

Oral submission by Frank McDonald to the MetroLink oral hearing, March 27th, 2024

1. Introduction

1.1 My name is Frank McDonald and I am a journalist, author and former Environment Editor of *The Irish Times*. During the course of my career, I won several awards, including one for Outstanding Work in Irish Journalism in 1979 for a series of articles entitled "Dublin: What went wrong?" as well as a Lord Mayor's Millennium Medal, the Chartered Institute of Transport's Journalist of the Year award and two National Media Awards.

1.2 I was also the author of several books, including *The Destruction of Dublin* (1985), *Saving the City* (1989) and *The Construction of Dublin* (2000), *Truly Frank: A Dublin Memoir* (2018) and *A Little History of the Future of Dublin* (2021), and joint author with James Nix of *Chaos at the Crossroads* (2005), which documented the environmental destruction of Ireland during the boom years, and with Kathy Sheridan of *The Builders* (2008), profiling the developers and others involved in the Celtic Tiger's casino culture.

1.3 I was conferred with an Honorary DPhil by Dublin Institute of Technology in 2006, and was made an Honorary Member of the Royal Institute of the Architects of Ireland in 2010, Honorary Fellow of the Royal Institute of British Architects in 2011, Honorary Life Member of the National Union of Journalists in 2014 and Honorary Fellow of the Royal College of Surgeons in Ireland in 2019. I was also a Press Fellow at Wolfson College, Cambridge, in 2008, a founder member of the Academy of Urbanism in 2006, and the only non-architect member of the jury for the Mies van der Rohe European Union Prize for Contemporary Architecture in 2019.

1.4 Throughout my career, I have consistently supported investment in major public transport projects, including DART and Luas, although I was extremely disappointed by the Luas Cross City project's trashing of Dublin's principal streets with utility boxes and unsightly steel poles, of which there are more than 130 between St Stephen's Green and Parnell Square. I am also deeply concerned about the negative impacts of MetroLink on the integrity of St Stephen's Green, which is not only a much-loved public park but also National Monument with the same status as Newgrange and the Rock of Cashel, and deserving of equal protection.

1.5 Like everyone else, I find the vast amount of documentation submitted by Transport Infrastructure Ireland in support of the MetroLink project quite intimidating and wish to express my sincere sympathy to An Bord Pleanála's presiding inspector, Niall Haverty, and his team for their fortitude and forbearance in dealing with it all. I will, therefore, endeavour to be as brief as I can be in dealing with the issues of concern I raised in my initial submission and TII's responses to these issues.

2. General comments

2.1 It is important to be clear about what is under consideration here. Loose talk in the media referring to this project as "the Dublin Metro", "the metro" and even "the metro system" — a term used by TII itself in item 5 of its response to my submission — conjures up fanciful notions that Dublin is on the verge of acquiring something like the Paris Metro. In reality, however, what's proposed is a single line nearly 19 kilometres in length, running between a park&ride site near Broadmeadow Estuary to Charlemont, on the Grand Canal, much of which would run underground — an aspect described on the MetroLink.ie website as "an exciting innovation for Irish public transport".

2.2 There is a repetitive and even rote character to TII's responses, which is probably inevitable when they come from engineers deeply involved in a project that they are determined to defend and deliver. Reading through their responses to observations made by me and by others, it almost seems as if they might have been generated by ChatGPT. We are repeatedly assured that the alignment was chosen after careful consideration of alternatives, that the loss of buildings, monuments and trees to make way for construction of cut-and-cover MetroLink stations is unfortunate, and that appropriate measures would be taken to "mitigate" these negative impacts.

2.3 In response to my characterisation of MetroLink as a "stand-alone project that doesn't make sense in its own terms", TII not unreasonably made the point that all three major public transport projects in the NTA's Transport Strategy for the Greater Dublin Area (2016-2035) — MetroLink, Bus Connects and DART+Tunnel — have been "developed as independent stand-alone projects". Taken together with existing services, such as DART and Luas, they were designed to provide a "fully integrated transport network" for the GDA.

2.4 But TII's claim that the three major public transport projects mentioned "continue to be supported by the Transport Strategy for the GDA 2022-2042" is incorrect, as DART+Tunnel (previously known as Dart Underground) — the crucial missing link needed to turn Iarnród Éireann's suburban rail services into a coherent network — has been deferred for advancement until "after 2042". Only DART+ electrification of existing rail lines are still included in the NTA's strategy, while the proposed tunnel between Heuston Station and Spencer Dock — via High Street, St Stephen's Green and Pearse Station — has effectively fallen off the NTA's planning table.

