

Submission No.			63	
Organisation Name or Name of Submitter			Development Applications Unit (DAU)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
DAU Cover Letter - 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.				
1	Cover letter - Impact on amenity and function as a statutory public park	3	<p>Having reviewed the Railway Order application documentation including the Environmental Impact Assessment Report (EIAR) prepared for the scheme, the Department is of the view that the construction of a station for MetroLink at the Green, as currently proposed, will impact on the amenity and function of the Green as a statutory park. The applicant needs to ensure that the effect of this impact will not be long-term and can be fully and quickly mitigated.</p> <p>Section 27.5.4.1 13 of the EIAR acknowledges that: "<i>the proposed works can apply a level of mitigation which would go some way to reinstating the disturbed part of 'the Green', however, beyond any potential for reinstatement, replacement or restoration, it would be difficult to offset impacts on the maturity and wholeness of this place.</i>" Further noting that: "<i>Once the reinstatement works are completed the severe negative effects of construction will be partially moderated, however the edge of the park along the section of required works, will appear rather raw, small-scaled and immature, especially when directly compared with the remaining untouched sections. These contrasts will reduce over time, though it may take a significant period before they may be described as imperceptible</i>" Review of the supplied photomontages (V22.1-V22.6) further reinforces this assessment of the long-term impact to the Green.</p>	<p>EIAR Chapter 27, The Landscape, section 27.5.4.23 identifies that there will be a very significant temporary impact on the Landscape due to the loss of trees in the area of St. Stephen's Green East if mitigation measures are not deployed. However with the proposed mitigation measures relevant to this location in place, summarised below, this temporary impact can be mitigated by:</p> <p>(1) Development of site specific and comprehensive proposals for hard and soft landscape works, including for trees ensuring effective retention of mature trees where possible. Details of such planting proposals will be provided for consultation with OPW in advance of the construction phase. These will include: details of the tree species mix, numbers, density and sizes proposed; the tree preparation, presentation, transportation, lifting and placement techniques proposed, as well as; the proposed ground preparation, rootball securing technique, backfill materials and methods, and the specific establishment maintenance proposals for each. These measures will minimise the risk to tree establishment and maximise their viability and future rates of growth.</p> <p>(2) In sensitive locations such as St. Stephen's Green, residual landscape and visual effects will be significantly reduced through the inclusion in the proposed planting of relatively mature specimen trees. Furthermore, while the removal of trees from the landscape will initially have a significant impact if left unmitigated, especially in the case of old and developed trees as the replacing material (saplings) and mature specimen trees can never have the same size and development as the mature original trees that have been removed, resulting in an initial, but temporary contrast between the original established area of trees and the new planted trees area. Over a period of time this contrast will reduce and eventually become imperceptible. TII will work with the OPW and commit to ensuring a newly planted/ replanted areas contain a significant percentage of mature specimen trees. The precise percentage can be consulted on with OPW.</p> <p>While the temporary impact on trees is considered very significant, it does occur over a localised area of the Park that amounts to only 5% of the total area of the Park and is confined to the east side (adjacent to the Park fence line) of the Park only. A total of 64 trees (of class A, B, C are to be removed). We have identified 5 of those trees as being "A class" in accordance with BS 5837, which are generally large, high-quality trees, the remainder are of class B and C, deemed to be of moderate to low quality specimens. Trees are to be planted to replace those removed.</p> <p>Proposed mitigation of other construction works impacting the Park are noted in the EIAR and include reinstatement of the memorials, railings, bollards, lamp standards and paving which are to be reinstated on completion of the work. Further details of these mitigation works are provided in the EIAR Chapter 26, Architectural Heritage. New permanent infrastructure required within the park, for example the ventilation structures, will incorporate materials chosen to respect the surrounding 18th century Georgian brick architecture.</p> <p>TII are therefore of the view that the construction of St. Stephen's Green Station will not have a significant impact on the overall amenity and function of the Park. During the construction phase, only 5% of the Park area is taken. Once construction is completed, this area is returned to the Park with only 0.2% of the total Park area taken by MetroLink when operational, whilst providing further access to, and reinforcing St. Stephen's Green as a key Dublin landmark and destination.</p>

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2	Cover letter - Impact on amenity and function as a statutory public park	3	<p>Review of the Consideration of Alternatives (EIAR Chapter 7 and Appendices A7.3-A7.5; A7.7-A7.8) indicates that viable alternative designs for a station at this location were identified. These potentially offer much greater capacity to preserve and maintain the amenity and function of the Green as a statutory public park during both Construction and Operation Stages. The St Stephen’s Green Station -Mined Options Report (EIAR Appendix A7.5), for example, notes that the current preliminary design performs worst with "regards to ‘Property Impaction SSG Park’, ‘Biodiversity’, ‘Landscape and Visual’, Archaeology/Cultural Heritage’, and ‘Architectural Heritage’ criteria".</p>	<p>In evaluating alternatives and options, including for St. Stephen's Green Station, impacts and benefits, both short-term temporary construction (considering the operational life span of the proposed Project), and long-term permanent (operational phase of the proposed Project) have to be carefully balanced, considering a wide range of criteria that cover Project Objectives, Environment, Engineering and Economy (E.g. programme and risk).</p> <p>It is not appropriate to focus solely on a particular evaluation criteria in isolation since this will not result in the optimum overall solution / option being selected. In the case of St. Stephen's Green Station, while TII acknowledge that the preferred station location and construction methodology for the station is not the least environmentally impactful solution for St. Stephen's Green Park, when this is balanced and considered against the long-term strategic need for and operability of the Station / MetroLink, the mined solutions are deficient in terms of; the significant increase in the construction programme, which in turn results in a significant increase in the duration of MetroLink construction and associated environmental impacts. The mined options would also deliver a poor quality passenger experience (compared to the station box) due to more enclosed passenger areas and less efficient end loaded platforms, resulting in an operationally less attractive and less efficient Metrolink station for passenger experience. This would not align with the MetroLink Objective to "Provide an efficient, low carbon and climate resilient public transport service which contributes to a reduction in congestion on the road network in the Dublin region".