



19/03/24 ③

Planning Ref: NA29N.314724

AN BORD PLEANÁLA

19 March 2024

20 MAR 2024

LTR DATED _____ FROM _____

LDG- _____

ABP- _____

An Bord Pleanála
Metrolink Oral Hearing
The Gresham Hotel,
Dublin 1

Dear Sir/Madam

RE: NA29N.314724 - Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]- Oral Hearing – The Heritage Council Statement

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

Need for a metroline for Dublin.

It is essential to state from the outset that the Heritage Council strongly support the provision of a metro rail service in Dublin. Dublin City is almost unique in a European context. It is an internationally important urban agglomeration but as a modern capital city, it is relatively poor in terms of public transport provision, and its city centre is overly dominated by cars and associated infrastructure. Recent decades have seen improvements i.e. the Luas and Bus Connects; with the provision of cycle lanes and the plans for College Green/ Dame Street highlighting further recent endeavours to make the city more liveable. For heritage, both natural and built/cultural heritage, this is welcome. Car dominated streetscapes and townscapes undermine the cultural heritage of urban areas, undermining the perception and experience of historic buildings and their curtilage, while car infrastructure provision directly leads to greater land take, therefore leading to an ever-expanding built environment, which inevitably leads to pressure on natural habitats and ecosystems. It is with this in mind that the Heritage Council recognise the need for a Metro line in Dublin.

Proposed Scheme and Heritage Impacts

The Heritage Council also recognise that it is inevitable that such large infrastructure projects will impact on heritage assets, both natural and built heritage. There are several heritage assets along the entirety of the route. These vary in terms of natural

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heritage assets, built heritage assets and landscape/townscape assets. The importance of the assets range from individual buildings (i.e. record of protected structures, national inventory of architectural Heritage designations), Architectural Conservation Areas (ACA), European Natura 2000 sites, and National Monuments. Their significance varies, and the Heritage Council recommends that that every provision is made to ensure the protection of these unique heritage assets. Where negative impacts are unavoidable, as identified in the EIAR, the Heritage Council recommends that careful mitigation and construction site management should be prioritised. The Heritage Council would emphasise several points in this regard:

1. If the route is approved, there will be much greater design detail required along the route, with specific emphasis on ameliorating the impacts on heritage.
2. Non-standard construction environmental management plans (CEMPs) should be utilised. Given the exceptional scale of the impacts, and the importance of the assets, bespoke CEMPs should be provided for each section of the route.
3. The provision of a comprehensive and competent team of conservation professionals will be required.
4. Avoid standardised franchise like station design – there is unique opportunity for each station, and any other above ground infrastructure, to be designed to reflect local community character, including heritage along each section of the alignment. The local history of the area can provide useful sources for naming stations and informing the public of the wider historic contexts within which a station is located.

St. Stephen's Green Station and Heritage

The Heritage Council notes that St. Stephen's Green is of national importance in terms of its cultural, built and ecological heritage. The Department of the Environment, Local Government and Heritage, and the Office of Public Works (OPW) have expressed concerns about the impact of the proposed scheme on the heritage asset that is St Stephen's Green. The Heritage Council notes, and shares, their concerns.

Significant excavation work is envisaged for the park. There will be:

- Immediate and irretrievable loss of mature trees (64 to be felled) and vegetation removed to the east of the park.
- Removal of the park railings, Wolf Tone Monument and Famine Sculpture, – to be stored and relocated in a new location or replaced at existing locations.
- Smoke and ventilation exhaust vents inside the railings, therefore in the park.
- Station entrance at the northeastern corner of the park (removal of monuments as noted above).
- Other aboveground elements (passenger lift, fire brigade lift and vents), some of which are outside park (but these still influence the setting, being immediately adjacent).

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- Plinth walls – (195 metres of wall and rail temporarily removed), along with two pedestrian gateways, six traditional-style lamp posts, fifty granite bollards outside the park railings and lengths of railing at the park entrances and at the margin – to be removed and reinstated.

The **construction phase** impact will be **significant**. It must be noted that given the importance of this heritage asset, any magnitude of impact is concerning. **Construction** stage direct impacts on The Green in general terms are assessed in the EIAR as **very significant negative (permanent) effect**, while the indirect effects during construction are also considered to be **very significant**. While the construction impacts on the physical features identified above will be significant.

In terms of the **operational phase** - the introduction of a new entrance to the Metrolink station within the park; pop-ups (ventilation shafts etc); the repositioning of monuments; and the alterations to the landscaping, represent permanent changes to the setting of the park and the impact has been considered **very significant**. The OPW have correctly identified this and emphasise that the Green is a square park, and this is how it is viewed from an historical, architectural, landscape and cultural heritage perspective. Therefore any 'chipping' away of the park, however small will naturally have impact the Green's integrity.

