Thursday 21 March 2024
An Board Pleanála Oral Hearing
(MetroLink – Estuary to Charlemont via Dublin Airport) ABP – 314724-22

Bernard Seymour

Motive:
To protect St. Stephen's Green from unnecessary forms of construction when better options exist to highlight the fact that options for full reinstatement of the urban setting can be achieved. Other priorities of timescale, cost and ease of construction have been given undue weight in this context.

Credentials:
I am a landscape architect with degrees in horticulture, urban design and landscape architecture from UCD, Royal Danish Academy, Copenhagen and Edinburgh University. BSLA, the practise I run is well regarded for expertise in the areas and have won eighteen Irish Landscape Institute awards over it's 25 years in existence.

This Submission is made as an individual familiar with ABP processes on the other side. In this case, I am acting to draw attention to the ill-advised and irrevocably damaging outcome to the park. Facets of the decision making common in such projects of scale understate the value of heritage, such as the national monuments of St. Stephen's Green, cherished by so many, who I suggest will be horrified to discover too late what the project entails.

Observation Statement	TII Response
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. Certain pragmatic criteria have been more heavily weighted than concerns for the damage to a fine public realm and park. It appears as if the inevitable construction phase difficulties and services diversion required in siting it entirely in the existing road St Stephens Green East have made the park a softer option. The absence of good cross sections across this road is a deficiency in the application. 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. I will confine the argument to the following points:	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. 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. As such, TII do not agree with the statement that 'The absence of good cross sections across this road is a deficiency in the application'. As indicated above, a multi-disiplinary analysis has been undertaken to identify the optimum location for a station at this location, with the findings outlined above.

HEADING: INTRODUCTION

SALIENT POINTS IN TII RESPONSE

"The long term impacts on St. Stephen's Green Park are significantly less for Location 5"

"the main surface elements of the proposed station are largely located outside of the current extent of St. Stephen's Green Park"

"the preferred location allows for the long-term impacts of the station to be significantly mitigated by replanting trees"

"TII do not agree with the statement that 'The absence of good cross sections across this road is a deficiency in the application'."

- The failure to recognize the inestimable worth of St Stephen's Green.
- The emphasis on delay and cost in determining the outcome.
- The deficiency in evaluating the mined / tunnelled option for the station.
- The unsubstantiated scenarios evoked during construction phase.
  for a cut and cover option on the road on St Stephen's Green.

Observation Statement	TII Response
1. Piecemeal wearing away of quality. 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. The park could actually benefit from the additional footfall and subtle upgrades associated with the station but somehow the project concludes that its value is as an "easy to get at and dig up" site and assumes that is the way forward. There is little of recent urban design in Dublin that one can be proud of and this comer of "The Green" with the Edward Delaney sculpture of Wolfe Tone and its bravura stone backdrop and cleverly integrated entrances to the park within it, is one of just a handful of such places of this scale and era that exist in the city. 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, while the station entrance, (I can't decide if it is apologetic or assertive as depicted), is just one of a series of new shaft elements that will clutter this side of the park. This process of eroding the integrity of what is already a good place by not considering its merits sufficiently means that adding new elements or siting them (the station designs seem to drive the same functional elements that extrude above ground) results in these clumsy outcomes.	Please refer to response (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. Similarly 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.

HEADING: PIECEMEAL WEARING AWAY OF QUALITY

SALIENT POINTS IN TII RESPONSE

"The proposals for the Project aim to reinstate the existing landscape faithfully as far as is practicable... It is feasible to do this...
...it is not feasible to imbue the replacement planting with the level of maturity, the 'weight' or the 'volume' of the existing tree planting"

"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."

"Similarly with regard to the architectural significance of the entrance...any negative impacts would be offset by an improvement to the current setting and appreciation of the Wolfe Tone monument"

