



**Submission to Minister for Transport  
With respect to the public inquiry concerning Luas Line B1**

**Platform 11 Dublin Rail Projects Committee<sup>1</sup>**

**January 17, 2006**

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We wish that the following submission be considered at the public inquiry.

## **Summary**

Platform 11 supports the provision of improved public transport services to south east Dublin, however we find the proposal put forward by the Railway Procurement Agency (RPA) to be defective, lacking in capacity and not in line with the transport planning strategy of Dublin or the views of the Department of Transport.

We wish to make a detailed submission outlining issues in the following areas:

1. Route Selection
2. Excessive Compulsory Purchase Order (CPO)
3. Clonlea House
4. Platform for Change (PFC)/Planning Context
5. Capacity
6. Metro Upgrade
7. Design Issues
8. Stations/Location of station
9. Procurement

We conclude our submission by putting forward a more suitable route, which we believe would offer a higher quality solution with less disruption and possibly at a lower cost to the Irish public.

## **1 Route Selection**

The route selection procedure detailed in the EIS gives no consideration for the need, at a later stage, to upgrade to a high quality metro in line with government policy.

## **2 Excessive CPO**

Despite the presence of an almost totally clear existing railway alignment between Sandyford and Carrickmines, the applicant has chosen to develop a totally new alignment, which will require massive land acquisition with resulting environmental impacts and disruption to members of the public.

In light of an almost perfectly preserved existing railway alignment we consider the level of land acquisition to be excessive.

## **3 Clonlea House**

Platform 11 are concerned that the proposed demolition of the property known as Clonlea House a protected structure may delay construction on this routing due to potential legal challenges that have become all too common in recent years. The moving of the entrance gates of Glencairn the British ambassadors residence could also prove problematic due to the setting of the property being compromised by the forced change of entrance which frames the setting through a maturely planted driveway.

Interference to the culturally important *Boss Croker* mansion may prove to be provocative to the heritage movement, which could lead to an undue delay in the delivery of this project, with resultant impact on costs. In light of the ambitious targets laid down by Transport 21 this is of particular importance.

In addition, we note a potential issue with access through the gates of Glencairn House with a proposed at-grade crossing in very close proximity. This would have safety ramifications and possible sightline issues.

## **4 PFC/Planning Context**

The RPA are tasked with the implementation of the rail based public transport infrastructure outlined in the Dublin Transportation Office (DTO) produced 'Platform for Change' document issued in 2000. No extension of the Luas Line B (Green) was proposed in that document.

The alignment proposed by the RPA does not, in our opinion, conform to Metro standards. We form this view based on on-street running and sharp corners at the Brewery Road/Blackthorn Road junction (Planning ref Area B1 – RO 13), in addition there are TWELVE at-grade crossings over the route. A metro line by definition should be fully segregated and thus free of at-grade crossings. While the original Line B was publicly acknowledged to have been constructed to allow quick conversion to Metro this extension makes no such provision.

## **5 Capacity**

It has been noted that passenger numbers on the existing line have exceeded all expectations. It is clear the addition of a further 6 stations, many adjacent to large housing developments, will increase peak demand beyond the systems capacity.

Should the proposed extension not be rejected and the DTO proposed Shanaganagh St. Stephen's Green Metro be built instead. A metro based solution would offer a higher capacity system, capable in our opinion of supporting both current and future demand for which we believe the proposed Luas line to be insufficient.

Currently many passengers, particularly those boarding close to the city, are experiencing delays and overcrowding in the morning rush hour. If Line B1 is built we contend it will place intolerable pressure on the existing Line B section leaving many current passengers unable to board.

Applicant to produce per station passenger-boarding estimates for Line B1 combined with observed boarding numbers for Line B during the busiest hour, the morning rush hour and show numerically that adequate capacity exists (both now and in 5 years) such that no one has to wait more than 2 trams to board or 10 minutes whichever is less.

It is the opinion of Platform 11 that the EIS is defective as it fails to identify the negative impact on existing Line B passengers caused by additional passenger loadings as a result of the proposed Line B1 extension.

## **6 Metro Upgrade**

Throughout the entire documentation accompanying the works order the word "Metro" appears twice: Page 6 volume 2 and chapter 9, page 1 chapter 1 volume 1.