2.5 In that context, it is impossible to avoid concluding that the eastward diversion of MetroLink to provide an interchange with DART at Tara Street in the latest alignment is actually intended *as a substitute* for the original plan for an interchange at St Stephen's Green to connect DART with MetroLink and the Luas Green Line — as envisaged by the Government's €35 billion *Transport 21* programme, announced with great fanfare in November 2005, when then Minister for Transport Martin Cullen predicted that St Stephen's Green "will be to Dublin what Grand Central is to New York".

3. St Stephen's Green station

3.1 St Stephen's Green still features in the latest scheme, but with a MetroLink station to be installed on its east side rather than west side. As this station would be 500 metres distant from the Luas Green Line stop, TII opted instead for an interchange at Charlemont to provide a more positive "customer experience" for users — even though it is located on the periphery of the inner city rather than in the south city centre core, as St Stephen's Green is. I find it hard to believe that TII's projected passenger numbers alighting or boarding at the proposed Charlemont interchange could be higher than for an interchange at St Stephen's Green.

3.2 TII's response to my submission cited a multi-criteria analysis of the Emerging Preferred Route to account for selecting the east side of St Stephen's Green as the location for a MetroLink station — on the basis that the construction of a station on its west side "would be very constrained due to the presence of St Stephens Green park, Luas services and the critical commercial importance of this area". As this location would be more than 1km from both Tara Street and Charlemont, there would also have been a requirement for two intervention shafts to comply with fire safety requirements.

3.3 An Bord Pleanála should note that “the presence of St Stephens Green park” was not seen by TII as an impediment to the placement of a station *within the curtilage of the park* on its eastern side. I agree with Maurice Buckley, chairman of the Office of Public Works, that the proposed station, as currently designed, would have “a direct, severe, negative, profound and permanent impact on the heritage value of the Green”. I am not reassured by TII’s claims that the “temporary land take required for construction activities at St. Stephen’s Green has been minimised in order to mitigate the impacts on the green as far as possible” or that “the construction footprint within St Stephen’s Green park will occupy just 5% of the park area”.



Figure 9. Trees highlighted in red are to be removed; and those highlighted in orange may be impacted by the Project works

3.4 I strongly agree with the findings of the report by Downey planning consultants and Gall Zeidler tunnelling consultant engineers, commissioned by the OPW, that the proposed development “will completely alter the landscape and historic layout of the park” as well as its biodiversity in “an unprecedented regression and destruction of one Dublin’s vital green infrastructure spaces”, with the felling of 64 of the Green’s mature trees and negatively impacting many more. It would also “completely disrupt the park’s Victorian square design by implementing a plaza at the north-eastern corner”; this would “upset the existing symmetry and completely alter the character of the Green”.

3.5 It should be noted that the existing stone-paved plaza at the north-eastern corner of St Stephen's Green was created in the mid-1960s to provide an appropriate setting for the Theobald Wolfe Tone Memorial, which features a cast bronze statue of the patriot by Edward Delaney standing in front of a curved line of granite monoliths designed by architect Noel Keating, behind which is Delaney's evocative Famine sculpture. It also has a typically Dublin nickname: Tonehenge. The entire composition is extremely site-specific and would be irrevocably disrupted and substantially devalued if, as proposed by TII, it were to be relocated within the park at an angle to the corner axis.



3.6 It is clear to me, as the Downey/Gall Zeidler report states, that in selecting the location and design for the station at St Stephen's Green, "the overall effect on this National Monument (encompassing factors such as property impact, social, landscape, amenity, archaeology /cultural heritage, and architectural heritage) has not been given appropriate weighting. The OPW is of the opinion that the proposed station option has prioritised construction requirements, uniformity of station design and construction methodology, programme, and cost considerations above a sufficiently weighted assessment of the long-term impacts on the Green."

