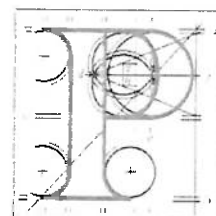


Our Case Number: ABP-314724-22



An
Bord
Pleanála

Brendan Heneghan
88 Parkmore Drive
Dublin 6W
D6W X657

Date: 03 October 2024

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,


An Bord Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

RA03

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AN BORD PLEANÁLA	
LDG-	_____
ASP-	_____
02 OCT 2024	
Fee: €	_____
Type:	_____
Time:	<u>10.34</u>
By:	<u>HAND</u>

2 October 2024

An Bord Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Railway (Metrolink –Estuary to Charlemont via Dublin Airport) Order [2022] 314724-22

Dear Bord

I wish to make a further submission on the above matter in response to newspaper advertisements dated 7 August 2024. I understand that I do not have to pay a fee of €50 as a member of the public who has already made a valid submission on the Railway Order application. This submission relates to aspects of the **Further Information** as referred to in the advertisement.

My submission relates to

A the unsuitability of Charlemont as a terminus – relevant documents in appendix D

B some aspects of the underground tunnelling and the relevant documents are listed in the Appendix D

C material issues raised very clearly in oral hearing, but not addressed in the Further Information in any meaningful way. They are listed in Appendix B. It is procedurally unsatisfactory that the applicant can introduce important new material verbally in the oral hearing, without any opportunity being promulgated to comment on this; they can evade comment by simply not putting what they have said in writing.

Executive Summary

I submit that you should not permit the construction of a station at Charlemont. Reasons are set out in detail below principally the wholly inadequate and “unfit for purpose” connection between the ground and Luas, serious deficiencies for airport origin passengers, the excessive length of the construction period in too close proximity to dwellings, the proposed routing of numerous Metrolink

passengers to non-existent bus services and the fact that a good alternative with similar connectivity is available at St Stephen's Green East Metrolink.

I believe it was highly irregular that significant interference with two newly constructed buildings were identified at the oral hearing, requiring emergency changes to the scheme. This does not inspire confidence that there are not other unidentified problems; the public have a right to expect that the applicant has identified these issues.

Many issues related to Charlemont were clearly flagged in the oral hearing and in submissions and are not addressed in the voluminous Further Information. I think the only proper conclusion the Board can reach from "silence" is that the issues exist, are valid and cannot be addressed. These issues include the use of the existing Luas platform as a "bridge" and the practical possibility of running more trams south of Charlemont.

Charlemont

It remains my view that the Charlemont station should not proceed. I am even more strongly of this view having heard most of the evidence on the subject at the oral hearing.

The position of the applicant at the oral hearing (and indeed in documents supplied in Further Information particularly the Response to Submissions of the Public Representatives) seemed to be that it was essential to have Charlemont, primarily as it facilitated onward connectivity to South Dublin and incidentally as it provided local pedestrian connectivity. Various passenger figures were thrown around such as 10 million a year and close to 30,000 a day. It was suggested in verbal evidence that c85% of the passengers would use the north exit, a fact consistent with transfer to Luas. In fact what the Further Information shows is a mere 8,000 a day Luas bound and an alleged 20,000 with a local pedestrian source or destination. Within this a fantastic 8,000 (the same as Luas) are coming to and from a four buses an hour bus service, and only 2,000 of the "Luas people" are heading to Luas stations from Dundrum north. I find these forecasts simply not credible. I believe the true position is that the majority of the 30,000 a day will be Luas bound and that the infrastructure proposed simply cannot cope with that volume. I therefore submit that you should refuse to permit a station at Charlemont.

There are seven issues (1) the inadequacy of the Charlemont connection between the Metrolink and Luas (2) the station being in far too close proximity to houses in Dartmouth Square (3) the fact that Charlemont closes down many extension options in the south city (4) the impact on the canal (5) poor connectivity at Charlemont shown by documents in "Further Information" (6) the alleged increased capacity south of Charlemont on Luas and (7) the POPS scheme.

There are also two linked issues namely (8) MetroLink terminating at St Stephen's Green and (9) the airport dimension.

It seems to me that in the planning of this project, the applicant has given virtually no thought as to what happens above the ground once a passenger emerges from Charlemont Metrolink station. This is clearly evidenced by the necessity to submit numerous documents in the course of the oral hearing related to number of passengers at Charlemont, the design of the steps leading to the Luas and the lay by arrangements extending over the canal. All of these issues should have been dealt

with well before the application was submitted. Likely they are only being dealt with because they are being raised by observers or the inspectors. The application also completely ignores the fact that any progress to or from places to the north of Charlemont has to be via either the bridges at Ranelagh Road or Leeson St (unless people use the Luas station as a bridge)

Inadequacy of the connection between the Metrolink and Luas

A key issue in this is the number of passengers likely to be transferring to and from the Luas at Charlemont. There are some relevant statistics in Appendix A.

