



dublinchamber
of commerce

**Dublin Chamber of Commerce
Submission to An Bord Pleanála**

RPA Railway Order for Luas Broombridge (Line BXD)

13th August 2010

Preface

Dublin Chamber is disappointed that this submission had to be prepared without sight of the findings of the planning inspector in relation to the Railway Order application for Metro North. It would have been beneficial to assess the Railway Order application for Luas Broombridge in light of the conditions attached to the Metro North works. Dublin Chamber reserves the right to make additional comments once we have had adequate time to review the inspector's report on Metro North.

Many of the issues raised in this submission also concern the delivery of Metro North and DART Underground. Consequently, this submission should be cross-referenced with Dublin Chamber's submission of 29th October 2008 to An Bord Pleanála regarding the RPA Railway Order for Metro North (see appendix 1). Dublin Chamber will also be making a submission on the Railway Order application for DART Underground. Please cross-reference with this document also.

1. Introduction

Without appropriate mitigation measures, the construction of the Luas Broombridge line could severely hinder the operation of businesses in the city centre. Unlike other major rail projects such as Metro North and DART Underground that are site specific, this entire project will be constructed at surface level, on-street and through the very heart of the city. It will forever change the road network in the city centre.

There has been no clear exposition to date as to how the impact on business during construction is to be minimised. In addition, there is no proposal as to the future of traffic routing for public and private vehicles in Dublin once LUAS Broombridge is operational.

2. Value of the project

Dublin Chamber supports the Transport 21 programme for the Dublin City Region. Metro North, DART Underground and the Luas extension projects will play an important role in delivering an efficient, integrated and coherent transport network in the Dublin City Region. Transport 21 will help to realise Dublin Chamber's goal of transforming Dublin into a modern dynamic competitive City Region, and Dublin City Council's vision to achieve a compact, sustainable and connected city.¹ Overall the rail projects proposed under Transport 21 will increase transport options, potentially shorten commuting times and reduce carbon emission levels.

The Luas Broombridge project is identified under Transport 21 as an element that enhances the connectivity of the whole rail based public transport network in the Greater Dublin Area, interchanging with other Luas lines, the suburban railway line and Metro North and DART Underground when built. Most importantly, it provides the "missing link" in the Luas network serving the city centre, connecting the Luas Green Line from St Stephen's Green to O'Connell Street and provides an interchange opportunity with the Luas Red Line at Abbey Street.

The RPA has offered an assessment of the need for this project.

- "To cater for the existing and future demand for cross-city trips and to offer greater penetration into the city centre with enhanced accessibility to employment areas, administrative, health, justice, educational institutions, retail areas and historic and cultural attractions
- To create a Luas network and in the process an integrated public transport network which supports national, regional and local policies aimed at reducing the reliance on private car trips;

¹ This vision is shared by Dublin City Council ('Dublin 2030' is a compact city, with a distinct character, a vibrant culture and a smart, innovative economy. It's a city of urban neighbourhoods, connected by good public transport and green spaces. In 2030, Dublin is one of the most sustainable, dynamic and resourceful cities in Europe) Draft Dublin City Development Plan 2011-2017, <http://www.dublincitydevelopmentplan.ie/vision.php>

encouraging the use of sustainable transport modes, and providing for sustainable development and relief of congestion".²

Dublin Chamber concurs with this assessment, but feels that a detailed cost/benefit analysis of the impact of the project should be published and made available in advance of the commencement of the Oral Hearing.

Overall in relation to this project and the Metro North and DART Underground projects, the focus of and highest priority for Dublin Chamber and its members continues to be the successful delivery of all these rail projects with minimal disruption to the commerce of the Dublin City Region.

3. Protecting the city centre

Dublin Chamber's support for the Luas Broombridge project is based on an overarching strict condition that it is 'business as usual for all businesses' during the enabling works, main construction works and when Luas Broombridge is fully operational. In addition, Dublin Chamber calls for this project to be built concurrently with Metro North and DART Underground.

LUAS Broombridge criss-crosses the heart of Dublin city centre which attracts workers, shoppers and tourists in large numbers daily. The adverse effects of the construction work of this, and the Metro North and DART Underground projects, need to be mitigated so that businesses can continue to operate effectively and the city remain attractive to all users (workers, shoppers, tourists etc).

Dublin Chamber participates in a number of the groups set up under the auspices of Dublin City Council to produce and direct a comprehensive contingency and communications plan for the Dublin City Region during the construction of the Transport 21 projects. Dublin Chamber is committed to proactively participating in, and contributing to, these groups; yet we are still concerned about the ability of businesses to continue to trade through the construction of these projects. Dublin Chamber believes special attention on the part of the responsible transport agencies, public authorities, an Garda Síochána and an Bord Pleanála is warranted on:

- 1) The construction period for the three rail projects in the city centre;
- 2) Traffic management, access to premises and the re-routing of traffic in both the short and longer term; and
- 3) Communicating the scale of the disruption to all users of the city in a positive way and marketing the city as fully open for business.

