

Development Applications Unit  
The Manager  
Government Offices  
Newtown Road  
Wexford  
Co. Wexford  
Y35 AP90

**Date:** 23 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 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](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.

Teil  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Fax  
Website  
Email  
(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Yours faithfully,

*PP Cmb*

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

**Teil**  
**Glaio Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Ríomhphost**

**Tel**  
**LoCall**  
**Fax**  
**Website**  
**Email**

(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902



Your Ref: ABP-314724-22

Our Ref: **SID-DF-2022-015**

*(Please quote in all related correspondence)*

16 January 2023

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Via email to [sids@pleanala.ie](mailto:sids@pleanala.ie)

Re: Notification under the Planning and Development Act, 2000, as amended.

**Proposed Strategic Infrastructure Development (SID): Railway (MetroLink-Estuary to Charlemont via Dublin Airport) Order 2022.** The SID application is for permission to carry out railway works and all works necessary to enable the construction, operation, maintenance and improvement of a railway designated as a metro including inter alia the construction of a fully segregated and automated railway and metro mostly underground approximately 18.8km in length with 16 stations. A multi storey 3000 space park and ride close to the M1 Motorway will be provided at Estuary Station, a maintenance depot is located near Dardistown Station which will house all the facilities required for the maintenance and operation of the Metro Link and its rolling stock and the Operational Centre. The 16 stations run from the North of Swords at Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and the city centre to Charlemont in the south of Dublin City Centre.

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated headings.

The proposed MetroLink railway and metro scheme is a very large scale development involving the construction of an underground double rail line from Charlemont near the Grand Canal under Dublin City Centre to Northwood, Ballymun. From there the rail lines are to run largely above ground to the southern boundary of Dublin Airport, and then beneath the airport, before surfacing and continuing through mainly agricultural lands to the Swords bypass, along which they are to run through mostly developed areas before crossing the Ward and Broadmeadow Rivers to a northern terminus at a park and ride facility at Balheary near the M1. Altogether 16 stations are to be built as part of the proposed scheme from



'Estuary' at Balheary south to Charlemont, with a maintenance depot to be located at Dardistown south of the airport and north of the M50.

### **Legal Status of Saint Stephen's Green**

Saint Stephen's Green ("the Green") has a special statutory status as a public park. This is provided for under the *Saint Stephen's Green (Dublin) Act 1877* ("the Act of 1877"), which is expressly maintained in force under section 2 and Schedule 1 of the *Statute Law Revision Act 2012*. It should be noted that this is the specific and original statutory status of the Green, separate from any consideration of the Green as a national monument within the meaning of the *National Monuments Acts 1930 to 2014* and any issues arising in that regard.

Arising from a series of transfers of statutory functions since the 1990s, ownership of the Green under the Act of 1877 is vested in the Minister for Housing, Local Government and Heritage, as are all functions under the Act of 1877 which do not relate to day to day operation of the Green. The ownership of the Minister extends not only to the area enclosed within the railings surrounding the Green, but also to the area outside the railings but within the surrounding posts (see section 6 of the Act of 1877). The day-to-day operation of the Green is, by reason of the transfers of statutory functions just mentioned (see in particular S.I. No. 690 of 2003), vested in the Minister for Finance and discharged on that Minister's behalf by the Office of Public Works.

Accordingly, the Green is one of only a handful of public parks in the State afforded the status of being specifically established under its own particular statute, the others being the Phoenix Park (under the *Phoenix Park Act 1925*) and the Bourn Vincent Memorial Park at Killarney (under the *Bourn Vincent Memorial Park Act 1932*).

Section 15 of the Act of 1877 provides that the Green shall be maintained as "an ornamental park or pleasure ground for the recreation or enjoyment of the public" and that the Green shall be allowed to be "used and enjoyed as a public park for the recreation and enjoyment of the public, and not for any other purpose".

Section 116 of the *Dublin Transport Authority Act 2008* dis-applies section 15 of the Act of 1877 in respect of railway works carried out pursuant to a railway order under applicable legislation and in respect of the operation of a railway or metro in or under the Green. However, this provision appears to govern the situation after a railway order has been granted and does not require that such an order be granted.

While the Green evolved historically over a long period, its current form largely arises from statutorily required works carried out under the provisions of section 4 of the Act of 1877.

By reason of its great heritage importance, the Green also falls into the definition of "national monument" for the purposes of section 2 of the *National Monuments Act 1930* and, as it is currently owned by the relevant Minister under the *National Monuments Act 1930* (as



amended), i.e. the Minister for Housing, Heritage and Local Government, is subject to a legal requirement under section 14 of the Act of 1930 for consent for any works to it or ground disturbance around or in proximity to it.

The Green is also a Protected Structure under the Planning and Development Act 2000.

***Impact on amenity and function as a statutory public park***

Having reviewed the Railway Order application documentation including the Environmental Impact Assessment Report (EIAR) prepared for the scheme, the Department is of the view that the construction of a station for MetroLink at the Green, as currently proposed, will impact on the amenity and function of the Green as a statutory park. The applicant needs to ensure that the effect of this impact will not be long-term and can be fully and quickly mitigated.

Section 27.5.4.113 of the EIAR acknowledges 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."* Further noting that: *"Once the reinstatement works are completed the severe 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."* Review of the supplied photomontages (V22.1–V22.6) further reinforces this assessment of the long-term impact to the Green.

Review of the Consideration of Alternatives (EIAR Chapter 7 and Appendices A7.3–A7.5; A7.7–A7.8) indicates that viable alternative designs for a station at this location were identified. These potentially offer much greater capacity to preserve and maintain the amenity and function of the Green as a statutory public park during both Construction and Operation Stages. The *St Stephen's Green Station –Mined Options Report* (EIAR Appendix A7.5), for example, notes that the current preliminary design performs worst with *"regards to 'Property Impact on SSG Park', 'Biodiversity', 'Landscape and Visual', 'Archaeology/Cultural Heritage', and 'Architectural Heritage' criteria"*.

These concerns are further expanded on below in the observations from relevant specialists.

**Archaeology and National Monuments**

It is noted that the EIAR submitted as part of the planning application includes a desk-based Archaeological Impact Assessment which was carried out by IAC Ltd (EIAR Chapter 25; dated September 2022) in relation to the proposed development. The Department, has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.





Issues of particular concern remain outstanding in relation to the likely effect of this development to three National Monuments:

**1) Lissenhall Bridge (RMP DU011-081---; Protected Structure No 341 (Fingal))**

- a. Further detail/specificity is desirable in the mitigation measures outlined in Table 25.9 of the EIAR

**2) 14-17 Moore Street and 8-9 Moore Lane, Dublin 1 (Preservation Order No. 1/2007; SMR DU018-390---; Protected Structure Nos 5282–5285 (DCC))**

- a. Potential for indirect or cumulative impacts to this National Monument must be further addressed

**3) Saint Stephen's Green (RMP DU018-020334-; Protected Structure Nos 7751-7761 (DCC))**

- a. Effect of the development to this National Monument (specifically the location of a station at Saint Stephen's Green East), as currently proposed, will be very significant at both Construction and Operation Stages
- b. Legal status of the park as defined by the *Saint Stephen's Green (Dublin) Act 1877* must be adequately accounted for.
- c. Viable alternative designs for a station at this location (including mined options) are outlined in the EIAR that could substantially reduce the negative impacts of the development to this National Monument

**1 Lissenhall Bridge (RMP DU011-081---; Protected Structure No 341 (Fingal))**

Lissenhall Bridge is a Protected Structure and Recorded Monument as well as a National Monument under the criteria defined in Section 2 of the National Monuments Act 1930–2004.

The bridge originally dates from the late medieval period and elements of this medieval structure are clearly identifiable within the extant bridge structure. This has been confirmed by a number of recent surveys as outlined in Table 25.6 of the EIAR.

The EIAR has correctly identified that likely significant effects to this National Monument could occur at Construction Stage as a result of nearby construction works (particularly necessary piling works) and also from the transit of construction vehicles. The proposed mitigation measures to be implemented are vibration monitoring and the hoarding off of the bridge during construction to prevent all but pedestrian access (see Table 25.9). Chapters 13 and 14 of the EIAR clearly set out the general vibration threshold limits that will be applied in relation to historic structures and Table 25.9 further notes that the thresholds implemented for this site will be agreed in advance with the Department. However, there is no specificity within the EIAR as to the minimum buffer or exclusion zone that will be maintained for the placement of hoarding, obstruction and signage to prevent access by construction vehicles



and machinery. The EIAR notes that hoarding/obstruction shall be placed “close to, but not on, the bridge deck”.