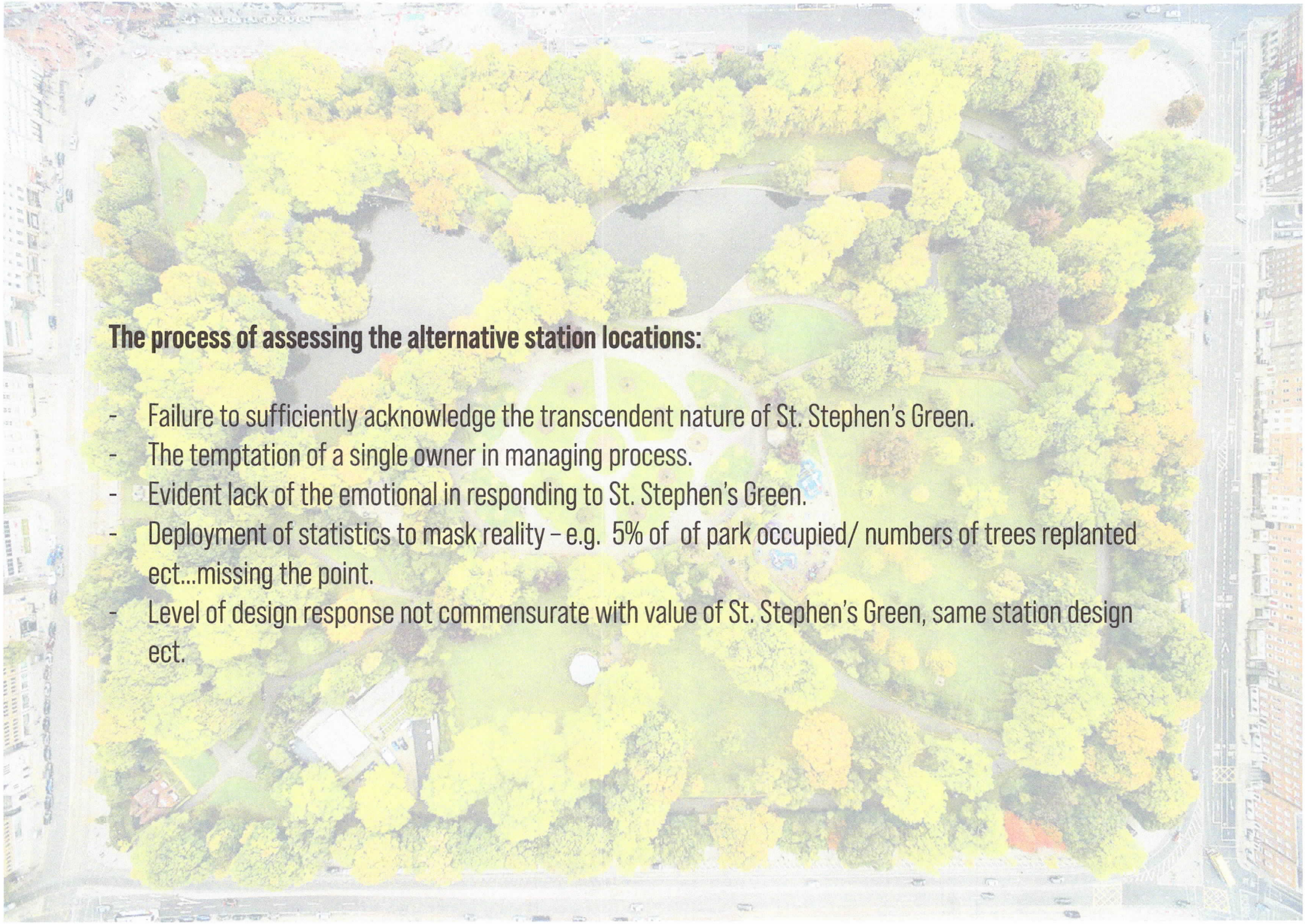
Observation Statement	TII Response
Focusing on re-instatement of elements as they were before, (just a jiggle this way or that to make them fit around the new things) can never do that job adequately in this setting. Once the concept is lost through the modifications necessary to make the new proposals work, it is gone forever. There is a question if this piece of public realm excellence is fully understood in its complexity, this corner is a landmark, despite its sobriety and sense of calm, it skillfully resolves a new intervention (1964) in an existing historic setting in a manner that one hardly notices. Indeed, it might have served as a lesson to the more reflective members of the Metrolink design team as to working in a historic context. But if it's not recognized as such, then the other arguments around inconvenience and cost win out and the matter becomes settled for the wrong reasons. The overriding outcome is another diminution of an original concept of wholeness and a fragmentation of the concept behind it. Unlike the planting which is entirely another matter, the juxtaposition of the new permanent and visible project elements such as the entrances, shafts, lifts etc. tip the balance in the wrong way. Here they clutter, push more important things aside or remove them and results in a random placement and juxtaposition of new and old. In the northern and suburban parts of this scheme many of these elements, (such as well-designed entrances and considered landscape design) can improve an area and in Metrolink many do so positively. However, a special place like this is a much more difficult task, perhaps requiring more engineering ingenuity in managing the visible parts above ground and at the same time a modesty of expression if it is not to harm the space's already established attributes.	Please refer to response (1) above in relation to the identification of the preferred station location, and response (2) in relation to mitigations to the landscape, visual impacts, and architectural heritage. All station locations that have been assessed would impact on St Stephen's Green Park and on protected structures within the National Monument curtilage including the eastern perimeter fence railings, plinth wall, bollards and lampposts. Although station locations with a smaller footprint in St Stephen's Green park would have a less significant impact on the National Monument, station locations furthest east that require the diversion of the Victorian Sewer have potential to impact directly on the cellars of a number of protected buildings along the eastern side of the St Stephen's Green road. TII do not agree with the position regarding the design approach. The general architectural design principles for St Stephen's Green Station are to: * Do the maximum to preserve the existing park; * Preserve the existing railing and pavement finishes; and * Provide enough soil depth over the station box where it lies under the park to be able to plant trees on top. A key objective of the urban realm design is to maintain as much of the park as possible. This is aided by placing the station box underground, partly under the park and partly under St Stephen's Green East Road and ensuring sufficient depth of the overlying soils to allow planting of new trees. The existing railings and footpath finishes will be conserved and replaced on completion of construction. This commitment is detailed in Chapter 4 (Description of the MetroLink Project).

