Submission No.	156
Organisation Name or Name of Submitter	Justin Marden (Australia)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
RE: APPLICATION FOR METROLINK NA29N.314724				
1	Letter	1	I was referenced in the An Bord Pleanála's Planning Inspectors report for Metro North In relation to St Stephens Green and its environs. Please see below and attached the grounds of observation and evidence of support. Much of the research and design development I did prior to the Metro North application advocated for a lower visual, environmental impacts and higher cultural and social returns results including: 1) Metro Entrances in shopfronts in O'Connell St in lieu of significant negative visual impact in heritage streetscapes. 2) Elevators in St Stephens Green to reduce significant negative visual impact in heritage streetscapes and the national moment.	TII wish to thank you for your submission and has provided response to your concerns in the items below.
2	Letter	1	The new project Metrolink "borrows some of these ideas" but still has a long way to meet the standards of International best practice. We believe the scheme needs more development and changes/upgrades to meet its full potential. The concept architects work is linked in the newspaper below. https://www.theage.com.au/national/victoria/southern-cross-is-grim-grimy-and-depressing-melbourne-deserves-better-20220628-p5ax8x.html	TII disagree and believe the commissioning of internationally renowned architect Nicholas Grimshaw and Partners, has delivered a contemporary station design which is appropriate for a state of the art metro system such as MetroLink. 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.
3	List	2	We would request that An Bord Pleanála formally request in writing prior to and await submission of reports which will be made public and accessible prior to any oral hearing/decisions that addresses the issues below: [PRESCRIBED BODIES] The ministers for [Tourism, Culture, Arts, Gaeltacht, Arts, Sport and Media] & [Environment, Climate and Communications] & [Public Procurement] conduct an internal comprehensive independent multi-criteria assessment written report separately in relation to alternatives of: listed below : *[See following items where these points are listed]* Any such report should quantify in numbers alternative cultural impacts, tourism impacts, art impacts, Gaeltacht impacts local and international.	TII does not have any comment to make in relation to the observers requests to ABP for reports by prescribed bodies and the Ministers of Government Departments Chapter 11 (Population) details the associated impacts on community and social infrastructure, with Chapter 25 presenting the impacts to Cultural Heritage. Chapter 03 (Background to the MetroLink Project) details the need for the Project, and how it will address challenges such as quality international connectivity. Tourists will be able to arrive at Dublin Airport and then access the rest of the rail network efficiently and effectively, confident in the time their journey will take and when they will arrive. By increasing the accessibility of Dublin and enhancing regional connectivity across Ireland, the Project will contribute to increased accessibility of the arts and cultural activities which often take place within Dublin City Centre. By facilitating improved rail connectivity to the rest of Ireland through interchanges provided at Glasnevin and Tara Street, there will be improved accessibility to Gaeltacht areas (e.g. Donegal, Mayo, Galway, Kerry , Cork, Meath and Waterford). As show in the images in Chapter 04 (Description of the MetroLink Project), signs will display the station names in both English and as Gaeilge.
4	List	2	Request for an independent multi-criteria assessment written report separately in relation to alternatives of: i) Selected colour coded stations. (St Stephens Green / Green - National Monument). Request for an independent multi-criteria assessment written report separately in relation to alternatives of: ii) A station foyer that references the Pantheon, Rome.	TII does not have any comment to make in relation to the observers requests to ABP for independent multi criteria assessment i), ii) Design principals for the project, including station design, are described in EIAR Chapter 4 (Description of the MetroLink Project), section 4.7. The project will deliver a robust and authentic design with a strong metropolitan identity, unique and sympathetic to Dublin. 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. For example 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.