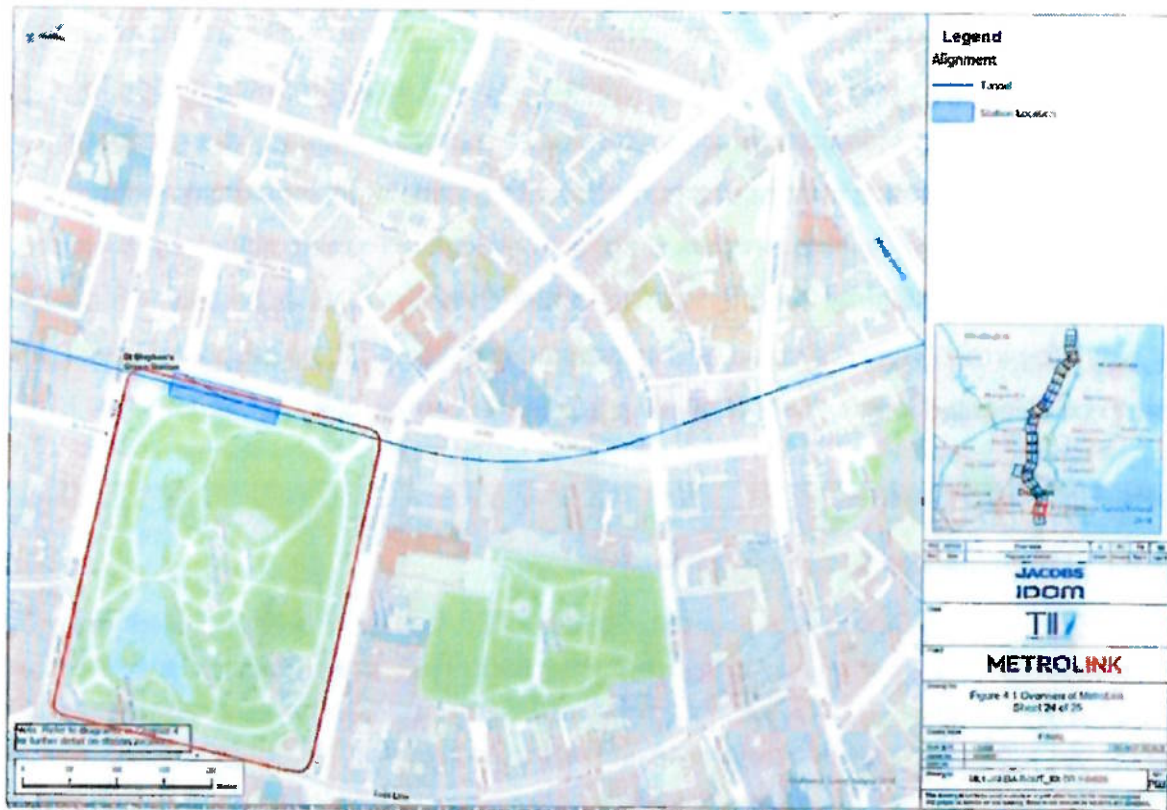


Figure 7. Plan Showing Horizontal Alignment (extract from ML1-JAI-EIA-ROUT_XX-DR-Y-04026)

3.7 MetroLink’s engineers appear to have viewed the Green as a soft option for the excavation of a station box, rather than locating it on the roadway, which would have required the closure of St Stephen’s Green East to traffic for the duration of construction. Although the OPW has offered to “work jointly with TII to develop a solution that satisfies the requirement for a station in the vicinity of the Green but has no impact on the Park”, it would be preferable if An Bord Pleanála imposed a condition to relocate the station slightly further east, with access and egress on the public footpath, rather than the proposed canopied station entrance inside the park.

4. Charlemont station

4.1 In addition to providing an “appropriate interchange” with the Luas Green Line, as mentioned in 3.1 above, the choice of Charlemont as a southern terminal point for MetroLink “allows for the possible extension [of the line] to Dublin south west, south or south east ... should sufficient demand arise”, according to TII. “This includes consideration of the need for the upgrade of the Luas Green Line to metro”, it says. “By extending MetroLink to Charlemont it provides for future proofing of the Green Line,

bypassing the capacity constrained Luas on-street running section, and ensures potential future connectivity options are enabled, either to the Green Line or for extensions of the metro”.

4.2 MetroLink terminating underground at Charlemont would be pointing south, along the former Harcourt Street railway alignment now occupied by the Luas Green Line. Extending it in that direction would be extremely disruptive, however. It would entail closures of the Green Line for up to three or four years, depending on construction methodology, according to TII’s *Constructability Report - Green Line Closure* (April 2019). Not surprisingly, this “led to the emergence of an alternative option which seeks to meet travel demand from south of Sandyford along a new light rail corridor which serves UCD post-2042”, TII said. In effect, as I have argued, NTA and TII are making it up as they go along.