Critique of the applicant's projections

Appendix A shows projections of numbers of passengers coming to and from Metrolink at this location. The best guess is that the applicant supplied information is suggesting that

about 8,000 people a day (or twelve hour period?) will be going to and from Luas,

about 12,000 will be walking to and from local destinations labelled A to G (day 13 doc fig 6) ;and

about 8,000 will be walking to and from the routes 86, 87 and 88.

I find this information lacking any credibility for the following reasons

1 the proposed level of service on routes 86 to 88 in Bus Connects plans as I presented at the oral hearing is a total of 4 per hour. It is simply not physically possible to accommodate 4000 passengers in a 12 hour period on those services.

2 Directions A,B and C for pedestrians are all north of the canal with a total of 2,532 pedestrians projected. Given the necessity to go to one of the bridges, it is my view highly likely that it will be much easier to leave Metrolink at St Stephen's Green for many of those pedestrians, so I doubt those projections have any validity.

3 For those walking in directions south of the Canal the biggest numbers are headed to Rathmines Road and Upper Leeson St (1,339 and 919 respectively). In both cases an exit from Metrolink at St Stephen's Green and a simple walk to an adjacent bus stop will pick up bus 81 and 82 going to Rathmines (every 10 minutes) and the E spine (every 5 minutes)going to Upper Leeson St, Why would anyone opt for a long walk from Charlemont when they can interchange to bus at St Stephen's Green? The document itself acknowledges that all of these areas have excellent frequency services in the context of dismissing the possibility of drop offs at Charlemont.

4 the SAPMAP feature of census 2022 shows a population of 30,814 within a 1km radius of the existing Luas stop at Charlemont. This is a significantly larger area than the 800 metres cited in the document as an acceptable walking distance (by Chartered Institution of Highways and Transportation). I am sceptical that this level of population is capable of generating anything close to

6,070 people a day (the aggregate local pedestrians indicated in applicant documents) who happen to be going somewhere (likely northside) that can be conveniently accessed by Metrolink.

5 while office workers will make up some of the pedestrian component, most of the offices are north of the canal and likely easier accessible ex St Stephen's Green Metrolink. Of the 3,319 jobs identified in five adjacent areas in Figure 3 of "Review of Charlemont Station" (see Appendix A), I doubt these are capable of generating more than 300 trips a day, as Metrolink will only be useful to northside resident workers in particular parts of the north city. There are also factors such as remote working.

I would submit that the figures for pedestrian and bus based use of Charlemont Metrolink set out in Further Information are wildly optimistic; the true figures are likely a fraction of what is suggested and the applicant has vastly overstated the likely demand. A key assertion they make as to the importance of Charlemont is based on an asserted 10,000 per day pedestrian based demand.

My own projections

As just set out, it is my belief that the figures supplied in Further Information are wildly inaccurate forecasts. I am inclined to accept the 28,000 passengers a day (apparently 12 hour period) forecast, as it is consistent with other Metrolink stations, but believe that the true use of Charlemont to link to Luas will be of the order of 20,000 a day.

I am very influenced by the evidence given by Mr Foy to the oral hearing (in response to concerns about the use of the south entrance) that about 85% of passengers would enter or exit via the north entrance (I believe he gave a 16-17% figure south). The 15% south is 4,200 passengers. About the same number of pedestrians are projected to go north, so about another 4,200. This takes the Luas figure to about 20,000. I note that despite giving evidence as to an approximate 85/15 split, the document Review of Charlemont Station of which Mr Foy is the author contradicts his verbal evidence by positing 25/75. This contradiction needs to be teased out by the Bord. I think assessing the number of passengers going to and from Luas is essential to evaluate the adequacy of infrastructure proposed.

The infrastructure

The primary proposed access point to and from Luas is a set of stairs which has two turn backs. It is my very strong position that this stairs is simply incapable of processing that volume of passengers. Even if the 8,000 per day Luas bound passengers in new documents is right, it almost certainly can't cope with that either. I am aware there is a second set of stairs to the Ranelagh Road side of the Luas line.