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5	List	2	Request for independent multi-criteria assessment written report separately in relation to alternatives of: iii) How green Connemara Marble/Surfaces might play a role to offset commercial designs with local cultural values in the realm of National Monuments. Request for independent multi-criteria assessment written report separately in relation to alternatives of: iv) A metro station alternative based on the form of the Book of Kells to offset the negative visual and cultural impact of automatic platform doors and commercial design.	TII does not have any comment to make in relation to the observers requests to ABP for independent multi criteria assessments. iii), iv) National Monuments have been identified in EIAR Chapter 25 (Archaeology and Cultural Heritage) and potential impacts from the proposed scheme on their settings are discussed in Chapter 27 (The Landscape) of the EIAR. As detailed in Chapter 27 (The Landscape) the underground station at St. Stephen's Green will include new above-ground elements which need to be incorporated within the reconstructed public realm and park, however the automatic platform doors will be located underground, causing no visual impact on the surface level. To mitigate visual and cultural impacts at St Stephen's green, the railings, statues, bollards, lamp standards and other park features that have to be removed prior to construction will be conserved and reinstated following completion of construction and all hard and soft landscaping will be reinstated. New structures will be designed to cause minimal visual impact on the Park and all final landscaping, conservation and reinstatement requirements will be agreed in direct consultation with the MHLGH/OPW and the TII Project Archaeologist and Project Conservation Architect. The Contractor appointed for the Operation Phase of the proposed Project will be required to keep all stations and their associated infrastructure well maintained and clean and to replace any failed planting above the station box.
6	List	2	Request for independent multi-criteria assessment written report separately in relation to alternatives of: v) The impact an international design competition, innovation partnerships would have on the project under European Procurement Law and Public Procurement Procedures and why this has not yet been progressed if they are claiming to get the best cultural/social/design/transport/tourism/environmental outcomes and why heritage entrances have not been considered in lieu of generic commercial design solutions Request for independent multi-criteria assessment written report separately in relation to alternatives of: vi) The impact of funding some companies involved in the project previously been in a consortium of nuclear weapons management in the UK and the extent to which nuclear power may fund/power this project from France with the Celtic Interconnector. https://www.reuters.com/article/uk-britain-atomicweapons-contract-idUSKBN27IOT5	TII does not have any comment to make in relation to the observers requests to ABP for independent multi criteria assessment v) Please refer to response item (4) summarising the design principles for the proposed Project, and response item (5) above in relation to the measures taken at St Stephen's Green to reduce the visual impact of the station. vi) Chapter 04 (Description of the MetroLink Project) details the proposed MetroLink Grid Connections and Power Systems. Electrical power will be provided from the national grid (Electricity Supply Board Networks Ltd - ESBN) at 110kV alternating current, which will feed two high voltage bulk connection (multi-purpose connection) substations, which will be Gas Insultation Switchgear transmission power substations. The new electrical substations will be constructed at the Dublin Airport North Portal and at the Dardistown Depot. These connections will be sought through a separate planning application by ESBN, but the environmental effects are assessed as part of the proposed Project in the EIAR in Chapter 10 (Human Health), Chapter 11(Population & Land Use), Chapter 12 (Electromagnetic Compatibility and Stray Current), Chapter 13 (Airborne Noise & Vibration), Chapter 15 (Biodiversity), Chapter 17 (Climate), Chapter 18 (Hydrology), Chapter 19 (Hydrogeology), Chapter 21 (Land Take), Chapter 22 (Infrastructure and Utilities), Chapter 24 (Materials & Waste Management), Chapter 25 (Archaeology & Cultural Heritage), Chapter 27 (Landscape & Visual) and Chapter 28 (Risk of Major Accidents & Disasters).