</p> <p>This is compared to what TII would consider is a temporary impact to a very limited area of the Park that will be mitigated, and in the permanent long-term case the Park can be returned to its existing condition (also refer to Response (1) above).</p> <p>Attention is also drawn to EIAR Chapter 7, Consideration of Alternatives of the EIAR, and in Appendices to the Chapter (A7.3, A7.5, A7.7 and A7.8). It is very important to recognise and is evident, that a significant level of analysis was undertaken to identify alternatives, 16 alternatives (10 cut and cover, 6 mined) in total were considered. Each were assessed against multiple criteria to inform the determination of the preferred station location for St. Stephen’s Green.</p> <p>This analysis considered potential environmental effects on St. Stephen's Green Park, potential effects on buildings on the east and north sides of St. Stephen's Green, on traffic and transport along St. Stephens Green East, and on critical utilities serving large areas of the city located under the road at St. Stephen's Green East. The analysis identified that the proposed station location on St Stephen's Green East partially under St. Stephen's Green Park is the preferred option because:</p> <ol style="list-style-type: none"><li>1. It avoids significant impact on existing utilities beneath the carriageway of St Stephen's Green East</li><li>2. It effects just 5% of the Park area during the construction phase, reducing to 0.2% of the Park area following full re-establishment</li><li>3. It reduces significantly the impact on traffic flows during the construction phase</li><li>4. It avoids the requirement for a separate intervention shaft</li><li>5. It has a shorter construction duration when compared to some other options including mined options</li><li>6. It delivers an optimum passenger experience resulting in an operationally efficient metro station</li></ol> <p>In addition, all heritage features such as monuments, railings, bollards, and paving stones can be fully reinstated following the construction phase. This option also negates the potential for direct impacts on properties to the east side of St Stephen's Green East road, on critical utilities including a major sewer (a critical piece of infrastructure) serving the Dublin population, and on the roadway which is an important access route to the city centre, particularly for public transport.</p>
3	Cover letter - Archaeology and National Monuments	4	<p>1 Lissenhall Bridge (RMP DU011-081—; Protected Structure No 341 (Fingal)) Lissenhall Bridge is a Protected Structure and Recorded Monument as well as a National Monument under the criteria defined in Section 2 of the National Monuments Act 1930-2004. The bridge originally dates from the late medieval period and elements of this medieval structure are clearly identifiable within the extant bridge structure. This has been confirmed by a number of recent surveys as outlined in Table 25.6 of the EIAR. The EIAR has correctly identified that likely significant effects to this National Monument could occur at Construction Stage as a result of nearby construction works (particularly necessary piling works) and also from the transit of construction vehicles. The proposed mitigation measures to be implemented are vibration monitoring and the hoarding off of the bridge during construction to prevent all but pedestrian access (see Table 25.9). Chapters 13 and 14 of the EIAR clearly set out the general vibration threshold limits that will be applied in relation to historic structures and Table 25.9 further notes that the thresholds implemented for this site will be agreed in advance with the Department. However, there is no specificity within the EIAR as to the minimum buffer or exclusion zone that will be maintained for the placement of hoarding, obstruction and signage to prevent access by construction vehicles and machinery. The EIAR notes that hoarding/obstruction shall be placed "close to, but not on, the bridge deck".</p> <p>Recommendation The Department recommends that either an acceptable minimum distance from the bridge structure should be specified or it should be specified that the minimum acceptable distance will be agreed with the Department in advance.</p>	<p>Hoardings will be located and designed to ensure there is no risk to Lissenhall Bridge structure from construction works, plant and equipment. TII will introduce a requirement in its contracts to ensure that no construction work are to occur within a 10m limit of Lissenhall Bridge ensuring clear separation.</p>

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4	Cover letter - Archaeology and National Monuments	5	<p>2 14-17 Moore Street and 8-9 Moore Lane, Dublin 1 (Preservation Order No. 1/2007; SMR DU018-390—; Protected Structure Nos 5282-5285 (DCC)). This set of buildings are collectively a National Monument (DU01 8-390 — ) in the ownership of the Minister of the Department of Housing, Local Government and Heritage. They are also subject to a previous Preservation Order (PO 1/2007) as well as individual listings as Protected Structures. The buildings are closely associated with the events of Easter 1916; No. 16 is accepted as the final headquarters of the 1916 leaders and is the location where the decision to surrender was taken. The EIAR does not indicate any likely direct impacts to this National Monument as a result of the construction of the proposed development. It does note a potential for significant indirect impact as a result of vibrations from the construction works, and an appropriate mitigation strategy for this has been outlined. However, construction of the proposed station as currently designed is predicated on its integration within an over-site development (see Section 4.17.9 of the EIAR) generally referred to as Dublin Central Site 2. This over-site development depends upon receipt of a separate and independent grant of planning permission and its footprint is expected to be substantially larger than that of the proposed station.</p> <p>• Section 4.17.9.3 of the EIAR notes that: "Allowance has also been made for the possibility that the developers may not progress with the proposed mixed-use development in advance of MetroLink. To provide for this scenario the TII has worked closely with Dublin Central GP Ltd to ensure that the design for that scheme allows for the construction of an independent support structure to enable the station box construction and fit out to be carried out during or after the Dublin Central GP works have been completed. Both scenarios (with and without the over-site development) have been fully assessed in the EIAR. The cumulative effect of the over-site development is considered in the EIAR Chapter 31 [sic] (Cumulative impact of interactions between other projects)".</p> <p>• Section 30.3.1 of the EIAR—identifying relevant projects for inclusion in the cumulative impact assessment—then states that: “the Hammersons Dublin Central Site 2 Project is not included among the developments as at the time of writing planning permission had not yet been obtained but also it is not included in this cumulative impacts assessment to avoid duplication in the assessment. It is noted that there would be a direct interface between these proposed Project [sic] and this development and the potential impacts of which have been assessed in the technical chapters within this EIAR”.</p> <p>• Chapter 25 of the EIAR only explicitly considers Dublin Central Site 2 in relation to the 'Do Nothing' scenario (Section 25.2) without specific reference to any potential interactions with the National Monument.