HEADING: Cont.

SALIENT POINTS IN TII RESPONSE

"The general architectural design principles for St Stephen's Green Station are to... Do the maximum to preserve the existing park"

"All station locations that have been assessed would impact on St Stephen's Green Park and on protected structures within the National Monument curtilage"



The process of assessing the alternative station locations:

- Failure to sufficiently acknowledge the transcendent nature of St. Stephen's Green.
- The temptation of a single owner in managing process.
- Evident lack of the emotional in responding to St. Stephen's Green.
- Deployment of statistics to mask reality – e.g. 5% of of park occupied/ numbers of trees replanted ect...missing the point.
- Level of design response not commensurate with value of St. Stephen's Green, same station design ect.

Observation Statement	TII Response
2. Better outcomes elsewhere from reinstatement perspective. When working on a large infrastructural project there is a forward thrusting "get it done" energy that needs to be balanced alongside the more nuanced understanding of place. You can see which prevailed here. 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 outcomes. There is a sewer diversion that militates against the St. Stephens Green East roadway siting, on delay and cost grounds. There may be un-acceptable traffic delays during construction.... some protected structures may possibly be impacted. 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. Of course, the applicant has to weigh up the practical aspects of the project, but as it is a public project, then merely capital cost considerations are not appropriate grounds alone for decisions that might impact other less tangible public benefits, especially in the longer term.	Please refer to response (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, as presented in Appendix A7.3 St Stephen's Green Report. The key findings of this analysis 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 (as presented in response item (2) above), demonstrate that a number of considerations have contributed to the decision making around location of the station box.

HEADING: BETTER OUTCOMES ELSEWHERE FROM REINSTATEMENT PERSPECTIVE

SALIENT POINTS IN TII RESPONSE

"The key findings of this analysis were that Station Location 5 (the proposed location) remained the preferred station location for the following reasons:
** ...cost*
** ...increase the overall construction programme*
**** ...very likely that... buildings would need to be vacated for much of the construction period***
**** ...require the diversion of a significant number of critical utilities***
**** ...would require the diversion of traffic, pedestrians and public transport for a number of years.***

Area of Impact	Proposed	Alternative
Temporary Impact on Park	Impacted (boundary/trees)	Minimal impact to trees but roots and overhanging branches may be affected (Ref
Permanent Impact on Park	New entrance and vents within park	Minimal, new entrance on corner adjacent to the Wolfe Tone sculpture
Construction Duration	92 months	Longer by 27 months (Allowing 12 month time risk)
Relative Direct Cost	100%	+ 67%
Heritage Building Impact	✓ Less impact due to noise, dust and vibration ✓ Shorter construction period, access and services to front of buildings maintained ✓ Bus, traffic and pedestrian access maintained	✓ Increased nuisance due to proximity of construction works including noise, dust and vibration ✓ No accesses or services to front of buildings ✓ No bus, traffic or pedestrian access
Utilities	✓ Single stage diversion from west carriageway to east carriageway ✓ No effect on Hume Street	✓ More services affected ✓ 3 stages of utility diversions in St Stephen's Green East and Hume Street ✓ No services to properties in St Stephen's Green East during construction
Traffic Impact	Critical traffic movements maintained	8-10 years ongoing disruption

Observation Statement	TII Response
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. Changes to hydrology locally can be detrimental to mature trees. 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. 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. 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. While allowing for soil build up over the station and re-planting generously, (assuming that there won't be design constraints for loading at the detailed design stages that begin to erode that proposition) it will never be as good. A re-instatement is not always a successful replacement for the status quo. Who can set a price on the value of a sewer diversion (that we are told is a significant part of not using the carriageway as the station cut and cover site) that would leave the park intact and allow the status quo to prevail after the works? We really need to show what we value in Dublin.	Please refer to response (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. As stated above, the contractor(s) will appoint Consultant Conservation Architects to implement required preservation of in situ works. With regard to hydrology, 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. This is presented in Chapter 18 (Hydrology). The impact of changes to hydrology on mature trees has been considered in Chapter 19 (Hydrogeology), as well as Chapter 20 (Soils and Geology).

