

Thank you Inspector for giving me this opportunity to comment on the proposed terminus at Charlemont.

My name is Leo Crehan. I am a Chartered Civil Engineer and I am speaking on behalf of my wife Anne and myself. We live in 11 Dartmouth Square West and the proposed terminus for the Metro is right behind our house, the works for which will extend into and underneath our property.

We fully support the plan to build a metro from the Airport to the city centre; Dublin badly needs such a facility. The metro will have to have a terminus but we believe Charlemont is not an appropriate location for such a terminus. A terminus in an urban context, by definition, should be either at the periphery of the city or in the centre of the city; there is no transport logic in having it in a quiet residential area one kilometre beyond the city centre. And given that particular residential area also happens to be an ACA, neither is there any planning logic to the proposal.

Charlemont is being proposed as the terminus for the metro for one reason only; it featured as the last underground station on the Emerging Preferred Route for the metro which TII published in 2018. And although that plan has long since been abandoned, TII have clung on to as much of it as they can, with Charlemont now becoming a terminus, instead of the original plan to have it as just a station along the route.

Because of this provenance for the Charlemont terminus, it is worthwhile looking back at the sequence of events and catalogue of errors that have resulted in the current proposal.

The Emerging Preferred Route was based completely on the premise that the existing overground Luas line from Ranelagh to Sandyford could be replaced with the new overground Metro. That proposed route involved the line of the metro rising after Charlemont up to the level of the elevated Luas line at Ranelagh and then replacing the Luas line with an overground metro all the way out from Ranelagh to Sandyford. The underground station at Charlemont would have been at a relatively shallow depth, to facilitate the climb up to grade at Ranelagh. The climb would have been relatively simple to construct, rising within the existing stone embankment of the Luas line.

When the plan was launched, it was stated that the existing Luas service would have to be closed for a brief 3 month period. As the Route was being discussed, it gradually emerged that shutting down the Luas was going to take a lot longer than 3 months; the Minister for Transport is on record stating that the shutdown would last between 2 and 4 years. As this would have been completely unacceptable for the users of the service, the communities along the route and the politicians, the proposed overground metro from Ranelagh to Sandyford was quietly abandoned.

There is a widespread misconception that the reason it was abandoned was down to the campaign waged by the residents of Ranelagh against the severance effect of Metro on their community at Dunville Avenue. The real reason is much more fundamental. TII had made a major error in the basis of their design and that error destroyed the entire feasibility of the proposal to cannibalise the Luas line.

That error was the fact that they had misjudged the scale of the Grand Canal Sewer underneath Grand Parade. This is no ordinary municipal drainage pipeline: it is a massive drainage tunnel, approximately 4m in diameter, which is about the size of a London Underground tube tunnel and yet, in drawing up and preparing their plans, TII missed it. They decided they could ignore the

existence of this sewer and build a station at a shallow depth in Charlemont. They needed the station at Charlemont to be close to the surface so that the gradient up to the elevated Luas Station at Ranelagh would not be too steep.

But reality eventually kicked in. They discovered that the sheer size of the sewer meant that, instead of diverting it as originally planned, the metro tunnel would have to go under the sewer. To get under the sewer, the tunnel now would have to go much deeper. Because it would have to go deeper, the station at Charlemont would have to be at a deeper level. Because the station at Charlemont would be at a deeper level, it would no longer be possible to climb up to station level at Ranelagh. It turned out that the track would not have got up to the Luas Line level much before Dunville Avenue. The tunnel would have had to emerge at ground level further into Ranelagh village, causing massive disruption with the need to demolish a lot of housing, particularly on Oakley Road. The 3 months shut down of Luas began to look more like 3 years. And so the proposal to cannibalise the Luas line was quietly abandoned. I believe it is completely disingenuous of the TII representative to state, as he did yesterday, that their belated discovery of the Grand Canal sewer had nothing to do with the reason the project was aborted.

