

Submission No.			112	
Organisation Name or Name of Submitter			Hedigans Limited (Michael and Peter Hedigan) - represented by Hughes Planning	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: Planning Observation ABP Ref. No. NA29N.314724 - Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order				
1	1.0 Introduction (page 1 of the Submission)	3	<p>From the outset, this submission requests that An Bord Pleanála duly consider the negative implications arising on our clients’ business. It is strongly contended that the proposed development has had no regard to the viability of our client’s business at the Brian Boru House, 5 Prospect Road, Glasnevin, Dublin 9.</p> <p>The grounds of objection are set out in the following sections of this submission and within Appendix A which has been prepared by Dermot Flanagan SC, which is to be read in conjunction with this planning submission.</p>	TII thank you and acknowledge your submission response referred to as "Planning Observations ABP Ref NA29S.314724". We have reviewed this submission and provided detailed responses for the issues and concerns raised below.
2	2.0 Site description (page 2 of the Submission)	4	<p>The premises has been in use as a business for over 200, with the Hedigan family occupying it and providing a public house from 1906 onwards. In addition to the business’s heavy ties to the community and to the local history, it is also of note that the premises contains high quality works including the existing signage at front elevation, as well as an existing painting located above the signage. The signage itself was prepared by a craftsman and required carving out of the letters, the utilisation of gold leaf and glass. This form of signage is no longer commonly found and should the demolition of the building proceed, this would be lost.</p>	Section 26.5.4.6.2 of Chapter 26 Architectural Heritage has identified that the unavoidable demolition of the Brian Boru will result in a very significant effect. The building which is listed on the National Inventory of Architectural Heritage (NIAH) is given a baseline rating of "medium" in terms of its architectural heritage merit.
3	3.0 Site Planning History (page 5 and 6 of the Submission)	7&8	<p>Reg. Ref. 4258/05: Permission refused by Dublin City Council for the demolition of the public house and the construction of a mixed use development comprising a public house (538.4 sq.m), media and associated uses (1732 sq.m) and 57 no. residential units (9 no. three bed duplexes, 4 no. three bed apartments, 1 no. two bed duplex, 39 no. two bed apartments and 4 no. one bed apartments) in a block ranging in height from six storeys in the east to three storeys in the west.</p> <p>The demolition of the structure was considered to be inappropriate by the Planning Authority, who refused permission for the following 2 no. reasons:</p> <p><i>1. Having regard to the location of the site adjacent to a protected structure, adjoining and within a designated Conservation Area along the Royal Canal and in a very prominent location on Prospect Road, it is considered that the proposed development, by reason of its design, bulk and scale, does not integrate physically or visually with its context and fails to take account of the proximity of and relationship to the protected structure (Prospect Lodge), the environmental quality of the Conservation Area and fails to respect the streetscape. As proposed, the development constitutes overdevelopment of the site and would seriously injure the amenities of the area and of property in the vicinity. The proposed development would therefore, be contrary to the proper planning and sustainable development of the area and to the provisions of the City Development Plan 2005-201 1.</i></p> <p><i>2. The demolition of the Brian Boru public house, which is of some architectural and streetscape value, as well as literary associations, has not been justified by sufficient evidence and would, therefore, be contrary to Section 15.10.3 of the Dublin City Development Plan 2005-2011, which provides for the retention and re-use of older buildings of significance which are not protected. Therefore, the proposed development would be contrary to the proper planning and sustainable development of the area.</i></p> <p>Thus, the structure is considered to be of historic value and should not be subject to a demolition. The refusal above is considered to set a precedent for retaining the building.</p>	<p>The value of the building as a Protected Structure has been acknowledged and assessed within the EIAR.</p> <p>The demolition is unavoidable to deliver the proposed Glasnevin station, which is supported in principle in Objective SMT017 of the Dublin City Development Plan 2022-2028.</p> <p>The decision in respect of demolition as part of the Railway Order will be taken in the context of the proposed development at the site, taken on its own merits, taking into account scheme-wide and site-specific matters, all of which is sufficient evidence to justify the demolition in this instance.</p>

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4	4.0 Proposed Railway Order (page 11 of the Submission)	13	As indicated above the proposal directly interferes with our clients’ premises and involves the demolition of their public house, ending their longstanding family business and resulting in unmeasurable concerns regarding their livelihood.	Businesses which are subject to the compulsory acquisition of their property will be compensated in accordance with the statutory compensation code. The principle of code is to seek to place the affected party in no better or worse position than prior to the compulsory acquisition. The nature and amount of compensation will depend on the specific circumstances but the typical heads of claim are as follows: (i) value of legal interest in land to be acquired such as freehold/leasehold (ii) severance or other injurious affection which relates to devaluation of retained lands, if any, caused as a consequence of the acquisition (iii) disturbance and any other matters such as professional fees and the loss sustained or expenses incurred by an owner following the compulsory acquisition. As part of the Land Acquisition Strategy, TII are introducing an agency service to support businesses whom may be displaced as a consequence of the scheme proposals. This will be introduced following confirmation of the MetroLink RO.