The drawings for these stairs supplied in Further Information (day 17) suggest that the stairs will be divided in two and it seems that each segment is 1.2 metres wide. I think this is wholly inadequate as a basis on which to carry the bulk of what I believe will be 20,000 passengers a day and even on their projections will be 8,000 passengers a day. I think to permit such a tenuous linkage between the ground and the Luas will create a severe bottleneck and is contrary to proper planning and raises significant safety concerns.

It is not clear from the drawings what arrangements are in place to stop passengers going in different directions meeting on the stairs. While no doubt the division into two is intended to create

a "dual carriageway", the drawings would indicate no obstacle to people going the wrong way. Irish people are known for obeying two directional signs!

I suspect because of the wholly inadequate stairs, some people will use the existing stairs and this will necessitate them walking across the track in front of trams to access south bound Luas. This again creates significant safety issues.

It would be invariable practice in proper systems that there would be escalators, but still these are not provided nor is an explanation of lack of same contained in Further Information.

I have recently spent time in both Porto and Madrid which have extensive metro/light rail systems. It stands out how there are comparatively few older people on Madrid metro. This in my view is linked to extensive provision of stairs to link a concourse to both street and to train level; escalators are routinely provided for the longer mid sections. Notably these stairs are wide and even largely unused stairs between a pair of escalators are about 2.5 metres wide (La Latina station on line 5). In Porto there is a much more extensive use of escalators in a more recent system at all levels and the demographic has a larger older component.

I should note that in Further Information, it is projected that 8,000 people a day will try to access the non existent bus services and that a small number of passengers will transfer to Luas to get to stations to Dundrum; this seems to be an implicit acceptance by the applicant that the connection is so awful that people would rather chance the bus. While I don't think it is as awful as what they seem to suggest, it is still very bad and likely influences passengers to walk to Ranelagh stations and to attempt to board the bus.

Another key issue is the location of the Carrolls Building Stairs and Lifts. While this takes up a lot of airtime, it is in my view much less important than the stairs being manifestly unfit for purpose. It is clear that the owner of the building has significant issues about a stairs in front of its premises as they have suggested the infrastructure ought to be moved to the canal side of Grand Parade. The day 21 document "Carrolls Building Stairs and Lift" in section 5.0 accepts that *"The provision of a lift, stairs and a widened pavement will be mitigated by design to reduce the impact on the protected structure. Following mitigation the impact will be significant"* This document trivializes (*"potential for overlooking"*) the issues of huge numbers of people walking by offices at floor 1 and 2 of the building, which affects about a third of the length of the building. The document seems to suggest that the owner (Union Investment Real Estate) might want the lift moved; I think the substance of their submission is that the stairs be moved to the canal side.

Some further important points on the inadequate structure are set out in Appendix C.

Station too close proximity to Dartmouth houses

I think a differentiating feature of Dartmouth which is not a feature of most of the scheme is the proposal to excavate a giant hole in the ground over many years in the immediate vicinity of sensitive residential properties. This is being done in what is a very constrained site. I think it is this

that is giving rise to what seems the eminently reasonable fear of Dartmouth residents of a lot of damage to their properties.

Further it seems a feature unique to Dartmouth as a residential area that construction will be going on for many years with disruption over a prolonged period of time. This construction will be in very close proximity to houses. By contrast most other affected residential properties would seem to have to endure a period of a few weeks while a tunnel is being excavated under them.

Until a few years ago there was a vacant site the whole way from the Dartmouth properties to the Luas embankment. It would have been much more satisfactory to have constructed the station on the embankment side and indeed it is open to the applicant to cpo those buildings. There is no evidence that the applicant took any steps to secure the entire site being available; rather it allowed the footprint of the site to become very constricted.

Closing down other future public transport options

Various questions were put at the oral hearing about the ability to extend Metrolink in various directions southside should the terminus be as far south as Charlemont. Particular focus was on Portobello and Rathmines. The answers verbally given by the applicant effectively saying all options are open do not seem credible. This issue is inadequately addressed in the Response to Submissions of the Elected Representatives presented on day 9.

I think it is contrary to good planning to allow a station at Charlemont in the absence of detailed consideration of various extensions to the south city, already the subject of much public discourse. Prominent among these is the concept of a Metro South West, badly needed in the south west city. I believe the initial application is highly defective in not including a proper analysis of the compatability of Charlemont with various extensions that might happen in the future. I have a huge fear that if Charlemont is allowed, we will inevitably learn in the future that this constrains the most logical extensions and will make them difficult to realise.

Impact on the Canal

I think it is highly unsatisfactory that at the opening of the oral hearing a new proposal was introduced for a walkway jutting out over the canal. It seemed blindingly obvious to me that there was simply not enough space to accommodate a two carriage roadway, a lay by and a pedestrian walkway, without intruding into the canal. This is another example of a poorly considered approach to the above ground issues at Charlemont.

