

# **METROLINK**

## **Response to Public Consultation May 2018**

**11 May 2018**

### **1. Introduction**

We represent a community broadly defined as living within the catchment area of the existing Luas line between Milltown and Ranelagh stops. The comments in this submission present a broad consensus of the views of a widely-advertised and well attended public meeting convened to discuss the METROLINK project which was attended by householders, residents associations, local social and educational interests and businesses.

The streets and communities making this submission are itemized at the back of this document.

### **2. Summary of overall position**

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. The existing Luas is a clear example of the transformative positive impact such investment has on urban communities.

We believe that, in executing the METROLINK project, the lessons learned from legacy investments in public transport and from other major capital infrastructure projects should be applied to ensure that intended consequences are delivered efficiently but, equally importantly, that unintended negative consequences are foreseen and addressed.

Our key concerns are focussed on the following areas:

#### **IMPACT ON OUR COMMUNITY**

- The negative impact of the emerging segregated over-ground METROLINK rail solution on local city communities has not been considered to any extent so far in the process. There has been no analysis of the social, environmental or economic effects of the proposals on communities and such analysis has to be completed before the projects proceeds to the next phase. This analysis must also include considering options for mitigating these negative impacts. Specifically, we are seeking that the design and options appraisal process are revisited to find a sustainable and acceptable solution for our community and the other communities and suburbs in south Dublin.

#### **NET BENEFIT ON IMPROVING WIDER SOUTH DUBLIN TRANSPORT CAPACITY**

- The overall strategic investment approach of TII does not address the long-term public transport needs of Dublin City, in particular the needs of widely dispersed communities.

Despite investing an unprecedented amount of capital, there will be no new incremental services available to large swathes of south Dublin and areas with chronic deficiencies in public transport will still remain unserved, in particular the catchment areas of UCD to the East or Terenure/Templogue/Rathfarnham areas to the West. It is the case that current capacity on the LUAS is driven by users travelling from these areas in order to access public transport.

## **CONSULTATION PROCESS**

- The current public METROLINK consultation process is inadequate. The community is concerned about the absence of real interactive engagement and no clear commitment to meet local communities to directly address community concerns.

These concerns are developed further in this submission and we would urge the TII to engage positively and constructively in order to address them.

### **3. Adverse Community Impact of emerging METROLINK option**

The community in the Green Line catchment area heading south from Charlemont has benefitted from the compelling advantages of a light rail system since its inception. Light-rail was welcomed by all local stakeholders as an ideal and proportionate solution at the time. It remains so as it is scale-able (through increased frequency and route management in the city-centre) to meet future growth requirements in particular if complementary multi-mode public transport solutions are developed in parallel for currently under-served areas of south Dublin.

Transformation of the current Luas line to a segregated high-speed over-ground METROLINK southwards from Charlemont has significant adverse social, environmental and commercial consequences for the adjacent neighbourhoods. A light rail system is relatively benign in terms of community impact. In contrast, the impact of a high-speed rail system is totally different. Because of its speed, frequency and inaccessibility, segregated high-speed over-ground rail, in effect, creates a clear physical partition within communities. In addition, it would also clearly have a significantly adverse impact on many houses in the neighbourhood that are adjacent to the line, in many cases extremely adjacent.

#### ***Segregation and permeability***

Under the current METROLINK proposals, regardless of which of the three train options is chosen (two low-floor and one high floor) TII has indicated that complete segregation of the line will be necessary i.e. no surface access to cross the line at any point for either road or pedestrian traffic. This will directly impact the local communities at five separate locations in the area – Dunville Avenue at Beechwood Stop, Cowper Drive at Cowper Stop, a smaller Luas crossing between these stops at the western end of Albany Road, and two crossings 160 metres apart at Milltown stop /Alexandra College/Richmond Avenue South. One of the latter crossings provides vehicular/bicycle and pedestrian to Alexandra Sports facilities while the other main entrance crossing facilitates large vehicle access including school buses and mini-buses. In addition both of these crossings serve the

large population of the multi-storey housing and apartment development at St Anne's in providing pedestrian access to the existing Luas service.

