

Submission No.			098	
Organisation Name or Name of Submitter			Frank McDonald (6 The Cedar Glensavage Avoca Road, Blackrock)	
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RE: Railway Order application for Metrolink project (ref 314724)				
1		3	In reality, however, it is a classic example of the absence of joined-up thinking on transport in Dublin — a stand-alone project that doesn't make sense in its own terms and would need to be extended southwards in order to do so. An Bord Pleanála is, therefore, in the invidious position of being asked to make a decision on part of a much larger project without having any idea of where the rest of it would go.	As outlined in EIAR Chapter 03 (Background to the MetroLink Project), three major public transport projects proposed under the Transport Strategy for the GDA 2016-2035 (NTA, 2016), namely MetroLink, BusConnects and DART+ have been developed as independent standalone projects. These continue to be supported by the Transport Strategy for the GDA 2022-2042. However, these projects (together with the existing transport network and other public transport projects) are designed to provide a fully integrated transport network. The proposed Project is designed to offer interchange with other modes of public transport at numerous stations, such as Luas, DART, and bus, with the Luas Green Line interchange at Charlemont Station offering connection southwards. Additionally. the design of the project does not preclude future extensions or phases. If developed, these extensions and phases will be considered through their own planning process.
2		5	<p>In November 2021, according to an Irish Times report, the NTA had decided to develop Luas lines serving UCD Belfield and Knocklyon/Rathfarnham to take pressure off the existing Green Line and remove the need for it to be upgraded to a metro south of Charlemont — but only after 2042. What all of this indicates is that the NTA is making it up as it goes along.</p> <p>In this case, it appears to be a stratagem to overcome the most glaring downside of the metro project, as first envisaged — the fact that it would have cannibalised most of the original Green Line, which had been installed just a few years earlier. So why, then, is the current plan to terminate the proposed 19km metro line at Charlemont being pursued?</p>	<p>As explained by EIAR Chapter 7, Consideration of Alternatives, section 7.5 Assessment of Alternative Route Options, the assessment of alternatives to identify a preferred route for the proposed Project has been undertaken based on the assessment of a number of route options and station locations. The proposed project has emerged out of three rounds of non-statutory public consultation and has been an objective of two GDA Transport Strategies that were the subject of Strategic Environmental Assessment and public consultation.</p> <p>Charlemont is specifically identified as locations for stations in the GDA Transport Strategy 2022-2042. ABP is required to have regard to those requirements as policies and objectives for the time being of a public authority whose functions have a bearing of the proper planning and sustainable development of Dublin (Transport (Railway Infrastructure) Act 2001 and 143 of the Planning and Development Act 2000). The transport strategy is also a consideration material to the proper planning and sustainable development of the area (Section 31 J of the Planning and Development Act 2000).</p> <p>The GDA Transport Strategy is a consideration material to the proper planning and sustainable development of the area (Section 31 J of the Planning and Development Act 2000).</p> <p>ABP has to give considerable weight to the GDA Transport Strategy, given its elevated role in the statutory scheme relating to proper planning and sustainable development, including that:</p> <ul style="list-style-type: none">* the NTA is required to provide a report to planning authorities making regional spatial and economic strategies, development plans and local area plans ("relevant plans") with recommendations on the optimal use, location, pattern and density of new development taking account of the Transport Strategy and stating whether there is inconsistency between the relevant plan and the Transport Strategy;* relevant plans are required to be consistent with the Transport Strategy;* the Office of the Planning Regulator is required to evaluate relevant plans to ensure that they address consistency with the Transport Strategy;* the Minister for Housing can direct variations to draft relevant plans to ensure that they are consistent with the Transport Strategy;* landowners are not entitled to compensation where permission is refused due to inconsistency with the Transport Strategy. <p>The proposed MetroLink alignment has not been extended south of Charlemont for the reasons set out by the GDA strategy , section 12.3.10, "The challenges associated with the upgrading of the Luas Green Line to a metro standard of service have led to the emergence of an alternative option which seeks to meet travel demand from south of Sandyford along a new light rail corridor which serves UCD post-2042. As such, the upgrading of the Green Line to metro standard is not being pursued as part of this strategy. Instead, for this strategy period, the capacity and frequency on the current Green Line from Sandyford northwards to the city centre will be incrementally increased through the provision of additional tram fleet and services and associated turnback arrangements to meet forecast passenger demand."</p>