### **Recommendation**

The Department recommends that either an acceptable minimum distance from the bridge structure should be specified or it should be specified that the minimum acceptable distance will be agreed with the Department in advance.

### **2 14-17 Moore Street and 8-9 Moore Lane, Dublin 1 (Preservation Order No. 1/2007; SMR DU018-390---; Protected Structure Nos 5282–5285 (DCC))**

This set of buildings are collectively a National Monument (DU018-390---) in the ownership of the Minister of the Department of Housing, Local Government and Heritage. They are also subject to a previous Preservation Order (PO 1/2007) as well as individual listings as Protected Structures. The buildings are closely associated with the events of Easter 1916; No. 16 is accepted as the final headquarters of the 1916 leaders and is the location where the decision to surrender was taken.

The EIAR does not indicate any likely direct impacts to this National Monument as a result of the construction of the proposed development. It does note a potential for significant indirect impact as a result of vibrations from the construction works, and an appropriate mitigation strategy for this has been outlined.

However, construction of the proposed station as currently designed is predicated on its integration within an over-site development (see Section 4.17.9 of the EIAR) generally referred to as Dublin Central Site 2. This over-site development depends upon receipt of a separate and independent grant of planning permission and its footprint is expected to be substantially larger than that of the proposed station.

- Section 4.17.9.3 of the EIAR notes that: *“Allowance has also been made for the possibility that the developers may not progress with the proposed mixed-use development in advance of MetroLink. To provide for this scenario the TII has worked closely with Dublin Central GP Ltd to ensure that the design for that scheme allows for the construction of an independent support structure to enable the station box construction and fit out to be carried out during or after the Dublin Central GP works have been completed. Both scenarios (with and without the over-site development) have been fully assessed in the EIAR. The cumulative effect of the over-site development is considered in the EIAR Chapter 31 [sic] (Cumulative impact of interactions between other projects)”.*
- Section 30.3.1 of the EIAR—identifying relevant projects for inclusion in the cumulative impact assessment—then states that: *“the Hammersons Dublin Central Site 2 Project is not included among the developments as at the time of writing planning permission had not yet been obtained but also it is not included in this cumulative impacts assessment to avoid duplication in the assessment. It is noted*



*that there would be a direct interface between these proposed Project [sic] and this development and the potential impacts of which have been assessed in the technical chapters within this EIAR”.*

- Chapter 25 of the EIAR only explicitly considers Dublin Central Site 2 in relation to the 'Do Nothing' scenario (Section 25.2) without specific reference to any potential interactions with the National Monument.
- Chapter 26 of the EIAR, dealing with Architectural Heritage, does discuss the potential impacts of the development both with and without the over-site development (see Section 26.5.4.10).

The Department is concerned by this general inconsistency in the supplied documentation and is concerned that the potential for indirect and cumulative impacts to the National Monument may not have been fully assessed.

### **2.1 Recommendation**

It is recommended that both indirect and cumulative impacts to 14-17 Moore Street and 8-9 Moore Lane need to be further addressed as part of the EIAR.

### **3 Saint Stephen's Green (RMP DU018-020334-; Protected Structure Nos 7751-7761 (DCC))**

Saint Stephen's Green ("the Green") is a Protected Structure and Recorded Monument as well as a National Monument. It originates as one of the three medieval commonages of Dublin City. The first formal enclosure of the Green occurred in the 1660s on foot of the decision by Dublin Corporation to develop the commonage creating the layout that persists today of an enclosed park encircled by a carriageway with residential development facing onto it. At this time, it was the largest urban square in the world and remains the ninth largest. The current park layout owes much to the philanthropic actions of Sir Arthur Guinness who funded its refurbishment, repair and improvement in the 19<sup>th</sup> century, leading directly to the legislation of 1877 that placed the park on its present statutory footing (see also above).

The current proposal is to site a station within the Green and the EIAR identifies the significant effect that this will have on this National Monument:

- Chapter 25 "Archaeology and Cultural Heritage" characterises the effect as very significant direct negative (permanent) during the Construction Stage and very significant indirect negative during Operation Stage.
- Chapter 26 "Architectural Heritage" characterises the effect as profound direct negative during the Construction Stage and very significant indirect negative during Operation Stage.
- Chapter 27 "The Landscape" characterises the effect as very significant negative during the Construction Stage and very significant negative during Operation Stage.





While certain mitigation measures are outlined within the EIAR the residual effect, even taking account of these actions, remains significant, intrusive and ongoing through both the Construction and Operation Stages. Preservation by record of sub-surface archaeological features, removal, storage and replacement of the historic furnishings (such as railings, paving, etc.) are entirely feasible and achievable. However, construction of the station as currently proposed will result in increased hard landscaping, introduction of upstanding structures into the footprint of the park and loss of mature trees and canopy that will result in long-term to permanent effects on the amenity and setting of this National Monument.

It is clear in reviewing the Consideration of Alternatives (EIAR Chapter 7 and Appendices A7.3–A7.5; A7.7–A7.8) that the proposed location for the station at the Green was not the only viable option.

- The *St Stephen's Green Station Options Assessment Summary* (EIAR Appendix A7.8) notes that: *"Of the 16 alternatives considered [including Preferred Design], location 8 and mined options 1 and 3 were considered viable [in addition to the Preferred Design]."*
  - Location 8 would place the station wholly under the carriageway of Saint Stephen's Green East.
  - Mined Options 1 and 3 would be partially constructed underground with much more limited interventions at surface level.

The likely overall effect of the development to the Green—encompassing all its intrinsic characteristics—at both Construction and Operation Stage would be substantially reduced, if any of these three alternatives had been adopted, with certain specific potential impacts eliminated or considerably reduced in scale and scope.

In that regard, the *St Stephen's Green Station –Mined Options Report* (EIAR Appendix A7.5) notes that: *"[Mined] Option 3 performs the best in terms of minimising the impact on St. Stephen's Green Park both during the construction and operational phases, noting that during the construction phase the Park's railings would be removed temporarily to ensure they are protected. In contrast Option 0, the current Preliminary Design performs the worst by a considerable margin both during the construction and operational phases of the station compared to the other options, which includes for during construction a haul road and logistics being located within the Park, and five ventilation 'pop ups' in the permanent case (operational phase). [Mined] Option 1, construction and permanent land take is confined to the Plaza area of the Park and also necessitates the removal of a section of the Parks railings."*

It is clear that in selecting the location and design for the station at the Green, as currently proposed, consideration of the overall effect to the intrinsic characteristics of the National Monument (encompassing factors such as property impact, landscape, amenity, archaeology/cultural heritage and architectural heritage) has been weighed more lightly. It is clear in reviewing the EIAR and supporting documentation that factors such as programme, cost and consistency of architectural design have been privileged. The Department is of the



opinion that the proposed station option has prioritised construction requirements above a sufficiently weighted assessment of the long term impacts on The Green.

### ***Recommendation***

The Department recommends that careful consideration be given to the proposed alternative station locations and/or construction methodologies assessed in the EIAR for the proposed station at St Stephen's Green. Such consideration would benefit from clarification of the issues raised above.

### **Architectural Heritage**

The Department understands that the proposed development of this major infrastructural project is part of the Project Ireland 2040 vision led by the NTA/TII. The Department also acknowledges that a modal shift to more sustainable forms of transport is required as an integral part of sustainable development and a necessary response to climate change and the provision of a high quality living environment for everyone. The recently published National Policy on Architecture underpinned by the UN Sustainable Development Goals identify that integrated planning and holistic management and best practice use of our shared heritage are central to this approach and awareness of the embedded carbon in extant historic buildings and structures and the avoidance of demolition have an important part to play in the consideration of sustainable development.

This Department participated in several pre-planning meetings during the consultation process, at which concerns regarding the impact of the proposed development on cultural heritage were discussed. The preferred route would traverse the historic city of Dublin arriving from the northern suburbs, under culturally significant city centre fabric, providing major station points at Glasnevin, Mater, O'Connell Street, Tara Street, and St. Stephen's Green, terminating at Charlemont station adjacent to the historic township of Rathmines.

Initial discussions highlighted that the preferred route might impact architectural and cultural heritage, and TII commissioned a report looking into the matter. The information submitted within this report provides the basis for the cultural heritage strategy and its overall assessment. It identifies 702 architectural heritage constraints, testifying to the overall impact of this proposed infrastructure on the historic character and fabric of the city and including:

- 6 National Monuments
- UNESCO Tentative List (2022 change noted)
- Architectural Conservation Areas
- Conservation Areas
- Protected Structures
- Proposed Protected Structures
- Buildings identified in the National Inventory of Architectural Heritage.



