

DUBLIN 15 COMMUNITY COUNCIL

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Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart

By e-mailed to info@rpa.ie
Public consultation.
Railway Procurement Agency,
Parkgate Business Centre
Parkgate Street
Dublin 8

19 February 2007

Re: Metro West Submission

Dear Sirs,

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observations on the call for public consultation on the proposed Metro West. In preparing this submission, the community council engaged its membership in extensive discussions and this submission represents the consensus views of the Dublin 15 Community Council members.

1.0 General

The Dublin 15 community council welcomes the proposed Metro West service for Dublin – West in general and Dublin 15 in particular.

We have specific concerns as follows:

- ❑ Impact on Porterstown Park of the proposed Depot - impact on scarce playing pitches, and the inappropriate location in the environmentally sensitive Liffey valley greenbelt.
- ❑ Recommended location for Depot
- ❑ The proposed route of Metro West across Porterstown Park.
- ❑ Route through Blanchardstown.
- ❑ Proposed interchange with Irish Rail at Porterstown
- ❑ Proposed interchange with Metro North at Silloge

We believe that these issues need to be addressed to if the Metro West is to effectively meet the needs of the residents of Dublin.

2.0 Growth of Dublin 15 and the demand for transport solutions.

The greater Blanchardstown area (Dublin 15) was earmarked from the early seventies as one of County Dublin's three new towns. It has been anticipated for the past twenty years that this area would eventually accommodate a population of circa 100,000 persons.

In the past few years the Ireland has undergone a radical transformation. Our economy has achieved annual growth rates, which are the envy of our European partners. All indications are that for the immediate future, the economy will continue to grow at levels exceeding the EU norm. The greater Blanchardstown area is currently one of fastest growing regions in the EU and an important area in terms of satisfying the appetite of the 'Celtic Tiger'.

With the explosion in economic development and the growth of residential developments in Dublin 15 have come many of the associated problems that accompany such success.

Those relevant to this proposed Metro are:-

- ❑ Higher demand for housing.
- ❑ Increased inward investment in industrial / commercial activity, much of which is multinational in nature.
- ❑ Tremendous demand for Public Transport.
- ❑ Greatly increased levels of car ownership.

The effect of this is the carrying capacity of existing roads infrastructure being exceeded by demand and this is evident during peak time commuting.

Early in the new millennium the target population for Blanchardstown will have been reached.

2002 census data is as follows:

- ❑ The Dublin 15 area has grown rapidly from 53,221 in 1996 to 69,566 (census figures) an increase of 31%.
- ❑ Within Dublin 15 some areas have increased by 60%.

2006 census data is as follows

- ❑ The Dublin 15 area has grown rapidly from 69,566 in 2002 to 90,952 (prelim census figures) an increase of 20%.

Future expansion

- ❑ There was land zoned to build 13,732 new homes in Dublin 15 prior to the adoption of the current development plan. The 2005 – 2011 plan added additional residentially zoned lands at Barnhill to the west and Hollystown to the north east of Dublin 15.
- ❑ Fingal development board report (strategy 2002-2011) predict Dublin 15 population reaching 118,000 by 2011 based on current zoned lands
- ❑ CSO population trends: The report forecasts that the figure for Dublin will grow by 317,000 by 2021 (from 1.123 million) a 28% increase. It is expected that development pressure will continue in Fingal and in the Dublin 15 area.

Fingal County Council became concerned at this rapid growth and commissioned the "Blanchardstown Catchment Area Integrated Development Framework" study.

This report was developed by SIAS and studied the transport demand. Both the Dublin 15 community council and the Rail Procurement Agency contributed to this report.

One of the surprises in this report was the volume of non-Blanchardstown residents who travel into the area to work. The SIAS report contains a traffic study & predicts the following flow

External Trip rates (AM peak hr)

Year	In bound	Outbound	Total
2006	17656	14974	32630
2010	31926	22591	54517

Since the late seventies the Dublin 15 Community Council and others in the area have relentlessly campaigned for investment in both rail and bus services for the region. It is intuitively obvious that the area can not continue to grow without this growth accommodated by public transport.