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			Response (2) continued.	<p>Further information on the challenges associated with connecting to the existing Luas Green Line can be found in the TII published report: "Constructability Report - Green Line Closure, April 2019, ref https://www.metrolink.ie/media/ox0p3cjb/constructabilityreportgreenlineclosure.pdf". This showed that construction works to connect the metro from Charlemont to the Green Line would incur line closures over a period of up to 3-4 years, depending on construction methodology.</p> <p>For this reason it has been necessary to determine the most appropriate interchange and termination location for MetroLink. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise.’ This is also reflected by EIAR Chapter 7, section 7.7.8 MetroLink Southern Terminus Location that explains the rationale for selecting Charlemont as the optimum location for interchange with the Green Line.</p> <p>As noted by the GDA Strategy the selection of Charlemont does not preclude any future connections to the west or south of the city should a railway order application be made for the same some point in the future.</p>
3		5	This issue was raised by An Bord Pleanála representatives during “pre-application consultations” with TII/NTA when they queried “the appropriateness of the selection of Charlemont as the end-point in the light of the decision to omit the Luas Green Line upgrade”. That question has never been satisfactorily answered and needs to be rigorously pursued.	<p>Rationale for the Proposed Charlemont Station</p> <p>The proposal for an interchange location at Charlemont / Ranelagh is supported by the previous Transport Strategy for Greater Dublin Area (2016-2035) and the current Transport Strategy for Greater Dublin Area (2022-2042). The latter considers a range of options for the onward extension of MetroLink to meet the demand for travel over the period of the strategy. This includes consideration of the need for the upgrade of the Luas Green Line to metro with a metro extension to Dublin south west, south or south east. Whilst the strategy envisages that further extensions will be delivered after 2042, MetroLink which terminates at Charlemont allows for the possible extension of the metro in all the above directions.</p> <p>The proximity of the Metrolink station to the Luas stop at Charlemont provides for a positive customer experience for all users with short interchange distance and due to the proximity, clear wayfinding and high visibility of the interchange. The interchange arrangements at Charlemont provide for significantly better interchange arrangements compared to an alternative interchange at St Stephen's Green Station. Passengers wishing to interchange between Luas and metro at an alternative St Stephen's Green terminus would face a 500m-walk along a route either through St Stephen's Green park or along the footpath north of the park, which adds significantly to the time for interchange and therefore the overall journey time for passengers and a less positive customer experience for all interchange users. This passenger experience would be reduced further for those with mobility or visual impairments as well as those travelling to/from the airport with luggage.</p> <p>The section of MetroLink route between St Stephen's Green and Charlemont Stations contributes significantly to the overall benefits of the scheme. It serves a significant area of the south city of Dublin and offers enhanced access from the local area to the city centre and a direct connection to Dublin Airport. It serves key trip attractors including residential areas and offices / workplace locations, with high passenger boarding and alighting figures in the peak hours. During the morning peak, at Charlemont station the flows include 1,800 passengers alighting, 2,300 boarding and 1,229 passengers alighting, 2,276 boarding during the evening peak. The passenger numbers contribute significantly to the overall benefits of the scheme and the effect of these benefits outweigh the additional costs that are associated with the delivery and operation of the section from St Stephen's Green to Charlemont station. Further details are provided in Chapter 7: Consideration of the Alternatives, section 7.7.8 MetroLink Southern Terminus Location, including Table 7-16 Summary to Identify Southern Termination Point for MetroLink.</p> <p>The location of the interchange at Charlemont does not preclude onward extension south. An interchange at Charlemont is supported by policy including the Dublin City Development Plan 2022 - 2028 and the Transport Strategy for the Greater Dublin Area. As noted by the GDA Transport Strategy 2022-2042, section 12.3.2, "Charlemont offers the optimal location for the primary interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise."</p> <p>By extending MetroLink to Charlemont it provides for future proofing of the Green Line, bypassing the capacity constrained Luas on-street running section, and ensures potential future connectivity options are enabled, either to the Green Line or for extensions of the metro.</p> <p>The Charlemont Station interchange provides for increased passenger utilisation of the MetroLink system, thereby increasing the benefits delivered by the Project, reflected by an improved Project Benefit Cost Ration (BCR).</p>