Permanent closure of these access points has unacceptable consequences for the wider community. Permeability within the adjacent local Victorian villages of Rathmines and Ranelagh encompassing the wider areas of Harold's Cross, Rathgar and Donnybrook has been a hugely positive factor in the regeneration of these inner-suburbs of Dublin following their decline in the 1970s. For example, Dunville Avenue, which will become a cul-de-sac under the proposals, is a neighbourhood and community hub between Rathmines and Ranelagh which because of the permeability factor has developed as a thriving commercial and social addition to the wider community. Dunville Avenue is an integral part of the fabric of the local community with traditional independent businesses that have existed well before the original Luas project including Pharmacy, Grocery, Café, Newsagent, Hair Salon and Clothes Shops.

### ***Impact on motorised and pedestrian traffic***

There is no evidence of any impact assessment by TII or the NTA of the closure in terms of displaced motorised traffic and on cyclist traffic in the area. The proposed closure of the key traffic route at Dunville Avenue and of separate crossings for pedestrians, cyclists and disabled persons at Cowper, Albany and Milltown, will cause disproportionate and costly disruption to residents, schools and businesses and will inevitably create traffic blockages in and between Rathmines and Ranelagh villages at all times during the day.

Traffic volumes on the remaining key Charleston Avenue link route between Rathmines and Ranelagh will increase hugely with knock-on impacts on traffic back to Rathmines and forward to Ranelagh.

As pedestrian crossing of the upgraded line will not be permitted at any point, the proposed availability of a lift solution in addition to a stepped overpass at Dunville Avenue and other crossing points are unworkable. At peak times, in particular during school term, the volume of cyclists crossing the current Luas line could not in any practical way be facilitated by lifts. The nature and volume of the cycling cohort is an added feature; many are parents with small children on bike-uggies which could not be accommodated for example by a ramp.

### ***Cyclist Safety Issues***

Cyclists displaced by the closure of all METROLINK surface crossing points will have no choice but to reroute to very busy alternatives e.g. to Sandford Road where the existing cycle lanes are congested at peak hour. Sandford Road and similar adjacent main roads are used by large vehicles and trucks and this will present a significant additional safety risk compared to the relatively quiet streets around the existing surface crossings at Dunville and Cowper.

### ***Impact on families and schools***

Families with pupils at the many Primary and Post-Primary schools in the catchment area of the Luas line between Milltown and Ranelagh have expressed serious concerns about the impacts of the proposed solution.

Primary schools in the area include Scoil Bhride and Lios Na nOg on Oakley Road, Ranelagh Multi-Denominational on Ranelagh Road, Sandford Primary School on Sandford Road and Kildare Place on Upper Rathmines Road. Secondary Schools impacted include Gonzaga College and Sandford Park in Ranelagh, Muckross Park on Marlborough Road, Alexandra College in Milltown and St Louis and St Mary's Colleges in Rathmines.

The impact will mainly arise from the proposed segregated rail line and the consequent closure of the main traffic route at Dunville Avenue and at other crossings and the significant restrictions on cyclists and pedestrians due to congestion on ramps and lifts in particular at school peak-times. Within our community we have thousands of children and their families impacted who currently access the schools on foot, by bike, on scooters, buggies, wheelchair, and by car who will be impacted by the closure of the Dunville Avenue crossing.

### ***Persons with reduced mobility***

Implications of the segregated rail solution for persons with limited mobility are of particular concern. The current light rail system has an excellent regime for disabled people mainly due to the fact that with some exceptions both the stops and trains can be accessed at street level in both directions. The segregated approach will require lifts at all stations and experience to date with the Luas illustrates the constant problems with lift maintenance due to technical and behavioural problems.

### ***Access for Emergency Services***

Implementation of the segregated rail solution will mean that there will be no through-road between Rathmines and Ranelagh in an area stretching from Milltown Road to Charleston Road. The adverse practical impact of this is very clear in the event of An Garda Siochana, Fire Service or Ambulance Service responding to an alert for example in any of the streets currently accessed via Dunville Avenue either from Rathmines or Ranelagh directions. The advantages to the criminal are also obvious.