Both references are generic and no detailed reference is made to the later upgrade of the Line B1 proposal.

We note:

Outside the city centre the Metro would be elevated for much of its length, where there was no existing rail corridor, to avoid at grade interfaces. This **dedicated line with full segregation** allows a fast, frequent, and reliable service<sup>2</sup>.

In a recent parliamentary question titled “If proposals to construct a Metro line from Shanganagh to the city centre have not been dropped completely”, the Minister for Transport responded:

Luas Line B1, one of the first projects to be rolled out in the implementation of Transport 21, involves a 7.5 km extension to the Luas Green Line southwards from Sandyford to Cherrywood. Transport 21 also provides for the extension of the Luas line from Cherrywood to Bray by 2015. **These extensions will be implemented having regard to the continuing strategic objective of upgrading the line to Metro in due course.**<sup>3</sup>

The proposed works order is clearly not in line with 'Platform for Change', the views of the Minister for Transport or indeed stated government policy. In light of this we consider the proposed line contained within this works application not to be in line with the wishes of the Minister for Transport and as such should be rejected.

## 7 Design Issues

In this section we wish to raise design and operational issues contained in the proposed works order if it is decided to proceed with the non Metro option which we have highlighted.

### 7.1 Depot Connection

Area B1 – RO 13 O – A (Sandyford Stop and Depot)

The provided plans show the Sandyford Depot to have only one single-track connection to the line. Since Line B opened there have been 2 separate incidents in which a tram has derailed between Sandyford stop and Sandyford Depot, forcing a partial closure on one occasion and total service suspension on the other. This single connection is the most critical piece of track on the entire Luas network.

It should be noted that the Red Cow depot has two independent connections each consisting of two tracks, Sandyford depot has only one single track section and the applicant has not sought to rectify this deficiency despite service experience which indicates a second connection should be provided.

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<sup>2</sup> Metro – Dublins Biggest Infrastructure Projects, RPA Railway Procurement Agency Ireland <http://www.rpa.ie/?id=65>

<sup>3</sup> Ref No: 36028/05 November 24th 2005  
<http://www.transport.ie/viewitem.asp?id=7141&lang=ENG&loc=1858>

Consideration should be given to provision of a connection, namely a 'delta junction', such that trams approaching from Line B1 can access the depot directly without having to reverse at the Sandyford station stop.

## **7.2 Routing Options Sandyford - Leopardstown Roundabout**

Area B1 – RO 13 O – A (Sandyford Stop and Depot)

Area B1 – RO 13 A – B (Blackthorn Avenue - Leopardstown Rd Roundabout)

We believe two superior alternative routes exist between Sandyford stop and the proposed Central Park stop.

### **Option 1**

Continue on the Harcourt street alignment in parallel to the current depot to Brewery Road turn left and continue on the left-hand side towards the Leopardstown roundabout, see attached map.

Benefits

- Reduced land acquisition
- Provides full segregation
- Minimises disruption to existing Luas services during construction phase
- Provides access to depot from both north and south sides
- Maximises use of existing Harcourt Line, much which is in state ownership

### **Option 2**

Continue on the Harcourt street alignment in parallel to the current depot to Brewery Road. Cross Brewery Road and proceed on Harcourt Street alignment to Leopardstown Road. Cross Leopardstown Road and turn right proceeding towards the Leopardstown Roundabout, leave Leopardstown Road and proceed through the area occupied by a redundant ESB pylon between the Leopardstown Road and Tudor Lawns estate then enter Central Park.

Benefits

- Eliminates need for bridge over Leopardstown roundabout
- Minimises disruption to existing services during construction phase
- Provides access to depot from both north and south sides
- Maximises use of existing Harcourt Line, much which is in state ownership

### **7.3 Emergency Crossovers**

Area B1 - RO 15 A - B (Racecourse Stop)

We note no emergency crossovers on the proposed 7.6km alignment. We note two emergency crossovers are provided on Line B, which is of similar length to the proposed extension. We propose that an emergency crossover be provided at the stop referred to as Racecourse, planning reference Area B1 - RO 15 A – B.

This may appear to be easily added later however we understand addition of a crossover requires permission of the Department of Transport.