</p> <p>• Chapter 26 of the EIAR, dealing with Architectural Heritage, does discuss the potential impacts of the development both with and without the over-site development (see Section 26.5.4.10).</p> <p>The Department is concerned by this general inconsistency in the supplied documentation and is concerned that the potential for indirect and cumulative impacts to the National Monument may not have been fully assessed.</p> <p>2.1 Recommendation It is recommended that both indirect and cumulative impacts to 14-17 Moore Street and 8-9 Moore Lane need to be further addressed as part of the EIAR.</p>	<p>The potential for impacts (including indirect and cumulative impacts) on the National Monument (SMR DU018-390) has been fully assessed in Chapter 25, Archaeology and Cultural Heritage, and Chapter 26, Architectural Heritage, of the EIAR. These assessments assess what is required to construct the MetroLink station and Dublin Central Phase 2. In EIAR Chapter 25, the assessment is presented in Table 25.9 (Refer to ACH 177 - ACH 180). For the purposes of the assessment in Chapter 25, the assessment concludes that as site clearance is required for MetroLink either independently or with Dublin Central, the impacts and mitigation measures presented in Table 25.9 cover the potential effects on archaeology in both scenarios. Mitigation measures are proposed which are "Any works to be undertaken within the defined proximity zone of the National Monument will be undertaken under Ministerial Consent". Likewise, in Chapter 26, the analysis presented considers that the potential effects associated with the MetroLink construction with or without Dublin Central are similar. The potential effects are associated with the required demolition of buildings (regardless of which project demolishes the buildings), vibration and settlement risks associated with the project. Refer to Table 26.55 which indicates that the potential significance of direct effect on these buildings is “very high” during the construction phase. (Please refer to impact reference AHL-76, AHL-77, AHL-78 and AHL-79). As a result mitigation measures have been applied to these buildings and these are "The exclusion zone established by the Ministers office is to be maintained at all times and settlement and vibration monitoring is to be carried out as a precautionary measure. The threshold limits are to be agreed with the Ministers office. In the event of threshold limits being exceeded all work in the vicinity is to stop until the cause of the issue is identified and resolved. Structures adjacent to the haul route are to be protected from potential damage by means of strong hoardings during construction". The impact would decrease to imperceptible following mitigation.</p> <p>The impacts of the proposed Project and the other elements of the proposed Dublin Central project (beyond the immediate MetroLink site (Dublin Central Site 2) have not been assessed In Chapter 31 Cumulative Impacts as none of these projects were permitted projects at the time of writing. However as is standard procedure, prior to the Oral Hearing, a gap assessment list of projects that are deemed valid since the last data gathering exercise was carried out will be produced and will include other Dublin Central planning applications (excluding Site 2 for reasons above) if they have been granted planning permission at that stage.</p>

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5	Cover letter - Archaeology and National Monuments	6	<p>3 Saint Stephen’s Green (RMP DU018-020334-; Protected Structure Nos 77517761 (DCC)) Saint Stephen’s Green (“the Green”) is a Protected Structure and Recorded Monument as well as a National Monument. The current proposal is to site a station within the Green and the EIAR identifies the significant effect that this will have on this National Monument:</p> <ul style="list-style-type: none"><li>• Chapter 25 “Archaeology and Cultural Heritage” characterises the effect as very significant direct negative (permanent) during the Construction Stage and very significant indirect negative during Operation Stage.</li><li>• Chapter 26 “Architectural Heritage” characterises the effect as profound direct negative during the Construction Stage and very significant indirect negative during Operation Stage.</li><li>• Chapter 27 “The Landscape” characterises the effect as very significant negative during the Construction Stage and very significant negative during Operation Stage.</li></ul> <p>While certain mitigation measures are outlined within the EIAR the residual effect, even taking account of these actions, remains significant, intrusive and ongoing through both the Construction and Operation Stages. Preservation by record of sub-surface archaeological features, removal, storage and replacement of the historic furnishings (such as railings, paving, etc.) are entirely feasible and achievable. However, construction of the station as currently proposed will result in increased hard landscaping, introduction of upstanding structures into the footprint of the park and loss of mature trees and canopy that will result in long-term to permanent effects on the amenity and setting of this National Monument. It is clear in reviewing the Consideration of Alternatives (EIAR Chapter 7 and Appendices A7.3-A7.5; A7.7-A7.8) that the proposed location for the station at the Green was not the only viable option.</p> <ul style="list-style-type: none"><li>• The St Stephen's Green Station Options Assessment Summary (EIAR Appendix A7.8) notes that: “Of the 16 alternatives considered [including Preferred Design], location 8 and mined options 1 and 3 were considered viable [in addition to the Preferred Design].”<ul style="list-style-type: none"><li>o Location 8 would place the station wholly under the carriageway of Saint Stephen’s Green East.</li><li>o Mined Options 1 and 3 would be partially constructed underground with much more limited interventions at surface level.</li></ul></li></ul> <p>The likely overall effect of the development to the Green —encompassing all its intrinsic characteristics—at both Construction and Operation Stage would be substantially reduced, if any of these three alternatives had been adopted, with certain specific potential impacts eliminated or considerably reduced in scale and scope. In that regard, the St Stephen’s Green Station -Mined Options Report (EIAR Appendix A7.5) notes that: “[Mined] Option 3 performs the best in terms of minimising the impact on St. Stephen’s Green Park both during the construction and operational phases, noting that during the construction phase the Park’s railings would be removed temporarily to ensure they are protected. In contrast Option 0, the current Preliminary Design performs the worst by a considerable margin both during the construction and operational phases of the station compared to the other options, which includes for during construction a haul road and logistics being located within the Park, and five ventilation ‘pop ups’ in the permanent case (operational phase). [Mined] Option 1, construction and permanent land take is confined to the Plaza area of the Park and also necessitates the removal of a section of the Parks railings.” It is clear that in selecting the location and design for the station at the Green, as currently proposed, consideration of the overall effect to the intrinsic characteristics of the National Monument (encompassing factors such as property impact, landscape, amenity, archaeology/cultural heritage and architectural heritage) has been weighed more lightly. It is clear in reviewing the EIAR and supporting documentation that factors such as programme, cost and consistency of architectural design have been privileged. The Department is of the opinion that the proposed station option has prioritised construction requirements above a sufficiently weighted assessment of the long term impacts on The Green.