transfer to MetroLink could do so at Stephens Green or O'Connell Street. It would be remiss of us not to add that the ideal scenario would of course be at a station on the West side of the Green.

## **A 'Metro' made of buses.**

The volume of buses needed under BusConnects to service Terenure/Rathmines (Corridor 10/12) is testament to the need for a metro. A huge percentage of the entire bus fleet, 66 per hour, will endeavour to do the job a metro, up and down these roads for the next quarter of a century. Even at this volume, the service is likely to be inadequate. Time constant travel will not be achieved. Public Transport congestion will result.

## **Rathmines Road v 'Ranelagh' Road (Northbrook Ave).**

A comparison of bus service to Charlemont and the limited space on the canal front suggests to us that further evidence that the choice of Rathmines for the Terminus of MetroLink offers so much more. Connectivity for much of the south west city could be greatly enhanced as these 33 buses operate from a large arc of the suburbs – Dundrum to Tallaght.

- We submit that this is a further reason why An Bord Pleanála should defer the authorisation of the section beyond Stephens Green, in order to conduct a proper feasibility study into this possibility.

### **Limitations of Charlemont.**

1. The range of the radial extensions into the south of the city is far more limited at Charlemont compared to St. Stephens Green, due to its more southerly location.
2. In the context of the preparation of the Greater Dublin Area Transport Plan 2022-2042, the National Transport Authority did a feasibility study entitled Metro to Knocklyon. We don't regard this as having been, in any way, adequate to fully assess the selection of a viable route into South West Dublin in particular.
3. We do not believe that any meaningful progress can be made in assessing an alternative option unless a proper assessment of metro to the south west city is done.

### **Financial return consideration.**

A metro station located at Portobello/Rathmines could reap the benefit of the 33 buses which will converging on the Rathmines Road for the next 20 years fed from a swathe of South West Dublin, i.e. between the Green Luas Line and the Red Luas Line with a population of over 350,000.

Motorists normally using the M50 would be enticed to leave the car and use bus and metro to the north side of the city.

By comparison, no 'new' passengers would add financially to Charlemont Station.

We would also add that to progress to Charlemont would be an extremely costly exercise if, subsequently, minds were changed and the south west route was given precedence.

### **Reduced Environmental Benefit.**

Poor access from Rathmines Road to Charlemont, particularly for those with mobility issues, would have a limiting effect on the numbers of passengers wishing to use MetroLink to the airport. The habitual route via the M50, with long-stay parking would be likely to continue.

We believe that a metro extension to Portobello/Rathmines would result in the beginnings of huge environmental benefits for the south west city.

Under current plans Climate action will be almost non-existent due to the on-going dependence on the private car until circa 2050.

Conclusion:

We believe that if the tunnel is bored as far as Manders Terrace, it seriously compromises the ability for flexibility of extension to the south city.

We would submit that proper planning requires a proper evaluation of the options for extension and that it is not consistent with proper planning to permit a station at Charlemont which would compromise the options.

Outside reviewers had this to say about continuing to Charlemont/Manders Terrace:-

Jaspers: *"The connection to Ranelagh could feasibly be deferred until there is clarity on the future of the Green Line (subject to an improved understanding of how this could physically be delivered in a scenario with Metro operational)"*

As 'outside reviewing residents' we would add:

We do not believe that any progress can be made in assessing the options unless a proper assessment of metro to the south west city is done. Pause at St. Stephens Green and be sure the next steps are the right ones, with both options being evaluated.

Our Ref: TTAS-MO-06074-2022 Reply from Minister Eamon Ryan.

a) *"...Studying a metro proposal in isolation in a standalone feasibility study would undermine this integrated approach and not provide an overall picture of the transport system needed to cater for medium and long-term demand in the south west of Dublin."*

Our comment on this: The proposal before An Bord Pleanála is in effect *a standalone project*. Utilising the opportunity to pause at St. Stephens Green offers an opportunity to investigate the following now:

b) *"While a metro to the south west of Dublin is not proposed before 2042 in the current draft GDA Transport Strategy, the NTA reviews and updates the strategy every 6 years. As such, this proposal may be reconsidered in future and progressed if there is sufficient passenger demand on the corridor."*

Our comment on this: If the Feasibility Study done by NTA had included the population of Lr. Rathmines and Portobello AND extended to Tallaght, we have no doubt it would have easily exceeded the demand criteria. We also note that the GDA Transport Strategy is still at draft stage.

Yours sincerely,  
Pauline Foster  
Chairman  
Recorders Resident's Association.