5	5.1.2 Neighbourhood Centre (page 12 of the Submission)	14	Our clients’ premises plays a key role in the neighbourhood, both as an employment generator, as well as providing a service to locals and visitors to the area. The public house has been a landmark of the area since the early 1900s and its loss would be detrimental to the area.	TII acknowledge the impact the MetroLink Project will have on this property, business, and the local community. As identified in Table 11.54 of Chapter 11 Population and Land Use, the loss of this property by demolition will have a negative significant permanent effect. While the loss is regrettable, businesses which are subject to the compulsory acquisition of their property will be compensated in accordance with the statutory compensation code, while the creation of an integrated transport hub at Glasnevin will bring long term economic and social improvement to the local area.
6	5.1.3 Permitted and Open for Consideration Land Uses (page 13 of the Submission)	15	As is evident, our clients' premises has the potential to accommodate a wide variety of land uses. The proposed Metrolink will hinder any form of development and reduce the existing services provided at the Neighbourhood Centre.	As outlined in Chapter 11 Population and Land Take, Overall, the impact on the retail industry is considered to be a positive, moderate, permanent effect for the local and regional economy and for each of the locations listed during operation of the proposed Project. The proposal to introduce a major interchange station here will increase footfall through the area, benefiting local businesses.
7	5.1 .4 Built Heritage Assets of the City (page 13 of the Submission)	15	<p>Many of the older buildings and structures in the city, whilst not included on the Record of Protected Structures or located within an Architectural Conservation Area or Conservation Area, make a positive contribution to the historic built environment of the city. The retention and reuse of these buildings add to the streetscape and sense of place and has a role in the sustainable development of the city. There will be a presumption against demolition of individual structures of vernacular or historic/ social interest that contribute to the character of an area.</p> <p>The development seeks to demolish the Brian Boru public house which is considered to be of local historic merit. This was the stated reason for the refusal of the previous application. Thus, it is considered that a robust justification for the demolition of the premises would be required and this has not been provided. As noted, the premises is mentioned in many Irish songs and books including James Joyce’s ‘Ulysses’ and The Chieftain’s ‘Hedigan’s Fancy’. The demolition of the premises will thus remove a building noted for its heritage and connection to the local area.</p>	Please refer to response to Item number (2) above.