This cock-up has never been acknowledged by TII. They have never admitted that they made this monumental error in their design. They have quite happily gone along with the public perception that it was resistance from the residents of Ranelagh that forced their change in plan. They have continued to push their original plan by keeping alive the pretence that the project can still be delivered in 20 years time. But the basic facts are not going to change in 20 years and irrespective of whatever year they might attempt to do it, the project will still require the Luas to be shut down for a very long period of time. That will always be an unacceptable consequence. In keeping this fantasy alive, they have effectively based the premise for Charlemont on a lie, on an untruth. Replacing the Luas with a metro will never be a realistic transport option but it is easier and less embarrassing for TII to pretend that it is. So they have kept Charlemont in their plans - except now Charlemont has become the terminus.

This fundamental design error by TII in forgetting about the Grand Canal sewer has already had a significant impact on the Protected Structures of Dartmouth Square West. As was outlined yesterday, Hines, a development company, had plans to build an office block with a basement car park on the brownfield site behind Dartmouth Square West. When the developer was advised by DCC to consult with TII, he learned of their plan to build an underground station on the site and realised it would have constrained the size of his basement; it would also have undermined the piled foundations of the Carroll's Building. TII had originally intended the tunnel to pass underneath the Carroll's Building with the station box placed down the middle of the brownfield site to its rear. The result of the consultation, as subsequently disclosed at the Oral Hearing on the planning application, was a secret deal between TII and Hines to push the location of the station box away from the centre of the site, over to the boundary, and on under the back gardens of the terrace of protected structures that is Dartmouth Square West. The station box was subsequently built for TII by Hines in the revised location, despite the fact that TII had never sought planning permission for its construction. The fact that this station box pre-exists the current application has compromised the design of the metro. TII have bent over backwards to have the line of the tunnel end up in this station box; it is the geometric constraint that obliges them to put the Stephen's Green stop on the east side of the Green instead of the more logical west side. It has certainly compromised the planning process and rendered it fundamentally flawed.

Incidentally, the original plan would have placed the station box further away from the protected structures of Dartmouth Square West than where the station box has actually ended up. The piling for the re-located station box, which is closer to the protected structures of Dartmouth Square West,

has already been the cause of structural damage to a number of the houses. And as was seen during the Module 1 hearings, it will create substantial damage if the project goes ahead. As it turned out, the extra depth of the tunnel required to get under the Grand Canal Sewer, meant that the piling to the Carroll's Building would not have been compromised; the proposed basement to the developer's office block would not have been constrained; and the station box could have remained in the centre of the site, more remote from the Protected Structures. Thus the difficulties created by the current proposal are yet another needless consequence of bad planning and failure to carry out due diligence.

The whole motivation for cannibalising the Luas line is that the line is reaching capacity and something must be done. But you don't have to rip up and replace the existing service in order to relieve the capacity concerns. Why not simply duplicate it? The flow of people in a transport system is not dissimilar to the flow of water in a hydraulic system. Consider this analogy: if you have a large field or car park which has to be drained, you would probably put a drain down the middle of the field to carry away all the rainfall. If, over time, the rainfall increased substantially and the drain was becoming overloaded, you would then have to provide more drainage. Would you rip up the existing drain in order to replace it with a bigger one? Or would you simply leave it as it is and put in another parallel drain some distance away? You could even subdivide the field by putting in new drains to carry the rainfall from those subdivisions. If the replacement option meant there would be no working drain for a long period, you would definitely go with installing another parallel drain, or maybe 2 new drains. In transport terms, the large field is South Dublin and the single drain down the middle of the field is the Green Luas line. It is becoming overloaded because it is a victim of its own success, the only rapid transit system available with many users driving to the park-and-ride stations; it cannot cater for the increased demand. There is no good reason why another Luas line could not be built out to Terenure and Rathfarnham, say, to take the pressure off the existing line. And if that wasn't sufficient, why not consider another line from Stephen's Green out the N11 to UCD and then further south?