In our opinion the following are some of the factors that have played a part in arriving at the current situation.

- ❑ Failure to provide a proper roads infrastructure ahead of development.
- ❑ Unwillingness to invest in public transport prior to developments coming on stream. It can be years later before either bus or rail serves residential areas e.g. Castaheaney, Diswellstown (West End) etc.,
- ❑ In early nineties too much emphasis placed on car / roads based solutions.
- ❑ Lack of unified approach to development and the provision of physical infrastructure in the greater Dublin Area. Various bodies have not consulted each other or properly co-ordinated their respective approaches.
- ❑ Lack of integration of public transport has deterred the public from using it (planning, operations, feeder buses to trains etc, timetables, integrated ticketing, fares structures)
- ❑ Public transport is perceived as unreliable, infrequent, overcrowded, time consuming and costly
- ❑ Haphazard approach to planning and development, widely believed to have been developer led.
- ❑ Failure to require developers to undertake major roads building at the outset of a commencement of a development, i.e. Allowed them to do it on a piecemeal basis thereby incurring long delays in building distributor roads etc.

Car usage

The levels of car ownership in Ireland have exploded in recent years (The increase in vehicle numbers from 1.02m in 1989 to 1.6m in 1999 (including 1.27m cars) gives some indication of the increase in traffic). The growth in car ownership are expected to continue to climb until European levels of car ownership are reached.

Fingal County residential areas are outer suburban locations, which are not easily accessible by public transport, neither are the vast majority of our facilities or services within easy walking distance. In these circumstances it is a fact that residents in Outer Suburbia rely more heavily on cars for mobility than do inner city residents.

Access to Public Transport

For decades we have experienced serious deficiencies in the provision of public transport in relation to newly emerging residential areas in Dublin 15. The scenario is outlined thus;

- ❑ New house built.
- ❑ Main Distributor/Access Roads only laid to entrance of the new phase to accommodate building of most recent phase of development.
- ❑ Houses occupied.
- ❑ No public transport (mainly Buses) available within reasonable distance.
- ❑ Dublin Bus won't provide service due to incomplete road network/and claim insufficient demand from new house occupants.
- ❑ New residents have to rely on private car and then establish commuting pattern, which is car based.
- ❑ Generally, years later Dublin Bus provide service once the entire area is built upon, however, commuting pattern now well established and therefore difficult to break.
- ❑ The element of choice has been removed/was never really available for the new residents.

We must provide the choice between public/private transport as soon as a newly built area is in occupation. Public Transport - To be effective must be

REGULAR, RELIABLE, ACCESSIBLE, AFFORDABLE AND FLEXIBLE

There is no doubt that a holistic, integrated and targeted approach is required to effectively deal with the communication issues posed by the extent of the existing and planned development in Dublin 15. Any solution must include a comprehensive mass transit system to enable the public travel to /from this area daily. Any strategy developed must recognise where people live/work in Dublin 15.

- ❑ The vast majority leaves the area to go to their place of employment.
- ❑ The vast majority of those who work in Dublin 15 do not live here.

The DTO stated aspiration of the vast majority of commuters using mass transit systems to go to /from work etc in the foreseeable future will take some years to achieve. The Metro West proposal will address this need in conveying people along the proposed route and in providing the connections to the radial Heavy Rail lines, Light Rail Lines and Bus Routes.

3.0 Specific concerns with the Metro West Proposal

3.1 Proposed Depot at Porterstown Park

The proposed location of the maintenance Depot at Porterstown Park **is not acceptable**.

The impact of this decision would be to take out one of the largest recreational facilities in Dublin 15. This proposal impacts a part of Fingal County where there is a major sporting infrastructure deficit.