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8	5.2 Project Ireland 2040 - National Planning Framework (page 14 of the Submission)	16	The Metrolink application has not had appropriate regard to the above as it relates to the our clients’ site. It is contended that the scheme will hinder any comprehensive development at the lands in due course, such a development would maximise the potential of the lands, providing for community facilities as well as higher density accommodation. The application as submitted does not accord with the National Planning Framework.	<p>As outlined above in response item number (5), the loss of the Brian Boru pub will have a negative significant and permanent effect. However, the provision of the MetroLink will enhance commercial activity in the surrounding area by providing increased footfall through the area, which will benefit local businesses. Furthermore, the MetroLink will be the highest capacity public transport system in Dublin and as such will facilitate the intensification of development on greenfield or brownfield sites, as a sustainable high transport link will be provided into the area. As such the proposed Project supports the aims of the National Planning Framework and it should be noted that the NPF supports the MetroLink project.</p> <p>MetroLink will be a catalyst for and provide opportunity for future development and regeneration. While the MetroLink Railway Order does not include for future neighbouring or overhead development, the tunnels and stations are designed to support appropriate future imposed loads.</p> <p>TII will be required to make submissions in relation to planning applications for proposed future developments on or adjacent to MetroLink and there will necessarily be some engineering constraints (such as permissible loadings) required. However MetroLink is committed to engaging with known development proposals and new development proposals as they emerge with the intent of facilitating such developments as they emerge to the maximum extent consistent with the safe operation of the proposed Project.</p> <p>Again in common with other existing rail and tunnel projects, following grant of the Railway Order and development of detailed design, TII will produce “Guidance Note for Developers” that will be the subject of bye-laws following the grant of Railway Order and which is designed to facilitate future adjacent or over-site development while protecting the integrity and safety of the MetroLink works and operations.</p> <p>Therefore at this stage TII is dealing with known development proposals on a case by case basis, TII will work with parties in the future to assist with the wider development of sites over and above stations and tunnels. In this context TII has successfully engaged with a number of developers over the last two years to accommodate development over and in proximity to the alignment and there have been no material restrictions on development subject to the implementation of agreed design and mitigation measures and it is not anticipated that MetroLink will have a material impact on the development potential of sites above and in proximity to the alignment in future.</p>
9	5.3 Housing for All - A New Housing Plan for Ireland (page 15 of the Submission)	17	As noted above, it is considered that the lands have not been maximised to their full potential, thus wasting lands. The Glasnevin Station could have been included as part of a larger structure which provides for services at floor levels and working or living spaces at upper levels. This has not occurred and as a result the lands have not been utilised. This is considered against the provisions of the Housing For All plan.	<p>TII do not agree that the lands are being wasted at this location. As detailed in Chapter 4 (Description of the MetroLink Project) section 4.17.7.2, the following considerations were addressed in developing the architectural and urban design for Glasnevin Station:</p> <ul style="list-style-type: none">* Provide an intermodal concourse at street level, designed as an open space under a light canopy;* Provide a potential café or shops for passengers;* Rebuild the Dalcassian Downs car park over the station roof slab;* Provide a car park/ large cycle park area and drop-off on the area of the existing Brian Boru car park;* Design landscaping with green integration on slopes;* Integrate station ventilation grilles in green areas; and,* Consider the requirements for revenue protection for the different modes, as well as safety in design, specifically regarding adherence to Iarnród Éireann's codes of practice. <p>TII note that Metrolink does not include for oversite development in the Railway Order. However, MetroLink does not preclude any future oversite development, but any consideration would be post Railway Order and be subject to An Bord Pleanála consent as a separate consent to MetroLink.</p>

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10	5.4 Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031 (page 15 of the Submission)	17	Dublin plays a key role in attracting internationally mobile talent and investment and combines vibrant urban living, a rich heritage and character and access to nature including Dublin Bay, the coastline and Dublin-Wicklow mountains. It is considered that the proposed Metroline does not take full advantage of our clients’ lands.	Please refer to response Item number (9) above.
11	6.0 Concerns on Submitted Application (page 15 of the Submission)	17	As stated throughout this submission, the principal concern of our clients arising from the proposed railway order application relates to functionality and viability of our clients’ business which has operated on site since the early 1900s. The application as submitted, seeks to demolish the premises in its entirety, thus forcing the closure of the business and raising uncertainties on our clients’ futures. This planning submission is to be read in conjunction with the outline legal submission at Appendix A of Dermot Flanagan S.C.	Please refer to response Item number (5) above.