</p> <p>Recommendation The Department recommends that careful consideration be given to the proposed alternative station locations and/or construction methodologies assessed in the EIAR for the proposed station at St Stephen’s Green. Such consideration would benefit from clarification of the issues raised above.</p>	<p>TII have undertaken significant assessment of alternative options for the MetroLink station as presented in Chapter 7 Consideration of Alternatives of the EIAR (Refer to New Metro North Alignment Options Report (TII 2018), Section 7.7.10.10 of this chapter) and associated appendices (Appendices A7.5, A7.7 and A7.8).</p> <p>Options assessed include alternative MetroLink alignment options through this area with alternative station locations, alternative station locations at St. Stephen's Green East, and alternative construction methodologies such as mining. The preferred station location of St. Stephen's Green East was chosen as it minimises the potential impacts on the Park when compared to other options with a larger footprint in the Park. As previously noted, the preferred option occupies c. 5% of the Park area during the construction phase, reducing to just 0.2% of the Park during the operational phase.</p> <p>It is correct to say that the protection of the Park was not the only consideration in the identification of the preferred station option here. The location of the station was also chosen and carefully designed to ensure that St Stephen's Green East continues to function as an important transport route, as an important corridor for critical utilities such as water, electricity and sewage, and as an important location for commercial and business activities. There would be significant and prolonged impacts on this side of St. Stephen's Green if the Location 8 that was located entirely outside of the Park is preferred. In fact, the Alternatives Assessment demonstrates that this critical functionality on this side of St. Stephen's Green would have been very difficult, if not practically possible, to achieve if Location 8 were chosen. In effect, the preferred option was a compromise solution balancing the impact on the Park while allowing the east side of St Stephen's Green Park to continue to function.</p> <p>Appendix A7.5 to the EIAR presents an analysis of the alternative construction methodology of mining the station which would allow for construction of the station with a smaller footprint at ground level. However these mined options were ruled out as they would increase the length of the construction phase (and as a result environmental impacts) by between 2 and 3.75 years and they would ultimately make it more difficult for the Project to achieve its objectives of providing a high quality operational station. It is acknowledged in Chapter 27 of the EIAR that the full maturation of replacement trees for those removed will take a significant period of time to re-establish (albeit that TII has committed to replanting a significant proportion of Mature Specimen Trees). However, on completion of the construction phase, by reinstatement of heritage items and replanting (and reestablishment) of trees, TII maintains that the proposed St. Stephen’s Green Station will enhance this area by providing Dubliners and visitors alike with high quality public transport access to St. Stephen’s Green and to this area of the city, thereby reducing car dependency, noise levels and improving air quality, while allowing citizens to enjoy St Stephen's Green long into the future.</p> <p>With regard to the permanent elements of 'upstanding structures' introduced into the park, for example the ventilation structures, these will incorporate materials chosen to respect the surrounding 18th century Georgian brick architecture. Please also refer to Responses (1) and (2) above.</p>	

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6	Cover letter - Architectural Heritage	9	The Department is concerned that the underlying significance of the historic city and suburbs (including medieval origins, the surviving legacy of the Georgian city, and the later designed elements and landscape of the C19 <sup>th</sup> suburban expansion) would be undervalued where a narrow focus is placed on the proposed route, and where individual sites and historic places are not fully evaluated.	<p>TII would like to provide the assurance that the underlying significance of the historic city and suburbs is respected and has been taken account of by the EIAR, in particular Chapter 26 Architectural Heritage. All potential impacts on individual sites and historical places are fully evaluated in the EIAR (again in particular at Chapter 26) and all required mitigation measures are identified, described and assessed).</p> <p>The proposed route is entirely below ground through the historic city and its suburbs, with the exception of necessary above-ground elements at stations such as accesses, ventilation shafts and skylights, which have a very localised presence. In some cases, such as Collins Avenue, Mater and St. Stephen's Green stations, the ground above is to be reinstated following construction, while at other locations, such as O'Connell Street, Tara Street and Charlemont Stations, the above-ground development would be carried out by others. In all cases, reinstatement and landscaping will be required to integrate the MetroLink above ground elements sympathetically with the existing environment and will need to be agreed with DCC.</p> <p>For this reason, the impact of the Project when complete will have a physical presence that is in keeping architecturally with the existing environment, with no direct impacts on the architectural heritage of a wider area.</p> <p>The EIAR assessment does also consider the wider effects of construction and tunnelling activity in terms of the impact of construction generated vibration and settlement on buildings beyond the immediate surface elements of the Project. The outputs of these assessments have fed into the analysis presented in Chapter 26 Architectural Heritage.</p>
7	Cover letter - Architectural Heritage	9	A key concern arising is that the architectural heritage impact has not been adequately considered in its widest context. The effect on protected structures and the mature character of their settings, and the impact of enabling works, demolition, excavation, construction and intensification of use have not been fully identified or appraised. Planning permission for works adjacent to protected structures typically is addressed in detail to ascertain the impacts on significance and character in the context of the Planning & Development Act 2000, and as per the Architectural Heritage Protection Guidelines, published 2011 .	EIAR Chapter 26, Architectural Heritage, assesses the potential impacts of the proposed Project on all elements of architectural heritage and identifies potential for direct and indirect impacts on these features. As the majority of the proposed Project is underground, the areas where there is potential for direct impacts are few. Potential impacts on Protected Structures and their settings resulting from the proposed Project (due to the proposed works) on each individual feature are presented in Section 26.5 of EIAR Chapter 26. For each feature, there is a description for the potential element of the works that could cause an impact and the significance of effect on each site is presented (based on a rating of the value of the site and the potential magnitude of impact) together with all required mitigation measures.