The information provided is based on an assessment of established baseline data for architectural heritage. It is noted in this regard that the National Inventory of Architectural Heritage (NIAH) for Dublin city is being undertaken incrementally and whilst partially complete, information is not yet available for the full length of the route. (Refer to Appendix 1 which shows the extent of the published survey to date).

The Department is concerned that the underlying significance of the historic city and suburbs (including medieval origins, the surviving legacy of the Georgian city, and the later designed elements and landscape of the C19<sup>th</sup> suburban expansion) would be undervalued where a narrow focus is placed on the proposed route, and where individual sites and historic places are not fully evaluated.

An overview of the project indicates that the proposal comprises 5 No. surface stations and 11 No. sub surface stations with 2 No. stations within developments at O'Connell Street and Charlemont, which emerge in locations with heritage contexts and significance. The preferred route runs parallel to and adjoins historic city infrastructure at various points, such as the historic canal, the extant railway line, crossings and boundaries. The works in the context of the historic village of Glasnevin and its C19<sup>th</sup> suburbs are regarded as significant due the scale of the proposed interchange in this location.

A key concern arising is that the architectural heritage impact has not been adequately considered in its widest context. The effect on protected structures and the mature character of their settings, and the impact of enabling works, demolition, excavation, construction and intensification of use have not been fully identified or appraised. Planning permission for works adjacent to protected structures typically is addressed in detail to ascertain the impacts on significance and character in the context of the Planning & Development Act 2000, and as per the Architectural Heritage Protection Guidelines, published 2011.

Whilst the proposed project is predominantly to be constructed by boring a tunnel at significant depths to avoid impacts on services, topographical features, archaeology etc. the construction of a number of subterranean station boxes are of significant concern due to their impact on cultural heritage. These structures proposed along the route are between 30 – 36 metres in depth by 122 metres in length and 25 metres in width and are described as being of top-down construction of either diaphragm or secant pile walls. Their construction using a 'cut & cover' or 'top-down' approach within the historic and sensitive grain of the city is problematic and will have significant impact on the heritage sites they adjoin, in particular the selected sites at Mater, O'Connell Street, St. Stephen's Green and Charlemont.

The impact arising from this infrastructural project includes extensive excavations in close proximity to protected structures, historic infrastructure, the demolition of boundaries, alteration of formal squares and streetscape character, and the removal of mature settings and amenity from C18<sup>th</sup> and C19<sup>th</sup> residential conservation areas. The cumulative scale of the impact is of particular concern.





The overall impact that will occur has not been fully documented, nor has adequate provision been made for conservation and re-making post construction.

#### **General recommendations**

The Department would welcome further consideration of the design strategy, in particular the 'cut and cover' approach and would favour tunnelling where possible to avoid architectural heritage impacts. It should be noted that this approach may facilitate more timely delivery, as it will reduce reliance on demolition and disturbance of existing built heritage.

The Department would also welcome the careful consideration by An Bord Pleanála of all the aspects of the proposed technical design, the scale of excavation, the vibration tolerances and proposed approach to water management with regard to the possible impact on architectural heritage, i.e. brick basements, areas, and cellars as identified. The close proximity and under tunnelling of National Institutions and the prominent cultural sites of the city along with historic infrastructure such as the Royal Canal and its crossings are noted.

The Department welcomes the appointment of a Project Conservation Architect for the lifetime of the construction programme as it develops with the input of industrial heritage and stained glass specialists. To support the cultural heritage strategy the appointment of a bespoke Heritage Works Contractor is envisaged for the future works and this is regarded as being of great importance in securing good long-term heritage outcomes.

The Department recommends that these provisions should be further supported by the appointment in each site of a Conservation Architect with demonstrable expertise and experience in urban design in historic contexts to identify, confirm and develop the record of the historic fabric, inform appropriate levels of intervention and protection, and to guide future conservation and make good original character and historical design intent.

With regard to the proposed surface station design the Department notes that a substantial number of new stations will be built and that they will be constructed within contemporary and historic settings. While an overall coherence of design across stations is anticipated, the Department recommends a heritage-led approach within areas of significant historic character to ensure high quality design and the use of appropriate materials and craft skills etc. This approach should be agreed in each instance with the Local Authority Architectural Conservation Officer and the Department.

#### **Site specific recommendations and observations**

##### **Santry Lodge**

Proposals provided in the context of Santry Lodge could potentially undermine the surviving significance of the historical demesne and its cultural heritage importance. Engineer-led design proposals in this context appear not to have sufficient regard to the surviving integrity of the former C18<sup>th</sup> estate and its planned landscape as evidenced by historical mapping. The proposed interventions would have impact on the architectural heritage of this area and





have not adequately evaluated the architectural significance and character of the surviving element of Santry Lodge, its entrance and boundary and its still discernible relationship to the wider planted landscape. The Department would welcome further consideration of the proposals to ensure the long-term survival of the lodge.

#### **Lissenhall Bridge**

The Department would welcome careful consideration and the provision of detailed survey of this early structure and its historic setting as it retains cultural significance and integrity. Further information is necessary to understand the overall condition and structural capacity to inform the level of intervention and to minimise adverse impact on the bridge's historic character. Due to the scale of the proposal insufficient information is available to ascertain the overall impact to this protected structure/monument and to gauge the proposed conservation outcome.

#### **Glasnevin Interchange**

This site comprises earlier railway infrastructure in the ownership of Irish Rail and the historic canal infrastructure in the ownership of Waterways Ireland. The Department would welcome the careful consideration and detailed survey of these complex historic settings, their fabric and historic relationships to minimise adverse impact on the architectural heritage significance and historical function and to minimise the loss of historic fabric, mature planting and amenity. The re-making of the former bridge at Glasnevin Station in close proximity to the canal gates is welcome to preserve an integral part of the historic canal character. However, it is recommended that the bridge be put back on a permanent basis and made part of a well-considered design in the context of the surviving stonework. Detailed design and co-ordination with service routes is required for agreement with the Department.

As noted above, it is recommended that interventions in historic areas such as Glasnevin be heritage led and of high quality, including the use of appropriate materials etc., all to be agreed with the Department and Local Authority Architectural Conservation Officer.

#### **O'Connell Street**

The proposed subterranean station is envisaged as part of the wider O'Connell Street regeneration area and is to be integrated with the proposed re-development of this historic urban block and streetscape fronting O'Connell Street known as Dublin Central, Site 2. This development is the subject of a separate planning permission which seeks substantial demolition of the street fronted buildings to O'Connell Street. The designation of O'Connell Street as the first Architectural Conservation Area in Dublin was based on detailed survey and research and affirmed the cultural significance of the place associated with significant events of our past, particularly relating to the formation of the State. (Refer to attached in Appendix).

The Department was informed that the design of the proposed station was intended to avoid adverse impact on the adjoining National Monuments site at Moore Street. While this is acknowledged, the wider urban block will be impacted upon by the proposed construction



methodology. In this regard the options discussed by the EIAR suggest that the development of the station can go ahead regardless of the planning outcome for the development of Dublin Central (which facilitates the proposed 'cut and cover' approach). This suggests that the removal of extensive historic streetscape may be avoidable.

As previously noted, it is recommended that interventions in historic areas such as Moore St. be heritage led and of high quality, including the use of appropriate materials etc., all to be agreed with the Department and Local Authority Architectural Conservation Officer.

#### **Mater**

This small enclosed park is identified as a rare amenity space for the community within the north Georgian character area and the setting of a grotto and a C20<sup>th</sup> high cross to the Four Masters, which gives the name to the park. The memorial is described as follows;

*'This high cross on a large plinth commemorates the Franciscan friars of Donegal town, who between 1632 and 1636 compiled from early sources a history of the ancient kingdom of Ireland which became known as the Annals of the Four Masters. The Annals are chronicles of the medieval history of Ireland.'*

The proposed intensification of use as an entrance to the subterranean station will have a substantial effect on the use and benefit of this recreational space. The temporary dismantling of fabric and its removal to storage is ultimately destructive and results in loss of cultural significance, authenticity and integrity.

Whilst the architectural character of the park today is defined by the presence of the historic classically fronted Mater hospital, an underlying significance is known to exist relating to Gardiner's unfulfilled ambition for the Georgian city. Excavations discovered the footprint and foundation stones for the great circus that was planned but never built in this location. The proposed excavation by 'cut & cover' approach and the removal of the surviving elements of this grand vision is not supported by this Department. The proposed construction from the top down of the large scale subterranean box will have a significant and immediate impact on the adjoining historic fabric extending beyond the boundaries of the Four Masters Park.

