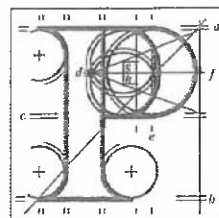


**Our Case Number:** ABP-314724-22

**Planning Authority Reference Number:**



An  
Bord  
Pleanála

Rethink Metrolink  
2 Cowper Drive  
Dublin 6  
D06P5Y6

**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.

Yours faithfully,



Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

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## Rethink Metrolink

### Observation to An Bord Pleanála on Metrolink Railway Order Case reference: NA29N.314724 Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin



A Chara

Rethink Metrolink, an activist group whose substantial membership is drawn from the communities along the Luas Green Line, Charlemont to Milltown, welcomes the opportunity to make a submission to An Bord Pleanála on Metrolink Railway Order, Case Reference NA29N.31474.

Our submission addresses some significant immediate problems with the proposal and also reflects on the longer term deficiencies in the scope and direction of this latest Metrolink plan: the individuals, families and communities impacted, and the city generally, will have to live with the consequences of this planning decision for many decades.

While we are sure that other observations on this case will address the engineering and technology aspects in detail, Rethink Metrolink are especially concerned about the human impact of these plans, including the catastrophic negative impact on both the Charlemont and College Gate communities. More broadly, the perhaps unintended consequences for the south west of the city of the choice of Charlemont as terminus with associated tunnel extension will adversely impact the quality of life of all the suburbs of the south west, possibly for generations.

This is but the latest in a long line of proposals from NTA/TII which have been characterised by inadequate consultation, occasionally shoddy analysis and less than professional management of the process which in this case led to a delay in the closing date for submissions.

Is Mise, Le Meas

Ronan O'Connell

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Chairman, 2 Cowper Drive Dublin 6 D06P5Y6



1. Introduction
2. An Bord Pleanála should approve MetroLink only as far as St Stephens Green
3. Options for future Metro South phase should not be be prejudiced by the approval of the current proposal
4. Rethink Metrolink proposes a set of investment principles which we believe should continue to underpin transport strategy
5. We continue to have concerns about inadequacies in the consultation process

### **1. Introduction**

Rethink Metrolink was formed in 2018 in response to local concerns about the specific negative impact of NTA proposals to construct a segregated high-speed suburban railway through the heart of our community. However, in the intervening period based on interaction with the local community, the group has broadened its focus to seek an efficient, effective and future-proof solution to the public transport needs of the south city.

We represent a community broadly defined as living within the catchment area of the existing Luas Green line between Milltown and Charlemont, the substantial area from the Grand Canal to the River Dodder. Our observations on this Metrolink Railway Order represent a broad consensus of stakeholders including householders, resident associations, local social and educational interests and businesses whose views were initially reflected in the original Rethink Metrolink submission to the NTA on the preferred emerging route in May 2018. We have subsequently made submissions on the consultation on the preferred route in May 2019 and on the Greater Dublin Transport Strategy 2016-2035 in January 2021.

At the outset, we wish to emphasise our absolute support for capital investment in public transport generally and in suburban and urban rail networks in particular as a solution to Dublin's needs into the future. In particular, Rethink Metrolink believes that the development of strategic solutions to Dublin public transport requirements should take account of their impact on individuals, families and communities during construction and operation.

In line with these principles, Rethink Metrolink continue to believe that any proposal involving the replacement of the light rail LUAS with high speed overground solutions is inconsistent with these principles and that any such proposal should not pass Oireachtas scrutiny or the Planning process.

We welcome the opportunity to make submission to An Bord Pleanála on Metrolink Railway Order, case reference NA29N.31474

## **2 An Bord Pleanála should approve MetroLink only as far as St Stephens Green**

It is very difficult to understand the project thinking which envisages the line terminating anywhere other than St. Stephens Green. Continuing MetroLink beyond St. Stephens Green to Charlemont is unnecessary, premature and lacks coherence in the absence of any firm plan for a future extension. The selection of Charlemont is not appropriate as the terminus in light of the (sensible) decision to shelve the Luas Green Line upgrade.

We believe that if the tunnel is bored as far as Manders Terrace, it seriously compromises the ability for a southern extension to include the highly populated city suburbs of Portobello, Lower Rathmines, and Harold's Cross. We would submit that proper planning of the project which is the subject of the Railway order requires a full and proper evaluation of the options for extension and that it is not consistent with proper planning to bring Metrolink beyond St. Stephens Green to Charlemont which would compromise the options.