And why are TII pushing Charlemont as the optimum interchange with Luas? Yesterday you heard Hines argue that the proposed stairs & lift on Grand Parade will compromise the integrity of the front facade of the Carroll's Building, a Protected Structure. I think Hines are absolutely correct; the TII proposal is an architectural dog's dinner. Why wouldn't TII go for a simpler Luas interchange at Stephen's Green West? A portal near the Harcourt Street end would discharge onto a broad footpath, at grade with the Luas line, which would be a far better option than Grand Parade. Dr Hallissey has stated there would be difficulties; my response to him & his colleagues: you are engineers, for God's sake, make it work! He has also stated that TII are trying to avoid the National Monument that is Stephen's Green - but the OPW are going to have to get real here. The Green can be fully restored after the works have been completed, the trees that will be lost can be replaced. If the only obstacle to having the Luas interchange at Stephen's Green is the loss of trees, we would hope that the State could be persuaded to exercise some basic common sense and change the boundary of the National Monument on a temporary basis, in order to facilitate construction works.

Charlemont is being proposed to facilitate a future TII fantasy that will never happen. The Metro requires a terminus but that terminus should be in the city centre, not behind Dartmouth Square West. It is not necessary to locate the terminus at Charlemont; a terminus in Stephen's Green, properly located on the west side to provide a workable interchange with Luas, is all that is necessary. If that was done, there would be no necessity whatsoever to build a terminus a short distance away, on the far side of the canal.

Before I conclude, I would like to draw your attention to the Planning Report update which TII published a few days ago, on 21 March. It is not hugely significant in itself - but it speaks volumes

about the attitude of TII to this project. This update makes several statements about the impact of Charlemont on the ACA which are incorrect, which are just not true. It states: "the Proposed Project lies outside the ACA." This is an untruth: my property and others on Dartmouth Square West will be the subject of CPOs because parts of our properties are needed to build the station. It continues: "the Proposed Project ... does not affect any of the structures within it." Again, this is not true: all of the Protected Structures on Dartmouth Square West will be affected by ground settlement of up to 30mm, according to data submitted by TII, as discussed in Module 1. These are 2 incorrect and untrue statements - but perhaps the greatest lie in this brief update is this: "At Charlemont Station, the Proposed Project complements the character and distinctiveness of the ACA." We are truly entering the realm of alternative facts here, the world of Trump and Johnson, where truth does not really matter. But this is the manner in which this project has been progressed. We had several examples yesterday. Dr Hallissey said Charlemont is not a terminus even though it is the end of the line and in plain language, nothing but a terminus. Mr Paul said Ranelagh to Sandyford was not abandoned because of the Grand Canal sewer even though that cock-up was fundamental to the extra time involved for the Luas shutdown. Mr Matt Foy said there was no assessment of the number of drop-offs at Charlemont because they wouldn't happen and even if they did, it would be up to the Traffic Wardens to move them on. Even the TII legal advisor, when asked what the station box in the Hines development had cost, told the Hearing that there was no station box; he later went on to say that even if there was, it was Hines that built it, not TII - before eventually being obliged to concede that it had cost TII €12.5 million. He later went on to say that whatever work was done, it was done as a requirement of a planning condition; it is quite a semantic stretch to say that a condition requiring the submission of a detailed plan for the structural stability of adjacent rail infrastructure, which obviously referred to the need to protect the existing Luas embankment from being undermined by the proposed deep excavation, could now be interpreted as requiring a station box to be built to protect an unbuilt, future metro line.

It is a sad state of affairs when a State body resorts to untruths, obfuscation and denial of reality and common sense, in order to achieve its objective. We the citizens are depending on you and on the Board to be our protectors from the destruction this misplaced terminus will wreak on us and on our community. The section of this route from St Stephen's Green to Charlemont exists like an appendix to an abandoned function. Like the appendix in the human body, it serves no useful purpose. We respectfully ask you to remove it from the approved plans.

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