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7	List	2	Request for an independent multi-criteria assessment written report separately in relation to alternatives of: vii) Provide the m3 of concrete, steel, earth moved, and total embodied energy to construct and operate, maintain the project including the financing costs and how these will contribute to carbon expenditure and how many litres of petrol this could buy. Request for an independent multi-criteria assessment written report separately in relation to alternatives of: viii) Provide a fixed relationship value estimate of 1 euro to carbon/mega joules/energy/Litre of petrol in the project. Request for an independent multi-criteria assessment written report separately in relation to alternatives of: ix) The negative impact of not formally allowing Dublin Bus drivers first preference to drive or operate the new transport impacting negatively on their jobs and future/economy.	TII does not have any comment to make in relation to the observers requests to ABP for independent multi criteria assessment vii), viii) EIAR Chapter 17 (Climate) presents the proposed Project's carbon emissions during both the construction and operational phase. During the construction phase the embodied carbon assessment includes for construction materials such as concrete or steel, excavations, waste, transportation of materials and waste, power usage and water usage. Full details are available in Section 17.5.2.1 of the EIAR. As calculated using the TII Carbon Tool (v2.1) the proposed Project will result in total Construction Phase GHG emissions of 1,017KT CO2eq over the 9.25 year period, equivalent to an annualised total of 0.32% of Ireland's non-ETS 2030 target. Over the predicted 60-year lifespan the annualised emissions due to the initial Construction Phase and ongoing maintenance of the Proposed Project will reach at most 0.044% of Ireland's non-ETS 2020 emissions target, or 0.24% of the 2030 transport sector carbon budget. In order to minimise, control and mitigate carbon emissions, monitoring and reporting of the embodied carbon in the Construction Phase will be conducted. The aim of the monitoring will be to see further ways to minimise climate impacts. Monitoring will include contractual obligations, in line with the most recent Climate Action Plan and sectoral targets. Commitments to monitor GHG emissions during the construction phase will also be secured through the outline Construction Environmental Management Plan (CEMP) (Appendix A5.1). Monitoring will include; embodied carbon of construction materials, water usage, power and fuel usage and waste generation (including reuse and recycling rates). A Waste Management Plan for Construction and Demolition Waste will also be implemented. Section 17.5.3.5 discusses the embodied carbon of the rolling stock during the operational phase. The rolling stock is not yet final however once the rolling stock is finalised an Environmental Product Declaration (EPD) will be prepared for the exact specification. As this is currently not available for the proposed Project as the rolling stock has not been finalised, an EPD published in 2019 for rolling stock that is utilised on a similar Metro project (Sydney Metro Northwest) has been sourced to give a likely estimate of the embodied carbon of the rolling stock. The main components of the rolling stock are metallic materials and electronic and electrical equipment which allow a high recyclability (95.2%) potential. The Sydney Metro Northwest EPD for rolling stock had upstream and core emissions of 0.3447gCO2e per passenger km. With future improvements in technology, energy efficiency and sustainable practices the proposed Project aims to future reduce the rolling stock embodied carbon. Additionally, a whole -life Carbon Management Plan will be implemented to inform the detailed design, build and operation of MetroLink. During the operational phase, there will be GHG emission reductions through the displacement of existing car journeys. Metro trips typically emit seven times less CO2 than the current equivalent car journey. ix) TII to comment on impact on Dublin Bus drivers Chapter 03 (background to the MetroLink Project) details that the proposed Project will help to stimulate economic activity, encourage innovation and growth in Ireland's national skills base. The scale and complexity of the Project will support approximately 4,3000 direct construction jobs for each year of construction, as well as further indirect related jobs. The operations and maintenance will require over 300 permanent skilled jobs. In addition, the proposed Project is anticipated to generate agglomeration impact benefits for existing and new businesses, facilitated by increased accessibility of labour and reduced journey times.
8	List	2	Request for an independent multi-criteria assessment written report separately in relation to alternatives of: x) I believe the design standard of the stations/public realm is average at this point of time and could be upgraded for minimal costs for a multi-billion-dollar project.	TII does not have any comment to make in relation to the observers requests to ABP for independent multi criteria assessments]. Please refer to response item (4) summarising the design principles for the proposed Project.