With regard to Landscape and Visual Impact, given the significance and importance of Saint Stephen's Green, the Heritage Council note that the development will undoubtedly alter the landscape and historical layout of the park. The cultural heritage amenity of St. Stephen's Green is priceless, and irreplaceable as a quiet oasis in the city centre, one of its few green spaces. It is true that one of the great features of these historic parks is the open/accessible designed treed landscapes that they incorporate. Edinburgh benefits from such parks and is an exemplar in terms of heritage protection and promotion.

In addition, large mature trees are an integral part of this landscape experience. Like the demesne grounds of a country house, the specific landscape planting of the Georgian and Victorian Squares in Dublin incorporates specifically such treed landscapes, which often take decades to establish as the intended historic landscape we see today. The felling of mature trees (64 in all) and the possible impact on more, some of which are of exceptional value, being the 'historic boundary', is highly disruptive to the character of the park. Not to mention the buffer they provide to the surrounding road network, where they amplify the amenity and cultural heritage of the park as a calm retreat for citizens. We note that compensatory planting is identified but this is not comparable, given the time taken for mature trees of character to establish. Therefore, we would question if it were in fact possible that this historic treed landscape would ever reestablish, and if so, what measures will ensure this? Detailed further information at the design stage is needed and should include the approach for redesign; the number and species of trees; and their siting locations. It is also important to note that the biodiversity and cultural heritage features of the Green are intertwined. The removal of such trees and associated understory vegetation will undoubtedly have significant negative impacts on the shelter and foraging habitats of bird, bats, and other

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species. Given the few refugia that exist in the city for biodiversity, this is of considerable concern.

The Heritage Council is also of the view that greater recognition be given to cultural heritage, particularly intangible heritage. St. Stephen's Green, since it was bequeathed to the city of Dublin from the Guinness Family is integral to the story of our capital city. The generosity of the Guinness family and the intention behind this gift to the citizens of Dublin, as well as visitors to the capital, is an important chapter in the history of Dublin and our national patrimony. Its location for some of the most intense scenes of the fighting during Easter 1916 further emphasises this historic and cultural importance. Whilst it may be difficult to quantify these values, when compared to tangible and physical heritage, their importance in the hearts and minds of Irish citizens, and particularly the citizens of Dublin, is of equal importance to the amenity that the Green provides. This importance is irreplaceable, and the current proposals, we believe, have the potential to compromise one of the city's most noted cultural heritage anchors.

The Heritage Council, therefore, strongly recommend to TII that they endeavour to ensure that heritage protection is not compromised in favour of construction/project management criteria, particularly, for this specific aspect of the proposed route. The EIAR itself appears to admit that mitigation will only go some way by noting that 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"*. Therefore, the Heritage Council encourage TII to recognise the exceptional importance of this asset; to realise that standard construction approaches are likely to be unsuitable, and that a suitable balance needs to be struck between temporary cost and long-term damage, whereby it is essential that heritage is the key criterion.

The Heritage Council notes that the initial assessment of Option Location 5 in Appendix 7.8, that accompanies the EIAR, for the preferred option – identified only one issue, which was simply described as "Impact on SSG park". This is scant on detail. This was highly unlikely and the EIAR has rightly corrected this in its assessment. It is important to note that the Heritage Council do not question the integrity of the construction approach in the St Stephen's Green East carriageway option described in Appendix 7.7. However, we do note, and agree with, the comments of the Department of Housing, Local Government and Heritage, who are of the opinion that the proposed station option appears to have prioritised construction requirements above a sufficiently weighted assessment of the long-term impacts on The Green.

This is striking in relation to table 1 – *pros and cons summary* - in Appendix 7.7, whereby *"heritage buildings impacts"* are discussed in relation to: nuisance, noise, dust and vibration, accesses, or services to front of buildings, bus, traffic, or pedestrian access. There is very little discussion in this table regarding the architectural heritage and setting of historic buildings, with one exception (Wolf Tone structure relocation). Other heritage bodies state that heritage criteria have been overshadowed by what appears to be construction efficiency requirements, and the heritage council concur with this view. The Heritage Council strongly advocates that heritage considerations are given equal weighting in decision making and that the impacts of the work on the

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heritage buildings, St Stephen's Green, as well as the impact on the occupiers of the buildings in question are key concerns.

The Heritage Council therefore remind TII that they have a unique responsibility in this regard to the national and cultural heritage of Dublin and the country, and that the design and location of the St. Stephen's Green station should be upmost in their considerations. During the construction phase, heritage criteria should not be undervalued at the expense of construction and project management efficiencies.

Conclusion

The Heritage Council believe it is necessary that a Metrolink is built for Dublin. Its importance for logistical and environmental reasons is undeniable and we support its development. We also appreciate that there is a need for a stop in the Saint Stephen's Green area but there is equally a need to protect heritage, and to ensure that the integrity of the National Monument at Saint Stephen's Green, its associated values, and indeed other assets, receive an appropriate level of priority in the decision-making process, whilst ensuring provision of Metrolink.

Yours sincerely,

Virginia Teehan
Chief Executive Officer



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