8	Cover letter - Architectural Heritage	9	<p>The impact arising from this infrastructural project includes extensive excavations in close proximity to protected structures, historic infrastructure, the demolition of boundaries, alteration of formal squares and streetscape character, and the removal of mature settings and amenity from C18<sup>th</sup> and C19<sup>th</sup> residential conservation areas. The cumulative scale of the impact is of particular concern.</p> <p>The overall impact that will occur has not been fully documented, nor has adequate provision been made for conservation and re-making post construction.</p>	<p>The impact of enabling works, demolition, excavation and construction are identified, described and assessed in the EIAR Chapter 26, Architectural Heritage. Further, undertakings have been given to have conservation method statements prepared by the Project Conservation Architect and be implemented at construction stage.</p> <p>Please also refer to Response (7) above.</p> <p>The construction methodologies assessed are neither unusual nor novel and have been proposed based on the environment within which the works are to be undertaken and are commonplace in many urban settings adjacent to protected structures and historic infrastructure. Impacts can be managed in accordance with the Construction Environmental Management Plan (CEMP) to minimise impacts.</p>
9	Cover letter - General recommendations	10	The Department would welcome further consideration of the design strategy, in particular the ‘cut and cover’ approach and would favour tunnelling where possible to avoid architectural heritage impacts. It should be noted that this approach may facilitate more timely delivery, as it will reduce reliance on demolition and disturbance of existing built heritage.	<p>The majority of the proposed alignment, and all of the sections through fully developed urban areas will be tunnelled, minimising impacts on the existing urban fabric and the built heritage. With regards to stations, even for mined stations, surface penetrations are necessary to enable the construction of a mined station, and also for access to the station when operational, plus surface penetrations required for ventilation, lifts and emergency access. As a result, some amount of impact on architectural heritage is unavoidable, but noting this is minimal for the reasons set out by Response (7) above.</p> <p>It is also incorrect to state that mined stations construction will deliver a more timely delivery, in fact the Alternatives Assessment EIAR Appendix A7.7 demonstrates that mined station construction would serve to lengthen the overall duration of the construction programme and its environmental effects.</p>
10	Cover letter - General recommendations	10	The Department would also welcome the careful consideration by An Bord Pleanala of all the aspects of the proposed technical design, the scale of excavation, the vibration tolerances and proposed approach to water management with regard to the possible impact on architectural heritage, i.e. brick basements, areas, and cellars as identified. The close proximity and under tunnelling of National Institutions and the prominent cultural sites of the city along with historic infrastructure such as the Royal Canal and its crossings are noted	<p>TII would like to provide the assurance, as evidenced by the extensive nature of the EIAR, that all possible environmental impacts have been identified, described and assessed, and where necessary, mitigated.</p> <p>Tii confirm that the environmental impacts on the city's architectural heritage have been assessed including:</p> <ol style="list-style-type: none"><li>1. vibration impacts</li><li>2. the proposed approach to water management with regard to the possible impact on architectural heritage</li><li>3. brick basements and cellars as identified.</li><li>4. tunnelling of National Institutions and the prominent cultural sites</li><li>5. tunnelling and construction works in proximity to historic infrastructure such as the Royal Canal and its crossings are noted.</li></ol> <p>The impacts and proposed mitigation measures are detailed in the following EIAR chapters:</p> <p>Technical design and scale of excavation, refer to Chapters; 4 Description of the Project, 5 MetroLink Construction Phase, and the Non-Technical Summary;</p> <p>Vibration tolerances, refer to Chapters 13 and 14 where airborne and groundborne noise and vibration are considered respectively;</p> <p>Water Management, refer to Chapters 18 Hydrology, and 19 Hydrogeology.</p>

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11	Cover letter - General recommendations	10	The Department welcomes the appointment of a Project Conservation Architect for the lifetime of the construction programme as it develops with the input of industrial heritage and stained glass specialists. To support the cultural heritage strategy the appointment of a bespoke Heritage Works Contractor is envisaged for the future works and this is regarded as being of great importance in securing good long-term heritage outcomes.	As outlined in EIAR Appendix A5.1 Construction Environmental Management Plan (CEMP), specialists with appropriate skills and experience will monitor on-site construction on behalf of TII, where required. In terms of Architectural Heritage this will include a Project Conservation Architect with the required expertise and experience who will have responsibility for each site along the alignment. A Cultural Heritage Strategy has been prepared by TII's Project Archaeologist and Conservation Architect, who will remain involved for the duration of the Project (Section 6.8 of the CEMP). For any heritage works carried out by TII's contractors, these will be carried out and managed by organisations and persons who are qualified and experienced in this field of work and are deemed competent.
12	Cover letter - General recommendations	10	The Department recommends that these provisions should be further supported by the appointment in each site of a Conservation Architect with demonstrable expertise and experience in urban design in historic contexts to identify, confirm and develop the record of the historic fabric, inform appropriate levels of intervention and protection, and to guide future conservation and make good original character and historical design intent.	Please refer to Response (11) above.
13	Cover letter - General recommendations	10	With regard to the proposed surface station design the Department notes that a substantial number of new stations will be built and that they will be constructed within contemporary and historic settings. While an overall coherence of design across stations is anticipated, the Department recommends a heritage-led approach within areas of significant historic character to ensure high quality design and the use of appropriate materials and craft skills etc. This approach should be agreed in each instance with the Local Authority Architectural Conservation Officer and the Department.	TII believe the commissioning of internationally renowned architects, Nicholas Grimshaw and Partners, has delivered a contemporary station design which is appropriate for a state of the art metro system such as Metrolink. Appropriately, significant emphasis is placed on the public spaces. Where feasible, the station concourse is a soaring space illuminated from above with natural light. Dublin's rich architectural heritage has been respected, but not copied in a pastiche imitation. In accordance with best conservation principles, as set out in the ICOMOS Venice Charter of 1964, the stations are architecturally distinguishable so as not to falsify the existing historic context. Reference and due respect to that context is made through the choice of high quality and appropriate materials and the scale of the interventions. At Mater station, the canopy entrance evokes the scale of park structures. At St Stephen's Green, the materials of the ventilation structures are chosen to respect the surrounding 18th century Georgian brick architecture. The aesthetic values of all eras, including our own, have cultural validity, and therefore the brick is used in a contemporary way reflecting contemporary aesthetic idioms derived from 21st century technology. TII believe the current station and surface level designs greatly enhance the public realm at all locations along the MetroLink route. There is a unifying commonality in the design of all stations, providing a consistent and coherent architectural language, which assists with orientation and wayfinding, and contributes a new architectural lexicon to the cultural iconography of the city.
14	Cover letter - Site specific recommendations and observations	10	<b>Santry Lodge</b> Proposals provided in the context of Santry Lodge could potentially undermine the surviving significance of the historical demesne and its cultural heritage importance. Engineer-led design proposals in this context appear not to have sufficient regard to the surviving integrity of the former C18 <sup>th</sup> estate and its planned landscape as evidenced by historical mapping. The proposed interventions would have impact on the architectural heritage of this area and have not adequately evaluated the architectural significance and character of the surviving element of Santry Lodge, its entrance and boundary and its still discernible relationship to the wider planted landscape. The Department would welcome further consideration of the proposals to ensure the long-term survival of the lodge	At the time of the Railway Order application, Santry Lodge, its gate lodge and gateway were not designated as a Protected Structure and not included in the NIAH, nor are the grounds of Santry Lodge included in the NIAH garden survey.  Notwithstanding the lack of statutory protection at the time of the Railway Order application, the EIAR has treated Santry Lodge as a significant structure, equivalent to being included in the NIAH. All potential significant impacts on Santry Lodge have been identified, described and assessed in Chapter 26 of the EIAR with proposed mitigation measures described in Section 26.7.1, Table 26.66. It is also important to note that the proposed design has been developed to avoid any direct impacts on Santry Lodge itself and while it is acknowledged that the alignment traverses the curtilage of this structure, it is unavoidable in the context of crossing the M50 Motorway at this location.