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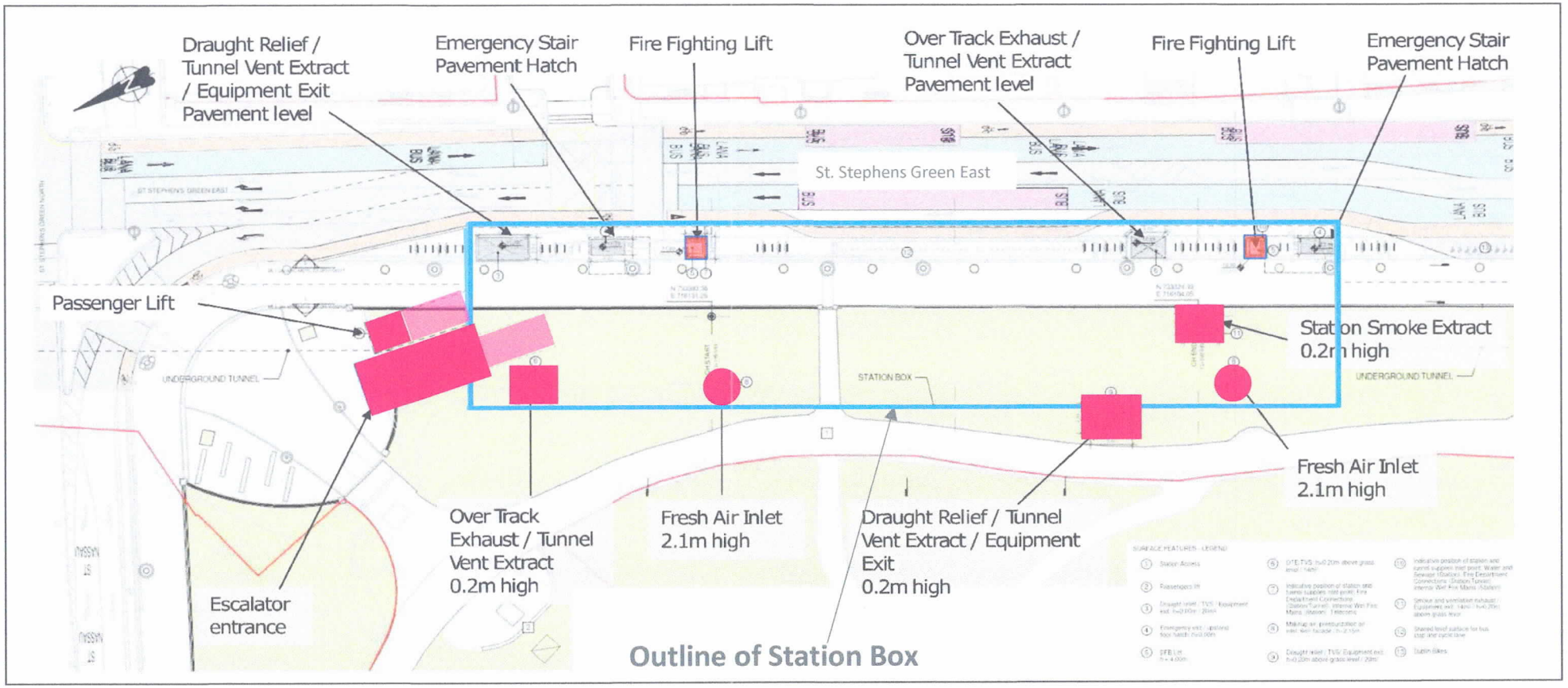
SALIENT POINTS IN TII RESPONSE

"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."

"the edge of the park... 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"

"an impact on approximately 5% of the area of St Stephen's Green"



TII OPTION 5 - Pop-ups

Location 8 Re-assessment of Station, entirely within St Stephen's Green East Carriageway

Additional Option Assessment March 2021

Main Features:

- The station sits entirely within the SSG east carriageway.
- The western extent of the box would be situated approximately 2.5m from the eastern railings of St Stephen's Green Park.
- Additional Entrance on Hume Street.

Key Issues:

- St Stephen's Green East closed to traffic for duration of the station construction. Significant impact/direction of local traffic and bus routes.
- Major impact on utilities (Ovoid Sewer, Water, Electricity, Gas etc.)
- Direct impacts on protected structures on SSG's east which would require strengthening works, such as, underpinning.
- Temporarily vacating buildings as access not being maintained for occupants or service connections.
- Significant infrastructure on footpath presents on street clutter, increased impacts for the mobility and vision impaired.