Adjoining the park is the site of St. Joseph's Church which is included in the overall public realm design and this Department, as before, notes the requirement for interventions to be heritage-led and of high quality, in this case, using appropriate materials to reference the Georgian architectural character area with all detailed design to be based on an understanding of the historical context and agreed with the Department and the Local Authority Architectural Conservation Officer.

#### **St. Stephens' Green**

The cultural significance of St. Stephen's Green formed the basis of several pre-planning discussions and the Department advised of the key concerns pertaining to the works in the context of the surviving cultural landscape.



The Department recommends careful consideration of the reference material appended to this report provided by OPW, as primary research on the cultural significance of the Green.

From an architectural heritage perspective the setting out of St. Stephen's Green as the first Renaissance Square in Dublin prompting the design of axial routes to and from it changed the character of the medieval city and moved the focus of development further to the South East of the medieval core. Constructed to the various sides of St. Stephen's Green over time were the high end residences from the mid C17<sup>th</sup> onwards as documented by the Irish Georgian Society Records 1939. To the East side of the Green some of the earliest and most architecturally interesting and decorative Georgian townhouses still survive within their original building plots and with features that were part of their initial construction namely the paved basement areas and cellars extending to the front of the property.

The Green has evolved over time making it today a richly layered cultural space of considerable scale and maturity that has been at the heart of the social, historical and political life of the city. Its surviving integrity is as a remarkable C19<sup>th</sup> planned landscape designed to be overlooked by Lord Ardilaun's city residence. As the premier C19<sup>th</sup> Park in Dublin, it retains many features of note including the design of the central lake with rock feature, the Wolfe Tone memorial designed as an entrance to the park, and extensive mature planting and perimeter enclosure. This Department endorses OPW's views that this is a cultural landscape of national significance and of immeasurable importance to the city.

As previously noted, the Department would welcome An Bord Pleanála's further consideration of the design strategy and evaluation of the construction approach of the large stations in particular to avoid the 'cut and cover' and 'top-down' approach where possible, in favour of tunnelling to avoid/minimise architectural heritage impacts as an integral part of overall design strategy to safeguard cultural heritage significance and the adjoining sites of national importance.

Furthermore, the Department would welcome the further consideration by An Bord Pleanála of the modified version of Options as presented by MetroLink, so that the station footprint is situated externally to the Green enclosure in order to restrict the scale of the construction/work within the park. Similarly the reconsideration of these options would remove vent shafts or skylights exiting within the railed area of St Stephens Green. The proposal to include these elements within the Green requires planting exclusion zones and maintenance access areas, diminishing the established areas of planting and the overall amenity space and habitat provision.

Consideration of other viable options such as the construction below the carriageway to St. Stephen's Green or partial construction underground would reduce the impact at surface level. For example, a reduced construction/work area at the Wolfe Tone corner may be achieved to permit a more discreet construction of the escalator shaft and public lift to access the proposed subterranean station.





In summary, the Department would welcome the further consideration of the design approach and the relocation of the construction zone eastwards away from the internal core of St Stephens Green, to protect the existing trees and to safeguard the historic setting and integrity of the Park.

As previously noted, any interventions within historic areas such as St. Stephen's Green should be heritage-led and of high quality, including the use of appropriate materials etc., all to be agreed with the Local Authority Architectural Conservation Officer and the Department.

### **Charlemont**

The Department regards the construction of the large subterranean station integrated with the commercial development at this location as a significant impact on the setting and architectural character of the protected structures and Architectural Conservation Area of Dartmouth Square.

Detailed conservation proposals are required to off-set the negative impacts that are apparent with this station construction i.e. the repair and conservation of historic structures, boundaries and settings to restore the overall architectural character of the area.

The Department, as before, recommends that interventions be heritage-led and of high quality, in this case using appropriate materials to reference the late Victorian architectural character area with all detailed design to be based on an understanding of the historical context and agreed with the Department and the Local Authority Architectural Conservation Officer.

### **Nature Conservation**

The MetroLink project will have a footprint of circa 138.9 ha, and given this scale therefore has the potential to result in significant impacts on flora, fauna and habitats, including in nearby and downstream European sites. However, having considered the documentation submitted in support of the present application for a Railway Order to authorise the construction of MetroLink, and in particular the supporting Natura Impact Statement (NIS) and Environmental Impact Assessment Report (EIAR), this Department not only accepts in general the evaluation of the possible detrimental effects of the proposed scheme on biodiversity presented in these documents, but also their conclusion, that provided the measures proposed in them to mitigate such effects are implemented in full, the construction and operation of MetroLink will not significantly affect the integrity of European sites nor result in any significant adverse effects on flora and fauna beyond effects at a local level.

The over-ground section of MetroLink north of Dublin Airport not only traverses the Broadmeadow and Ward Rivers, but also the Gay Brook and two tributaries of the Sluice River; the first three water courses enter the Malahide Estuary, both a Special Area of Conservation (SAC) and Special Protection Area (SPA), while the Sluice River runs into the head of the Baldoyle Estuary, which is part of the Baldoyle Bay SAC and Baldoyle Bay SPA.





South of the airport MetroLink's route runs across the Cuckoo Stream and the Mayne River to which the latter is a tributary. The laying out of the proposed depot at Dardistown will involve the diversion of the Turnapin Stream another tributary of the Mayne. The Mayne River also enters the Baldoyle Estuary. Just south of the M50 the scheme's route takes it across the Santry River which eventually runs into the North Bull Lagoon within the North Dublin Bay SAC and the North Bull Island SPA. One of the construction depots for MetroLink is to be sited in Griffith Park adjacent to the River Tolka which runs into the South Dublin Bay and River Tolka Estuary SPA, while Glasnevin Station to serve this scheme and in addition the proposed DART+WEST and DART+SOUTHWEST projects, is to be built on a site adjacent to the Royal Canal immediately upstream of Cross Guns Bridge and therefore hydrologically connected, via the canal and River Liffey, to European sites in Dublin Bay.

Due to the existence of these various hydrological linkages between the proposed MetroLink route and European sites, the NIS identifies the possibility for pollutants mobilised into surface water runoff from the proposed development during its construction phase, such as silt or accidentally released hydrocarbons or cementitious materials, to reach and potentially adversely affect the downstream European sites referred to above and other nearby marine European sites. Also, because there are to be eight outfalls from MetroLink's drainage system to the surface water streams along its route north from the Santry River, the NIS considers that there is the potential for pollution arising from MetroLink during its operational phase to detrimentally affect downstream European sites. A very comprehensive suite of measures to prevent pollutants being mobilised from MetroLink during its construction is therefore set out in the NIS and these are to be incorporated in a finalised Construction Environmental Management Plan (CEMP), a Water Management Plan (WMP) and a Soil Erosion and Pollution Control Plan to be prepared in relation to the proposed scheme. An Incident Response Plan will be prepared as well in order to cope with any accidental release of pollutants. During MetroLink's operational phase the restriction of activities from which pollution might arise in the Dardistown depot to hard standing areas and the direction of water runoff from the scheme's drainage system through oil interceptors and attenuation ponds before its outfall into surface streams, should prevent pollution of these water courses and adverse effects on downstream European sites in this phase of the proposed development.

The NIS also considers the potential for *ex-situ* effects from MetroLink's development on wintering Qualifying Interest (QI)/Special Conservation Interest (SCI) bird species which nearby SPAs have been designated to protect. Surveys of the use of sites on or near the MetroLink route by bird species were carried out during the winters from 2018/2019 to 2020/2021. In the course of these surveys up to 84 black-tailed godwits, a QI/SCI species for the Malahide Estuary SPA, were recorded on a 8.1 ha site at Barryparks on the Swords Bypass adjacent to where Fosterstown Station is to be built. This peak number is considerably less than 1 % (being 200) of the national wintering population of black-tailed godwits and the mean peak number of these birds which is 206, recorded from the Malahide Estuary SPA, and flocks of this species were only recorded on this site (at its far end from the station site) on two of the four visits to it during the winter bird surveys. Consequently because of the relatively small numbers of godwits which may be affected by MetroLink and



the availability of other *ex-situ* areas suitable for the godwits to forage on in the vicinity of the Malahide Estuary SPA, the NIS concludes that the black-tailed godwit and (and the SPA) will not be significantly adversely affected by the proposed development. It reaches a similar conclusion with regards to curlew, a red listed species, flocks of which up to 105 in number were recorded from fields to the east and south east of the Dardistown depot site, as this peak number is much less than 1 % (being 300 birds) of the national wintering population, and of the mean peak number of curlew i.e. 850 recorded from the North Bull Island SPA which is the nearest SPA for which this species is a SCI.