This issue seems to have been dropped casually to Waterways Ireland and all Waterways Ireland have to say about it in a response of 1 March 2024 is that they are aware of it and will work with TII.

I don't think adequate note has been taken of the use of that area of the canal by wildlife. The day 1 book 5 document is clearly inadequate as it accepts at page 11 that "this is the incorrect time of year to habitat map". If the applicant had not failed to identify that the canal area was required, there would be a proper survey. Their inattention should not allow them get out of a proper process. The updated report has not really addressed the deficiencies.

The lay by that this facilitates seemed to itself present problems and the Bord should consider its omission and the consequent omission of the canal structure.

Poor connectivity at Charlemont shown by "Further Information"

Buses In my submission at the oral hearing, I pointed out the virtually non existent bus connections in the vicinity of Charlemont, with most available buses being in any event more convenient to access at St Stephen's Green East. This is not really addressed in Further Information, presumably because the applicant cannot contradict the point.

The oral hearing also focussed to some extent of persons accessing by taxi, drop off from private car and bicycle and there are some interesting new facts arising from Further Information.

Drop Offs The document "Review of Charlemont Station" dismisses the possibility of drop offs on the basis of a rather tenuous assertion that Windy Arbour, which does have a drop off area has a 23% drop off rate and three stations with no drop offs have a 0-4% drop off rate. I think this is not a satisfactory basis on which to come to any conclusions about drop offs at Charlemont metro.

Bicycles In the powerpoint submitted on day 21, it is stated at the outset (Measure CYC5) that "it is the intention of the NTA to deliver ...high quality cycle parking at origins and destinations, serving the full spectrum of cyclists including users of non standard cycles". In the National Cycle Manual a minimum of 2.5% of daily boarders at the station is specified. The Dublin City Development Plan suggests 7 per number of trains at the two hour AM peak period.

The number of spaces to be provided at Charlemont is 162. This is considerably less than the 808 to 865 stated in the document supplied Cycle Parking Overview Table 4.1 page 11.

It is highly likely that people will want to cycle to the Metrolink and then use Metrolink to get to northside destinations. I would suggest that the application is grossly inadequate in terms of its provision of spaces and makes the station highly unattractive for access to it by way of bicycle. This seems to be fundamentally contradictory to all the planning guidelines on this subject.

I would also raise questions based on the figures supplied. For example people living in the general Ballymun area can probably cycle to either Ballymun or Collins Avenue where opening year requirement is an aggregate 400 (372 at Charlemont) as against an aggregate provision of 662. By contrast a very big area of south Dublin within easy cycle reach of Charlemont is underserved.

I think the provision for Charlemont simply does not meet CYC 5 and to permit it would contravene proper planning policy and the Development Plan.

The alleged increased capacity south of Charlemont on Luas

It is continuously alleged by the applicant that there is a much greater capacity to run Luas south of Charlemont and that capacity north of Charlemont is restricted. This is addressed sketchily in day 9 Response to Submissions of the Elected Representatives page 9. I fundamentally disagree with the contention that it is so much more difficult to run trains on the section as far as St Stephen's Green.

I observe the time it takes for the Luas to travel this section and it is really not much more than the section south of Charlemont despite speed being reduced. On two recent occasions I observed Luas taking respectively 7.07 and 7.22 minutes from Ranelagh to St Stephen's Green and taking 17.52 and 18.34 minutes from Ranelagh to Upper O'Connell. Where things get really slow is the section beyond Dawson. However there is obvious potential to turn trains at the siding in St Stephen's Green (as raised by observer Andrew Whelan).

The "public reps" document fails wholly to address the question asked about how the train is to be turned at Charlemont; this point was raised in submissions. If it is to be turned around south of Charlemont, Luas will depart from the wrong platform. The road configuration north of Charlemont provides few opportunities. The first current "swap" point is at St Stephen's Green Luas.

The document asserts that there is a key east west city centre route at Cuffe Street/St Stephen's Green South. They completely ignore the fact that application 317742 (Bray corridor) currently before the Bord is to sever the east to west connection and that application 316272 (Rathfarnham corridor) by closing Rathmines Road will significantly impede access to that junction from west to east. I think the point is wholly incorrect and that in practice there would be no difficulty with numerous Luas crossing that junction. I don't think there are other material intersections.

If a significant number of trams terminate at Charlemont, this will result in the inbound platform becoming congested with passengers left short of the city centre. There is in any event an issue with the width of platforms at Charlemont.