- Based on the Size of Depot for the Luas at the Red Cow roundabout, with maintenance sheds, the staff car park and the sidings the site is measuring roughly 300m x 300m x 420m (its a triangle), making it 45,000 sq.metres or 4.5 hectares (just over 11 acres).
- If the Metro West maintenance depot is the same size as the one at Red Cow (is there any reason to suppose it would be smaller?) there would be virtually nothing left worth saving in Porterstown Park if the depot is located there. This proposal will take out the following pitches:
 - Soccer 4 full size (senior) pitches and 4 full size (junior) pitches shared between Castleknock Celtic & St Mochta's FC's (These clubs have a membership in excess of 1000 members, predominantly children)
 - GAA 1 full size (senior) pitch, shared between Castleknock Hurling & Football Club and Eireann Go Brath. (These clubs have a membership in excess of 1000 members, predominantly children)
 - Metro St Brigid's running track.
 - Passive recreation walking route.
 - Field for St Mochta's RC parish summer fête
- Impact of noise on Porterstown church, from both rail car noise & maintenance depot noise, will disrupt religious services. It is not a good example of sustainable planning to surround a church with a significant industrial development.
- The road infrastructure in the vicinity of Porterstown Park is totally inadequate to serve the needs of a maintenance depot. The roads structure is of narrow country roads unsuitable for HGV. It is long standing policy of Fingal County Council not to upgrade these roads to protect the scenic character of the area, it's green belt status and it's proximity to the Liffey Valley Special Amenity Order area.

3.2 Proposed route across Porterstown Park

The proposed route of both Metro West options (1 and 2) across Porterstown Park has a considerable impact on the recreational amenity.

- ❑ Impact of rail route on scarce playing pitches, proposed route runs through 2 senior football pitches, 1 junior football pitch and development league pitches).
- ❑ Impact of route crossing the playing pitches is not the same as crossing the Luas in the city centre, children will be chasing ball and exercising the care and attention expected in a park rather than a busy street.
- ❑ Ball protection will be required at rail line boundary.
- ❑ Proposed route appears to follow the line of the Bord Gais high pressure / high capacity natural gas line. We are concerned that this should be minimised to reduce the possibility of rupture to this natural gas line, for obvious safety reasons.
- ❑ The placement of a light rail system through the only quality park that currently exists in the greater Dublin 15 area quite frankly has amazed many of the residents of this area. Quite apart from the ball sports participants, this Park is heavily used by local residents for many purposes- walking, casual kick-about, family outings, etc:- all which can currently be enjoyed in a peaceful, rural like environment.
There is no other facility like this in our area.
To follow your proposals would be in direct contravention of sustainable planning and development.
We do not subscribe to the principal of development / public transport provision at any cost.

Feasible alternatives exist and we would ask you to look favourably on the following suggested alternatives.

We request the RPA to look at an alternative route, which avoids entering the lands at Porterstown Park. We propose that the rail route run parallel to Rugged Lane, in lands in the ownership of Luttrellstown Castle:

<http://www.gmap-pedometer.com/?r=689892>

Clearly there would need to be protection of the rail line from golf balls.

We request that the River Liffey crossing be located as far to the west as possible. In this respect Route Option 2 should be chosen for the Liffey Valley crossing. If necessary the line could run from Lucan to the Liffey Valley Shopping Centre (if the selected route is required to link with this shopping centre).

The Dublin 15 Community Council is fundamentally opposed to a new road crossing the Liffey Valley with the Metro West because of the chaos this would cause to the Dublin 15 road network. It is worth noting that this option was evaluated by Fingal County Council and abandoned because of the impact it would have on mobility in the greater Blanchardstown area.

3.3 Sporting infrastructure deficit in Dublin 15 area.

Lack of facilities in the Dublin 15 area

We would like to draw attention to The Fingal Sports Strategy 2003-2007 published by the Fingal Sports Partnership (Fingal County Council, the County Dublin VEC and the Campus Stadium Ireland).

The report states (page 10):

“The largest single issue highlighted by sports clubs across Fingal was the access to, availability of, or the complete lack of facilities available to them to provide for their sport. The range of difficulties relating to facilities and grounds varied from security and safety of premises to lack of changing facilities or parking to unavailability of the desired facilities at appropriate times.

