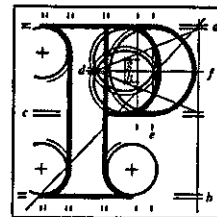


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

Justin Marden
Apartment 112
960 High Street
Armadale 3143
Melbourne
Australia

Date: 06 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.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Tell
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 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

info@celtcia.com
celtcia@gmail.com

Apartment 112
960 High St
Armadale, 3143
Melbourne, Australia

Case reference: NA29N.314724

DATE: 2023/01/06
RE: APPLICATION FOR METROLINK NA29N.314724
TO: PLANNING INSPECTORS, AN BORD PLENALA, DUBLIN, IRELAND

Dear Planning Inspector,

I was referenced in the An Bord Pleanála 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.*

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>

More recently I won an international national design award to upgrade a train station that handles almost 28 million passengers a year. It was reputedly the world's busiest passenger station in the 1920s. I also spoke at a 3-day international heritage conference on this proposed train station upgrade. Professor Andrew Saint – Senior Advisor, English Heritage, General Editor Survey of London – focused on the London experience of planning and conservation was present for my presentation.

1. 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:

- i) *Selected colour coded stations. (St Stephens Green / Green – National Monument)*
- ii) *A station foyer that references the Pantheon, Rome.*
- iii) *How green Connemara Marble/Surfaces might play a role to offset commercial designs with local cultural values in the realm of National Monuments.*
- 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.*
- 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.*
- 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>
- 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.*
- viii) *Provide a fixed relationship value estimate of 1 euro to carbon/mega joules/energy/Litre of petrol in the project.*
- 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.*
- 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.*
- xi) *The fare structure of the project.*
- xii) *Under Irish Procurement practice only architects with a "Royal" are allowed to design important major projects based on historical events. This is discrimination.*

(i-iv) extracted from the schedule of intellectual property from Celtcia TTT.

Any such report should quantify in numbers alternative cultural impacts, tourism impacts, art impacts, Gaeltacht impacts local and international.

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.”

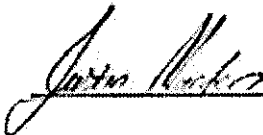
2. The 2014 Directive states inspector that there is a requirement for a description of the reasonable alternatives studied by the developer which are relevant to the project and its specific characteristics.

<https://www.youtube.com/watch?v=24g9H5D2zt0>

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.

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.

Regards,



Justin Marden

www.celtcia.com

3. Appendices
 - i) Taranis Toulouse Treaty Agreement IX TTT PDF
https://www.celtcia.com/s/About-Celtcia_20220322.pdf
 - ii) Various images