The NIS concludes "following an examination, analysis, and evaluation of the relevant information, including in particular the nature of the predicted impacts from the MetroLink Project with account taken of the implementation of the mitigation measures proposed, that the proposed MetroLink Project will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects." The Department agrees with this conclusion.

Chapter 15 Biodiversity of the EIAR supporting the current application evaluates the impacts of MetroLink on flora and fauna not associated with European sites. Altogether c.14ha of habitats of local importance, higher value, will be lost as a result of the proposed development including riparian habitats, species rich calcareous grassland, 4.83 ha of woodland, 385 m of hedgerow and 77m of treeline. 51ha of arable farmland will also disappear. According to the Arboricultural Impact Assessment a total of 3,437 trees will have to be removed to facilitate the construction of MetroLink, with another 154 trees recommended for removal for arboricultural reasons. Many of the trees concerned are relatively young trees planted as part of the landscaping of the M50 and the Swords Bypass, but others are much longer established trees. In the 'Northwood' area of Ballymun the 650 trees to be removed to facilitate the proposed development include trees of both categories, with another 53 trees to be removed for arboricultural reasons.

In St. Stephen's Green an entire section of the boundary planting is to be removed at the northern end of the eastern side of the green in order to facilitate the construction of the St. Stephen's Green Station. Including trees to be lost from the roadside pavement which is also part of the legal park managed by the Office of Public Works (OPW) 64 trees are to be removed to allow the building of the station, with another 15 trees recommended for removal because of their poor condition. Apart from 18 hollies, the trees to be removed from within the railings which delineate the boundary of the physical park consist of various exotic species including London planes, sycamores, holm oaks, Caucasian limes and a number of elms which have not been affected by Dutch Elm Disease. Some of them are large specimens and were probably planted when St. Stephen's Green was laid out to its present design around 1870. Because they were planted and of non-native species, these trees cannot be considered of high nature conservation value, but they are significant from a landscape perspective and form an integral part of the St. Stephen's Green National Monument. They are also of local biodiversity value for breeding birds and possibly of value



for roosting bats, as two of the trees to be removed have been identified as containing features (knotholes, cracks) which have the potential to be used as bat roosts (PBRs).

Breeding bird surveys of the proposed MetroLink route in the springs and summers of the years 2018 to 2020 recorded the presence of 55 species, the great majority of which nest in trees or shrubs. Two ground nesting species which are red listed were recorded along the scheme's route, snipe and meadow pipit, but only one record of the former species was made, from a rough grassland field at Ballymun which is to be used as a depot. The numbers of meadow pipit recorded were also small, and though this species has declined recently it remains a common nesting species of open habitats in County Dublin, and any loss of breeding birds of this species as a result of MetroLink could not therefore be considered significant. Another species which has declined and is therefore red listed is the yellowhammer, which was recorded in small numbers at Dardistown and at Swords. This is a species associated with arable agriculture, and particularly cereal cultivation, which remains common in Fingal in suitable habitat, and again the losses of breeding birds (possibly three to four pairs) likely due to the construction of MetroLink could not be considered significant. In the longer term the large numbers of trees (3,444) and length of hedgerows (385 m) to be planted as part of the proposed landscaping of MetroLink will compensate to a considerable extent for the loss of bird nesting and foraging habitat which will result from the clearance of vegetation to facilitate the construction of this project, but the removal of woody vegetation during the bird breeding season could result in the direct destruction of nests, eggs and nestlings and should be avoided.

Bat activity surveys of the proposed MetroLink route, including the use of static detectors, were carried out in the summers from 2018 to 2020, following on from survey work for potential bat roosts in April 2018. Only one active bat roost was identified along the route, which was being used by a single soprano pipistrelle bat, in a private house in the 'Northwood' area of Ballymun. On the entire route only eight of the trees to be removed were identified as having PBRs. During the bat activity surveys the three common bat species, common and soprano pipistrelles, and Leisler's bat were recorded along the entire route, including in St. Stephen's Green. Nathusius's pipistrelle was only recorded at a single location while the more light sensitive long-eared bat was only recorded in the Balheary area and at the Royal Canal. The Daubenton's bat, another light sensitive species, which is largely confined to foraging over or near fresh water bodies, was recorded in the Broadmeadow River area, and the whiskered bat, which is also light sensitive, on the Royal Canal. The latter two species are both members of the genus *Myotis* and bats which could only be identified as *Myotis* species using the bat detectors employed for these surveys were recorded at Balheary and Lissenhall Bridges, at the Home Farm grounds and Griffith Park near the Tolka, and at Santry Demesne.

In order to avoid injury to bats during tree felling the NIS recommends the resurvey of PBR trees before their removal, which should be carried out in September and October when bats are still active before entering hibernation. As bat conservation measures the erection of 30





no. 2F Schwegler Bat Boxes along the MetroLink route is recommended and the review of the lighting plans for the scheme by a bat specialist.

From survey work carried out on the MetroLink route or in previous surveys the otter, a mammal species, like bat species, afforded a system of strict protection under the Habitats Directive, has been recorded on practically all of the water courses on the scheme's route. High levels of evidence of the presence of otters was found during survey work for the present scheme in particular on the Royal Canal. Spraint, footprints and potential slides were recorded below Broombridge adjacent to and c. 80m to 685m northwest of the site of the proposed project works. An otter couch was also identified on the south bank of the canal east of Cross Guns Bridge and the 5<sup>th</sup> Lock and c. 120m away from the project site. The EIAR recognises the potential of the works required for the construction of Glasnevin Station along this section of the Royal Canal to result in habitat severance for otter and act as a barrier to the movements by this species along the canal. In order to facilitate works on a section of the north canal wall between the 5<sup>th</sup> and 6<sup>th</sup> Locks to allow construction of the station, the 215m long canal level between these locks will have to be dewatered for six months, and to preserve motor access to the upstream north bank Coke Smelter Cottages a bridge is also to be installed across the canal at the 6<sup>th</sup> Lock to allow vehicular access along the south canal bank from Prospect Road.

The EIAR proposes that fencing should be erected along the section of canal between the 5<sup>th</sup> and 6<sup>th</sup> Locks for the duration of the dewatering of the canal associated MetroLink works in order to guide otters around these works. However, it does not appreciate the problem, that because of the close proximity of the 5<sup>th</sup> Lock to Cross Guns Bridge, movements of otter upstream in this area, and probably downstream as well, require them to traverse Prospect Road/Phibsborough Road at Cross Guns Bridge, presumably at night (an otter was reported killed here in the autumn of 2021 apparently attempting such a road crossing). In addition any measures to be adopted to preserve otter movement along the canal around the MetroLink works and Cross Guns Bridge will have to take account that works on other projects which are proposed for this area may be taking place during the same time period as the MetroLink works. Such works include the laying out of a section of the proposed Royal Canal Greenway and the erection of a pedestrian/cycle bridge immediately east of Cross Guns Bridge as part of the proposed Bus Connects Ballymun Finglas to the City Centre bus corridor.

The EIAR identifies several areas along the MetroLink route where habitat potentially suitable for use by breeding amphibians is present, including ditches on the Dardistown Depot site where frogs have previously been recorded and a field west of the R108 in Ballymun which is to be used as a temporary depot site during the project's construction phase. Pre-works surveys of these areas for amphibians and the movement of any spawn, tadpoles or adults discovered to suitable habitat nearby are therefore proposed as a conservation measure.





### **Recommendations**

In light of the above the Department recommends that any Railway Order granted in response to the present application should be subject to the following conditions:

1. That all the mitigation measures to avoid the pollution of surface water runoff during the construction phase of the proposed development set out in the NIS supporting the present application shall be incorporated in a CEMP, a Water Management Plan (WMP) and a Soil Erosion and Pollution Control Plan to be submitted to the planning authority for its written agreement before the commencement of works, and these plans shall be implemented in full.

#### **Reason:**

To avoid the pollution of surface water courses in the vicinity of the proposed development resulting in adverse effects on aquatic flora and fauna and the Qualifying Interests (QIs) of downstream coastal European sites designated under the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC).

2. That no removal of trees or vegetation to facilitate the proposed development shall occur during the main bird breeding season from March to August inclusive.