We propose that a trailing crossover with respect to trams travelling on the down line (Cherrywood direction) in the normal running direction be provided approximately 50m north of the proposed station. This will facilitate shuttle services to the racecourse. Furthermore that electrical isolation be provided south of the Racecourse stop combined with the crossover would allow services to be maintained north of the Racecourse stop should the line southwards be closed for any reason.

Irrespective of the provision of a stop at the location indicated in the plans this crossover remains a critical element in ensuring the flexibility of the system.

### **7.4 Road Crossings**

There are numerous at-grade road crossings on the proposed Line B1. The majority of these crossings are adjacent to 'T junctions' thus creating a significant possibility of accidents as road traffic turning left onto the minor road are hindered by poor sightlines and thus may not see oncoming trams until they have completed their turn.

The presence of numerous road crossings will have a negative effect on reliability, a fact demonstrated by the Red Luas line which failed to meet its journey time targets. Complex and extremely well planned traffic signalling and signage will be required.

## **8 Stations/Location of station**

Location of stop named Racecourse Stop (Occasional) is of concern. No provision is made to provide access to this stop.

The question must be asked would a passenger from the city centre not reach the public areas of Leopardstown Racecourse quicker (and cheaper) by disembarking at Sandyford and walking. In light of the use of the term 'occasional' this stop adds nothing to the local area.

Stop should be removed from plans, noting local area adequately served by proposed Carrickmines and Ballyogan Wood stops. Alternatively applicant to redesign to incorporate local access, rename station to a more accurate title and provide a normal service level.

## 9 Procurement

We note and object to the actions of the applicant with respect to the issuing of tenders for works related to the construction of the works contained within the works order under consideration.

We note and object to tenders which published in advance of submission of the draft works order to the Minister. A number of recent tenders are in respect of works, which are part of this works order application such as the bridges over the M50. These actions in our opinion undermine the authority of the public inquiry, as the applicant would appear to have already selected a route, has issued tenders and is in the process of engaging third parties by contract to perform works for which they (the RPA) have no authority to yet undertake.

We note the following tenders/awards have been issued covering key elements of the works contained with the application at hand.

### **Luas Line B1 Utilities Infrastructure Mapping,**

Contract No: B1\_151, awarded 06-May-2005, published notification 10-Oct-2005

[http://www.etenders.gov.ie/Search/Search\\_Show.aspx?ID=OCT045887](http://www.etenders.gov.ie/Search/Search_Show.aspx?ID=OCT045887)

**IRL-Dublin: works for complete or part construction and civil engineering work** Contract No: B1\_100 Utilities, issued 16-Sep-2005

[http://www.etenders.gov.ie/search/search\\_show.aspx?ID=SEP044474](http://www.etenders.gov.ie/search/search_show.aspx?ID=SEP044474)

Realignment of Ballyogan Rd and light rail construction

### **IRL-Dublin: engineering works and construction works**

Contract No: B1\_300 Structures, issued 16-Sep-2005

[http://www.etenders.gov.ie/search/search\\_show.aspx?ID=SEP044473](http://www.etenders.gov.ie/search/search_show.aspx?ID=SEP044473)

Bridges over M50 and Leopardstown

## 10 Alternative

In light of the major deficiencies in the applicant proposals we propose that the works proposal put forward by the applicant be rejected on the basis that it does not integrate with accepted transport planning for Dublin and the views of the Minister for Transport.

We also contend that the proposal will place an unbearable strain on the existing Luas Line B by massively increasing passenger demand on what is already a very heavily used service, which has capacity issues in the morning peak.



We propose that the former Harcourt Street alignment be followed throughout and in doing so provide an alignment with good segregation, which could be easily upgraded to metro standard in future years in line with government policy.

#### Benefits

- Shorter route
- No major civil engineering required, no bridges
- Minimal environmental impact
- Increased segregation
- Reduced land acquisition
- Easy upgrade to metro

The only two issues of concern are:

The site of the former station at Leopardstown racecourse is built on, however extensive green space exists to allow a deviation. We propose a station here to be called Foxrock to serve both the racecourse and Foxrock.

Second is the former Carrickmines station, this is common with the section proposed by the applicant and thus is not in addition to works already proposed.