### ***2.1 Charlemont Station is neither a sensible or viable solution as a southside Metrolink Terminus***

The selection of Charlemont as the point of tunnel emergence seems to be predicated on the related (but shelved following consultation and additional analysis) NTA plan to convert the Luas Green line into a high speed limited stop system. The effect of this decision Charlemont terminus is to pre-empt future decisions on the configuration of any comprehensive, integrated and inclusive rail-based transport solution for the south city generally. Rethink Metrolink has consistently called for consideration of extending the underground high-speed rail (the Metrolink) to deliver services to under-served parts of the south city either South West (Rathgar, Terenure, Rathfarnham, Tallaght/Sandyford) or East (Stephens Green, Donnybrook, UCD Belfield, Mount Merrion, Sandyford.) or both. While the current plan to continue tunnelling to Charlemont/Ranelagh does not render this approach impossible, it would seem that terminating the Northern Metrolink line at St. Stephens Green preserves the possibility of far more elegant and integrated solutions at some stage in the future. (This was specifically envisaged in the current plan for DART underground and the original 2010 plan for Metro North, which suggests that the current Charlemont terminus does not adhere to the principle of integration which should underpin projects of this scale).

The current NTA plans for Charlemont/Ranelagh suggests a policy fixation by the NTA with upgrading the Luas Green Line to the exclusion of alternative more equitable and inclusive use of taxpayer resources. It is based on a historic policy position which was always suspect and certainly does not reflect key urban social and demographic trends in the interim. It is also a proposal (Luas upgrade) which has been already rejected by key stakeholders. It is in effect driving policy through the rear-view mirror.

### ***2.2 The selection of Charlemont as a transport hub is fundamentally flawed***

### **2.2.1 Long-term impact**

Charlemont has only become “the” major Southern transport connection hub by default. The “emerging preferred route” originally envisioned that southside passengers would access MetroLink at multiple points along the spine of an (upgraded) Green Luas Line. Under that design, Charlemont would not have been “the” focal point for access for the whole of the southside. The original strategy for the “emerging preferred route” was based on a north-south spine and not a “hub and spoke” model.

The subsequent withdrawal of the proposal to “tie-in” the Green Luas line has now resulted in Charlemont unintentionally becoming “the” southside hub for the whole Metro project. The fundamental basis of the MetroLink transport strategy for the southside has now totally changed. However, no comprehensive study of a “hub and spoke” model has been carried out. Furthermore, no data has been proffered to demonstrate that Charlemont is the ideal solution for a long term major Southern transport connection hub.

If the Metrolink strategy is to be fundamentally changed to a hub and spoke model, the most important criteria for any “hub” would be that it provides maximum flexibility to accommodate all future southern route possibilities. Under this model, the optimum location will be as close to the city centre as possible. Charlemont is clearly not as central as St. Stephen’s Green and therefore already compromises future routes by bypassing densely populated city centre business areas due to the more southern location. The likelihood of future routes satisfying return on investment criteria is further compromised by the likely cost of re-aligning any future tunnel routes (away from Green Luas tie-in).

### **2.2.2 Interim Impact**

Even as an interim solution, the logical criteria for selecting the location of a station to service the whole of the southside would be:

- It should be in an area that is already a transport hub, i.e. is well served by multiple current modes of transport – pedestrian, rail, bus, coach, taxi and car.
- It should be in an area that already caters for major transport activity and is a destination for both regular commuters and tourists.

St. Stephen’s Green satisfies both criteria; Charlemont satisfies neither:

- Charlemont is not an existing transport hub – while there is a Luas stop, it is not a destination for buses, coaches, taxis or cars. It is also severely compromised by the Canal in terms of connectivity and traffic congestion. This is in stark contrast with the 360 degree access to St Stephens Green.
- Immediately south of the proposed Charlemont station is a residential area (beginning from Dartmouth Square and Dartmouth Road). This long-standing residential and architectural conservation area has never been envisaged or proposed as a suitable location for a major transport hub. The congestion problems caused by the Canal boundary will worsen on the Canal (Grand Parade) and result in the main station access for buses, coaches, taxis, cars and pedestrians, being forced to come through this residential area. Once this is established it

will become a de facto access route to MetroLink and with severe long-term implications for the local community.