#### **Reason:**

To avoid the destruction of bird nests, eggs and nestlings.

3. That any trees with potential bat roost features (PBRs) to be felled to facilitate the proposed development shall be resurveyed for bats before their removal, using if necessary endoscopes, and if the presence of any bat is identified in such a tree, it shall only be felled on the receipt of licence from the National Parks and Wildlife Service (NPWS) of this Department to derogate from the Habitats Directive to destroy a bat breeding or resting place.

#### **Reason:**

To avoid the death or injury of members of species, namely bat species, afforded a system of strict protection under the Habitats Directive (92/43/EEC).

4. That 30 no. 2F Schwegler bat Boxes shall be installed along the MetroLink route, and that the lighting design for the proposed development, signed off on by a bat specialist and incorporating measures to minimise light spill pollution, shall be submitted to the planning authority for its written agreement before the commencement of any development on site, this lighting design to be implemented in full.

#### **Reason:**

To conserve bat species which are afforded a system of strict protection under the Habitats Directive (92/43/EEC).



5. That a Cross Guns Otter Bypass Plan, to be drawn up in co-operation with the National Parks and Wildlife Service (NPWS) and Waterways Ireland, shall be submitted to the planning authority for its written agreement before the commencement of any works in connection with the proposed scheme in the vicinity of the 5<sup>th</sup> and 6<sup>th</sup> Locks and Cross Guns Bridge, Phibsborough; this plan to provide for the preservation of movement of otters along the Royal Canal as far as possible past the works on Glasnevin Station for the duration of these works.

**Reason:**

To maintain free movement along the Royal Canal of a mammal species, namely otter, afforded a system of strict protection under the Habitats Directive (92/ 43/EEC), and which forms an important element of the city of Dublin fauna.

6. That the areas along the MetroLink route identified in the EIAR supporting the present application as being suitable habitat for amphibians should be surveyed for such animals before the commencement of any works on these areas, and if any spawn, larvae or adults of frog or smooth newt are identified during these surveys, they shall be removed to suitable habitat nearby under licence from the NPWS.

**Reason:**

To conserve species, namely frog and smooth newt, protected under the Wildlife Acts, 1976 to 2022.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie), or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

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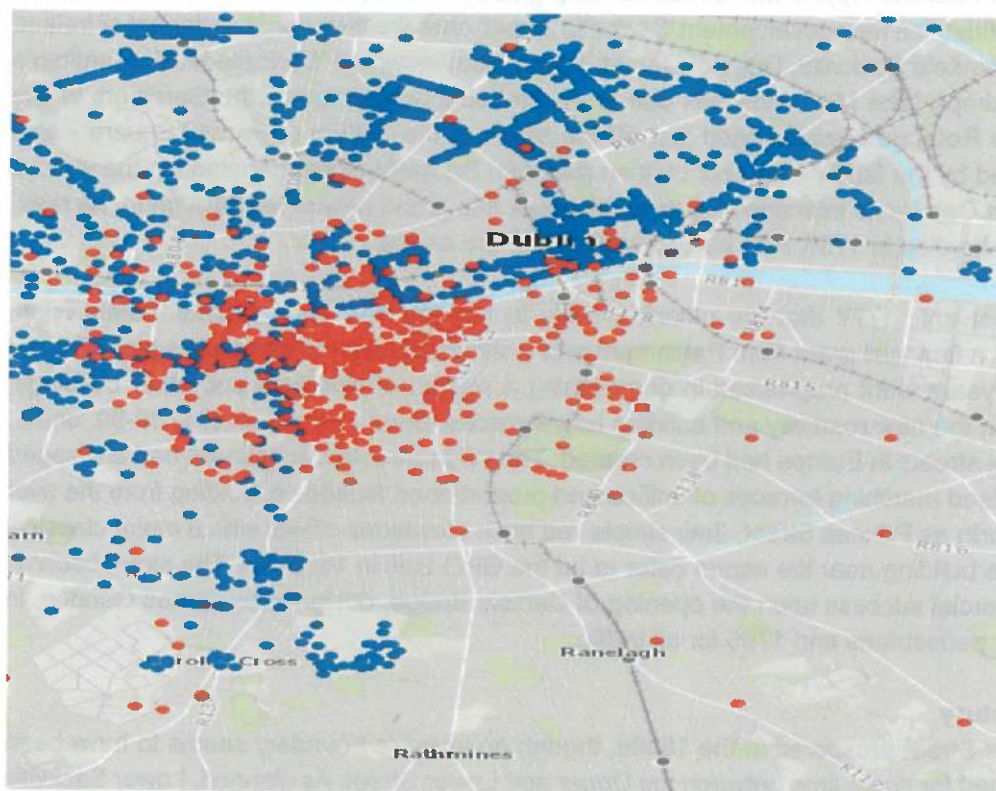
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Joanne Lyons  
Higher Executive Officer,  
Development Applications Unit  
Administration



## Appendix 1

NIAH Dublin City Extract approximate to the preferred route selection historic environment viewer - <https://maps.archaeology.ie/historicenvironment/>



### Architectural Heritage context – Reference Material

Extract from Architectural Conservation Area, Dublin City Council

Historical Context & Morphology of O'Connell Street.

Upper O'Connell Street and its tree-lined median in 1964 as viewed from Nelson's Pillar, looking north. The original 'Gardiner's Mall', this northern part of the street was planted with London plane trees c. 1903 and further added to mid-century. All were cut down amidst some controversy as part of recent improvement works to the street.

O'Connell Street has its origins in a street named Drogheda Street dating from the 17<sup>th</sup> century. Laid out by Henry Moore, Earl of Drogheda, it was a third of the width of the present-day O'Connell Street, located on the site of the modern eastern carriageway and extending from Parnell Street to the junction with Abbey Street. In the 1740s, a wealthy banker and property speculator by the name of Luke Gardiner acquired the upper part of Drogheda Street extending down to Henry Street as part of a much larger land deal. He demolished the western side of Drogheda Street creating an exclusive elongated residential square 46m (150 feet) in width, thus establishing the scale of the modern-day thoroughfare. The new,





more ordered western side featured modest two-bay houses to the south intended for merchants, and larger three-bay houses further north, while the eastern side had many mansions, the grandest of which was Drogheda House rented by the sixth Earl of Drogheda. Gardiner also laid out a mall down the central section of the street, lined with low granite walls and obelisks topped with oil-fueled lamp globes. It was planted with trees a few years later. He titled the new development 'Sackville Street' after the then Lord Lieutenant of Ireland Lionel Cranfield Sackville, Duke of Dorset. It was also known as 'Sackville Mall', 'Gardiner's Mall' or simply 'The Mall'. However due to the limited lands owned by the Gardiners in this area, the Rotunda Hospital sited just off the street at the bottom of Parnell Square - also developed by the family - was not built on axis with Sackville Street, terminating the vista. It had been Gardiner's intention to eventually break this grand new street through to the river, however he died in 1755, with his son taking over the estate.

It was not until 1777 that the planning body in the city, the Wide Streets Commission, obtained a financial grant from Parliament and work could begin to realise this plan. For the next 10 years work progressed in demolishing a myriad of dwellings and other buildings, laying out the new roadway and building new terraces. Upon completion c. 1785-90, one of the finest streets in Europe had been created. The Wide Streets Commission had envisaged and realised marching terraces of unified and proportioned facades extending from the river as far north as Princes Street, their simple red brick elevations off-set with a major classical cut stone building near the centre (later to be the GPO built in 1814-18). The street became a commercial success upon the opening of Carlisle Bridge, designed by James Gandon, in 1793 for pedestrians and 1795 for all traffic.

### 19<sup>th</sup> century

Sackville Street prospered in the 1800s, though an invisible boundary seems to have been maintained for some time between the Upper and Lower Street. As planned, Lower Sackville Street became highly successful as a commercial location; its terraces ambitiously lined with purpose-designed retail units, one of the first schemes of its kind in Europe. By contrast the northern end proved not to be as successful initially; being exposed to the commercial activity of the lower street, it lost its fashionability as a quiet enclave of grand townhouses, whilst also being too far away from the commercial core of the city to stand as a strong retail location. As a result a difference between the two ends of the street developed: the planned lower end successful and bustling next to the river, and the upper end featuring a mixture of less prominent businesses and old townhouses, some converted for commercial use and growing somewhat decrepit. Upon his visit to Dublin in 1845, William Makepeace Thackeray observed: *"The street is exceedingly broad and handsome; the shops at the commencement, rich and spacious; but in Upper Sackville Street, which closes with the pretty building and gardens of the Rotunda, the appearance of wealth begins to fade somewhat, and the houses look as if they had seen better days. Even in this, the great street of the town, there is scarcely any one, and it is as vacant and listless as Pall Mall in October."*

Sackville Street c. 1840, showing the extent of the Wide Streets Commission interventions, with unified commercial terraces marching from the river towards the GPO.