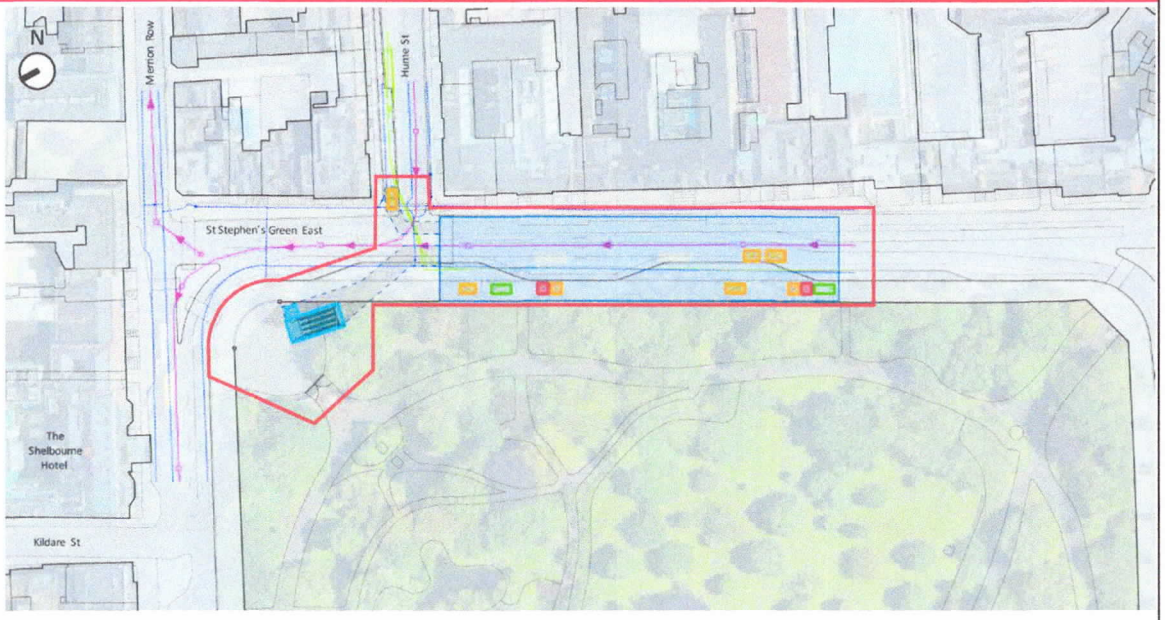
Park Impact:

- Other than the main station entrances all passenger, fire lifts and ventilation structures would be permanently located outside Park.
- Approx. 1,300m^2 or 1.4% encroachment of overall Park during construction (removal of trees, railings).
- Wolfe Tone Memorial relocated as part of the enhanced plaza access.
- Permanent area required –126m^2 (0.14% of Park)

Programme:

- Construction programme **(10.5 years)**.

This Option was considered viable but was ultimately ruled out due to its poor performance against programme criteria



Mined Station Alternatives – Option 1

Mined Option Review (April 2022)

Main Features:

- Entrance is located within the footpath of St Stephen's Green North.
- This connects to the main access shaft located in the Plaza area which in turn leads to the platform concourse (located in the mined platform cavern).
- Mined option requires deeper station depth.

Key Issues:

- Difficult passenger wayfinding, navigating four sets of escalators to platform, significant disadvantage to the mobility and visually impaired.
- Walking time from surface to platform level 153% longer than preferred solution, 2.5 minutes V's 1.6 minutes.
- Cavern construction presents risks of generating noise and ground borne noise and vibration that has potential to impact hotels and residents.
- Architectural canopy design significantly different to MetroLink vision. Presents a significantly different and sub-optimal architectural vision and feeling of space when compared to other MetroLink stations line wide.
- Emerging intervention may depart from DFB requirement and challenge gaining approval from DFB.
- Having a station entrance located in these footpaths would result in poor integration with the public realm, constrain footpath access.

Park Impact:

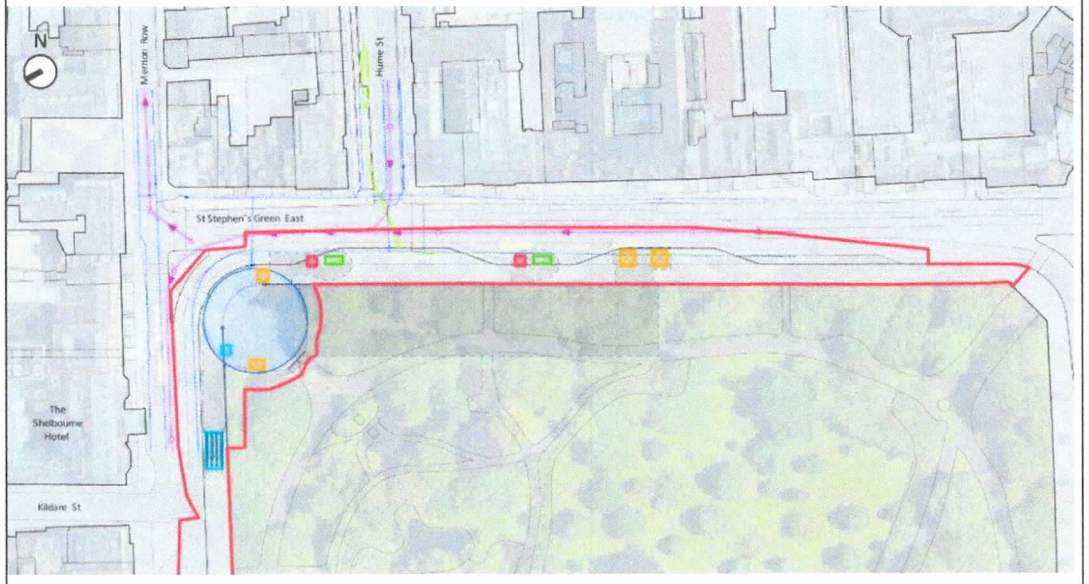
- Significant temporary construction shaft located at Park entrance.
- Wolfe Tone memorial removed and reinstated post construction.
- Main station mined beneath the Park.
- Approx. 1,300m^2 or 1.4% encroachment of overall park during construction.
- Permanent area required – 40m^2 (0.04% of Park).

Programme:

- Preliminary design & early programme indicated construction duration of **10.5 years.**

Of the six mined station options considered, Option 1 was the most viable mined solution.

*Note Green Box indicates this option is preferred of the April 2022 mined alternatives options