I don't for one moment believe the applicant has any serious intent to "turn" trams at Charlemont. I submit this is a completely contrived point to shore up the weak case for Charlemont. If the applicant had any serious intent to run extra trams only to Charlemont, they would have addressed how this is to be done.

POPS Scheme

Two different POPS schemes (day 1 and day 11) and two different boundary schemes (day 10 and day 11) were introduced during the hearing. It seems to me unsatisfactory that these documents should not have been made available as part of the application. They are not really the types of documents that should have been casually dropped in during the course of the oral hearing.

No explanation is given for the difference between the two sets of maps, despite being of very different lengths. It is noted that the usual "bulge" both sides does not appear near the Mobhi Road intervention tunnel.

It seems to be accepted by the applicant by virtue of their submission of the Gillarducci Paper that minor property damage is inevitable as a result of the tunnelling. In the context of the Charlemont area, it seems to me self evident in the context of the types of properties involved that a limit of €75,000 will not be sufficient. I doubt anyone but a specialist contractor will go near those houses. I think the Bord (if it makes the unwise decision to allow Charlemont) should make it a condition of any permission that a sensible limit is put in place for properties in such areas. I am aware that there

is in any event recourse to insurance, but I think what is effectively a "no quibble" scheme should have a higher limit.

St Stephen's Green

There were extensive challenges in the opening days of the oral hearing to the extension of the line to Charlemont. While there was a degree of debate about where exactly in St Stephen's Green the Metrolink end should be, this prompted a lengthy section in a document entitled "Response to Submissions of the Elected Representatives..." starting at page 10 effectively saying, without any proof, that finishing at St Stephen's Green would be awfully problematic and would be a huge delay factor.

It is really unsatisfactory that such a document should have been introduced at that stage. It is blindingly obvious from observations that Charlemont is highly controversial and there was ample opportunity for the applicant to put these issues out in their replies to those observations. Rather they chose to punt in quite material issues after the opening days, to avoid them being teased out in the oral hearing.

I am not an engineer, but it seems to me that all that is required extra at St Stephen's Green is a protected escape route. I think a mountain is being made out of a molehill. If they opt for a tunnel escape route that is one extra tunnel below with an additional structure to the side of the Stephen's Green Station box. There appears to be no issue raised in the extensive Charlemont discussions about the same concept at Charlemont. I submit that the applicant is grossly exaggerating the issues here to try and force the Bord to agree to an ill thought out terminus.

Airport

I think there may be excessive focus generally on the number of airport origin or destination passengers who arrive or depart Charlemont. There is no real effort to quantify this. However even if they only represent 2,000 of the passengers at Charlemont per day, they do pose a number of specific issues.

A Despite the efforts of the applicant to contend that the earth is flat, it seems certain that airport drop offs and pick ups will be a material feature of Charlemont. I live in Terenure and it is very attractive if I have an 8.30 am flight to have someone drop me off at Charlemont at 6am. No amount of unenforceable rules is going to stop a driver stopping for a minute at Ranelagh Road to drop off the wife and daughter on the way to the airport; it is risible for the applicant to suggest otherwise.

B the applicant seems to argue that people will instead get one of the high frequency buses and transfer to Metrolink from that. They wholly ignore that Dublin Bus is not adapted for people with luggage. This is even the case with the 16 and 41 services at the airport. Generally people with luggage will not use the bus.

C the really unsatisfactory arrangement for connection between Luas Green line and Metrolink at Charlemont make it highly unattractive for people with much luggage to try and lumber cases up and down the stairs. In fact it is probably less challenging to use an A service to Rathmines Road and wheel a suitcase to and from Charlemont ^{714 N} ~~and~~ negotiate the stairs or the inadequate lifts.

Is there is a significant issue as to whether passengers are deposited at Charlemont late at night without other public transport being in operation. The application is coy about hours of operation but I understand Metrolink will operate to 1am whereas Luas stops at 12.30am. I think that this late deposit of passengers should only happen at a station where taxis are available.

Tunnelling

Gillarduzzi

I would expect that it is par for the course that there is some minor property damage caused when a tunnel is drilled directly under property and that this project is not "inventing the wheel" in that regard. While I understand why the Gillarduzzi Paper was only introduced at day 7, it might have been more helpful to have included this in the original application.

What I do think is unacceptable however is the trite commentary in the PowerPoint Presentation on Gillarduzzi, which airily dismisses in a single sentence why the very detailed analysis of Mr Gillarduzzi of problems in Marino is not applicable to Metrolink. I would have thought that given the prevalence of concerns expressed by property owners, the Bord should seek and have received a far more extensive analysis of the Gillarduzzi issues and anything that can be done to mitigate the issues.