3.1 Period of construction

The marked downturn in economic activity over the past two years has depleted the reserves of businesses. The Dublin business community has genuine concerns about their ability to remain trading through a protracted period of disruption due to the construction works for Luas Broombridge, Metro North and DART Underground projects. Dublin Chamber is disappointed that a detailed impact assessment of the cumulative impacts of delivering these three projects has never been completed by the RPA and Irish Rail. We call for this report to be compiled and published prior to the opening of the public hearings for the DART Underground and Luas Broombridge.

Without detailed evidence from the agencies delivering these projects why these projects cannot be delivered concurrently, Dublin Chamber believes the combined construction works should be conducted in as short a period as possible and be completed in a period of no more than five years. A protracted period of construction could deter existing and potential investment, leading to a sharp and possibly irreversible decline in business activity in the Central Business District. As the Dublin City Region competes with other city regions abroad, a decline in investment could lead to a

² Luas Broombridge, St. Stephen's Green to Broombridge (Line BXD), Environmental Impact Statement, Part 1 - Chapters 1-7

reduction in taxation revenue for both Dublin City Council and the Exchequer. Consequently, a short period of disruption, during which the simultaneous construction of these three projects occurs, is the only option that should be considered.

Dublin Chamber is concerned that the Metro North, DART Underground and Luas Broombridge projects are each being treated and managed as separate projects by separate teams. This is not the most effective form of organisation, particularly if the goal is to achieve a short, coordinated construction period. Consequently, Dublin Chamber calls on the RPA to:

- Undertake appropriate and comprehensive integrated planning collectively with the other public transport providers;
- Engage openly and extensively with businesses operating in the affected area; and,
- Take full responsibility for the impact on the Dublin city centre environment of delivering this project.

Dublin Chamber believes that if Irish Rail and the RPA take responsibility for their actions and those of their contractors, and fully engage in an open and honest manner with each other and businesses in the area, then there is no reason why construction of the Metro North, DART Underground and Luas Broombridge projects cannot be undertaken together and be effectively managed.

Dublin Chamber strongly disagrees with the RPA's proposal within the EIS to undertake the main body of the works following full road reinstatement, after the construction of Metro North.³ This will reinforce the perception that the Central Business District is inaccessible and is a construction site for a prolonged period. Furthermore, the re-opening for construction purposes of streets that have just been refurbished after construction of Metro North and DART Underground will give credence to the perception that the delivery of these programmes has not been coordinated and that taxpayers money has been wasted.

Dublin Chamber recognises that the simultaneous delivery of the Metro North and Luas Broombridge projects poses challenges for the RPA who will have two contractors on-site within the city. At a minimum and acknowledging procurement timelines, we believe that An Bord Pleanála must be swift in their consideration of the Luas Railway Order application to allow the RPA (if permission granted and funding secured) to move ahead with their plan "that elements of the proposed scheme infrastructure (track bed, rail, stop platforms, pole foundations, etc.) would be included within the Metro North scope of works for the main works contract at St. Stephen's Green West, St. Stephen's Green North, Westmoreland Street, and O'Connell Street Lower between Bachelors Walk and Henry Street."⁴

3.1.1 Hours of construction

Dublin Chamber has many members offering culture, leisure and hospitality services in the city centre. They have strong concerns about the impact of noise, vibrations and dust levels on their premises and the visible impacts on the physical environments adjacent to construction works. Whilst it is accepted that some disturbance during construction will be inevitable, they want this to be short lived and properly controlled to ensure it is not at an unacceptable level that will impact on their operations or attractiveness.

Dublin Chamber submits that a condition be attached to the Railway Order to the effect that the RPA should continue to liaise with all occupants of the buildings that are close to the works – particularly those sectors identified above - during the course of the enabling and construction works to ensure

³ "Initial phase prior to commencement of Metro North main works and comprising localised utility works and cellar reconfiguration at various locations within the city centre. At each location these concurrent works are likely to be in the order of two months in duration within a total duration of approximately 12 months; The proposed scheme works will commence following the reinstatement of the roads by the Metro North main works contractor and taking cognisance of any requirements for the 1916 commemoration services". Luas Broombridge, St. Stephen's Green to Broombridge (Line BXD), Environmental Impact Statement, Part 1 - Chapters 1-7

⁴ Luas Broombridge, St. Stephen's Green to Broombridge (Line BXD), Environmental Impact Statement, Part 1 - Chapters 1-7

their concerns regarding noise, dust and vibrations are addressed, and to identify a suitable compromise on work hours.