The situation relating to facilities is outlined in greater detail by the Collier & Broderick study. In some parts of the county there are proportionately less facilities per capita (this will be exacerbated by projected population growth) than in older longer established communities. This is the case in many parts of Dublin 15. While particular attention needs to be directed at these areas there are also needs in all of the areas across the county. The Collier & Broderick (p.21, 2002) study illustrates that 3 areas (Blanchardstown, Castleknock and Swords) with the greatest growth in population between 1996 and 2002 are now the most deprived in terms of facilities compared with other parts of the county.”

Chapter 3 page 17 *“In Dublin 15 (greater Blanchardstown and Castleknock) which has 75,000 people and is expected to grow to 100,000 by the end of the decade there very few sports clubs proportionally when compared to the rest of the county. Map 1 illustrates this as there is a higher proportion of sports clubs with their own facilities along the coastal areas and in Swords.*

In addressing the disadvantage experienced by Dublin 15 and Swords area, we believe that the funding should be targeted at these areas. When we talk of disadvantaged areas, the Castleknock, Blanchardstown and Swords areas are not areas that are associated with disadvantage. In the past clubs in similar areas would have fundraised to acquire playing fields, facilities etc

The issue that make it very difficult for sporting organizations on their own to provide facilities is the cost of acquiring lands. The situation arises due to speculative pressure on land in proximity to residentially zoned land in the Dublin 15 area which has made it virtually impossible for clubs to purchase their own lands.

The proposal to take out the playing fields in Porterstown Park to make way for a depot to service Metro West is unfair, as it removes a substantial amount of playing pitches from the Castleknock area and results in a major loss of amenity for an area that is under represented in it’s allocation of playing pitches and sports facilities.

3.4 **Recommended option for Depot.**

The Metro West propose 3 options for a maintenance depot, we believe the Depot should be located at Silloge or Harristown.

- ❑ This would offer the opportunity for Metro West, Metro North and Dublin Bus to develop a centre of excellence in this area. While much of the maintenance would be done “in house”, co- location would provide the opportunity for specialist sub contractors to support the maintenance of the transport infrastructure.
- ❑ Possible co- location of the Metro West and Metro North Depot resulting in considerable capital saving.
- ❑ Greater accessibility for support staff and engineering suppliers due to its close proximity to major national /regional road network (M50 & M1), Dublin Port(Port Tunnel) and the airport for spares/engineer support.
- ❑ Area already identified as an area zoned for industrial use and not environmentally sensitive as either of the two alternative options proposed.

3.5 **Recommended Route through Blanchardstown.**

The Dublin 15 Community Council recommends Option 2 - Blanchardstown Road South & North, past Blanchardstown Institute of Technology, through Abbotstown and to the airport for the following reasons:

- ❑ Both routes provide equal access to the Blanchardstown Town Centre.
- ❑ The alternative Route 1 runs through Verona’s playing fields. As argued in section 2.3 this will remove some space for active recreation (playing pitches) from the Blanchardstown area and erode amenity for an area that is under represented in it’s allocation of playing pitches and sports facilities.
- ❑ Impact of route running around the playing pitches is not the same as crossing the Luas in the city centre, children will be chasing ball and exercising the care and attention expected in a park rather than a busy street.
- ❑ Children in Coolmine Community School access the Blanchardstown Town Centre daily, they will have to cross the metro line if option 1 is selected.
- ❑ Option 2 links up with the proposed bus centre for Blanchardstown Town Centre.
- ❑ Option 2 maximizes access to the Science & Technology zoned lands (this industrial area is 7 times the size of Sandyford Industrial Estate). There is considerable development potential in these lands for job creation.
- ❑ Route up Blanchardstown road South should run along the road reservation rather than through the Millennium Park