Gillarduzzi reports that the southbound tunnel went below about 150 properties, that there were about 40 complaints and that 32 appeared to be at least of aesthetic significance. This seems quite a high level of issues. There is no information at all supplied as to the cost of remedying the issues. The paper strongly supports the proposition that there will be extensive minor damage, particularly to older properties, but that is hardly of itself a reason to refuse permission. The evidence given to the oral hearing supports the proposition that areas such as Prospect and Dartmouth have foundation issues likely comparable to Marino.

All of this brings into sharp focus the Property Owner Protection Scheme discussed above in the Charlemont context.

Aercap/Cadenza

I am an experienced lawyer and I found the revelations on a single day of a failure by the project to assess the foundations of both the Aercap building at St Stephen's Green and the Cadenza building at Earlsfort Terrace/Adelaide Road quite shocking. My recollection of proceedings is that the former was under construction around the time the application started to be prepared and that the former building on the Cadenza site was in course of demolition. It worries me quite a bit that an application can be in process without the applicant being wholly on top of the foundational aspects of likely new buildings and apparently conducting its assessments on the basis of "former" demolished buildings. This begs for me the question as to whether there are other buildings on the route where the impact of a post 2010 or so building has simply not been taken into account.

My understanding in both cases is that the building owner suggested that the applicant wholly failed to take account of double basement and foundation structures, such that in the case of the Cadenza Building the application as submitted actually drove through the foundations of Cadenza. The solution was the hurried introduction of drawings submitted on days 9 and 11 proposing the lowering of the tunnel, so that the tunnel dips 1.2 metres ex St Stephen's Green and then rises 3 metres from about the location of Cadenza, as opposed to a gentle 1.1 upwards in the submitted proposal. The tunnel is now apparently 6.3 metres under AerCap and 5 or 4.2 metres under Cadenza.

I find some aspects of the new arrangement puzzling

- (I) I can't reconcile the original rise of 1.1 metres suggested in the drawings with a dip of 1.2 and a rise of 3 (which seems to infer 1.8). Is this correct?
- (II) There is no explanation of the variance in the clearance under Cadenza between 5 and 4.2 meters in day 9 and day 11 drawings. Is 4.2 adequate?
- (III) It is difficult to understand how new drawings would refer to an Irish Life building when the discussions all referred to Cadenza.

These are all things that I assume the property owners will take up.

Issues not Addressed at all or peripherally

There were quite a number of issues clearly raised in evidence at the oral hearing that are not addressed in Further Information Charlemont documents. I would submit that they are not addressed because the applicant has no answers. I would say that in those circumstances the Bord must accept those concerns and observations as correct. They are

A the potential use of the Luas station as a bridge

B the extensive crossing of the track by Metro bound passengers coming from Sandyford

C the likelihood that passengers allegedly within walking distance of Charlemont Metrolink will transfer to bus services outside the door of the metro station at St Stephen's Green

D the huge lack of bus service at Ranelagh Road

E the lack of any evidence as to the asserted practicality of running more Luas on the section south of Charlemont

F Comparative figures for Irish train stations with extensive infrastructure

This is further detailed in Appendix B.

Yours Sincerely

Brendan Heneghan

Brendan Heneghan

Appendix A

These are all statistics provided by the applicant as Further Information or on NTA website

Traffic projections

There are lots of confusing figures presented for passenger numbers at Charlemont and some are presented on an undefined 12 hours, some annually and some for boarding or alighting only.

There is a day 5 document and a day 13 document

It is suggested that the appendix 7.9 numbers are predicated on an unrealistic (my words) opening date of 2030.

A figure of 10 million was “thrown” around a bit but it is suggested that this is an approximation of 2060 boarding only. That figure seems vaguely consistent with scenario A for 2065.

Day 5 document

2035 (scenario A)

14,870 boarding

14,668 alighting

Annual 12,447,158 (implies 34,101 daily on a 365 day year)

Somewhat higher figures apply in scenario B including 13,141,336 annually)

2050 (scenario A)

18,202 boarding

18,192 alighting

Annual 15,737,096 (implies 43,115 daily on a 365 day year)

The scenario B figures are similar with annual 15,622,238.

