

SAVE MARKIEVICZ POOL & GYM

While we do not oppose the MetroLink project as a whole, and while we support the development of public transport, the proposed plan for the Tara St MetroLink station – which requires the destruction of a vital public sports amenity and 78 homes – will have a devastating impact on this inner city community and will severely impact on the sporting and recreational opportunities for all who live and work in or near Dublin city centre.

I will now detail the shortcomings in TII's responses to our observation on the MetroLink Railway Order.

1) Impact on the Community (TII Responses 2, 3 and 4)

It should be noted that in Response 2 TII is responding to our observation regarding the loss of the 70 College Gate apartments and the 8 DCC homes on Townsend Street – homes which we referred to as 8 duplexes – numbers 25–32 Townsend Street. However, in their response TII does not even mention 25–32 Townsend St or their proposed demolition. TII talks about mitigation of the loss of the College Gate apartments, but not the other 8 homes on Townsend Street. We feel this is indicative of TII's disregard for the devastating impact of their proposal on the people of this area.

8 high quality public housing units, which were built in the 1990s, are set to be demolished. The residents were originally moved from Moss Street by DCC in order to make room for a different development. It is now proposed that these mostly elderly residents will be uprooted and moved again, away from their community, away from local services, doctors and supports that they rely on. But far from addressing and mitigating this loss, TII does not even acknowledge it.

We welcome that TII concedes the MetroLink project should be assessed on the basis that an alternative may not be available. Since DCC is now proposing to build the supposed alternative in Irishtown (a facility which is c.2.5km away; 32 minutes walking, 17 by bus, or 10 by bike), we agree that there is indeed no alternative to the city centre location of the Markievicz Leisure Centre likely to be realised.

2) Consideration of Alternative Proposals

TII Response Items 2-13 inclusive relate to Lack of Due Consideration Given To Alternative Proposals, and several of them refer us to Chapter 07 (Consideration of Alternatives) of the EIAR and Appendix A7.2 to that Report. From these and the remainder of the Responses text we make the following observations:

(i) Nowhere does TII address the following point from our Submission:

Preferred Option 0 includes effects on "a large diameter sewer" (Appendix M. Tara Street Station 2.2.1) but Option 2 was dismissed in part because it would affect "a large sewer". [Reference Jacobs Idom report 2019/02/22 - released under FOI top p 6]

Appendix M p.297 highlighted a major problem with Option 3 under heading Utilities –"Irish Water unlikely to agree diversion or interference with sewer". It seems given the size and scope of the project relatively speaking a small detail to overcome. What reason have TII to state this? Have they attempted to address this question to Irish Water and when?

(ii) In Appendix A7.2 of the EAIR (Tara St Report) it was concluded that Option 0 remained the preferred option, with "a cheaper overall cost" cited as one of the five main reasons why. However, the assessment of costs for all options was severely lacking.

Construction costs for Option 0 were estimated to be €139.9M.

Property costs were not analysed for any option. Property costs would include CPO costs; compensation for owner/occupiers in College Gate and replacement of the Markievicz Pool & Gym – estimated by DCC to be €44.5M (South East Area Committee Meeting April 3rd, 2023).

While we are not able to estimate the property costs for College Gate CPO/compensation at this time, they are likely to be in the order of tens of millions of euros (for example 70 apartments x €500k = €35M). And the cost of replacing the pool and gym alone increase the overall cost of Option 0 by 31.8% ($€44.5M / €139.9M \times 100$).

In Jacobs Idom's analysis construction costs are listed, but we would like to ask whether demolition costs and the costs of recycling debris and excavation material have been included. These costs would be significant.

(iii) Although Option 0 is recommended because of its presumed lower financial costs, the very significantly higher human cost in terms of loss to community (physical mental and social benefits) doesn't appear to have been factored in at all.

(iv) TII state that "The FOI request referred has been dealt with separately by TII in accordance with the Freedom of Information Action 2014".

We had sought access to the documentation of the Multi Criteria Analysis of the comparative Options but TII refused. After the Information Commissioner annulled the refusal TII released 3 documents which included no more information and no analysis behind the information included in Appendix M of the Assessment Summary of the Preferred Route Design Development Report, already in the public domain.

No detailed alignment drawings, schematics or other technical documents were released other than diagram in Appendix M, for example 3.4.2 and 3.4.3 on pages 17 and 18

It does not appear credible that a multi criteria analysis of eight different station options in such a large and complex project would not have produced more, and more detailed, documentation than what has been published in Appendix M, the additional documents published with the Railway Order and the documents released to us through FOI. We can only conclude that the multi criteria analysis was not in fact carried out to the standard required for a decision on the best station option to be made.

(v) Although one of the main reasons for dismissing Option 1 was that the alignment was not feasible, there are to be major changes to the tunnel to resolve problems at the Irish Life and Hines Real Estate buildings near Stephen's Green. We read that TII has a "substantial list of possible mitigation measures, which includes lowering the tunnels further into the ground". In the light of this we feel that options which would not require such large scale demolition might have been assessed differently if the will had been there.

(vi) The reasons for dismissing Option 1 included constraints relating to tunnel boring mechanism technology but Response Item 8 does not address our observation that tunnel boring machines are custom built for each project and adapt to all kinds of underground conditions all over the world.

(vii) TII's response to Item 9 fails to address the implications of the letter which NTA Deputy CEO Hugh Creegan wrote to Dublin City Councillors in October 2018, long before the completion of the public consultation process, never mind the analysis of the alternative proposals arising from it. In it he advised them that the project "does require the acquisition of the swimming pool and the block of apartments ... with all of the implications that arise from that".

This brings into question the claim that all Options were considered with a genuine intention of mitigating the impact on this community and all who rely on the Markievicz Leisure Centre.

3) Funding (TII Responses 14 – 17 inclusive)

[To clarify: TII's response to Item 14 says "Please refer to response item (11)" but response item (11) says "Please refer to response item (11)". We assume this last should have read item (10) which includes a paragraph referring to funding.]

Whilst we appreciate that "the project budget and financial approvals are ... outside the scope of the Railway Order application" we raised the issue of funding in our submission because of the vital importance of the viability of the project for the community affected by it and felt that this context could be included in the assessment of the Railway Order:

If costs spiral out of control or if sufficient funds are not made available by government as the project progresses and it is abandoned or deferred, the community and the leisure centre will have been sacrificed unnecessarily.

And in a climate where government funding sources have to cover many large infrastructure projects, we are concerned that the value of the development land released by the demolition of the buildings would make Option 0 more attractive, affecting any consideration of alternative locations.

WE understand that "potential future development above the finished station does not form part of the Railway Order Application"

However we feel it is not appropriate for Metrolink to benefit post CPO and request sale or transfer be made only to Dublin City Council