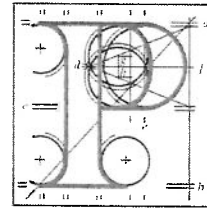


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

An Taisce
5 Foster Place
Temple Bar
Dublin 2
D02 V0P9

Date: 10 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 letter in relation to the above mentioned case. The contents of your letter 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

Tel
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Ríomhphost

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bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Wednesday 9 October 2024 13:05
To: Phoebe.Duvall@antaisce.org
Subject: RE: Ref. 314724

A Chara,

The Board acknowledges receipt of your email, official correspondence will issue in due course.

Kind regards,

Lauren

From: Phoebe Duvall <Phoebe.Duvall@antaisce.org>
Sent: Tuesday, October 8, 2024 3:26 PM
To: Bord <bord@pleanala.ie>
Subject: Ref. 314724

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Please find attached a submission from An Taisce in relation to Ref. 314724.

Kind regards,

Phoebe Duvall

Senior Planning and Environmental Policy Officer
An Taisce - The National Trust for Ireland
5 Foster Place, Dublin 2, Ireland
Phone: 01 454 1786
www.antaisce.org

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An Taisce is a membership-based charity
Join at www.antaisce.org/membership

Please note that I work Monday through Thursday.



An Taisce

The National Trust for Ireland

5 Foster Place

Dublin 2, Ireland

D02 V0P9

20241008-ABP-314724

64 Marlborough Street,
Rotunda,
Dublin 1,
D01 V902.

Sent by email to: bord@pleanala.ie

8th October 2024

Ref: 314724

App: Transport Infrastructure Ireland (TII)

For: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]

A Chara,

Thank you for referring the additional information on the above application to An Taisce for comment as part of the second public consultation on the above application. We wish to make the following observations.

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 previously 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 cycleand-ride to use the Metrolink, we welcome TII'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.

Based on the Metrolink Oral Hearing Documents, we will this submission on our concern that the selected option for the Tara Station, its selected site, and 'cut and cover' construction methodology will lead to the unnecessary loss of vital community infrastructure, and also be more expensive to the public purse.

Although the MetroLink project team explained the rationale behind the selection process behind the preferred site selection and 'cut and cover' construction method of the current scheme for the proposed MetroLink Tara Station at the Oral Hearing (please refer to Oral Hearing Documents for Second Round of Day 17 Book 1 of 1/ Tara Station Locations considered), in our submission to the hearing, An Taisce questioned CIE's decision making process, when this option would exact a substantially higher human cost, when compared with the next preferred OPTION 4 'with its excavated, mined structural construction method' on the same site', whereby the College Gate apartment building and leisure centre could be retained for up to approximately 60 million euros less.

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An Taisce – The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

Registered Office: Tailors' Hall, Back Lane, Dublin, D08 X2A3, Ireland | www.antaisce.org | +353 1 707 7076 | info@antaisce.org

Company Limited by Guarantee no. 12469 | Charity CHY4741 | Charity Regulator no. 20006358 | EU Transparency Register no. 473905437651-60

Directors: Stuart McCaul (Chair), Trish O'Connell (Vice Chair), Laura Segura Gutierrez (Hon Secretary), John Conroy (Treasurer)

Olivia Rogers, Rónán O'Brien, Finbarr Murray, Helen Shaw, Terri Morrissey, Sinead Mercier, Phil Doyle

An Taisce then proceeded to break down the comparative costings of the selected Tara Station and the alternative mined/ tunnelled (second preferred - option 4) .

'Project costs for selected Tara Station option and option 4'

Although the projected construction cost (listed in the Vol 5 App A7.2 - MetroLink RO) of the current station design(€139.9 Million excluding risk), is €21.8 Million cheaper than that of OPTION 4, which is projected to be €161.7M (also excluding risk but includes a ground issues allowance). However, these costs do not allow for relocation costs of the Markievicz Leisure Centre , which is currently projected to cost up to €48 million, according to a press release by DCC on 3/4/23. While estimated compulsory purchase compensation costs due to the owners of the 70 College Gate Apartments would add approximately €35 million, to the MetroLink budget, based on an average value (€450k) of current valuations of €450k-€550k per unit, as notified to the MetroLink Oral Hearing by Townsend Apartment Management that, With these figures added in, Therefore estimated final costs would be up to €222.9m for the current Tara Station design verses €161.7m for Option 4, which equates to 60 million euros difference, in favour of OPTION 4.

'Project Risks and Constraints' for Option 4' for Tara Station

Then referring to 'Project Risks and Constraints' in the Multi-Criteria Analysis in the applicant's Railway Order for MetroLink, which was used to rule out the 'excavated, mined' construction method':

Option 4 involves mining a cavern below College Gate buildings, which carries more safety risks during its construction and is more expensive. While Option 4 would retain the College Gate Building there would be significant disturbance to residents, because of the shaft construction directly adjacent to the building (taken from RO EISR Vol. 5 – Appendix A7.2)

An Taisce then asserted that that while 'Project Risks and Constraints' raised by the applicant for OPTION 4, listed in Multi-Criteria Analysis, and those listed elsewhere in the applicant's Railway Order, were used to rule out the 'excavated, mined' construction method similar 'Project Risks and Constraints' have been successfully mitigated by numerous engineers and design teams on many other underground metro projects around the world, where similar construction techniques have been successfully utilised, to construct underground railway stations below occupied buildings, and therefore we would assert, that the applicant could also mitigate the same Risks and Constraints listed, if alternative construction strategies, were recommended, which would retain the College Gate Complex'.

In conclusion , 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 publicly 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, for a substantially higher financial cost of up to 60 Million Euros from the public purse.

And given that numerous metro stations have been successfully constructed through tunnelling underoccupied 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 Pleanála 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.

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

Is mise le meas,

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