12	6.1 Demolition of Building (page 15 and 16 of the Submission)	17&18	<p>Having regard to the location of the site adjacent to a protected structure, adjoining and within a designated Conservation Area along the Royal Canal and in a very prominent location on Prospect Road, it is considered that the proposed development, by reason of its design, bulk and scale, does not integrate physically or visually with its context and fails to take account of the proximity of and relationship to the protected structure (Prospect Lodge).</p> <p>The demolition of the Brian Boru public house, which is of some architectural and streetscape value, as well as literary associations, has not been justified by sufficient evidence and would, therefore, be contrary to Section 15.10.3 of the Dublin City Development Plan 2005-2011, which provides for the retention and re-use of older buildings of significance which are not protected. Therefore, the proposed development would be contrary to the proper planning and sustainable development of the area.</p> <p>The structure is considered to be of local historic merit and would require a strong rationale, including a conservation assessment, in support of the demolition. This has not been provided with the application.</p>	<p>Please note that Chapter 26 Architectural Heritage has assessed the potential direct and indirect impacts on the area surrounding the proposed station during the construction phase. (Please refer to Table 26.49 and Table 26.50 in that chapter). However Section 26.5.4.6.3 of the chapter identifies that there will be no significant direct impact on the architectural or industrial heritage on completion of the works.</p> <p>The demolition of the Brian Boru, although regrettable, is justified on the wider benefits afforded by the MetroLink station at Glasnevin and the critical transport interchange it affords. The broader benefits of MetroLink are clearly stated within Chapter 3 of the EIAR: Background to the MetroLink Project.</p>
13	6.2 Underutilisation of Lands (page 16 of the Submission)	18	The lands owned by our client are a clear example of lands which have the potential to facilitate significant redevelopment. The application does not avail of this opportunity and seeks to demolish a public house which serves a locality. The Glasnevin Station building is an under provision on the lands as it would be more suitable to support a mix of uses. It is our opinion that the station should have been provided with a more significant form of development which provides accessible services at ground floor level and office or residential units at upper floor levels. This would be more in line with the zoning objective which seeks to provide a variety of uses to serve the locality. The proposed Glasnevin Station, in its current form, does not facilitate the vision of the zoning objective.	<p>Metrolink is the single biggest investment in transport infrastructure in the history of the State and is part of an integrated transport solution that also includes for BusConnects and Dart+ are all included under Project Ireland 2040, part of the NTA Transport Strategy for Greater Dublin Area 2022-2042. Together these projects will result in reliable, sustainable, affordable, integrated public transport that will support the economy, help Ireland meet its climate change targets in line with Climate Action Plan 2023 and make Dublin a more liveable and sustainable city.</p> <p>Metrolink is a critical part of the proposed integrated transport system for the Greater Dublin Area and the need for the project has been described in details in Chapter 3 of EIAR Background of the Project and 3.6 Need for the Project. Glasnevin is a major interchange station for Metro and DART. Demolition of concerned property and the landtake for access/egress is required for the Metrolink works and for the integration with DART to serve as an Interchange Station.</p> <p>As noted in the Planning Report that forms part of the Railway Order documentation, a station is Permissible under the Z3 zoning of the lands, and will directly deliver objective SMT017 of the Dublin City Development Plan 2022-2028.</p> <p>Please refer to response Item number (9) above with regard to development opportunities.</p>

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14	6.3 Proportion of Lands to be Acquired (page 20 of the Submission)	22	The full impact of the proposal on our clients’ premises has not been adequately demonstrated in the submitted documentation as it does not include an aerial overlay of the scheme and the fact that the full building is to be demolished is not fully accurate. Such a drawing would have made it more evident to An Bord Pleanála that the scheme directly abolishes the operations of the business.	The full impact (as noted in comments above) has been demonstrated in the draft Railway Order documents. Relevant drawings are provided within the Railway Order Submission. Please refer to the Property Drawing (Plan Number: ML-P 304 N-O) and the related Alignment Drawing (ML-RO-304-N-O) which annotates the extent of proposed acquisition of land and buildings to be demolished which includes Brian Boru House at 5 Prospect Road.
15	6.3 Proportion of Lands to be Acquired (page 20 of the Submission)	22	As acknowledged in the Planning Report submitted with the Railway Order Application, our client's premises will be subject of land acquisition which is considered to impact on quite a significant amount of our clients lands. The lands to be acquired affects our client's lands comprises approximately 3,217sq.m, consisting of: parcels of lands sizing at 35sq.m, 64sq.m, 125sq.m, 160sq.m and 708sq.m currently in use as a car park and a parcel of land sizing at 2,125sq.m comprising the Brian Boru public house. Our clients are set to lose their property and livelihood which has operated for a significant number of years. The public house is an easily identifiable business in Glasnevin which has operated since 1904. The business has significant local importance while also being contained within a historic building. Its demolition is unwarranted and unjust and will have irreversible impacts on the streetscape as well as our clients.	Further to response item numbers (3) and (13) above, the buildings and subject lands are being acquired to deliver an integrated station for MetroLink and Dart + services. The details of the interchange station proposed at this location, which has been carefully considered, are fully described in the EIAR, please refer to Structure Drawings Book 2 of 3 Dublin City Council, sheets 21 to 28 (ML1-JAI-SRD-ROUT_XX-DR-Y-02057 to 02064). Please see response to item number (4) above in relation to the loss to business, relocation and compensation.