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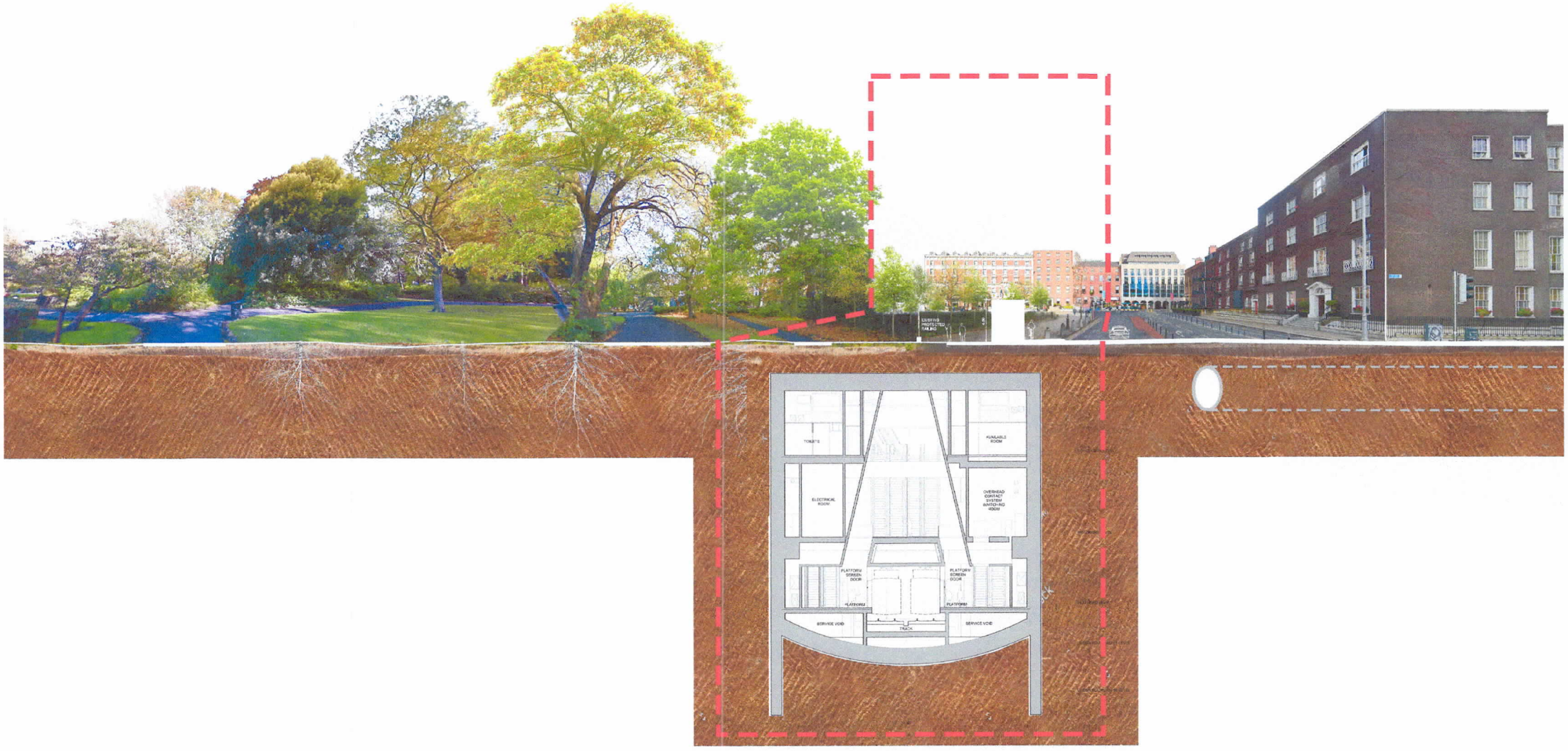
TOILETS
AVAILABLE ROOM
ELECTRICAL ROOM
OVERHEAD CONTACT SYSTEM SWITCHING ROOM
PLATFORM SCREEN DOOR
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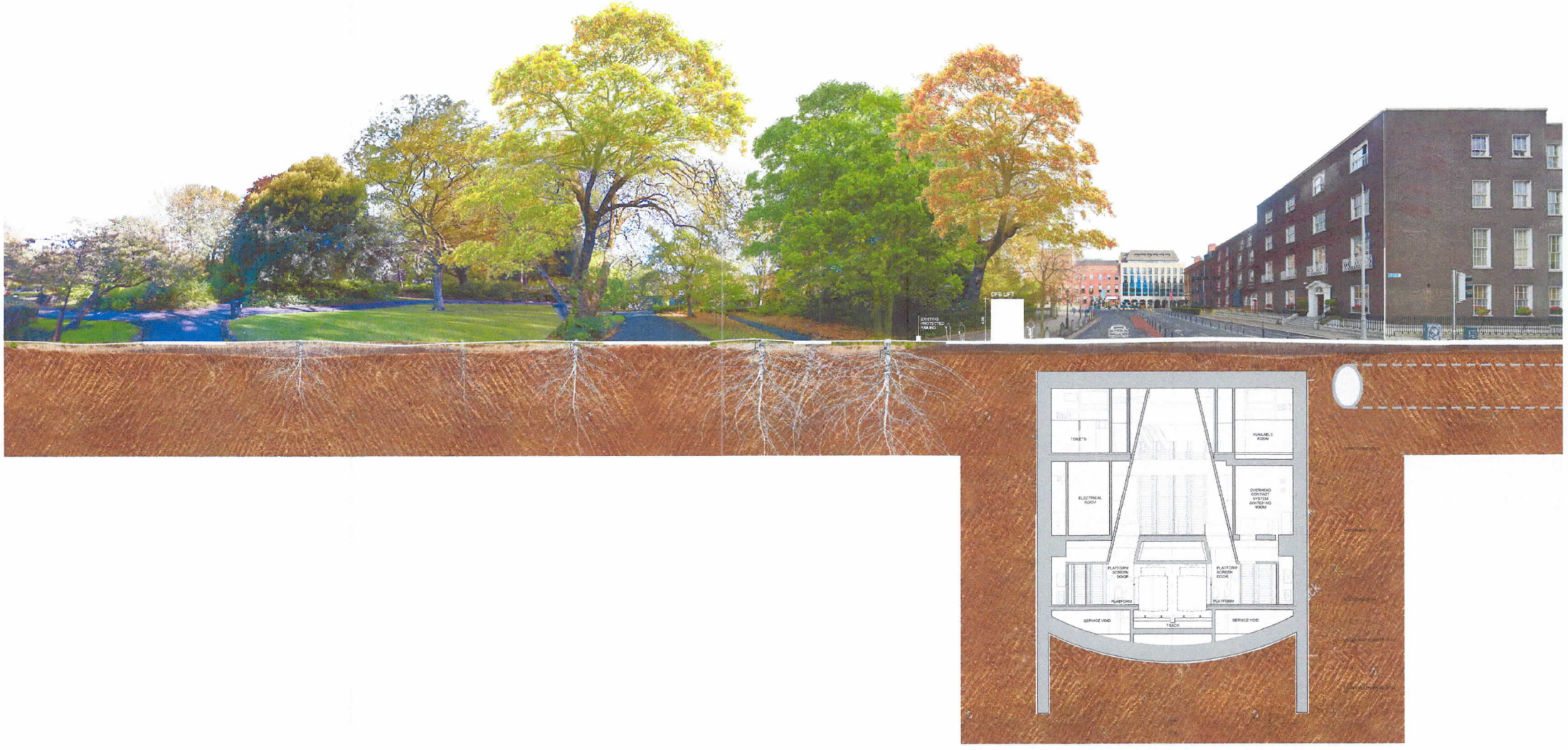
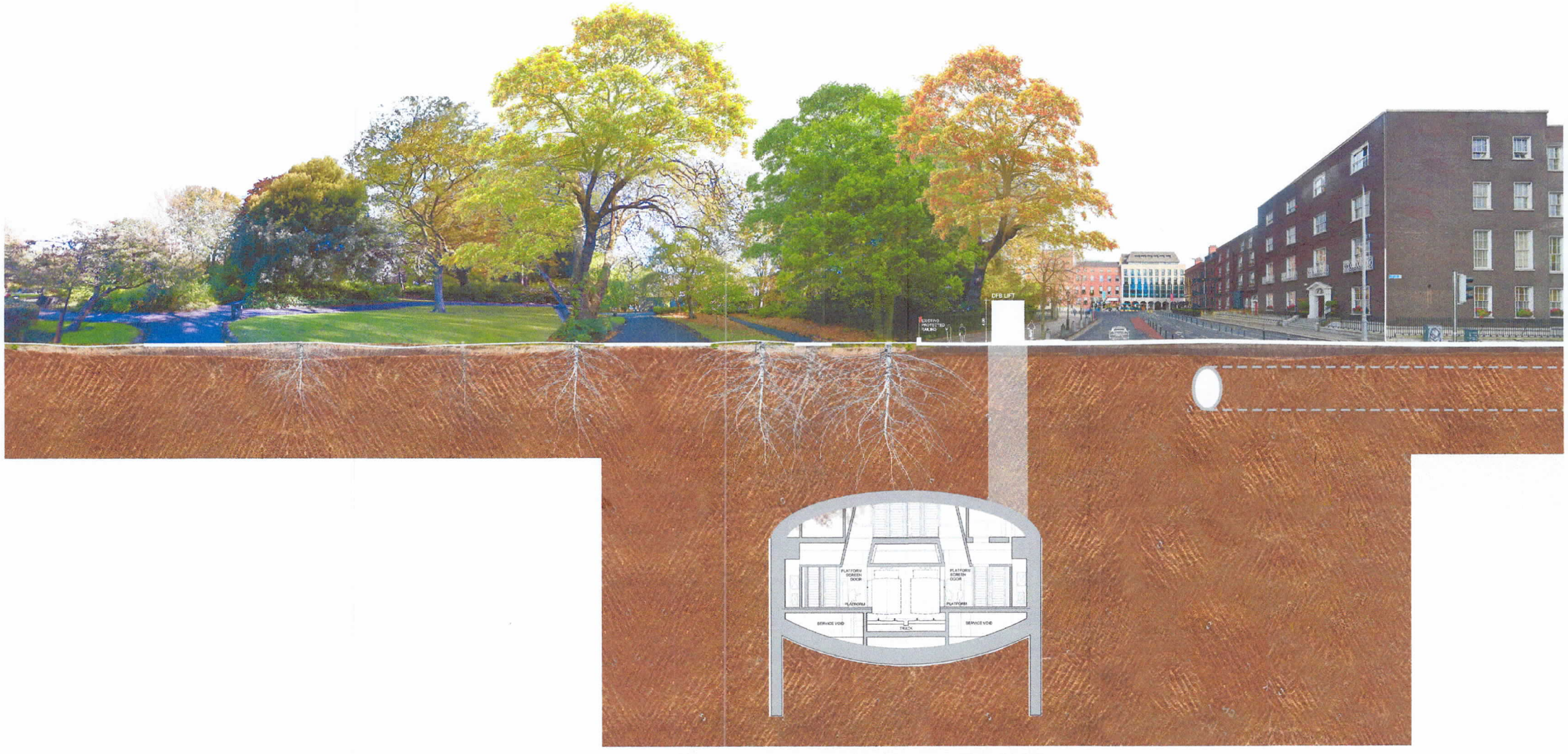
SERVICE VOID
TRACK
SERVICE VOID

TII OPTION 5



TII OPTION 4 and 8



MINED STATION

1. The mined or tunnelled options have been dismissed without adequate recognition of context.
2. The extended project timeline (unproven) in the St. Stephen's Green east roadway location should be viewed beyond the Metrolink delivery. It is a civic venture to be done right.
3. The solution that preserves the setting of St. Stephen's Green is expensive.
4. The damage to St Stephen's Green is an inestimable cost and permanent.
5. The best outcome is one where during the metro's life all traces of its construction will be invisible to St. Stephen's Green.