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4		6	The Board’s representatives queried the rationale for Glasnevin being chosen for one of the principal Northside stations, as opposed to Drumcondra, which was the location under the earlier scheme — given that Glasnevin is relatively close to the Luas Green Line terminating in Broombridge and also relatively remote from Croke Park (unlike Drumcondra).	<p>EIAR Chapter 7, Consideration of Alternatives details the robust decision-making that has led to the preferred route chosen, including alternative alignments and station locations. The identification of a preferred route took account of the interchange capability of a location with other modes of transport, including the existing rail commuter services, and the future proposed DART+ network. Other criteria were also identified, such as potential trip demand, key trip attractors in the area, and directness of route (and subsequent impact on cost). Section 7.6.5 of Chapter 07 presents in detail the rationale for the selection of Glasnevin over Drumcondra. The choice of a station location at either Drumcondra or Glasnevin has been considered in the context of the achievement of the Transport Strategy for the GDA, having particular regard to maximising the interchange opportunities between different services and to provide fast and convenient access to major transport destinations such as Dublin City Centre and Dublin Airport.</p> <p>That analysis was subject to the non-statutory public consultation as part of the Emerging Preferred Route Report in 2018 and the conclusions of that report and consultation ultimately led to the adoption of the Glasnevin Station as an objective of the GDA Transport Strategies 2016-2035 and 2022-2042.</p>
5		6	Also raised was “the selection of the east side of St Stephen’s Green, given the distance from Grafton Street and possible future interchange with Dart Underground”. The Board should also have queried the costly diversion of Metrolink’s alignment to link up with DART at Tara Street when such an interchange would ultimately be provided by Dart Underground.	<p>Chapter 07 (Consideration of Alternatives) outlines how the Emerging Preferred Route (EPR) process identified St. Stephen's Green East as the preferred location for a station at St. Stephen's Green. The EPR was assessed through a Multi-Criteria Analysis (MCA) which included consideration of capital cost, landscape and visual impacts, impact to property, archaeology/architectural and cultural heritage, settlement, passenger experience and accessibility. St. Stephen's Green West was ruled out as the alignment between the proposed Tara Station and a station on St Stephen’s Green West would result in an undesirable horizontal reverse curve and an alignment greater than a 1000m long that would necessitate an intermediate intervention shaft located somewhere between these stations to comply with the MetroLink Fire Strategy. Further, as a potential station location, St Stephen’s Green West itself is a very constrained location due to the presence of buildings, Luas and St Stephen’s Green Park. Maintaining the Luas operational during station construction would be complex and challenging with significant disruption expected, whilst the impacts on St Stephen’s Green Park would be greater for a station in this location compared to the proposed location on St Stephen’s Green East. This would be the result of; the likely need to place more of the station in the Park compared to the proposed station on St Stephen’s Green East; it would impact an area of the Park that has greater amenity value than St Stephen’s Green East due to the nearby Park entrance adjacent to the southern end of Grafton Street, and there would be a risk of impacting the existing Park lake. In summary, an alignment that links the proposed Tara, St Stephen’s Green East and Charlemont stations is a more direct and economic alignment, does not require additional intervention infrastructure, avoids a complex engineering interface with the Luas Green Line, impacts the Park less and has less potential for disruption during the construction phase.</p> <p>A station at Tara Street allows the project to achieve one of the projects key objectives of interchange. It provides a good interchange opportunity with DART services and serves important key trip attractors in the study area with high potential passenger trips. This option also takes a direct and short route through areas of high demand in the centre of the study area. Additionally, the latest Transport Strategy for the GDA 2022-2042 indicates that DART Underground will not be delivered before 2050, and therefore its benefits will not be present for Metrolink's proposed 2035 opening year, or for many years into the future. Therefore, the Tara Street location is critical to achieve an effective interchange between DART and MetroLink enhancing the overall transport network .</p>

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6		6	The abrupt termination of MetroLink at Charlemont, without any firm plan for a future extension, would involve excavating both the station as well as a substantial turn-back loop deep enough underground to avoid the Grand Canal and the main sewerage line serving Tallaght that runs alongside it. This would add immensely to the overall cost of the project.	<p>Please refer to response item (2) above in relation to the choice of Charlemont Station as an appropriate interchange with LUAS. As presented in Chapter 07 (Consideration of Alternatives), the selection of Charlemont Station does not preclude any future connections to the south. In terms of cost, the provision of turnback facilities will be required no matter where the project endpoint will be, so there is no additional cost associated with this element of the project.</p> <p>The proposed tunnel turnback for Charlemont Station is to the south of the station with the tunnel entering the station from the direction of St Stephens Green from the North under both the Grand Canal and the Main Sewer from Tallaght.</p>