16	7.0 Conclusion (page 20 and 21 of the Submission)	22&23	The proposed railway has been designed without due regard to our client's existing property and business at Hedigan’s Brian Boru Public House located Prospect Road, along the route. This business has existing in some extent since 1906 and has become well renowned within the area by locals and tourists alike. The scheme seeks to demolish our clients’ property resulting in a significant loss, both financially and also sentimentally. The proposal results in unmeasurable impacts arising from the loss of their business and property. The lands subject to the acquisition are considered to be disproportionate and severely impacts any development potential of lands remaining within our clients’ ownership.	Please refer to response item number (15)
17	7.0 Conclusion (page 21 of the Submission)	23	As per the document prepared by Dermot Flanagan S.C., the following conclusions may also be made: No attempt has been made to return land to the landowner post construction; The construction compound is not a justification for the acquisition of the full landholding; The design of access/egress to the rear is an overprovision and sterilises the development opportunity offered to the rear of the station; There has been a failure to consider alternative designs and the minimisation of land acquisition; There has been a failure to integrated the development potential of the landholding, along with the construction of the station; There has been a failure to secure the planning policy objective for the area in a consistent and transparent manner; There has been failure to adequately assess the impacts of the proposed Metrolink, either at construction or operational phases; and There has been no attempt to seek to return land to the landowners such that a disproportionate acquisition arises, in breach of constitutional and ECHR principles.	These concerns have been responded to individually. Please refer to response item numbers (18), (19), (20) and (22). As part of TII response to loss of business, relocation and compensation, please refer to response items (4) and (15).

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18	7.0 Conclusion (page 21 of the Submission)	23	We trust that on the assessment of this application and its impacts detrimental impact on our client’s existing businesses and premises, along with the inefficient use of zoned and services lands, that An Bord Pleanála will see fit to either refuse the railway order.	Please refer to response item numbers (5), (6), (8) and (13) above.
19	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 1 (page 2)	26	<p>It is submitted that the acquisition of land contained in the Schedule to the Railway Order comprising the entirety of the landholding is disproportionate and excessive in the following circumstances the footprint of the station proposed that this location represents a portion of the landholding. The balance of the land acquired appears to be for the purposes of a construction compound and following the construction phase, for access/egress to and from the station.</p> <p>Despite various discussions with the landowner in relation to the proposed acquisition, no opportunity has been given to the landowner to enter into an arrangement or agreement with TII in relation to the potential redevelopment of the site of the station or the balance of the site post construction;</p>	Please refer to response item number (4) and (15) above.
20	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 2 (page 2)	26	<p>The proposed development has not considered any alternative design or access/egress arrangements at this location.</p> <p>It would appear that the primary justification for the acquisition of the entirety of the property is as a construction compound during the lengthy construction phase.</p> <p>The proposed development has not considered the alternative design elements for the proposed permanent station as discussed at Paragraph 7.6.5 of Chapter 7 of the EIAR.</p>	<p>The location of the impacted property is at the location of the proposed Metrolink Station which integrates with the DART + and forms a major interchange for public transport. No other alternatives afford such an interchange. Demolition of concerned property and the landtake for access/ egress is required for the Metrolink works and for the integration with DART + to serve as an Interchange Station.</p> <p>The construction activities will progress over an extended period requiring the lands referred to. The construction site area is highly constrained bounded by residential developments to the north and the railway and canal to the south and there is no scope to reduce this area further.</p> <p>Chapter 7: Consideration of the Alternatives, section 7.6.5 Drumcondra v Glasnevin describes the rationale for the final location selection of an interchange station for MetroLink and Dart +. The design presented in the EIAR supporting the draft Railway Order represents the preliminary station design within the available lands assessed for the purpose of the Railway Order. Alternative design elements that might become feasible for development post completion of MetroLink were not considered for the EIAR and Railway Order.</p>
21	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 3 (page 3)	27	No opportunity has been provided to the landowner for an alternative design that would integrate with the balance of the land in question having regard to its significant pre-existing development potential. In referring to the consideration of alternatives at Table 7 - 19, it is regarded as the only feasible option.	Please refer to response Item number (20) above.

