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Re: Pedestrian / Cycle Bridge over River Liffey at Forbes Street

Dear John,

I refer to the recent decision by An Bord Pleanala to refuse to approve the application by Dublin City Council to make an amendment regarding the re-location of cycling/pedestrian bridges already included in the North Lotts and Grand Canal Dock SDZ Planning Scheme.

The National Transport Authority (NTA) has noted the statement included in the Board Order (29N.ZE.0006) under "Reasons and Considerations (2)" in respect of the proposal to relocate the previously proposed Forbes Street bridge which states:

"In relation to the Forbes Street bridge, it is considered that the location of the bridge in the Planning Scheme is an appropriate location owing to its position on a clear desire line for pedestrians and cyclists between north and south of the River Liffey, directly linking Grand Canal Square and Spencer Dock (including the existing Luas red line stop) and in the longer term offering the potential of a direct connection from south of the river to a future Dart Underground commuter rail station at North Wall Quay. This location has greater potential to alleviate pedestrian and cycling congestion on the Samuel Beckett Bridge, compared with the proposed alternative location at Blood Stoney Road, which would not serve the pedestrian and cyclist desire lines as successfully. The Board considered that, notwithstanding the technical and cost arguments put forward in support of relocation, the existing approved position for the Forbes Street bridge would better serve the interests and amenities of the area in the long term, and would accord with the proper planning and sustainable development of the area."

As the above extract references the DART Underground project and "a future Dart Underground commuter rail station at North Wall Quay", it is worth setting out the current position in relation to that project.

The DART Underground Tunnel is part of a larger DART Expansion Programme which includes electrification to Drogheda, Maynooth and Celbridge and the extension of DART services to those areas. You may be aware that there was a Government decision in 2015 determining that the CPO

powers for the previously granted DART Underground Railway Order would not be activated, and that the DART Underground project "will be redesigned to provide a lower cost technical solution for the project" (Minister Donohue statement of 22nd September 2015).

This position was reflected in the National Development Plan (NDP) 2018-2027 published by the Government last year, which allocated €2 billion to the delivery of the non-tunnel elements of the overall DART Expansion Programme. The NDP also stated that "[t]he route for the remaining element of the overall DART Expansion Programme, the DART Underground Tunnel, will be established and protected to allow for its future delivery."

The NTA is currently focussed on the development of the remaining elements of the DART Expansion Programme excluding the tunnel. However, in line with the NDP, we intend to undertake a full reevaluation of options for the DART Underground Tunnel with the objective of establishing a final route for protection to enable its construction subsequent to 2027.

The NTA has significant reservations in relation to the recent rejection by An Bord Pleanala of the proposal to relocate the previously proposed Forbes Street Bridge, and the rationale underpinning that determination. These reservations relate to the following:

- (i) The reliance of the decision on the previous design of the DART Underground Project regarding the location of the Docklands Station. As identified earlier, the Government decided in 2015 not to activate the CPO powers for the DART Underground Railway Order and required that the DART Underground project would be redesigned to deliver a lower cost project. Accordingly, it cannot be assumed that the previous Docklands Station proposal will ultimately be progressed as previously envisaged. In line with the Government decision, there will be a full re-appraisal of the DART Underground project and of the need for, and potential location of, a future Docklands station.
- (ii) Linked to the last point, the need to redesign and reappraise the DART Underground project means that there is uncertainty regarding the location of the future DART Underground station in the Docklands. That uncertainty will only be resolved when revised proposals are brought forward for DART Underground and progressed through the planning process.
- (iii) Given the limited potential station locations in the Docklands area, and the likely connection points of an underground tunnel to the existing rail network, the potential constraint risk of a bridge over the Liffey is much higher at the Forbes Street location than at the alternative proposed location at Blood Stoney Road.
- (iv) Given that the development of the bridge at the Forbes Street location would represent a significant additional constraint on the design of the revised DART Underground Tunnel, it is the NTA's position that it should not proceed in advance of the determination of the DART Underground Tunnel, including through the planning process. This means a potential delay until after 2027.
- (v) The non-ability to proceed with a bridge at the Forbes Street location for that period of time will mean a major loss of additional connectivity between the north and south quays.

In cost terms, the overall cost of the DART Underground Tunnel was estimated in 2015 as being approximately €3 billion. If Forbes Street bridge were to proceed, it would represent an additional constraint on the potential alignment of the DART Underground Tunnel. In particular, the location of the support piles for the bridge could cause a significant constraint, with attendant costs on, the DART Underground project.

In the absence of a finalised route proposal for the DART Underground Project, it is difficult to put an exact monetary value on the cost implications. If, ultimately, the identified optimum alignment of the tunnel clashed with the bridge piles, it is likely to be cheaper to include for the removal of the new pedestrian and cycle bridge, and its reconstruction at an alternative location, as part of the DART Underground project. In this event, the incurred expenditure on constructing the bridge initially at Forbes Street would have been unproductive. Clearly this would represent an unjustifiable and wasteful expenditure of scarce Exchequer funds and should not be allowed to happen.

Overall, it is the NTA position that the provision of a pedestrian / cycle bridge across the Liffey at Forbes Street should not proceed given its potential interaction with, and implications for, the future DART Underground. This location carries too high a risk to the possible development of the future tunnel project and cannot be supported for that reason.

Yours sincerely,

Hugh Creegan, (

Deputy Chief Executive.