7		6	To put it mildly, more “joined-up thinking” is urgently required. This needs to embrace the integration of a// public transport modes serving Dublin — Luas lines, bus routes, commuter rail services and mainline rail. In regard to the latter, an All Island Strategic Rail Review is now under way to consider how the rail network can promote “sustainable connectivity”.	<p>The transport strategy for the Greater Dublin Area is outside the scope of the Board's functions in considering this application for a Railway Order. The NTA, whose statutory function is to lead transport planning, has identified the current MetroLink and in particular the stations at Dublin Airport, Swords, Glasnevin, Tara Street and Charlemont as a critical component of the integrated transport solution for the GDA.</p> <p>Please refer to response item (1) above in relation to integration offered by MetroLink. EIAR Chapter 06 (MetroLink Operations and Maintenance) details how the proposed Project has been designed to ensure maximum interchange with other modes of transport, specifically more sustainable modes of transport such as walking, cycling and public transport. Table 6.6. of this chapter details the interchange opportunities present at each station.</p> <p>As detailed in EIAR Chapter 03 (Background to the MetroLink Project), sustainability was a critical driver in the development of the Project. The Project is a sustainable mobility solution which supports the National Planning Framework's vision. The Project will be fully electrified and will be able to serve over 100 million passengers over time, diverting approximately 6.8 million car trips per annum in the early years through its delivery of interchange opportunities at each station. It should be noted that the All Island Strategic Rail Review "is not focused on commuter rail services within the major cities, but it will consider the interactions between proposed improvements to inter-urban rail and existing, or proposed, commuter rail services".</p>
8		6	<p>If there is to be a new high-speed link between Belfast, Dublin and Cork, it should obviously be routed through Dublin Airport — not only to cater for Northern Ireland residents using the airport but also to free up the existing coastal railway line south of Drogheda for commuter services, which are currently impeded by having to share the same tracks.</p> <p>But if the mooted high-speed rail line was to run through Swords and Dublin Airport, running underground into the city centre and then onwards to Cork, where would that leave MetroLink? Clearly, it would make little sense to have two tunnelled rail lines serving the airport — both of these in addition to the Port Tunnel, which feeds into the M1 that also serves the airport.</p> <p>As far as I can see, this issue is not mentioned at all in the voluminous EIAR submitted in support of the MetroLink scheme; clearly, a high-speed mainline rail line running through Dublin Airport is someone else’s department — CIE or Iarnrod Eireann — whereas MetroLink is TII’s (and NTA’s) baby. Such compartmentalisation is the enemy of “joined-up thinking” on transport.</p>	<p>Chapter 03 (Background to the MetroLink Project) recognises that an intervention is necessary on this corridor to achieve a change in transport patterns that reduces the reliance on private cars and increases significantly the modal shift to public transport. The corridor facilitates the efficient functioning of two major international gateways (Dublin Port and Dublin Airport) and completes the economic link between Dublin and Belfast (which is part of the Belfast/Dublin Economic Corridor that is flagged for protection in the NPF).</p> <p>As detailed in Chapter 07 (Consideration of Alternatives), during the development of the Old Metro North project, an option was considered that provided a link to the airport from the Iarnród Eireann network. This option was not approved as it failed to achieve the Government’s objectives for the (Old) Metro North project. It was also considered as part of the North Dublin Fingal Transport Study, which considered a long list of 10 heavy rail options and a short list of 3 heavy rail options, none of which performed as well as the proposed project having regard to economic, environmental, safety, accessibility and social inclusion factors.</p> <p>The Board's functions on this railway order application do not extend to matters of strategic transport planning. TII will not comment on the potential outcomes of the All Island Strategic Rail Review other than to say that as noted above the All Ireland Strategic Rail Review is a review of the inter-urban rail network while the proposed MetroLink project is a high capacity urban metro system required to serve predicted future population needs from Swords via Dublin Airport to Dublin City Centre and onwards to Charlemont . As noted in response item (1), MetroLink has been designed as part of an integrated transport network, with consideration given to avoiding the duplication of infrastructure/services by maximising interchange with all networks.</p>
9		6	The EIAR’s Architectural Heritage chapter lists seven buildings on the west side of O’Connell Street Upper dating from the reconstruction of the street in neo-classical style after the 1916 Rising and Civil War that are either protected structures or listed in the NIAH, all of which are located within the site of the proposed MetroLink station. Only facades would be retained.	Please see response item (10) below in relation to the impacts on architectural heritage at this location.