Even as an interim solution, why bring all southside MetroLink passengers to a Charlemont location that is less accessible than St. Stephen's Green, will cause increased traffic congestion and will destroy a residential area?

### **3 Options for any future Metro South phase should not be prejudiced by the current proposal**

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.

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. When MetroLink comes south to St Stephens Green, it could be directed either to South West Dublin. 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.

The MetroLink "Project Review: Phase 3 (Preliminary Business Case) incorporating Independent External Review" by JASPERS, May 2022 also concluded that this is not a priority.

- Reference A.1.4 "It is noted that the revised design for St Stephens Green arose following the objective to provide a connection to Charlemont/Ranelagh, which is no longer considered a priority by the independent review team."



- Reference A.4.8 "The connection to Ranelagh could feasibly be deferred until there is clarity on the future of the Luas Green Line"

The selection of Charlemont as the end-point, estimated to cost in the region of €650m, is not justified in the light of the decision to omit the Luas Green Line upgrade.

#### **4 Rethink Metrolink proposes a set of investment principles which we believe should continue to underpin transport strategy**

We re-emphasise our absolute support for capital investment in public transport generally and in suburban and urban rail networks in particular as a solution to Dublin's needs into the future. Rethink Metrolink strongly urges that the development of strategic solutions to Dublin public transport requirements should be guided by the following; -

- Transport solutions should be based on a strategic approach encompassing all options in an integrated plan.
- High-speed urban rail solutions should run underground when servicing the city centre and inner-suburban neighbourhoods.
- Incremental development of urban rail transport should prioritise areas of high demand where there is no existing rail link.
- Investment of incremental taxpayers' monies should not be predicated on decommissioning existing essential and well-proven transport assets, specifically light-rail services such as Luas.
- Investment proposals should include analysis and quantification of the social, economic and environmental effects of the proposed route on all the affected communities.
- The energy crisis and the fallout from the pandemic have been unwelcome reminders of the perils of forecasting and the challenges of devising a regional transport strategy . Government policy in relation to remote working demonstrates the profound changes that this global pandemic will have on future transport patterns in Ireland. It is widely expected that the volume and pattern of future commuting in the Dublin region will change markedly due to the dramatic increase in remote and hybrid working. It is very possible that commuter numbers may actually decline. As a consequence it is likely that the current carrying capacity of the Luas system will be able to cope with demand until 2050 and not 2040 as currently assumed. In light of this, it cannot be good transport strategy to even explore options involving the destruction of existing fit-for-purpose light rail infrastructure: therefore the only rationale for including any consideration of the Luas Green Line (City-Centre to Sandyford) in the strategic review is to confirm that it should be retained in its current tram format, in our opinion.

#### **5 Rethink Metrolink continues to have concerns about the consultation process**

Rethink Metrolink has already expressed concerns that NTA needs to be more transparent in its strategising and decision making. For example, an earlier consultation on the preferred Metrolink route did not provide full relevant information on engineering challenges that have a direct bearing on the exact location for the Luas-Metrolink tie-in and had the effect of ensuring disproportionate focus – with adverse public commentary - on the community's concern about the closure of Dunville

Avenue. This information was only released in a subsequent detailed design report. In addition we should remember that NTA insisted that the Luas green line could not cope with likely demand growth to 2040 until activist groups actually presented solutions involving tram length and frequency, scenarios which must have been developed by a well-resourced entity such as NTA.

In addition, we are concerned by the reluctance of NTA to engage directly with community groups including Rethink Metrolink. As Rethink Metrolink (representing a broad cohort of residents who are situated adjacent to the Luas Green line as well as commuters who have been daily users of that facility for the last 18 years) we made extensive submissions to all prior consultations; we requested that a meeting of manageable numbers and duration with NTA but that was not forthcoming. At that time, the Joint Oireachtas Committee on Transport did deem it appropriate to meet with us, in fact on the same day that the NTA met with them.

The Metrolink Railway Order, case reference NA29N.31474 will have an immediate adverse impact on two communities, namely the residents of the College Gate development and the Charlemont/Dartmouth Square community. In the longer term, the south west quadrant of the city will be disadvantaged by the choice of Charlemont as terminus as it precludes the development of the needed southwest alignment. The impact on these citizens has been poorly reflected in the current proposal and the wider planning process provides surprisingly limited opportunity for advocacy on behalf of these impacted groups.

<end>