Submission No.	047
Organisation Name or Name of Submitter	Colin Torpay (4 Mary's Abbey, Dublin 7) (Observer form)

Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Observation on a Strategic Infrastructure Development Application - Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]				
1	5. Grounds	3	I would like to make an observation regarding the siting of the St. Stephens Green Station: namely the cut and cover works for the station location, as the project does not seem to have balanced the full range of factors that should have been taken into account. It is troubling that any part of Dublin's best loved park could ever be considered as suitable for a major cut and cover project for the station while alongside lies an adjacent wide roadway (St. Stephens Green East) with capacity for the station, its entrances and structures, allowing for a successful and complete re-instatement after the works.	TII wish to thank you for your submission, and acknowledge your concerns around the protection of St. Stephen's Green. Appendix A7.3 St. Stephen's Green Report presents the alternative station locations that were considered and assessed as part of the decision-making process. Following the identification of St. Stephen's Green East as the best general location for a MetroLink station, a further multi-disciplinary analysis was undertaken to identify the optimum location for a station at St. Stephen's Green East having regard to Engineering, Environmental and Economy criteria. Seven potential locations were assessed having regard to the importance of St. Stephen's Green Park as an historical public park, the architectural heritage of the area, the importance of the transport corridor on St. Stephen's Green East, the presence of multiple utilities underneath the roadway on St. Stephen's Green East, and the requirement for an intervention shaft between the St. Stephen's Green Station and Tara Street in the event that the distance between these stations is greater than 1,000m. The long term impacts on St. Stephen's Green Park are significantly less for Location 5 as the main surface elements of the proposed station are largely located outside of the current extent of St. Stephen's Green Park. Furthermore, the preferred location allows for the long-term impacts of the station to be significantly mitigated by replanting trees and other vegetation, and the reinstatement of existing elements of architectural heritage. The overall construction phase impacts are reduced by avoiding the requirement for an intervention shaft, significant utility diversions and retaining transport and traffic movements on St. Stephen's Green East during the construction phase.
2	5. Grounds	3	While the potential of the proposal is positive in its increased ease of access to St Stephens Green and potential for urban upgrades associated with the works, it throws this opportunity away by not sufficiently acknowledging how outstanding the urban purlieus of this corner of Dublin actually is.	Please refer to response item (1) above in relation to the identification of the preferred station location. TII disagree with the statement regarding sufficient acknowledgement. Chapter 27 (The Landscape) of the EIAR considers the landscape and visual impact of the project and outlines the significance of St Stephen's Green. The proposals for the Project aim to reinstate the existing landscape faithfully as far as is practicable within the constraints which are known to apply. It is feasible to do this, however, as has been set out, it is not feasible to imbue the replacement planting with the level of maturity, the 'weight' or the 'volume' of the existing tree planting which needs to be removed. This aspect of this approach to restoration of the Park edge will take time. It may be acknowledged that the proposed works can apply a level of mitigation which would go some way to reinstating the disturbed part of 'the Green', however, beyond any potential for reinstatement, replacement or restoration, it would be difficult to offset impacts on the maturity and wholeness of this place.
3	5. Grounds	3	It's an architecturally ingenious park entrance as much as a sculpture, uncluttered and spare, it is a dignified set piece read against the greenery and huge tree canopies behind. That is a successful urban composition. There is really nothing convincing in its proposed re-located position, rendered impotent of function and pushed back out of the way.	With regard to the architectural significance of the entrance, Chapter 25 (Archaeology & Cultural Heritage) of the EIAR identifies that any negative impacts would be offset by an improvement to the current setting and appreciation of the Wolfe Tone monument. The monument would be relocated further into the park, retaining the monument's historic setting and allowing greater and safer appreciation of the monument as a sculpture, rather than as a barrier. The existing railings and footpath floor finishes will also be preserved. Following mitigation, Chapter 26 (Architectural Heritage) of the EIAR states that "There will be no direct or indirect impacts on architectural heritage during Operational Phase in this section of the study area". To ensure mitigation is appropriate, the contractor(s) will appoint Consultant Conservation Architects to implement required preservation.

