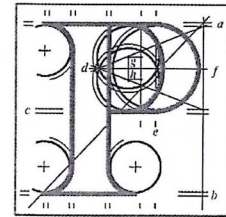


**Our Case Number:** ABP-314724-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Bernard Seymour  
4 Marys Abbey  
Dublin 7  
D07KOWY

**Date:** 18 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 and oral hearing request (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.

The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you on this matter in due course.

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](http://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.

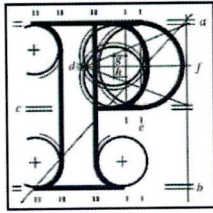
Yours faithfully,



Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An  
Bord  
Pleanála

## Observation on a Strategic Infrastructure Development Application

### Observer's details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Bernard Seymour

(b) Observer's postal address

4 Marys Abbey  
D07KOWY

### Agent's details

#### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.



## Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**  
(for example: 300000)

NA29N.314724

- (b) **Name or description of proposed development**

Metrolink

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Estuary to Charlemont



## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

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:

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 purview 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 corner 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.



## 5. Grounds

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 skilfully 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.

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.



## 5. Grounds

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.

## 5. Grounds

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## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office.

You cannot use the online uploader facility.

## Fee

7. You **must** make sure that the correct fee is included with your observation.

### **Observers (except prescribed bodies)**

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request



## Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

**Yes, I wish to request an oral hearing**

☐

**No, I do not wish to request an oral hearing**

☐

## Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

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**For Office Use Only**

<b>FEM – Received</b>		<b>SIDS – Processed</b>	
Initials		Initials	
Date		Date	

**Notes**