### ***Parish, Church and Related social activities***

Similar to the impact on the dispersed school community affected by the proposals, the impact on local religious practice and related social activities will be severe. The segregated line will partition Beechwood Catholic and Sandford Anglican parishes and will impact parishioners frequenting at Sandford and at Holy Trinity Church on Church Avenue as well as placing a burden on related social services including local Meals on Wheels distribution.

### ***Impact during construction***

The construction of the proposed METROLINK will have significant impact not only on our community but also on today's users of the existing Green Luas Line. Given that it is proposed to shut down the Green line while constructing the Metro it is concerning that the economic, environmental and social impacts have not been considered and clearly communicated. In addition,

our concerns include construction related activity; traffic, parking, noise, pollution, chemicals, dust, health and safety of our community. The existing Luas line is in close proximity to four schools which will be directly impacted during construction. Exposure to this air pollution will be particularly severe on those who suffer from asthma and breathing difficulties. Also, the management, logistical and health and safety aspects of hundreds of school children who currently cross the Luas line each day to access their studies has not been considered.

### **Conclusion**

The emerging solution envisages an outcome whereby

- A substantial part of the city and environs will be served by two complementary public transport systems (Luas light-rail and a **tunnel-based** high-speed rail) that do not converge and will meet future growth requirements in the areas serviced while having a proportionate and limited impact on city neighbourhoods.
- A separate expanse of the city, beginning southwards from the Charlemont tie-in, will have a single converged **high-speed over-ground** rail line with no complementary additional public transport service and which will have a hugely detrimental impact on the neighbourhoods of the inner suburbs including Ranelagh and Rathmines.

To reiterate, we are supportive of a rail service for Dublin and for the south of Dublin, and we recognise the benefits it brings to the community, with our experience with the Luas Green line. However, the development, design and construction needs to be balanced and appropriate. We believe the current “emerged preferred route” from Charlemont to Milltown and the proposed design is not appropriate or reasonable and will have a seriously disproportionate impact to our community.

The Greater Dublin Area Transport Strategy 2016-2035 and National Development Plan 2018-2027 states that sustainable mobility is a National Strategic Outcome to support compact growth and minimise congestion and provide convenient movement in our communities. Obviously segregating and dividing a community into two was not the intended outcome of improved rail services in south Dublin through the METROLINK. We therefore ask you to revisit your design and options appraisal process in order to find a sustainable and acceptable solution for our community and the other communities and suburbs in south Dublin.

For example a specific option for assessment could be the extension of the current tunnel-based high speed rail to a further point least 6kms southwards from the city centre – in particular to a less densely populated tie-in point beyond the River Dodder. This would significantly address the excessive impact which an integrated high-speed over-ground line would have on inner-suburbs served by the existing Luas line.

Referring back to the support studies for Greater Dublin and South Dublin and assessments of the various route options you have considered such as the enhanced Luas Green Line, Bus Rapid Transport, various options for the metro (including tunnelling) we ask you on behalf of our community to go back and review these studies and further consider these options. We also ask you

to clearly communicate the options and the decision making process so that future users of these services have a say in how they are developed, delivered and serve their communities.

#### **4. Overall Investment Strategy**

We do not accept that TII has made a convincing case in favour of the emerging preferred route for METROLINK specifically in respect of Dublin south city communities generally. The value of concentrating unprecedented amounts of transport capital investment in an area that is currently well served with a relatively recently completed light-rail system is unproven. Under the current proposals, there are large geographical areas in South Dublin where major public transport deficiencies will remain unresolved in the long-term. Given the inevitable delays in completing a project of the scale of METROLINK, embarking now on a sub-optimum solution could postpone the resolution of Dublin's overall transport challenges for another generation.

While we acknowledge and support the requirement for an airport rail link, there is no compelling evidence presented that would support extending such a link beyond a node in the city centre in an over-ground linear route to an end-point at the far extremity of the city. Common sense and international precedent would suggest that a spoke-network of supporting multi-mode transport systems hubbing to a city centre node - with a number of radial connections - would optimise the benefits for the public overall and ensure better value for money.

Also, the METROLINK project seems to have been considered in its own right without an integrated approach nor a sustainable transportation plan for Dublin as a whole. There are many suburbs in south Dublin (from UCD to Rathfarnham) which are not being served by efficient and modern transportation system. We ask that the various options considered be clearly explained to the public and communities in an open and transparent manner.