As the 19<sup>th</sup> century progressed, a great many changes took place on Sackville Street, resulting in the gradual erosion of the unified classical street created by the Wide Streets Commission and its replacement with an ostentatious high-Victorian boulevard, comprised of elaborate individually designed buildings. One of the world's first purpose-built department stores was such a building: Delany's New Mart 'Monster Store' built in time for the Dublin Exhibition of 1853 and later to be purchased by the Clery family in the 1880s. It also housed the Imperial Hotel. Across the road, another elaborate hotel was built next to the GPO: the Hotel Metropole, in a high-French style. Similarly the Gresham Hotel opened in 1817 to the north of the street in adjoining Georgian townhouses and was later remodeled, as it became more successful.

As the fortunes of Upper Sackville Street began to improve in the second half of the century, other businesses began to open such as a Turkish Baths, later to be incorporated into the Hammam Hotel. Standard Life Assurance built their flagship Dublin branch in a striking classical style close to the GPO, while the Findlater family opened a branch of their successful chain close to Parnell Street, as did Gilbeys Wine Merchants. A distinctive turreted office building by the firm of T.N. Deane was also built on the corner with Cathedral Street in 1866. The thoroughfare also became the centre of the Dublin tramways system, with many of the city's trams converging at the Nelson Pillar. By 1900 Sackville Street became as venerable a shopping and business location as the institutions that lined it, a highly successful city centre thoroughfare that earned the title of 'Ireland's Main Street'.

#### **Impact of events of 1916 and 1922**

The Easter Rising of 1916, when Irish republicans seized the General Post Office (GPO) and proclaimed the Irish Republic, led to the street's bombardment for a number of days by the gunboat *Helga* of the Royal Navy and several other artillery pieces which were brought up to fire on the north of O'Connell Street. The thoroughfare also saw sustained small arms and sniper fire from surrounding areas. By the end of the week, the rebels had been forced to abandon the GPO, which was burning, and held out in Moore Street until they surrendered. Much of the street was reduced to rubble, the damaged areas including the whole eastern side of the street as far north as Cathedral Street, and the terrace in between the GPO and Abbey Street on the western side. In addition, during the chaos that accompanied the rebellion, the inhabitants of the nearby slums looted many of the shops on O'Connell Street.

The events had a disastrous impact on the commercial life of the inner city, with many businesses forced to close for up to six years for rebuilding, or some never even reopening. Vast tracts of Henry Street, North Earl Street, Eden Quay and parts of Abbey Street were also devastated, resulting in a loss of rates for Dublin Corporation and a rise in unemployment in the city.

In the immediate aftermath of the Rising, the 'The Dublin Reconstruction (Emergency Provisions) Act, 1916' was drafted with the aim of controlling the nature of reconstruction on the thoroughfare. An expert group was also established in October 1916 which included the City Architect CJ McCarthy. Making use of the new Act, the group set out to rebuild in a



coherent and dignified fashion, using the opportunity to modernise the nature of commercial activity on the street.

The imposing buildings of Lower O'Connell Street, built in a restrained neoclassical style between 1918 and 1923. They make use of Irish granite and limestone, red brick and Portland stone, with copper as a roofing material.

Plans were drawn up for unified terraces or 'blocks' of buildings, lined with retail outlets at street level and housing modern office accommodation in the upper floors. While the unified facades were never realised, and some developments didn't quite match the rest of the reconstruction efforts on the street leading to criticisms of an opportunity lost, Lower O'Connell Street was nonetheless rebuilt in a coherent fashion, its buildings maintaining a standard cornice line and making use of similar materials of limestone, granite, Portland stone, and red brick with stone dressings. The imposing architectural idiom of 'commercial classicism' generates a strong sense of civic importance and grandeur, especially the first set of buildings on the street with their neo-classical features, and grand cupolas and copper domes piercing the skyline.

With the exception of its Sackville Street facade and portico, the vast structure of the General Post Office was completely destroyed - a decade-long refurbishment project only having been completed a few weeks previous to its destruction. In the aftermath of the events, consideration was given to knocking the surviving facade, as were various plans proposed for the site such as a new Catholic cathedral for the city; in the end a new GPO was built behind the 1818 facade. Works got underway in 1924, eight years after the Rising, with the Henry Street side the first to be erected with new retail units at street level, a public shopping arcade linking through to Princes Street, and new offices on the upper floors. The Public Office underneath the portico on O'Connell Street reopened in 1929.

O'Connell Street was again the scene of a pitched battle in July 1922, on the outbreak of the Irish Civil War, when anti-treaty fighters under Oscar Traynor occupied the street after Free State troops attacked the republican garrison in the nearby Four Courts. Fighting lasted from 28 June until 5 July, when the Free State troops brought artillery up to point blank range, under the cover of armoured cars, to bombard the republican-held buildings. Among the casualties was Cathal Brugha. Luckily, none of the post-1916 reconstructed buildings were seriously damaged during the Civil War. The effects of the week's fighting were largely confined to the northern end of the street, with the vast majority of the terrace north of Cathedral Street to Parnell Square being destroyed, as well as a few buildings on the north-western side. As a result, only one Georgian townhouse remains on the street today, though there are still some other Georgian buildings extant on the corner with Henry Street, as well as some masked behind Victorian facades on the lower end of the street.

Because of the extensive destruction and rebuilding, most of the buildings on O'Connell Street date from the 1910s and 1920s. Apart from the GPO, the famous buildings include the Gresham Hotel (reopened 1927), Eason & Son booksellers, the Royal Dublin Hotel (opened



1963) and Clerys department store (reopened 1922).

### **Modern O'Connell Street**

Despite the progress made in improving the street's architectural coherence post-1916 and 1922, poor planning controls in the 1970s and 1980s had a sorely negative impact on the vitality and presentation of the street. Like so much of Dublin of that time, property speculators and developers were permitted to construct on the thoroughfare what were widely accepted to be inappropriately designed buildings, often entailing the demolition of historic properties, in spite of its Conservation Area status. Fine Victorian and 1920's buildings were demolished in the 1970s including the elaborate Gilbey's premises at the northern end, the Metropole and Capitol cinemas next to the GPO, and even the last surviving Wide Streets Commission buildings on the street dating from the 1780s located on the present day site of a well-known shoe shop at the southern end of the street. Coupled with a neglect of the public domain by the authorities, the emergence of many fast-food joints, gaming arcades, convenience shops and deadening office developments, and poor planning controls that enabled plastic signage, PVC windows and inappropriate alterations to buildings to flourish, O'Connell Street became a shadow of its former self as one of the grand thoroughfares of Europe.

However, after four decades of neglect, the street has undergone a form of renaissance of late as part of Dublin City Council's O'Connell Street Integrated Area Plan (IAP) which was unveiled in 1998 with the aim of restoring the street to its former status. The first plan of its kind to be used in Ireland, the IAP sought to go beyond the often cosmetic changes undertaken by local authorities in addressing rundown areas, seeking to intervene and exert control in as many aspects of the street as possible, ranging from pedestrian and vehicle interaction, the governing of retail outlet type and buildings' upper floor uses, the protection of architectural heritage and wider historic character of O'Connell Street, the regulation of signage and decorative state of private property, as well as radical improvement works to the public domain. Work to realise the plan was delayed by approximately four years, and finally started in 2002.

### **O'Connell Street in 2008**

The main features of the plan included:

- The widening of footpaths to double their previous width on each side of the street and a reduction in road space to two traffic lanes either side of a slightly narrower central median.
- The removal of all London plane trees and the installation of over 200 replacements of varying species.
- The creation of a central plaza area in front of the GPO to address the street's principal building and provide a space for public gatherings and national celebrations.
- New street furnishings including custom-designed lampposts, litter bins and retail kiosks.
- The Spire of Dublin project, the world's tallest sculpture, erected in January 2003, occupying the site of the former Nelson's Pillar.





- The restoration of the street's monuments, including those of late nineteenth century Irish political leader Charles Stewart Parnell, radical early twentieth century labour leader Jim Larkin, prominent businessman and nationalist MP Sir John Grey, and the most challenging of all: the conservation of the O'Connell Monument standing guard at the southern entrance to the thoroughfare. This project was worked on for a number of months by an expert team of bronze and stone conservators in the first half of 2005.