2065 (scenario A)

Boarding 22,297

Alighting 21,976

Annual 19,040,726 (implies 52,166 daily on a 365 day year)

The scenario B figures are a bit lower with 18,044,998 annually

Day 13 document

This document is arguably consistent with the information supplied on day 5. That suggests a minimum of more than 14,000 people both boarding and alighting at Charlemont in a 12 hour period in 2035. The day 13 information only accounts for 8,000 coming to and from Luas and 6,000 local trips.

Of the 6,000 local trips, figure 6 suggests a total of 6,070 trips in directions A to G, all of which seem to be alighting from Metrolink and walking in different directions. On top of this there are 4,000 people forecast to connect to services 86, 87 and 88.

It would seem to me that the reconciliation to the day 5 figures is

Ex Metrolink to Luas 4,053

Ex Metrolink to walk 6,070

Ex Metrolink to bus 4,000

Total 14,123 (a bit short of the day 5 document)

Figure 5 in that document suggests that 4,053 passengers will arrive by Luas at Charlemont in a 12 hour period to board Metrolink. It suggests that 3,751 will have accessed the Luas at Charlemont. This is the total of green and blue boxes on the map. This is consistent with the 8,000 number cited.

It is notable that for the five Luas stations to and including Dundrum the totals are only 883 and 800 respectively. Most of the transferring traffic is coming from further afield.

Job projections

It is noted that on page 9 of "Review of Charlemont Station" (day 13), it is suggested there will be a total of 3,319 jobs (in 2035) in the five areas substantially within five minute walk identified in Figure 3. The bulk of these 1,622 and 448 are in areas to the north of the canal where the challenge of crossing the canal comes into play.

Figure 2 of that paper seems to zone in on jobs where there is a realistic possibility that people would use Charlemont Metrolink. I would submit that key attractors Royal Victoria, Global Media and Zendesk are in practice easier to access ex St Stephen's Green Metrolink. The only work places that are indicated that are much more readily accessible from Charlemont are Harcourt Green, We Work and Charlemont Square.

Comparative figures for other train stations

The National Rail Census Report 2022 published by NTA in May 2023 identified daily boardings on a date in November 2022 at key railway stations. The 14,870 suggested daily for Charlemont is

comparable with or in excess of other major stations. All of these stations have far superior infrastructure to that proposed for Charlemont.

Connolly 15,423 (page 54) +600

Pearse 12,660 (page 55) + 826

Heuston 10,108 (page 57)

Tara 7,005 (page 55) +315

Dun Laoghaire 3,718 (page 54)

Additional passengers arise in 3 of them because of trains running from Grand Canal Dock towards Kildare.

Similar figures apply for alighting.

These were figures I submitted at the oral hearing. Since then the 2023 survey has reported the following boardings

Connolly 18,049 +821

Pearse 13,932 +791

Heuston 12,297

Tara 8,392 +337

Dun Laoghaire 4,194

Appendix B - points not dealt with

The potential use of the Luas station as a bridge

In my oral presentation and submissions I and others suggested that a problem with the Luas station is that, due to the failure of the plans to provide a bridge over the canal, lots of people would compromise the narrow Luas south bound platform by using it as a bridge to access the north side of the canal.

The extensive crossing of the track by Metro bound passengers coming from Sandyford

It is my belief that a significant portion of the 10,000 (my projection per day -12 hours) coming from Sandyford will cross the track on foot to reach the new stairs. This will impede south bound tram traffic and is a serious safety hazard.

The likelihood that passengers allegedly within walking distance of Charlemont Metrolink will transfer to bus services outside the door at St Stephen's Green

The document "Review of Charlemont Station" (at page 5) correctly identifies that *"There is also seamless interchange opportunity at St Stephen's Green East with many of the Spine Bus services for BusConnects, including the E and F Spines which will interchange at St Stephen's Green East see figure 1"*. It fails wholly to note that the supposed passengers who will apparently walk from Charlemont to the same services are likely to avail of this opportunity.

The huge lack of bus service at Ranelagh Road

Page 11 of 20 in Review of Charlemont Station notes that it is *"likely to see considerable levels of interchange with BusConnects routes 86,87 and 88 which serve the Ranelagh Road"*. It signally fails to note the published proposals of BusConnects which suggest that only four buses an hour will be provided on that corridor so the word "considerable" is not appropriate. I also noted in material I supplied that those routes largely follow the broad line of the Luas south. Even if as I maintain it is very difficult to transfer to Luas at Charlemont, it is still a far superior option to a passenger seeking to transfer to 4 buses an hour.

While these routes broadly shadow the Luas, they have different routes. Assuming every bus runs, a passenger seeking to board the 87 or 88 could have to wait an hour for the next bus.