On the condition that the request above for action on the part of the RPA is met, Dublin Chamber submits that where possible all construction should proceed on a 24/7 basis and that a condition be included in the Railway Order to that effect. We do not support the blanket restriction on construction hours such as those attached to upgrading works on the M50 and construction of the Port Tunnel, and we believe that that the proposed construction hours of 8am–6pm, Monday–Friday; and 9am–4pm, Saturday, will only delay delivery and further damage the vibrancy of the city centre. Indeed, the absence of a regular construction schedule on Sundays or outside peak times appears incompatible with effectively trying to manage traffic and project delivery. We firmly believe that any reviews to 24/7 construction must be location and building specific. Dublin Chamber supports the RPA’s proposal that “some work, in particular on busy road junctions, railway crossings and in commercial areas, will take place outside of normal construction working hours...Works across certain road junctions will need to be undertaken outside of peak hours and at weekends including Sundays in order to minimise the impact on road traffic movements.”⁵

3.2 Traffic Management, access to premises and the re-routing of traffic

Luas Broombridge will bring construction right through a central, congested corridor with high traffic flows of business vehicles, private vehicles, taxis and public transport. In the shorter term, road space will be lost and traffic disruption is inevitable as roads are closed, traffic is re-routed and construction traffic is brought into the mix. In the longer term, Luas Broombridge will alter the road network through the heart of the city. Dublin Chamber is particularly concerned about the public roads in ‘area 29’ identified by the RPA from St. Stephen’s Green to Parnell Square and believes that:

- During enabling works and the main infrastructure works, effective traffic management will be required to ensure that businesses can continue to trade successfully;
- During the operation of Luas Broombridge, intelligent management of Dublin’s limited road space must occur, with the needs of all users catered to including private vehicle users.

Both the Department of Transport and Dublin City Council⁶ have a vision to get a greater number of people to move onto public transport, and these rail projects are a critical element in realising this vision. Whilst Dublin Chamber supports the promotion of sustainable travel through effective integration of land use and transportation, we are concerned at the possibility that Dublin may become a “donut-shaped city” that is deserted after commuters leave work. Indeed Dublin Chamber believes that the “strengthening the city as the national retail destination” element of strand two of the draft Dublin City Development Plan’s core strategy is not in keeping with their stated priority to “restrict through traffic and calm traffic generally within the city centre and to give increased levels of priority for pedestrians, cyclists and public transport”, nor with their policy “to ensure adequate but not excessive parking provision for short term shopping, business and leisure use; and to control the supply and price of all parking in the city in order to achieve sustainable transportation policy objectives.”

As Dublin City Council will be central to traffic management plans agreed, Dublin Chamber calls on the City Council and the transport agencies delivering the T21 rail projects to properly acknowledge and subsequently cater to the role that car based shoppers, diners, tourists, concert and theatre goers play in the economic life of the city. They must recognise that shopping is a discretionary activity, and any perception of inconvenience caused by disrupted travel patterns due to restrictions placed on private vehicles will simply result in individuals selecting alternative locations to shop rather than promote a move to public transport. The consequences for the city’s rate base will be

⁵ Ibid.

⁶ Dublin City Council’s draft Dublin City Development Plan 2011-2017 seeks to achieve modal share targets crossing the canals of 55% for public transport, 15% for cycling, 10% for walking and 20% for private car use by 2017.

detrimental if agreed traffic plans are not amended to include ones that are good for commuters, bus access, cyclists, pedestrians, business traffic and private vehicle users alike.

The RPA has outlined the key objectives of their traffic management measures that will be implemented:

- Maintenance of pedestrian access to all premises during the works which are safe and of adequate width
- Maintenance of vehicle access routes for servicing of premises
- Continuity of access routes to city centre public car parks serving the retail areas
- Re-routing of bus services as required

Dublin Chamber believes that the first three are the absolute basic requirements for the contractors, and that these should be expanded further to ensure the areas around construction sites remain attractive and easy for pedestrians to use, and private vehicle users to access. Shoppers, tourists, workers and residents need to know that the city centre and all the companies located there are 'Open For Business'. They need to be clearly informed as to how current capacity - people, business traffic, public transport - into the city will be maintained at all times, including an outline as to how access to specific buildings, businesses and car parks will be maintained. Some of Dublin Chamber's members located in the Stephens Green area remain concerned about the lack of clarity in relation to the positioning and indeed the very availability of a permanent loading bays and drop off points for customers during and after construction works. Thus, Dublin Chamber is calling for all traffic and pedestrian plans to be drawn up in consultation and partnership with the business community. In addition, the RPA and the contractors that they hire must remain flexible to respond to, and cater for, problems that businesses within the construction vicinity experience as they arise during construction works, e.g. cash deliveries for banks.