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4	5. Grounds	4	In the planning report seven options are considered for this station and then in varying degrees dismissed for practical reasons. The impression given is that in certain circumstances anticipated construction problems for Metrolink are more importantly avoided than detailed consideration of the final urban outcome	Please refer to response item (1) in relation to the identification of the preferred location, supported by Appendix A7.3 St. Stephen's Green Report. The decision to locate St Stephen's Green station box at the preferred location has considered Engineering and Environmental factors, as well as Economy criteria. However, following concerns raised by the Office of Public Work and the Department of Culture Heritage and the Gaeltacht (DCHG)) with regard to potential for direct impacts on St Stephen's Green, TII undertook further analysis to identify the feasibility of constructing a station fully located outside of the area of St Stephen's Green Park. The summary of the options considered and analysed for the location of St. Stephens Green station box together with reference to supporting reports are available in Chapter 7: Consideration of Alternatives, section 7.7.10.10 St Stephen's Green and supporting appendices. The key findings of the analysis completed were that Station Location 5 (the proposed location) remained the preferred station location for the following reasons: * A station located entirely outside of St Stephen's Green Park would cost 67% more to build than the preferred station location; * The complexity of the alternative construction methodology and the necessity to carry out extensive utility diversions would increase the overall construction programme of between 15 months and 27 months when compared to the preferred station location; * The proximity of buildings to the construction area for the option wholly within St Stephen's Green East would make it very likely that these buildings would need to be vacated for much of the construction period. This would not be required for the preferred station location; * The station location wholly within St Stephen's Green East will require the diversion of a significant number of critical utilities including a major Victorian sewer and a major ESB cable route. This diversion work would result in extensive disruption to services while this work will be undertaken. This disruption would be largely avoided by progressing with the preferred station location; * The closure of St Stephens Green East and Hume Street during the Construction Phase would require the diversion of traffic, pedestrians and public transport for a number of years. These impacts would be avoided by progressing with the preferred station location; TII consider that the above factors, combined with the mitigation proposed for the impacts on architectural and landscape importance, demonstrate that a number of considerations have contributed to the decision making around location of the station box.
5	5. Grounds	4	These are not insurmountable issues and the protected structure reason highly questionable. It just seems that it is never stated how important St. Stephens Green is, although perhaps this would take up an entire volume and in arguing that a little damage at one side is really nothing. A well-presented section should be provided by the applicant to include the east side from the houses and basements westwards through the park boundary, showing the entire width of the wide road and double pavement outside the park which would really be a telling drawing to combat the main concerns for pushing into the park.	Please refer to response item (4) above in relation to the decision on the location of the St Stephen's Green Station.

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6	5. Grounds	5	The felling of trees for such projects is usually understated and in a “cut and cover” project, there are overhanging branches and adjoining roots of retained trees impacted so the neat little box is rarely the actual damage zone.	Please refer to response item (2) in relation to the proposed mitigations to landscape, visual impacts, architectural heritage. Mitigation measures will be implemented during construction and operation to minimise the effects of habitat loss and habitat degradation on biodiversity including trees and their root structures. These mitigation measures can be seen in Sections 15.5.1.2 and 15.5.2.2 of Chapter 15 (Biodiversity). TII acknowledge the importance of the landscape and sense of place with regard to St Stephen's Green Park. Chapter 27 (The Landscape) details that once the reinstatement works are completed the negative effects of construction will be partially moderated, however the edge of the park along the section of required works, will appear rather raw, small-scaled and immature, especially when directly compared with the remaining untouched sections. These contrasts will reduce over time, though it may take a significant period before they may be described as imperceptible. However, the mitigation proposed ensures the station box will be deep enough to guarantee the relocation of trees above, integrating the station with the park setting over time. The preferred station location will have an impact on approximately 5% of the area of St Stephen’s Green during the Construction Phase, however once the station is constructed, with the reinstatement of all railings, monuments, street furniture and paving stones, only 0.21% of the park area will be directly impacted. And as stated above, The contractor(s) will appoint Consultant Conservation Architects to implement required preservation of in situ works.
7	5. Grounds	5	Changes to hydrology locally can be detrimental to mature trees.	All stations feature surface drainage systems which are sustainable. Wherever possible surface drainage is conducted to swales/infiltration trenches (as appropriate) which are also integrated into the soft landscape proposals, the impact on mature trees has been considered. Further information in relation to Hydrology and Hydrogeology impacts and assessments is available in Chapter 19 Hydrogeology, specifically section 19.5.3 Construction Phase Impact Assessment and section 19.5.4 Operational Phase Impact Assessment.
8	5. Grounds	5	The imbalance to the composition of the canopy within the park will be a very damaging outcome, it will be an obvious visual and ecological negative and one that can only recover over generations.	Please refer to response item (6) above in relation to the mitigations proposed for landscape, visual impacts and biodiversity.
9	5. Grounds	5	The park is regular on plan and in every way as one looks at it, so it has to become clear in the future to anybody looking to admire it or if walking through it, that some traumatic negative event has occurred to unbalance the beautiful composition.	Please refer to response item (6) above in relation to the mitigations proposed for landscape, visual impacts and biodiversity.
10	5. Grounds	5	The tree canopy cover exceeds its boundary, offering canopy covered sidewalks externally alongside the outer rows of limes and at every season one is stuck by how lucky we are to inherit such a place. While the buildings are more intact and regular on the east side of the green than any other, the significance of its canopy reading as a beautiful counterpoint and balance to them is even more intensely experienced, a sublime effect that could be lost for generations if current preoccupations prevail.	Please refer to response item (6) above in relation to the mitigations proposed for landscape, visual impacts and biodiversity.