It is also the case that passengers using these services will almost certainly exit the south entrance to Charlemont Metrolink as both bus stops are close to the end of Dartmouth Road.

The lack of any evidence as to the asserted practicality of running more Luas on the section south of Charlemont

It is continually asserted by the applicant that it is possible to run more Luas services on the section south of Charlemont, but without a shred of evidence being given to the Bord to substantiate this. This point is again asserted in the Further Information and is dealt with in my letter.

Comparative figures for train stations with extensive infrastructure

I submitted figures to the oral hearing showing the level of use of main line stations with extensive infrastructure. These are repeated in Appendix A. These passenger levels are similar to Charlemont with its mere two sets of steps. If infrastructure is needed at Connolly, it is needed I would submit at Charlemont and plans need to be revised, if Charlemont is to proceed. It is simply not credible that Connolly and Tara (which interacts with MetroLink) have enormous infrastructure, but only a single stairs is provided at Charlemont Luas.

Appendix C Other Charlemont infrastructure issues

1 I think it would be instructive for the Bord to inspect the access to Luas at the village side of Dundrum Luas. This station has a set of steps similar to the only new access at Charlemont (the height difference is less) and it also has the feature of people using the Dargan bridge as a way of crossing an obstacle.

It is my experience that when a busy train arrives at Dundrum, there is a degree of chaos at the stairs on the village side. Pedestrians exit via all parts of the stairs and it is quite difficult to climb the stairs at those times. I am sure the passenger numbers exiting at Dundrum is known and I suspect it is a small fraction of the potential at Charlemont.

Quite a number of Dundrum Luas passengers use the Dargan bridge to cross the busy road junction. I believe that this illustrates the potential for the use of the Charlemont platform in a similar way. The difference is that there seems to be a dedicated space for people to walk across the Dargan bridge and it is not part of the platform.

2 It seems to be asserted in the Further Information that the new lift, street to Charlemont Luas will not project to the front of the Carroll Building. It seems to me that the new lift has to be wholly in front of the facade of the Carrolls building. There is simply not the space between the building and the Luas embankment to fit in a lift.

3 Lifts are the only way that a mobility impaired passenger or a passenger with a buggy has to access the Luas. Further they are the only sensible way for a passenger with luggage to access. It seems blindingly obvious that two lifts of the limited size proposed are simply not adequate for the needs of those persons. It is I understand part of the "basic ethos" of Metrolink to have it fully accessible; this ambition seems to be flung out of the window at Charlemont.

4 While I have probably made the point already, there seems to be huge scope for persons to be crossing the Luas track at Charlemont when boarding or exiting a Luas. While this is a general feature of Luas, I think this creates a lot of safety and operational issues at a station with the volume of passengers proposed. The problem would be greatly augmented if there was a scenario where trams "turned" to go back south at Charlemont.

Appendix D Relevant "Further Information" Documents

Charlemont documents (23)

Property Owner Protection Scheme day 1 book 1 ("d b")

Errata Appendix 10 Updated Appendix 13.7 Charlemont d1b3

Updates Appendix 4 Charlemont PRM Lay-by Assessment d 1b5

Passengers at Charlemont Station etc d5b3

TII response to Submissions of the Elected Representatives d9 b1

Email from Waterways Ireland d10b3

POPS Boundary Map d10 b2

Property Owners Protection Scheme Updated d11 b1

Updated POPS Boundary Maps d11 b2

Review of Charlemont Station Note d13 b1

TII Response to Public representatives d 13 b1

Pedestrian Impact assessment at Dartmouth Road d17 b1

Hostile Vehicle Mitigation Presentation d17 b1

Dublin Airport – NTA Passenger Survey d17 b1

Charlemont Luas – Stairs and lift Connection d17 b1

Charlemont Drop Off Biodiversity update report d19 b2

Hines Charlemont planning barriers d20 b1

Construction Works Sequence Grand Parade d20 b1

Carrolls Building Stairs and Lift d21 b1

Cycle parking overview d21 b1

Cycle Parking Provision for transfer d21 b1

Updated photomontages d21 b2

Charlemont and St Stephen's Green Updates d22 b1

Tunneling documents

Gillarduzzi Paper day 7 book2

Tunnel alignment drawings St Stephen's Green Charlemont day 9 book 1

Updated tunnel alignment drawings St Stephen's Green Charlemont x 4 d11 b1

EIAR Addendum Downward realignment St Stephen's Green to Charlemont d11 b3

Jacobs IDOM Report AerCap House d18 b1

Jacobs IDOM Report Cadenza d18 b1 (incorrectly dated on cover page)

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