#### ***Value for money***

Serious questions arise about the waste of public money in dismantling the existing LUAS line which has only recently been expensively constructed as well as the waste and environmental irresponsibility associated with destruction of /ripping out pieces of public transport infrastructure only relatively recently completed. Fourteen years is a very short time-period in the life-time of planning and implementing major transport investment projects. In addition, TII has not presented a detailed cost-benefit analysis of the impact of full closure of the line during the upgrade period; depending on the length of the closure period, the economic and social cost to the city could arguably amount to a multiple of the actual cost of the upgrade.

#### **5. Limited Consultation process**

On a procedural issue, we are concerned about the limitations of the consultation process. We recognise that TII and the NTA are well-intentioned in the current engagement. However the overall community feedback is one of cynicism regarding the consideration that will be given to the views of

affected communities and regarding the amount of genuine present and future engagement. Feedback includes a view that the current exercise is not an adequate consultation in any sense. We would urge TII to carefully consider this issue in order to sustain critical public support for the project, whatever the final agreed approach may be.

## **6. Next Steps**

This is an initial preliminary summary of the views of the local stakeholders in the area in response to the TII request for comments by the 11 May. Of necessity it is general in nature due to the time constraints.

We are committed to providing further comments to the TII/NTA to support the views of the community and therefore this submission should not be regarded as a complete and final submission. We are requesting that the TII/NRA agree to begin a series of meetings with community representatives as soon as possible to address the community concerns.

## **7. This is a community submission to the consultation process**

Prepared by, and submitted on behalf of, a broad coalition of residents of Ranelagh and Rathmines within the catchment area of the existing Luas line between Milltown and Ranelagh stops:

Gerald Flynn, representative of Beechwood Avenue Lower

Gerald Fitzgerald, representative of Temple Gardens

Greg Ryan, representative of Cowper Gardens

Brian Daly, representative of Cowper Drive

Helen Bowe, representative of Tudor Road

Brian O'Mahony, representative of Cullenswood Gardens

Eugene Flynn, representative of Albany Road

Katie O'Brien, representative of Edenvale Road

Neil Murphy, representative of Tudor road

Gillian Farren, representative of Merton Road

Elizabeth Burke, representative of Richview Park

Clodagh Murphy, representative of Ashfield Road

Barbara O'Keeffe, representative of Windsor Road

Suzanna Gilmore, representative of Park Drive

Philip Daly, representative of Merton Drive

Carol Louthe, representative of Beechwood Avenue Upper

Ronan O'Connell, representative of Mountain View Road

Patrick Galvin, representative of Edenvale Road

Siobhan Lennon, representative of Edenvale Road

Stephen Dorman, representative of Ashfield Road

Cliona Buckley, representative of Cambridge Road

Mary Crosbie, representative of Ormond Road

Geralyn Byrne, representative of Cowper Gardens

Clare Looby, representative of Beechwood Avenue Upper

Emily-Jane Homan, representative of Mornington Road

Peter Nash, representative of Cowper Drive

Gerard Cavanagh, representative of Richmond Avenue South and Richview Residents Association covering:

Cowper Road

Temple Gardens

Merton Road

Palmerston Lane

Palmerston Park

Richview Park

Richmond Avenue South

Temple Road

Temple Villas

Nicholas Simms, representative of Belgrave Place and Belgrave Residents Association covering:

Annesley Park

Belgrave Road

Belgrave Square

Belgrave Place

Belgrave Villas  
Belgrave View  
Belgrave Terrace  
Cambridge Road and Villas  
Moyne Road  
Oakley Road  
Dunville Avenue  
Palmerston Road and Court  
Ormond road  
Windsor road  
Killeen Road  
Castlewood Avenue and Park  
Charleston Road and Avenue  
Church Avenue  
Church Gardens  
Beechwood Park  
Purser Gardens

Ann Valentine, representative of Park Drive and Local Residents Association covering:

Park Drive  
Cowper Gardens  
Cowper Drive  
Albany Road  
Tudor Road

May 11<sup>th</sup> 2018