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10		7	<p>Table 26.55: Potential Direct Impacts During Construction at O’Connell Street Station rates the impacts of demolishing all but the facades of these buildings as “Significant” or “Very Significant” — whether this is done “on a standalone basis” or (as Til intends) in conjunction with Hammerson pic’s redevelopment of “Site 2” of its Dublin Central mega- scheme.</p> <p>The last surviving Georgian house from Luke Gardiner’s development of Sackville Street — 42 O’Connell Street Upper — is endangered by the demolition of No.43 and the excavation of its site to a depth of 28 metres. This would have “significant implications” for its stability, “requiring underpinning of the party walls/foundations” to keep the long-vacant house standing.</p>	<p>The assessment, protection and monitoring of any building impacted by the Project will be a key requirement in the delivery of the construction works at each station and MetroLink Site. To this end a Project Conservation Architect (PCA) has been engaged to oversee the implementation of the Project and will be thoroughly engaged throughout the construction works to ensure that No. 42 O’Connell St is not damaged during the works adjacent to the building.</p> <p>The potential impacts to 42 O’Connell Street have been addressed in a number of chapters in the EIAR including Chapter 14 (Ground borne Noise and Vibration) and Chapter 26 Architectural Heritage. Please note that in Chapter 26, Table 26.55 of the EIAR relates to the potential effects on sites including No. 42 O’Connell St in the absence of any mitigation, while Table 26.66 in the same chapter outlines mitigation measures which are:</p> <p>"The demolition of number 43 O’Connell Street Upper and the structures to the rear and the propping of number 42 O’Connell Street Upper are to be carried out in accordance with a method statement compiled by the PCA or by the appointed contractor’s conservation architect and approved by the PCA and vibration and settlement monitoring equipment is to be installed in number 42 and monitored to ensure that at no time do vibrations or settlement exceed given limits."</p> <p>The equipment is to be monitored and 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. Furthermore, any damage to architectural heritage receptor is to be repaired in accordance with a method statement to be prepared by the PCA or by the appointed contractor’s conservation architect and approved by the PCA. The potential effects are expected to decrease from Imperceptible to slight following mitigation.</p>	
11		7	<p>The most tragic loss would be the former Carlton cinema, dating from 1938, which was one of the anchors of O’Connell Street for decades until its closure in 1994. With seating for 2,000 in its original format before it was subdivided into three cinemas in 1976, the entire volume of the Art Deco cinema still survives, including a significant amount of its original fabric.</p> <p>More than 20 years ago, the Carlton was proposed as a location for the National Conference Centre; indeed, its name was appropriated to refer to the development site even then being assembled by forerunners of Hammerson pic as the “Carlton site". It would be ideal for conversion into a concert hall or music venue to enliven this stretch of O’Connell Street.</p>	<p>Unfortunately as identified in Chapter 26 of the EIAR, whilst, the impressive facade of the Carlton Cinema will be retained, other elements will be demolished. However the impacts at this site and the adjacent site have to be considered in the context of this building not being used since 1994 and the adjacent site being vacant since 1976. The retention of this facade will ensure that it does not continue to deteriorate due to dereliction. In addition, prior to the demolition of number 52-54 O’Connell Street Upper the building is to be recorded to English Heritage level 3. The recording of associated coal cellars to facilitate propping of the facades, the demolition and the propping of the facade are to be carried out in accordance with a method statement compiled by the PCA or by the appointed contractor’s conservation architect and approved by the PCA. Vibration and settlement monitoring equipment is to be installed in the retained façade and monitored to ensure that at no time do vibrations or settlement exceed given limits. The equipment is to be monitored and 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.</p>	
12		7	<p>Instead, as the EIAR notes, “the Carlton ... is to be demolished, except for the facade, as part of the works to construct O’Connell Station. The section to be demolished [the entire interior] is not part of the protected structure, though it is included in the NIAH. To facilitate the supports for the façade during construction, the cellars beneath the footway will be infilled with concrete ...</p> <p>Again, the predicted impact is rated as “very significant". As someone who remembers the cinema in its heyday as well as the Carlton Grill on the first floor, overlooking O’Connell Street, I sought to persuade Hammerson to retain and refurbish its Art Deco glory. They were also open to considering options for its future use, including the idea of turning it into a music venue.</p> <p>But that was before the alignment of MetroLink was altered so that, instead of excavating a station box in the middle of O’Connell Street as originally envisaged, it was now to be done behind propped-up façades along its west side. It is clear that the combined impact of MetroLink and Hammerson’s Dublin Central scheme will fundamentally change the character of the street.</p>	<p>Please refer to response item (11) in relation to the demolition associated with the construction of O’Connell Street Station.</p>	