All public domain works were completed in June 2006, finalising the principal objective of the IAP at a cost of €40 million. Work was disrupted by a riot centred on the street which erupted on February 25 2006. A protest against a planned Loyalist march degenerated into vandalism and looting, with building materials from the works in progress being used as weapons and for smashing windows and fixtures.

In efforts to protect O'Connell Street from the planning mistakes of the past, the thoroughfare has been designated an Architectural Conservation Area and an Area of Special Planning Control - both of which safeguards strictly govern all aspects of planning and development on the street. In most cases, not even comparatively minor alterations can be made to any structure, or changes in use (such as to fast-food etc.) without the planning permission of Dublin City Council. The majority of the buildings on the street are now also Protected Structures. The north-western block (Henry Street, Moore Street, Parnell Street), is currently undergoing substantial redevelopment, subject to planning approval.

**St. Stephen's Green, Dublin** – Primary Research on the significance of the public park, provided by OPW, Margaret Gormley.

Dublin's oldest public park, St Stephens Green is a late Victorian park originally laid out in a Restoration Dublin. The origins of Saint Stephen's Green Park may be traced back to medieval times. The 'common area' was named after the Chapel of Saint Stephen, which was the chapel of a leper hospital, latterly known as Mercer Street Hospital. In 1635, the City Assembly (Dublin Corporation) passed an ordinance.

*"That no parcel of St. Stephen's Greene shall henceforth be lett, but wholie kepte for the use of the citizens and others to walke and take the open aire, by reason this cittie is at present groweing very populous".*

The City Assembly in 1663, decided to develop Saint Stephen's Green, then about 60 acres, in such a way that it would provide income for the city, while still serving the citizens as an open space. By the following year, the central area of 27 acres had been enclosed by a boundary wall. In 1666, one William Harvey was employed in "plowing up and leveling Saint Stephen's Green" and in 1670, Richard Buxton & Thomas Jones, gardeners, were paid £50 to lay out paths, £5,4 schillings to plant trees and £3,5 schillings to watch the trees !





During much of the 18<sup>th</sup> century, the Green was considered a fashionable place to be seen, owing to the developments and rise of the Grafton and Dawson Street areas, in addition to nearby desirable properties in the surrounding areas. Walks in the Green such as the Beaux Walk -now the Lime Walk - on the northern side, were popular promenades. Swift, writing from London in 1711 in his "Journal to Stella", said:

*"Why don't you walk in the Green of St. Stephen's? The Walks there are finer gravelled than the Mall" (James Park, London).*

By the 19<sup>th</sup> century, the condition of the Green and its features were greatly deteriorated. In 1814, an Act of Parliament was obtained for the improvement of the Green. The boundary wall was removed and the Green was enclosed by ornate early Victorian railings. The granite bollards and chains were erected at this time on the edge of the perimeter footpath.

Living in Iveagh House, 80 St. Stephen's Green - now the Department of Foreign Affairs - Sir Arthur Guinness, later known as Lord Ardilaun, came from a family of generous philanthropists. He himself followed this family tradition of largesse, and with the support of the government he initiated an upgrade of the Green. Following this redevelopment, the Green was handed back to the public by means of the St. Stephen's Green (Dublin) Act 1877, which entrusted the maintenance of the Green to the Commissioners of Public Works (OPW).

The enclosing of St Stephens Green with a solid perimeter plantation of trees and shrubs is typical of Victorian parks, which created a sense of enclosure for the visitors to the Green. On the 27<sup>th</sup> July 1880 the transformed Saint Stephen's Green was re-opened without formality, to the public. The 49<sup>th</sup> Annual Report of the Board of Works, 1880-1881, made the following observations:

*"The Walks, Ride, Shrubberies & Plantation have been maintained during the year but from the crowds which frequent the park it is extremely difficult to maintain the grass surfaces"*

By the end of the Victorian era, the need for public open spaces had become widely appreciated. With their horticultural displays, ornamental lakes and garden buildings, they were enjoyed by the citizens from different classes. Likewise, St Stephens Green was typical of this evolution, which is uniquely still evident to this day.

The uniqueness of the Green is insufficiently appreciated today. There is hardly anything like it in any other European city, where most urban squares are open plazas, and none of the greener London residential squares approaches it in splendour and intricacy of foliage and bloom. When the Green was formed in 1660's it was the largest urban square in the world. (It is now the ninth as reported by Desmond McCabe in his Book- St Stephen's Green, Dublin 1660-1875).



Some sites owe their special character to the fact that they are enclosed. This is certainly the case with St Stephens Green, where the sense of enclosure is the essence of the place. The Green is often described as an oasis of peace and calmness within the urban hub. The attraction of St Stephens Green is therefore because of its enclosure and escape from the hectic city centre.

St Stephens Green is classified as of National Importance under the ICOMOS-IFLA (International Committee for Historic Gardens) in 1982. In 2006, the Green was a finalist, representing the best of Irish urban spaces, in the 'Great Places' award set up by the International Academy of Urbanism. It has been awarded the International Green Flag Award every year since 2015 and is a designated National Monument.

The Wolfe Tone & Famine Memorial was designed for its current location & its relocation into the Green is not appropriate. It was designed as an entrance to the park rather than a stand-alone feature as proposed in this new location.

**Dartmouth Square and environs** – Architectural Conservation Area, published by Dublin City Council states,

*'The houses around the square have not been altered to any great extent and most of them retain their original period features and present an attractive façade of typical Victorian terraced housing. The houses are built in pairs in a terrace with recessed porches. This area does not appear to be an area of parking stress, which has meant that the vast majority of the front gardens are still intact. This significantly enhances the setting of the square and is an important aspect of the character of the conservation area'*

#### **Dartmouth Square and Dartmouth Road**

- The subject site may be considered as an integral part of the development of C19<sup>th</sup> suburbs just outside the canal in terms of layout scale and grain. Dartmouth Square, the focal point is probably the most impressive and best conserved of these Victorian Squares in Dublin. The layout of the square, dictates the amenity and orientation of the central garden, informs the hierarchy of approach routes to the square, the position of the church and the relationship of the houses bordering the C18<sup>th</sup> canal (residences were built with their backs to the canal or gable –ended to the canal. This is similar to the evolution of the Ranelagh Road adjacent). Thus, the over-riding character of this mature area comprises C19<sup>th</sup> brick residences to the outer edges of the residential block, with a building line set back from the perimeter street, linear gardens and modest coach house development to the rear. The scale is predominantly residential and of a high quality. Views extend from the square to neighbouring streetscape of similar residential architecture and scale. Dartmouth Square may be regarded as the focal point of the C19<sup>th</sup> suburban development in this area. The removal of garden amenity is not only detrimental to the protected structures that have been earmarked for development but also to the adjoining properties which retain their original building plot as their enjoyment of the shared amenity is diminished.



- The intensification of use in the form of a transportation hub is likely to have significant impact on architectural character in terms of access due to increased vehicular and pedestrian movement as well as engineering upgrading for parking, drop off lighting etc. This proposal has not identified the scale or scope of these upgrades in the context of the architectural heritage.

#### **The former Carroll's building**

- Adjoining the site to the north is the former Carroll's building, which is a rare surviving and unique example of the C20<sup>th</sup> building period and represents the ambition of the architects attributed with its' crafting and design and landscaped plaza. Though modified in recent times the integrity of the site remains. The proposed Charlemont Station orientation to this building has not been indicated and the potential to its surviving architectural significance and structural integrity undetermined.
- Extract from the architectural heritage appraisal notes;  
*"Irish Architect, Vol. 108, June 1995- Former Carroll's Building, Grand Parade Dublin Corporation granted planning permission to the Irish Nationwide Building Society to carry out alterations and extension to the former Carroll's Building on the Grand Canal in Dublin. The Irish DoCoMoMo working party then lodged an appeal against the decision with An Bord Pleanála and the RIAI has written to An Bord Pleanála supporting the appeal. The Institute's letter points out that the building is widely acknowledged to be **one of the finest examples of Modern Movement Architecture constructed in this country.** The RIAI letter concludes by saying "The RIAI believes that the re-use and adaptation of important modern buildings should be given the same consideration as the conservation of historic buildings; the adaptation and re-use of modern buildings of quality should preserve the integrity of those buildings".  
Designed by Robinson Keefe and Devane, the building received a Commendation from the RIAI Triennial Gold Medal Jury for the period 1962-64."*