- ❑ Park & Ride in the Blanchardstown Town Centre is **not a feasible option**. The current draft master plan for the Blanchardstown Town Center anticipates reducing level of car parking as the center expands. While access to Metro West will provide signifying public transport access, the master plan is not compatible with a park & ride location for Metro West. Presently park & ride is discouraged by closing some of the car parks to morning commuters. Park & Ride should be located at Irish Rail’s proposed Park & Ride at Pace (located North West of Clonee, Co Meath).
- ❑ We have a concern with the proposed grade level crossing of the Ongar Road (south of the Millennium Park). This junction suffers from congestion during the morning peak hours, where traffic is stationary with a tail back around the roundabout on Blanchardstown Road South. The proposed grade level crossing of the Metro West at this point will result in a dangerous situation. We request that the RPA consider a under pass of the Metro under the road at this point. The existing rail reservation and building set back along Blanchardstown Road South appears adequate to construct an underpass. While this may appear an unwelcome additional cost the pay back will be in the efficient running of the metro service.
We would also mention that it is international best practice to avoid the use of grade level crossings for metro type operations as they are seen as impediments to the delivery of an efficient interruption free service .
Where have many of the difficulties and interruptions to the existing LUAs services arisen – we understand that many have occurred at / close by grade level crossings.

3.6 Proposed interchange with Irish Rail at Porterstown

- ❑ RPA need to actively discourage car parking at this key transport node. There is no land for park & ride in this locality. Providing a nominal car park will encourage cars into the area with the resulting parking in the residential areas. This situation is demonstrated at the adjacent Irish Rail stations of Coolmine and Clonsilla. At Coolmine a modest car park is provided, this rapidly fills up with the resulting overflow on the Riverwood distributor road at the Luttel Park estate. When morning commuters drive their car to the Park & Ride, they are committed to leaving their car close to the station. For this reason we recommend no car park at this station. Clearly the local authority will have to enforce “residents only” parking in the adjacent estates.
- ❑ Park & Ride should be located at Irish Rail’s proposed Park & Ride at Pace on the Clonsilla – Hansfield – Dunboyne line. This should be a substantial facility capable of intercepting commuters from Navan and the North West as well as residents in Dublin 15. Inter agency rivalry should not inhibit joined up thinking in the context of the “Transport 21” master plan.
- ❑ The Dublin Bus No. 37 terminus is located close to the proposed interchange with Irish Rail at Porterstown on the Diswellstown Road, the planning permission that Castlethorn have for the residential and commercial development at this interchange is designed to facilitate the location of the No. 37 terminus within the development facilitating access to Metro West via the No. 37 Bus.
- ❑ Fair Integrated ticketing between the Metro West, Irish Rail and Dublin Bus is key to getting Metro West to work.

3.7 **Proposed interchange with Metro North at Silloge.**

The Metro West offers the opportunity to interconnect vast areas of Dublin West through the:

- Interchange with the Kildare Railway,
- Interchange with the Maynooth Railway,
- Interchange with the existing Luas Red Line,
- Interchange with the proposed Luas extension to Citywest
- Interchange with the proposed Lucan Luas line.

The catchment area includes residential and areas zoned for new residential development, industrial and areas zoned for new industrial development, the Sports Campus Ireland site with potential a very large sports stadium.

The actual commuting pattern along the Metro West is not clear at this stage, so the interchange with Metro North should facilitate a variety of options to meet present and future commuting needs. We recommend:

- Design of rail line should permit Metro West lines travel onwards to the Airport or onwards to the city centre based on commuter demand.
- Design of rail line should permit Metro West lines travel from the Airport and to the city centre. Both of these options need to be built into the service from the outset (learn from past failures , such as the M50 two lanes rather than three, placing toll plaza in the midst of the M50 etc).

It is important that this flexibility is designed in the first phase as the Metro West will be a catalyst for development at the junction of Metro West and Metro North similarly to the experience on Luas. If not planned for day 1, this flexibility will be lost.

We are available to discuss further any of the issues raised in our submission.

Yours sincerely,

Dublin 15 Community Council