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13		7	<p><i>Table 26.58: Potential Direct Impacts During Construction at St Stephen’s Green Station</i> acknowledges that “part of the park will become a construction site during the works to provide St Stephen’s Green Station, with the removal of paths, railings alongside paths, vegetation, the addition of hoardings, the installation of plant and other equipment, the removal of trees ...”</p> <p>Railings, plinth walls and gates around part of the park’s eastern perimeter would also be removed along with some of the lamp posts and bollards as well as the Wolfe Tone monument, its array of granite columns and the adjoining Famine sculpture for the duration of the station’s construction. All of this will have a “profound” impact on the architectural heritage of the park.</p>	Temporary land take required for construction activities at St. Stephen's green has been minimised in order to mitigate the impacts on the green as far as possible. The construction footprint within St. Stephens Green park will occupy just 5% of the park area. As noted in Chapter 26 (Architectural Heritage), architectural elements such as railings, monuments, paving stones are to be removed on a temporary basis prior to construction and are to be reinstated on completion. Mitigation in these cases involves the removal into secure storage of those items and their return and re-erection in each case. The dismantling, transportation, storage, conservation or repairs and reinstatement are to be carried out in accordance with specifications to be compiled by the MetroLink Project Conservation Architect and the works supervised by suitably qualified professionals. Following the implementation of mitigation measures the potential impacts on elements of architectural heritage are considered to be moderate.
14		8	<p>Socially, the proposed demolition of the mid-1990s College Gate apartment block on Townsend Street and the Markiewicz Leisure Centre on its lower levels as well as a nearby terrace of social housing adjoining the railway bridge would be the most serious negative impact of MetroLink in the city centre, as it would result in the loss of more than 80 homes.</p> <p>Chapter 8 of the EIAR states that “the Project Team is acutely aware of the potential [!] impact of the proposed Project to these property owners” and that TII would negotiate a scheme of compensation to allow for relocation of residents. It would also “support DCC in the identification and development of a replacement site for a leisure centre and swimming pool”.</p>	<p>TII acknowledge that the loss of residential property and the Markiewicz Sports and Fitness Centre is a very significant impact arising from the proposed station location at Tara St. However the decision to locate a station here was carefully considered and is central to the proposed MetroLink project as it allows for interchange with DART services at this location, in addition to serving an important catchment area. The EIAR outlines proposed mitigation measures to ameliorate the effects of the property loss. As detailed in Chapter 11 (Population and Land Use), for those residential properties that will need to be acquired permanently, suitable measures will be proposed for residents under the provisions of the Railway Order. In particular, a Land Acquisition Strategy has been prepared to provide information to residents and set out the arrangements in place for affected property owners. As detailed in Chapter 21 (Land Take), section 21.6 Mitigation Measures, in recognition of the impact on residential cases where properties are to be acquired and given the unique circumstances surrounding the proposed impacts to the College Gate apartment complex, TII will engage the services of a property advisory company to engage directly with property owners. Property owners will be invited to participate in a Discretionary Scheme. The Discretionary Scheme will offer property owners the opportunity to negotiate and reach a 'Pre-Agreement' on both a baseline residential unit price and other matters of compensation that an owner would normally be entitled to under the compensation stage. This will provide the parties with as much certainty as possible at this early stage.</p> <p>TII will use reasonable endeavours to make arrangements to provide residential property owners with as much time as possible in which to relocate, beyond that which is provided for under the statutory process. Full details of the Land Acquisition Strategy are contained in Chapter 11 and 21, and on www.metrolink.ie</p> <p>TII will also continue to work with DCC in relation to the development of an alternative sports and recreational facility to replace the Markiewicz leisure centre and intends to fund the alternative. However, TII does not have control over that development, which is part of DCC’s function to provide public sport and recreational facilities in its function area. DCC may or may not be in a position to deliver it in parallel with the MetroLink project. Accordingly, the Board should assess the MetroLink project on the basis that the alternative may not be available. The impact would then be significant, but nonetheless one that would not outweigh the strategic scale long term benefits that MetroLink will deliver.</p>
15		8	Ashford House on Tara Street, a substantial eight-storey office block dating from the 1990s, is also targeted for demolition to make way for the excavation of the Tara station — all as a direct result of the project promoters’ decision to divert the MetroLink alignment further east to provide a multi-level connection with the overground Tara Street DART station.	Please refer to response item (5) above in relation to the justification of Tara Station location.