Furthermore, Dublin Chamber believes the contractor should not be responsible for traffic management at each site. Past experience of traffic management by contractors has been poor, with contractors placing traffic cones on the street on an apparently ad hoc basis, taking up parking spaces and blocking roads and access to premises in the city centre. An Gardaí Síochána in association with Dublin City Council - not the RPA or their contractors - must be fully responsible for traffic management at each site, including the making of contingency plans when emergency vehicles need access, or when routes surrounding a site are closed off due to unforeseen circumstances.

Dublin Chamber is extremely disappointed that site specific traffic management contingency plans, which include a local communications plan, are not available given the scale of construction that will be taking place in the city centre. A 24/7 contact number must be made available to businesses to ring if there is a problem with traffic in their vicinity.

3.2.1 Public and private bus operators and taxis

The issue of bus rerouting is one that needs to be appropriately managed both in the short and longer term, as clearly the bus will play a central role during the construction of Luas Broombridge, Metro North and DART Underground. Bus operators and taxi companies need to be consulted so that they can continue to offer their services and compensate for the loss of access for private vehicles at certain locations. The answers to important questions relating to taxi ranks, bus layover, dwell time, bus stop location and re-routing of buses must be fully addressed in consultation with the operators, and then fully communicated to users of the system, in particular businesses who can communicate with their staff and customers. The business community needs to be guaranteed that the public bus operators in particular, and private operators accessing the city centre collecting/ dropping off commuters and tourists, are able to continue to offer high levels of frequency and quality services.

Dublin Chamber accepts that there will be a need to prioritise and improve those modes of transport that are capable of carrying significantly more people within the limited road space. Therefore in principal, Dublin Chamber supports the prioritisation of buses on the road network provided it can be demonstrated that this improves traffic flows across the city centre network and is needed to maintain an efficient, frequent and reliable service to passengers, and does not unduly disadvantage the movement of private vehicles for shopping and business related travel.

Overall if the vitality and economy of the city centre is to be maintained throughout and beyond the construction phase for the Luas, Metro and DART projects, there is a need to bring coherence, understanding and certainty to long-term traffic routing for the city which will inspire confidence and ensure reliability of access for all.

3.2.2 Pedestrians

Unimpeded pedestrian access is essential for many businesses. It is therefore imperative that pedestrian movement is not impaired in and around the construction sites, for example, by optimising pedestrian signals and providing for generous space between shop fronts and hoardings. The Railway Order should attach conditions that ensure the maximum flow of pedestrians that is consistent with the health and safety of the sites under reference.

3.3 Communications & Marketing Plans

As the construction of the Luas Broombridge project will have a short term negative impact on the business and socio-economic environment of the city centre, and result in long term decreased road capacity for private vehicle users, it is critical that the gain from this project is communicated clearly to stakeholders. In addition, the project's delivery is proposed in tandem with the Metro North and DART Underground projects - two of the largest infrastructure projects ever undertaking in the state. An effective, intensive and coordinated communications campaign which has the support and active involvement of all stakeholders - the business community, local authorities, transport agencies, NTA, Department of Transport, an Garda Siochana - will be fundamental to the successful implementation of a citywide transport plan.

This communications plans must clearly and honestly communicate to the general public, businesses and the media the scale, short term construction impact and long term benefits of the Transport 21 rail transport projects. Recognising - and operating within - the limits the tender process puts on disclosing sensitive financial information, Dublin Chamber calls for this communications plan to include information on the economic benefits of this project for Dublin businesses (particularly those in the vicinity of the works) and the economy. Due to the absence of this critical analysis, the true impact of this project on the workers, traders and employers in Dublin is not fully understood.

Furthermore, a comprehensive marketing plan should be implemented that clearly informs all investors, workers, shoppers and tourists planning on travelling into the Dublin City Region that the city centre remains fully accessible and open for business. This will be vital for businesses, particularly those in the cultural, leisure and hospitality sectors.

4. Utilities

Water, telecommunications, waste water, electricity and gas utilities are the lifeblood of the daily operations of any business. Any disruption to the supply of a business' utilities is detrimental to a business' commercial viability. Thus, businesses operating in the vicinity of the Luas works must be informed of the work which needs to be carried out by utility companies and when they are permitted to carry out such works. This programme of works must be created in consultation with businesses and be in place before enabling works begin.

5. Oral Hearing

Dublin Chamber notes that an Bord Pleanála has discretion to hold an Oral Hearing into the RPA's Railway Order application for Luas Broombridge. Given the potential disruption that delivery of this project will cause, the business community strongly urges an Bord Pleanála to hold an Oral Hearing so that all stakeholders views and concerns can be presented and considered prior to the granting of the Railway Order.