15	Cover letter - Site specific recommendations and observations	11	<b>Lissenhall Bridge</b> The Department would welcome careful consideration and the provision of detailed survey of this early structure and its historic setting as it retains cultural significance and integrity. Further information is necessary to understand the overall condition and structural capacity to inform the level of intervention and to minimise adverse impact on the bridge's historic character. Due to the scale of the proposal insufficient information is available to ascertain the overall impact to this protected structure/monument and to gauge the proposed conservation outcome	As noted by Response (3) above, the EIAR identifies, describes and assesses all significant impacts of the project on the Bridge. Hoardings will be located and designed to ensure there is no risk to the Lissenhall Bridge structure from construction works, plant and equipment, and that there are no proposals for construction work to occur within 10m of Lissenhall bridge.  TII commit to procuring the main works contractor to undertake further surveys and assessments prior to commencement of works (in order to update existing surveys and results and data held) to ensure that the Lissenhall bridge is protected from the MetroLink works. In the unlikely event these assessments dictate that further protection measures are required, TII will agree with the Department the form and nature of any measures required. The assessments and mitigations will respect the bridge's historic setting and cultural significance.
16	Cover letter - Site specific recommendations and observations	11	<b>Glasnevin Interchange</b> This site comprises earlier railway infrastructure in the ownership of Irish Rail and the historic canal infrastructure in the ownership of Waterways Ireland. The Department would welcome the careful consideration and detailed survey of these complex historic settings, their fabric and historic relationships to minimise adverse impact on the architectural heritage significance and historical function and to minimise the loss of historic fabric, mature planting and amenity. The re-making of the former bridge at Glasnevin Station in close proximity to the canal gates is welcome to preserve an integral part of the historic canal character. However, it is recommended that the bridge be put back on a permanent basis and made part of a well-considered design in the context of the surviving stonework. Detailed design and co-ordination with service routes is required for agreement with the Department. As noted above, it is recommended that interventions in historic areas such as Glasnevin be heritage led and of high quality, including the use of appropriate materials etc., all to be agreed with the Department and Local Authority Architectural Conservation Officer.	The bridge referred to is a temporary structure to facilitate access to the Coke Oven Cottages during station construction works. The temporary structure will be removed following the completion of the works. There are no plans to remake/reinstate the original bridge structure at this location which was removed in the 1980's.



Submission No.			63	
Organisation Name or Name of Submitter			Development Applications Unit (DAU)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
DAU Cover Letter - 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.				
17	Cover letter - Site specific recommendations and observations	11	<p><b>O’Connell Street</b></p> <p>The proposed subterranean station is envisaged as part of the wider O’Connell Street regeneration area and is to be integrated with the proposed re-development of this historic urban block and streetscape fronting O’Connell Street known as Dublin Central, Site 2. This development is the subject of a separate planning permission which seeks substantial demolition of the street fronted buildings to O’Connell Street. The designation of O’Connell Street as the first Architectural Conservation Area in Dublin was based on detailed survey and research and affirmed the cultural significance of the place associated with significant events of our past, particularly relating to the formation of the State. (Refer to attached in Appendix). The Department was informed that the design of the proposed station was intended to avoid adverse impact on the adjoining National Monuments site at Moore Street. While this is acknowledged, the wider urban block will be impacted upon by the proposed construction methodology. In this regard the options discussed by the EIAR suggest that the development of the station can go ahead regardless of the planning outcome for the development of Dublin Central (which facilitates the proposed ‘cut and cover’ approach). This suggests that the removal of extensive historic streetscape may be avoidable. As previously noted, it is recommended that interventions in historic areas such as Moore St. be heritage led and of high quality, including the use of appropriate materials etc., all to be agreed with the Department and Local Authority Architectural Conservation Officer.</p>	<p>TII and the developer of the Dublin Central Scheme (Hammersons) have worked closely together to ensure that both developments are complementary to one another and can be delivered in parallel provided that a Railway Order has been granted for MetroLink and planning permissions for the Dublin Central scheme has been granted. The EIAR assesses the environmental impact for two potential scenarios.</p> <ul style="list-style-type: none"><li>• The first scenario envisions the shell of the MetroLink station box being constructed as part of the Dublin Central development. The planning application for the Dublin Central Development includes for the shell of the MetroLink Station box.</li><li>•The second scenario envisions a situation whereby the Dublin Central scheme is delayed significantly or will not progress to construction. In this scenario the entire station box (shell and finishes) will be constructed by Transport Infrastructure Ireland.</li></ul> <p>It is important to clearly state the following:</p> <ul style="list-style-type: none"><li>• In Scenario 1, and in accordance with the Transport (railway infrastructure) Act, 2001, should the Dublin Central Scheme receive planning permission, works on the MetroLink Station shell cannot commence until a Railway Order for MetroLink has been granted.</li><li>• In scenario 2, TII will construct the entire station box (shell and finishes), subject to a Railway Order having been granted.</li></ul> <p>For this reason and as correctly stated in the DAU’s submission “the development of the station can go ahead regardless of the planning outcome for the development of Dublin Central”. In both scenarios, the extent of demolition of structure to the rear of street fronted buildings to O’Connell Street that is required has been assessed as part of the EIAR.</p> <p><b>Impact on the National Monument</b></p> <p>In the EIAR Chapters; 25 Archaeology and Cultural Heritage, and 26 Architectural Heritage, Dublin Central Site 2 was considered in the Do-Nothing Scenario to assess the potential impacts should that project not proceed. Section 26.5.1.10.1 of Chapter 26 notes that the in the event of Dublin Central Site 2 not proceeding, clearance works would still need to be undertaken to facilitate the proposed Project. These works would be carried out under the supervision of a PCA and mitigation measures would be in place to protect the facades of the buildings impacted. In either scenario there are no impacts to the National Monuments in this area.</p> <p>TII also confirm that interventions in historic areas such as Moore St. will be respected, the relevant authorities consulted, and that as noted by our Response (11) above, specialists with appropriate skills and experience will monitor on-site construction on behalf of TII, and that any heritage works carried out by TII's contractors will be carried out and managed by organisations and persons who are qualified and experienced in this field of work and are deemed competent.</p>