16		8	<p>It should be noted that the entire city block bounded by Tara Street, Poolbeg Street, Hawkins Street and Townsend Street has been cleared in recent years for redevelopment. Had the alignment been drawn differently, it would surely have been possible to provide a station box for Metrolink on that extensive site. However, it appears to have been overlooked by TII/NTA.</p> <p>Instead, an equally large urban block immediately to the east — bounded by Tara Street (with the sole exception of the Irish Times building), Townsend Street, the Loopline and Poolbeg Street, and incorporating much of Luke Street — is now slated to be turned into another huge hole in the ground for several years to facilitate construction of Metrolink’s Tara station box.</p>	Please refer to response item (5) in relation to the justification for Tara Street Station. EIAR Appendix A7.2 Tara Street Station Report summarises the options considered for the location of Tara Station. In total 11 options were considered, which included various alignments which would locate under other sites referenced in the submission, however the preferred option 0, now the proposed Tara Street Station location, was selected as the preferred option as it retains good interchange facility with DART in line with the Project objectives, it has more limited impact on city traffic and utilities during construction than other options, it reduces risk to the overall construction programme, provides for a safer construction methodology, offers a cheaper overall construction cost, and retains the opportunity for future adjacent development by others.

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RE: Railway Order application for Metrolink project (ref 314724)				
17		9	It is now up to An Bord Pleanála's inspectorate and the Board itself to examine this huge transport project objectively, bearing in mind that it carries a minimum price-tag of €9.5 billion. Given the complexity of what has been proposed, it will need to hold an oral hearing to tease out many of the issues, including the downsides I have highlighted in this submission	TII welcome the opportunity to present the proposed Project at an Oral Hearing.
18		9	If MetroLink has an Achilles heel, it is surely the abrupt termination of the 19km line at Charlemont and the extensive turn-back loop that would be required to accommodate it. To overcome this fatal flaw, TII/NTA should be sent back to the drawing board to devise a viable continuation of the line that would sensibly extend it into Dublin’s southern suburbs.	Please refer to response item (2) in relation to Charlemont Station and future phases of the Project.
19		9	In this regard, I agree with the submission made by architect Peter Twamley that the line should be extended to serve Rathmines — including the site of Cathal Brugha Barracks, now the subject of a Government-sponsored feasibility study for a major housing scheme — and onwards via Harold’s Cross, Terenure and Templeogue to terminate in Tallaght.	Please refer to response item (2) above in relation to Charlemont Station and future phases of the Project. As presented in Chapter 07 (Consideration of Alternatives), the selection of Charlemont Station does not preclude any future connections.
20		9	I also agree with Mr Twamley that the diversion of MetroLink to connect with DART at Tara Street must be revisited. As he writes, “based on distance alone, the cost of a direct route from O’Connell Street to St Stephen’s Green will be considerably less than the proposed diversionary loop from O’Connell Street to Tara Street and on to St Stephen’s Green ...” This would not only make much more sense economically but also eliminate the drastic requirement to demolish several important assets in and around Townsend Street, including the College Gate apartments and Markiewicz Leisure Centre, the nearby small social housing scheme adjoining the Loopline and the Ashford House office block on Tara Street.	Please refer to response item (5) and (16) in relation to the justification for Tara Street Station.