

ABP-314724-22

An Bord Pleanála
64 Marlborough Street
Dublin 1

Date: 19th February 2024

Ref: 314724-22

App: Transport Infrastructure Ireland (TII)

For: Railway (MetroLink Estuary to Charlemont via Dublin Airport) Order Application



An Taisce

The National Trust for Ireland

AN BORD PLEANÁLA

19 FEB 2024

LTR DATED _____ FROM _____

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ABP-

ORAL HEARING:

1. Introduction and Overarching Comments

A Chara,

In opening, we wish to thank you for inviting An Taisce to present at today's oral hearing.

Firstly we wish to welcome the overall proposal as it is a long overdue strategic priority for the improvement and expansion of the public transport network in and around Dublin.

In relation to our expressed concerns regarding Metrolink's integration with a wider transportation initiative for the catchment area to reduce private car use and dependence, including the promotion of cycle-and-ride to use the Metrolink, we welcome the applicant, Transport Infrastructure Ireland's clarification that Metrolink has been designed to ensure maximum interchange with other modes of transport, specifically other sustainable modes of transport such as walking, cycling and public transport.

The remainder of our submission today, concerns options for the Tara Station due to considerations about the loss of community infrastructure and city centre residential accommodation.

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Directors: Philip Kearney (Chair), Trish O'Connell (Vice-Chair),
Stuart McCaul (Secretary), Aoife O'Gorman (Treasurer), Hugh O'Reilly, John Sweeney, Olivia Rogers, Rónán O'Brien

2. Selection of Site and Construction Methodology for Tara Station.

The Selection of Site and Construction Methodology for Tara Station was determined by the applicant, through a two-stage Multi-Criteria Analysis, which may be viewed in Volume 5 – Appendix A7.2 Tara Street Station Report in the EIA of the Railway Order.

In second and final round Multi-Criteria Analysis three options remained:

OPTION 0, was the solution proposed for the EPR using the cut and cover method, and was estimated to cost less than the other two options. It had the benefits of good interchange with the DART station, it was safer to build and is less disruptive to city traffic and existing utilities. Although there was also an opportunity for over-station development as part of an urban integration plan, the cut and cover method, selected would result in the College Gate Complex having to be demolished.

OPTION 2, which moved the station box northwards, was ruled out as it would have a major impact on city traffic, because Tara Street and Poolbeg Street would need to be closed for long periods during construction. There were also major utility diversions needed for its construction.

OPTION 4 (on the same site as OPTION 0) involves the mining of a cavern below the existing College Gate buildings, it was deemed to have more safety risks during its construction and it is more expensive. While Option 4 would retain the College Gate Complex, it was deemed that would still be a significant disturbance to residents because of the shaft construction directly adjacent to the building.

Following this final round of Multi-Criteria Analysis OPTION 0, was the solution selected by the applicant and proposed for the EPR for Tara Station, being sited alongside the DART railway line and being aligned in a northwest-to-southeast direction and with the 'Cut and Cover' construction methodology being selected.

3. Comments on the selection of Option 0: Base Scheme for Tara Station in the final Multi-Criteria Analysis

In the final recommendations in the Multi-Criteria Analysis, although both the selected Cut and Cover - OPTION 0 and mined cavern - OPTION 4 were given similar (amber colour), we would query why OPTION 0 was indeed selected, when this selected option would exact a substantially higher human cost than Option 4, including, although we do understand that both options would result in the loss of 8 DCC-owned Duplex units on Townsend Street.

The human cost will include loss of Markievicz Leisure Centre, which can justifiably be described as critical infrastructure, as it is the only remaining publically accessible swimming pool in Dublin's South inner city, as well as being a heavily used sports amenity. The Markievicz, when taken together with its predecessor, the Tara Street baths has continuously served Dublin's inner city communities and workers in this location for the past 150 years.

It will also include the loss of the 70 apartments in the College Gate complex, which is taking place during Ireland's current housing crises. Therefore it is reasonable to suggest that some of the apartment buildings' 160 residents may face homelessness as a result of Transport Infrastructure Ireland's selection of the cut and cover construction methodology of the selected option.

Also, the selected OPTION 0 will also actually cost more than OPTION 4:

Although in Multi-Criteria Analysis OPTION 0 is estimated to have construction costs of €139.9M, this does not include demolition and recycling costs and also does not include estimated relocation costs of the Markievicz to the Irish Town stadium of €48 M (according to DCC) and approximately €35 M compensation costs to the owners of the 70 apartments in College Gate (estimated at €500K per unit) which would be a total of € 222.9M, which is € 61.2 M more than the applicant's estimates of construction costs of € 161.7M.

Project Risks and Constraints raised by the applicant for OPTION 4 listed in Multi-Criteria Analysis and those listed elsewhere in the applicant's documentation for Metrolink, have been successfully mitigated by numerous engineers and design teams on many other underground metro projects around the world, where tunnelled construction techniques have been successfully utilised, to construct underground railway stations below occupied buildings, Therefore we would assert, that the applicant could also mitigate the Risks and Constraints listed, if alternatives

construction strategies, were recommended, which would retain the College Gate Complex.

4. Closing Remarks

In closing, we wish to restate the importance of the Markievicz leisure centre, to the south inner city local community, which can justifiably be described as critical infrastructure and which we reiterate is the only remaining publically accessible swimming pool in Dublin's South inner city, as well as being a heavily used sports amenity. Also, The Loss of 70 apartments in the College Gate complex, during Ireland's housing crisis, will exact a heavy human cost.

And given that numerous metro stations have been successfully constructed through tunnelling under-occupied and inhabited structures, similar to the College Gate and Markievicz complex, with all risks and constraints being mitigated, we would recommend that the planning inspector and An Bord Pleanala request the applicant to seek to retain the College Gate complex, through the utilisation of alternative construction methodologies, such as that outlined in Option 4 of the Multi-Criteria Analysis, in Volume 5 – Appendix A7.2 Tara Street Station Report in the EIA of the Railway Order and given that a tunnelled

Please acknowledge our submission and advise us of any decision made.

Yours sincerely,

Ian Lumley
Heritage Officer
An Taisce – The National Trust for Ireland