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22	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 4 (page 3)	27	It is submitted that there has been a failure in this design to consider the integration of the new station with the rear area comprising the existing carpark of the Hedigan's Brian Bora Public House such that its pre-existing development potential is maximised in conjunction with the construction of the new station at Glasnevin.	The location of the impacted property is at the location of the proposed Metrolink Station which integrates with the DART + and forms a major interchange for public transport. Demolition of concerned property and residual car park area is required for the Metrolink works and for the integration with DART + to serve as an Interchange Station including for access/ egress. The existing car park at the rear is required for overall Metrolink works including drop-off for accessible vehicles, access to maintenance vehicle, cyclists parking, utilities and drainage works.
23	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 6 (page 4)	28	It is submitted that this is a disproportionate acquisition of land with pre-existing significant development potential in conjunction with the provision of the station. There has been a failure to consider alternative designs and/or alternative acquisitions to the east and west of the Hedigan Brian Boru Public House and related carpark facilities such that portion of the land could be retained by the landowners post construction to facilitate high density development, consistent with the overall planning and transport objectives of the Project.	Please refer to response Item numbers (20) and (22) above.
24	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 7 (page 5)	29	It is submitted that alternative designs, with the acquired and retained lands, would reduce this impact by retaining part of the landholding post construction, for development in accordance with the land uses and zoning objectives for the area.	Please refer to response Item numbers (20) and (22) above.
25	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 8 (page 5)	29	It is submitted that insufficient analysis has been given of the manner in which this could be mitigated by retaining portion of the Hedigan landholding for potential redevelopment albeit whether as residential, commercial or other consistent with the provision of the station to the front.	Please refer to response Item number (20) above.
26	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 8 (page 5)	29	While it is stated that the loss of the Brian Bonu premises due to acquisition will result in a negative significant permanent effect, the only response is that compensation will be in place reducing the impacts to negative/permanent.	Please refer to response item number (4) and (15) above in relation to compensation.

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27	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 8 (page 5)	29	It is submitted that this is a wholly inadequate response in circumstances where the land use has significant pre-existing potential and where a re- design would allow a retention of portion of the landholding to the rear of the proposed Glasnevin station thereby allowing a collaborative approach to redevelopment of the rear carparking area consistent with high density development for the benefit of both the retained and acquired lands.	Please refer to response Item numbers (20) and (22) above.
28	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, point 8 (page 5)	29	It is submitted that it cannot be said that there is a medium term impact to the landholding. The impact is profound, negative and long term in circumstances where there has been a failure to consider alternative designs and alternative acquisitions which would minimise that impact. The assessment is in breach of the EIA Directive as transposed into domestic law.	<p>The EIAR has taken a considered view an weighed the undoubted benefits of the MetroLink station at Glasnevin to the community against the loss of the Brian Boru..</p> <p>As presented in Table 21.6 of Chapter 21 (Land Take), it is stated that there will be a permanent land take and demolition of the Brian Boru public house and car park to allow for the construction and operation of Glasnevin Station and interchange with Irish Rial. The impact magnitude of this is stated as 'High', leading to a 'Very Significant' impact on the this property and land.</p> <p>In Chapter 11 (Population and Land Use), it is stated that the impact on population and land use during the construction works at this location is considered negative, significant and medium term. It is considered a medium term impact on population and land use as in the long term, the Glasnevin station in the operational phase will bring considerable benefits to the surrounding population. As stated in response item (16) above, MetroLink stations will also be a catalyst for surrounding development in the area, and therefore the surrounding population and land uses will benefit greatly from its presence</p>
29	Appendix A, Memo prepared by Dermot Flanagan, Barrister-at-Law, Summary (page 6)	30	The foregoing are the outline legal submissions. We reserve the right to further expand on these submissions at an oral hearing, which is requested and in reply to any further requests for information, as required under EU law and the Aarhus Convention.	TII acknowledge the submitters intent to do so.