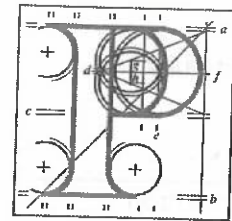


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Brian McGrath
16 Glenmore Road
Dublin 7
D07 RH9E

Date: 26 January 2023

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Tell
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Yours faithfully,

PP EM

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1890 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

To the Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1, D01 V902

Brian McGrath
16 Glenmore Road
Dublin 7 (Do7RH9E)
Monday 16 January 2022

Observation on Dublin Central Site 2 and Metrolink: Case reference: NA29N.314724 - 314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin (Metrolink), by Brian McGrath, 16 Glenmore Road, Dublin 7.
Monday, 16th January 2023

To the the Secretary,

The [Dublin Central](#) application for site servicing plan states that to facilitate the Metrolink plan for (2035) – A structural box (120m length, 26m width, 34.5m depth) beneath the ground floor level has been designed to accommodate the independent construction and operation of the planned O’Connell Street *MetroLink* Station by Transport Infrastructure Ireland, including provision of the structural envelope and co-ordinated voids to accommodate station entrances, ventilation and fire escape shafts through this part of the Dublin Central proposed development.

This, according to the application, is to ensure that the Dublin Central proposed development is structurally independent of, and not prejudicial to, the *MetroLink* project. The *MetroLink* project will be the subject of this separate railway order for planning approval to be made by Transport Infrastructure Ireland. This part of the Dublin Central proposed development is referred to as the *MetroLink* Enabling Works.

The proposed rail station is to be constructed under ‘site 2’ of the Dublin Central site. The timeline is 15 years as the application makes it clear that the development is dependent on Metrolink proceeding immediately. If the metro does not proceed, *neither can the development in its current form.*

Since the timeline in relation to *Metrolink* is unknown, and that this is acknowledged by state agencies, why is a fresh application for site 2 enabling works being pushed through at this time? And since the real timeline is 15 years, why is this not stated on the [application page](#)? And why have the developers placed the metro at Upper O’Connell St. Terrace (Site 2),

where its removal is necessary for the metro to proceed? Is this simply not to facilitate the development as several of the buildings are protected under Irish law?

Questions about Site 2 and the Upper O'Connell St. Terrace:

This has a special relevance to heritage protection, if the Dublin Central applicants plan to proceed immediately with demolition of the protected structures listed in application 5126/22 and the three previous applications as part of Dublin Central? Also, is this the case with the O'Connell Street and Moore Street buildings listed as part of this and the Hammerson 2022 applications? The EIA Volume 2 report states that the windows are to be retained (where applicable) and that all parts of the protected structures are to be photographed.

Demolition of a protected structure is illegal under Irish planning law, there is also the practical reason arises as to where all this material is to be located? The development is proceeding as the application makes clear on the basis that Metrolink will proceed in tandem with the development. That timeline is dubious, and Dublin Central / Metrolink is to proceed on the word of the Government, will this mean that demolition of the protected structures on O'Connell and Moore Streets will proceed before both the larger Dublin Central and associated Metrolink developments are to proceed?

Is this the intention of the developers (the Dublin Central applicant ((5126/22)) and today's railway order, (NA29N.314724 – 314724) submitted by Transport Infrastructure Ireland? The question must be asked, because the Dublin Central application and previous applications and this Metrolink application go to some trouble to knit the protected structures and the history of O'Connell and Moore streets into the development process.

However, a later application (given the 15year timeline), could simply alter the plan again, with the historic materials lost or disposed of (given the length of time involved), this is a distinct possibility.

In fact, Metrolink was first promised in 2005 in the [Transport 21 Plan](#). When revised plans were announced in 2018, it was [scheduled to be operational by 2027](#). However, the plan will be delayed well beyond that time period or could be cancelled or scaled back at some future time.

Metro Timeline:

The Chief Executive of Transport Infrastructure Ireland (TII), Peter Walsh, told the Dáil's Public Accounts Committee (PAC) last February 2022 that he hoped Government approval will be granted and that a submission would be made to An Bord Pleanála in the second half of the year. He said the planning process is out of the TII control and whether there is a judicial review challenge "will add a period of time that we [cannot determine](#)".

Issues with the Dublin Central / Metrolin Proposal:

As a result, there is a proposed Timeline of Completion in the [5126/22](#) application of 2034. (Baseline Programme 4.0 p.19.). There is to be a fresh application to be submitted in March 2023 with construction proposed to commence in August 2023. With [Dublin Central](#) clearly

tied in to Metrolink, (for purposes of the present application) why is a planning application being tied so clearly together with a rail proposal whose timeline is so vague and unclear and why is it being proposed that a massive building development be allowed to proceed in the city centre for the next fifteen years?

Objection:

I object to the proposed Metrolink enabling works to be carried out by DCGP Ltd as part of its application of the Dublin Central Project once the proposed railway order has come into operation. This is to enable these preliminary works at Site 2 (Upper O'Connell Street Terrace) on O'Connell Street. This railway order is being proposed by Transport Infrastructure Ireland as part of the Dublin Central proposal. Given that this proposed preliminary construction is to be started in advance of the Metrolink project, (whose timeline is vague and uncertain), Dublin City Council are proposing to grant permission to demolish the Upper O'Connell Street terrace as that is where 'Site 2' is located.

Dublin City Council (as part of its legal obligations under the Planning and Development Act 2000, maintains a [list of protected structures in Dublin City](#) with several of the Upper O'Connell Street terrace buildings included. The proposal to demolish and reconstruct the Upper Terrace is in direct contravention of the protected status of the buildings on O'Connell Street.

The buildings proposed for demolition as part of Site 2 on the Dublin Central site are as follows:

[43, O'Connell St. Upper, Dublin 1](#)

[44 O'Connell St. Upper, Dublin 1](#)

[No.45, Upper O'Connell Street](#)

[52-54 O'Connell St. Upper, Dublin 1](#)

[55-56 O'Connell St. Upper, Dublin 1](#)

[57 O'Connell St. Upper, Dublin 1](#)

[58 O'Connell St. Upper, Dublin 1](#)

[61 O'Connell St. Upper, Dublin 1](#)

Commented [BM1]: Make sure that the Byrne building is not No.58.

Removal and rebuilding constitutes destruction of these unique pieces of Dublin architecture, these date from the 18th century, to the rebuilding after the war of independence, to the art deco ([Carlton](#)) cinema of the 1930's.

The 1916-22 street buildings are fine examples of architecture, and constitute not merely fine facades of cut stone and red and brown brick, but [Portland stone](#) on O'Connell Street. These buildings constitute a historic record of O'Connell Street's 18th century origins as well as its

subsequent reconstruction post 1916 and 1922 and which were clearly carried out to a very high standard.

Consequently, I object to the Railway order submitted by Transport Infrastructure Ireland as these works would involve the demolition of the Upper O'Connell Street terrace and that the idea of placing a subway station at this site is badly conceived and deserves reconsideration given the uncertain timeline of the Metrolink project.

Yours Faithfully,

Brian McGrath

16 Glenmore Road, Dublin 7.

(D07 RH9E).

16th January 2023