18	Cover letter - Site specific recommendations and observations	12	<p><b>Mater</b></p> <p>This small enclosed park is identified as a rare amenity space for the community within the north Georgian character area and the setting of a grotto and a C20th high cross to the Four Masters, which gives the name to the park. The memorial is described as follows; ‘This high cross on a large plinth commemorates the Franciscan friars of Donegal town, who between 1632 and 1636 compiled from early sources a history of the ancient kingdom of Ireland which became known as the Annals of the Four Masters. The Annals are chronicles of the medieval history of Ireland.’ The proposed intensification of use as an entrance to the subterranean station will have a substantial effect on the use and benefit of this recreational space. The temporary dismantling of fabric and its removal to storage is ultimately destructive and results in loss of cultural significance, authenticity and integrity. Whilst the architectural character of the park today is defined by the presence of the historic classically fronted Mater hospital, an underlying significance is known to exist relating to Gardiner’s unfulfilled ambition for the Georgian city. Excavations discovered the footprint and foundation stones for the great circus that was planned but never built in this location. The proposed excavation by ‘cut &amp; cover’ approach and the removal of the surviving elements of this grand vision is not supported by this Department. The proposed construction from the top down of the large scale subterranean box will have a significant and immediate impact on the adjoining historic fabric extending beyond the boundaries of the Four Masters Park. Adjoining the park is the site of St. Joseph’s Church which is included in the overall public realm design and this Department, as before, notes the requirement for interventions to be heritage-led and of high quality, in this case, using appropriate materials to reference the Georgian architectural character area with all detailed design to be based on an understanding of the historical context and agreed with the Department and the Local Authority Architectural Conservation Officer</p>	<p>The amenity and historical value of the park are fully understood (as outlined in EIAR Chapter 26 Architectural Heritage, section 26.4.4.8.2). This was fully considered in the development of the proposed station design, resulting in the park being largely retained in its current shape and layout, with all elements of architectural heritage being reinstated. It is TII’s view that while the temporary removal of the Four Masters Cross, Healing Hands sculpture and the construction of the station box will have a short-term impact on the amenity of the area, the final reinstatement of all of these elements (as well as the park layout) will ensure that the impact on the character of the park is minimised.</p> <p>The former existence of the street pattern of the Royal Circus is also understood and is referenced in EIAR Chapter 26, section 26.4.4.8.2, and in this context it is important to note that the proposed station will not alter the street layout in this area.</p> <p>The intended compulsory purchase of the park as part of the Railway Order Application will allow TII to open the reinstated and improved park to the wider public who will be able to fully avail of its extraordinary amenity value.</p>

Submission No.			63	
Organisation Name or Name of Submitter			Development Applications Unit (DAU)	
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19	Cover letter - Site specific recommendations and observations	12	<p><b>St Stephens' Green</b> The cultural significance of St. Stephen’s Green formed the basis of several pre-planning discussions and the Department advised of the key concerns pertaining to the works in the context of the surviving cultural landscape.</p> <p>As previously noted, the Department would welcome An Bord Pleanála’s further consideration of the design strategy and evaluation of the construction approach of the large stations in particular to avoid the ‘cut and cover’ and ‘top-down’ approach where possible, in favour of tunnelling to avoid/minimise architectural heritage impacts as an integral part of overall design strategy to safeguard cultural heritage significance and the adjoining sites of national importance. Furthermore, the Department would welcome the further consideration by An Bord Pleanala of the modified version of Options as presented by Metrolink, so that the station footprint is situated externally to the Green enclosure in order to restrict the scale of the construction/work within the park. Similarly the reconsideration of these options would remove vent shafts or skylights exiting within the railed area of St Stephens Green. The proposal to include these elements within the Green requires planting exclusion zones and maintenance access areas, diminishing the established areas of planting and the overall amenity space and habitat provision. Consideration of other viable options such as the construction below the carriageway to St. Stephen’s Green or partial construction underground would reduce the impact at surface level. For example, a reduced construction/work area at the Wolfe Tone corner may be achieved to permit a more discreet construction of the escalator shaft and public lift to access the proposed subterranean station.</p> <p>In summary, the Department would welcome the further consideration of the design approach and the relocation of the construction zone eastwards away from the internal core of St Stephens Green, to protect the existing trees and to safeguard the historic setting and integrity of the Park. As previously noted, any interventions within historic areas such as St. Stephen’s Green should be heritage - led and of high quality, including the use of appropriate materials etc., all to be agreed with the Local Authority Architectural Conservation Officer and the Department.</p>	<p>Please refer to Responses (1), (2) and (5) above. As outlined, TII have undertaken a robust and extensive options/alternatives assessment to identify the preferred location and construction methodology for the proposed station at St. Stephen's Green. The requirement for planting exclusion zones and maintenance access areas will be minimal, as noted previously, and once construction is complete and MetroLink is operational, MetroLink will occupy just 0.2% of the Park. Therefore, it is considered by TII that no significant diminishment of established areas of planting and the overall amenity space and habitat provision is materially impacted.</p> <p>TII recognise the historic and cultural importance of St. Stephen's Green and that the intervention in to the Park will be dealt with respectfully and with care. TII confirm that they will engage and consult with the Local Authority Architectural Conservation Officer and the Department, and as noted by response (11) above, specialists with appropriate skills and experience will monitor on-site construction on behalf of TII, and that any heritage works carried out by TII's contractors will be undertaken and managed by organisations and persons who are qualified and experienced in this field of work and are deemed competent.</p> <p>The work area at the Wolfe Tone corner is dictated by the design of the station and cannot be simply reduced as it has been sized to support the extensive construction required for this option.</p>
20	Cover letter - Site specific recommendations and observations	14	<p><b>Charlemont</b> The Department regards the construction of the large subterranean station integrated with the commercial development at this location as a significant impact on the setting and architectural character of the protected structures and Architectural Conservation Area of Dartmouth Square. Detailed conservation proposals are required to off-set the negative impacts that are apparent with this station construction i.e. the repair and conservation of historic structures, boundaries and settings to restore the overall architectural character of the area. The Department, as before, recommends that interventions be heritage-led and of high quality, in this case using appropriate materials to reference the late Victorian architectural character area with all detailed design to be based on an understanding of the historical context and agreed with the Department and the Local Authority Architectural Conservation Officer.</p>	<p>TII recognise the setting and architectural character of the Protected Structures and Architectural Conservation Area (ACA) of Dartmouth Square and commit to dealing with this respectfully and with care. EIAR Chapter 26, Architectural Heritage, includes as a mitigation measure the requirement for the Project Conservation Architect to prepare conservation method statements which will be implemented in order to ensure the protection of features in the ACA such as historic granite steps, kerbing and lamp posts to safeguard the architectural character.</p> <p>Mitigation measures are outlined within Chapter 26, Section 26.7.1 to mitigate the negative impacts of the proposed Project on the architectural heritage throughout the Project footprint. TII can confirm that they will engage and consult with the Local Authority Architectural Conservation Officer and the Department, and as noted by our Response (11) above, specialists with appropriate skills and experience will monitor on-site construction on behalf of TII, and that any heritage works carried out by TII's contractors will be undertaken and managed by organisations and persons who are qualified and experienced in this field of work and are deemed competent.</p>