9	List	2	Request for an independent multi-criteria assessment written report separately in relation to alternatives of: xi) The fare structure of the project.	TII does not have any comment to make in relation to the observers requests to ABP for independent multi criteria assessments]. As detailed in Chapter 06 (MetroLink Operations and Maintenance), the Project will have an automatic fare collection system compatible with an integrated ticketing scheme with other public transport offerings in the Greater Dublin Area. The fare structure for MetroLink is a mater for the National Transport Authority and does not form part of the railway order application for MetroLink.

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10	List	2	Request for an independent multi-criteria assessment written report separately in relation to alternatives of: xii) Under Irish Procurement practice only architects with a "Royal" are allowed to design important major projects based on historical events. This is discrimination.	TII does not have any comment to make in relation to the observers requests to ABP for independent multi criteria assessments.
11	Letter	2 and 3	There are other ways to measure the value of architecture too, such as social value, which is especially relevant for public, civic and commercial buildings. You can find the RIBA Social Value Toolkit from the UK here. In Australia, Deloitte used both social value and financial measures to quantify the contribution of the Sydney Opera House to NSW. The Deloitte report - first published in 2013 and updated in 2018 - found that: "*The social asset value of the Opera House has increased to $6.2 billion since FY13. Visitation has also increased by 33% to 10.9 million, while the economic contribution of the Opera House rose by 44% to $1.2 billion since FY13*."	Please refer to Chapter 26 for details of the assessment of the impact on Architectural Heritage. The appraisal method for the assessments of impacts follows the guidance in Guidelines on the Information to be Contained in EIARs (EPA 2022), and Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes (NRA, 2005). An overview of the approach is presented in Chapter 02 (Methodology used in Preparation of the EIAR. The approach involves identifying the value of an architectural constraint, assessing the magnitude of the impact of the proposed Project on the constraint during the Construction and Operational Phases, and then assessing the significance of the effect on the integrity of the constraint. Each of the buildings and other structures that are identified within the study area is evaluated in accordance with its legal protection status. Where a structure is included in more than one protection status, it is assigned to whichever category has the higher evaluation.
12	Letter point 2	3	The 2014 Directive states inspector that there is a requirement for a description of the reasonable alternatives studied by the developer which are relevant to the project and its specific characteristics. https://www.youtube.conn/watch?v=24g9H5D2zt0	Chapter 7 (Consideration of Alternatives) of the EIAR provides a detailed assessment of alternative proposals to MetroLink, such as the consideration of alternative transports, route alignments and station locations, in line with the Directive 2014/52/EU. The chapter has also been prepared in accordance with the Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA 2022). The chapter describes the main alternatives considered at all stages of the MetroLink project development in order to clearly outline: * The robust decision-making process that has led to the proposed Project; * How environmental analysis was integrated into the proposed Project development from the earliest stages of the proposed Project; * The main reasons, environmental and otherwise, for choosing the proposed Project or the specific element of the proposed Project from the reasonable alternatives; and, * The likely evolution of the current state of the environment without implementation of the Project.
13	Letter point 2	3	Given that I raised many of these issues prior to and after the Metro North Application, during consultations, development plans and directly to ministers and in public where are the reasonable alternatives studied found in this application which is of International Significance in areas and environs of national monuments? At present I don't believe the application meets the high standards and objectives of the National Planning Framework highly enough without small and reasonable upgrades/innovation partnerships for a project of international significance under European law. Metrolink should be Irish.	MetroLink has been designed and assessed against all relevant polices at all levels, from European, through national and regional policy down to the local level. The policy context against which the project is considered and assessed is set out in the Planning Report and the EIAR that accompanies the Railway Order. The selection of the route of the project has been subject to a full consideration of alternatives as set out in the EIAR Chapter 07, as noted in response item (12) above.
14	Letter point 2	3	Will the applicant/inspector consider the issues raised in this submission or Article 26 Arbitration to resolve these issues and progress forward. Or will discrimination based on protected grounds under nationality/national origin be raised against the applicant on the employment equality acts.	TII have no comment to make in relation to whether the inspector should consider the MetroLink Railway Order Application is any-way discriminatory.