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21	Cover letter - Nature Conservation	19	<p><b>Recommendations</b></p> <p>In light of the above the Department recommends that any Railway Order granted in response to the present application should be subject to the following conditions:</p> <p>1 . That all the mitigation measures to avoid the pollution of surface water runoff during the construction phase of the proposed development set out in the NIS supporting the present application shall be incorporated in a CEMP, a Water Management Plan (WMP) and a Soil Erosion and Pollution Control Plan to be submitted to the planning authority for its written agreement before the commencement of works, and these plans shall be implemented in full. Reason: To avoid the pollution of surface water courses in the vicinity of the proposed development resulting in adverse effects on aquatic flora and fauna and the Qualifying Interests (QIs) of downstream coastal European sites designated under the Habitats Directive (92/43/EEC) and the Birds Directive (2009/1 47/EC).</p> <p>2. That no removal of trees or vegetation to facilitate the proposed development shall occur during the main bird breeding season from March to August inclusive. Reason: To avoid the destruction of bird nests, eggs and nestlings.</p> <p>3. That any trees with potential bat roost features (PBRs) to be felled to facilitate the proposed development shall be resurveyed for bats before their removal, using if necessary endoscopes, and if the presence of any bat is identified in such a tree, it shall only be felled on the receipt of licence from the National Parks and Wildlife Service (NPWS) of this Department to derogate from the Habitats Directive to destroy a bat breeding or resting place. Reason: To avoid the death or injury of members of species, namely bat species, afforded a system of strict protection under the Habitats Directive (92/43/EEC).</p> <p>4. That 30 no. 2F Schwegler bat Boxes shall be installed along the MetroLink route, and that the lighting design for the proposed development, signed off on by a bat specialist and incorporating measures to minimise light spill pollution, shall be submitted to the planning authority for its written agreement before the commencement of any development on site, this lighting design to be implemented in full. Reason: To conserve bat species which are afforded a system of strict protection under the Habitats Directive (92/43/EEC).</p> <p>5. That a Cross Guns Otter Bypass Plan, to be drawn up in co-operation with the National Parks and Wildlife Service (NPWS) and Waterways Ireland, shall be submitted to the planning authority for its written agreement before the commencement of any works in connection with the proposed scheme in the vicinity of the 5th and 6th Locks and Cross Guns Bridge, Phibsborough; this plan to provide for the preservation of movement of otters along the Royal Canal as far as possible past the works on Glasnevin Station for the duration of these works. Reason: To maintain free movement along the Royal Cana! of a mammal species, namely otter, afforded a system of strict protection under the Habitats Directive (92/ 43/EEC), and which forms an important element of the city of Dublin fauna.</p> <p>6. That the areas along the MetroLink route identified in the EIAR supporting the present application as being suitable habitat for amphibians should be surveyed for such animals before the commencement of any works on these areas, and if any spawn, larvae or adults of frog or smooth newt are identified during these surveys, they shall be removed to suitable habitat nearby under licence from the NPWS. Reason: To conserve species, namely frog and smooth newt, protected under the Wildlife Acts, 1976 to 2022.</p>	<p>The majority of the measures / proposed conditions are addressed in either the EIAR Chapter 15 Biodiversity, or the Natura Impact Statement (NIS). TII have reviewed each of the proposed conditions and comment as follows:</p> <p>Proposed Conditions 1, 3, 4, and 6: TII confirm their agreement to these conditions.</p> <p>Proposed Condition 2: TII would ask that this condition is amended to read "Where feasible no removal of.....". In the event this is not feasible for reasons of programme, an alternative approach would be taken such as breeding bird checks before removal is undertaken. This condition goes beyond the restrictions set out in the Wildlife Acts with respect to vegetation clearance and breeding bird habitat, which contains an exception for "in the course of road or other construction works or in the development or preparation of sites on which any building or other structure is intended to be provided"</p> <p>Proposed Condition 5: The DAU condition states 'That a Cross Guns Otter Bypass Plan, to be drawn up in co-operation with the National Parks and Wildlife Service (NPWS) and Waterways Ireland, shall be submitted to the planning authority for its written agreement before the commencement of any works in connection with the proposed scheme in the vicinity of the 5th and 6th Locks and Cross Guns Bridge, Phibsborough...'</p> <p>Chapter 15, Section 15.5.1.4.3 of the EIAR sets out the mitigation measures to deal with the severance/barrier effect identified by the DAU. It proposes that temporary mammal-resistant fencing is erected at the dewatered basin between Locks 6 and 5. That will provide a safe path for commuting otter. The fencing/path will be installed in accordance with the specification outlined in Guidelines for the Treatment of Otters prior to the Construction of the National Road Schemes (NRA, 2008c) and TII's mammal resistant fencing specification. It will also be regularly inspected by an ecologist over the six-month period to ensure its effectiveness and if necessary, adjustments will be made to maintain functioning.</p> <p>TII is satisfied that will be sufficient to avoid any severance/barrier effect at this location, it has no difficulty with a condition requiring it to agree the details of the mitigation with Dublin City Council in consultation with NPWS and Waterways Ireland. In that regard, it is not clear whether NPWS is proposing a different mitigation approach and TII will seek to clarify this with NPWS with a view to presenting an agreed approach in advance of the oral hearing.</p> <p>Ref Wolfe Tone monument. TII believe that the proposed relocation of the Wolfe Tone Monument is appropriate and is sympathetic to St Stephen's Green and its historic setting.</p> <p>Ref Carroll's Building. The proposed orientation of the Charlemont station is clearly shown in the RO Plans\Drawings, Structures Details Book 2 of 3 MetroLink Stations Dublin City Council, ref Plan No. ML-ST 307 O-A1. The assessment of impact of the proposed works on the architectural significance is given in EIAR Chapter 26 Architectural Heritage. Refer to Table 26.66, Impact Reference AHI-102 to 104. Assessment of the structural integrity due to the station construction is discussed in EIAR Appendix A5.17 Building damage report which notes that '<i>While the ground movement impact assessment has concluded that protection works are not necessary, due to the proximity of the building to the station excavation, it is proposed, as a precaution, that provision at this time is made to be able to treat the ground beneath the building from the station site in the event ground movement mitigation is necessary</i>'.</p>