4.3 When a site adjoining the former Irish Nationwide headquarters at Grand Parade came up for development in 2018, NTA/TII did a deal with Hines, the developer, to make provision for a deep-basement station box beneath a proposed office block, at a cost of €12.5 million, to cater for MetroLink. This was done long before the current Railway Order application was made to An Bord Pleanála, on foot of a planning permission granted by the Board to Hines for its scheme (ABP ref 300873), and has been seen by some — notably independent Dublin city councillor Mannix Flynn — as a case of “jumping the gun”. No doubt NTA/TII regard their investment in “enabling works” at this location as a prudent move to include provision for MetroLink’s Charlemont station before the site above it was developed.

4.4 (I should note that TII had nothing say about a point made in my submission about how the re-routing of MetroLink’s alignment meant writing off a €25 million investment in excavating a metro station box beneath the Mater Hospital’s new main block when it was developed more than 10 years ago. Instead, the latest plan would dig up the triangular park on Berkeley Road, in front of the original hospital building. The sum written off on the Mater station box is just one element of an estimated €300 million already spent on “drawing up, tearing up, and re-drawing up plans for the project”, as *The Journal* put it in September 2023).

4.4 The Luas Green Line stop at Charlemont is on the elevated Harcourt Street railway alignment that continues beyond Ranelagh, descending to street level before it reaches

the Beechwood stop, whereas the MetroLink station at Charlemont is deep underground. It is not at all clear how or where the two could be joined if MetroLink was to be extended south, as originally envisaged. Nor is it clear what would happen to the remainder of the Green Line or where its termini would be located. We simply do not know the final shape of MetroLink — described by its project director Aidan Foley on the opening day of this hearing as the “spine” of an integrated public transport system for Dublin, serving a north-south corridor that’s also a “major artery for our economy”.

4.5 It would appear almost inevitable that MetroLink will ultimately be extended south, cannibalising a substantial stretch of the Luas Green Line. Given the location of Charlemont, it would be technically difficult and probably impossible to extend MetroLink in a south-westerly direction to serve Rathmines — including the site of Cathal Brugha Barracks, now the subject of a Government-sponsored feasibility study for a major housing scheme — and onwards via Harold’s Cross, Terenure and Templeogue to terminate in Tallaght, as the Metro South West group has been demanding.

4.6 Rather than locking in a southern alignment for MetroLink, as the interim Charlemont terminal station would almost certainly entail, I would suggest that An Bord Pleanála should consider making its Railway Order conditional on Tara Street becoming the terminal station. This would not only leave open a variety of options for MetroLink’s extension in the future, but would also avoid causing irreparable damage to the integrity of St Stephen’s Green that the current plan would certainly entail.

5. Tara Street station

5.1 According to TII, “the Tara Street location is critical to achieve an effective interchange between DART and MetroLink enhancing the overall transport network”, thereby achieving one of the project’s key objectives. They seek to justify this on the basis that “DART Underground will not be delivered before 2050, and therefore its benefits will not be present for MetroLink’s proposed 2035 opening year, or for many years into the future”. So the proposed MetroLink station at Townsend Street is effectively seen by TII/NTA as a stopgap interchange and may well be even more than that, as I’ve suggested in paragraph 2.5 — a *substitute* for the original plan for an interchange at St Stephen’s Green to connect DART with MetroLink and the Luas Green Line.

5.2 As I noted in my submission, installation of the proposed “cut-and-cover” MetroLink station box in the vicinity of Tara Street Station involves the clearance of an entire city block, with the sole exception of the Irish Times building. Very regrettably, the buildings slated for demolition include the College Gate apartment block, Markievicz leisure centre and nearby social housing, all of which date from the early 1990s. TII acknowledges the loss of more than 80 homes as a “very significant impact”, but says the decision to locate a station here was “very carefully considered”. I disagree with that contention.

5.3 It should be noted that most of the apartments in College Gate are rented rather than owner-occupied, so the principal victims of its proposed demolition would be tenants needing to find alternative accommodation in a market characterised by extremely high rents. Dublin City Council’s proposal to relocate the Markievicz leisure centre to Irishtown Stadium, 2.5 kilometres away, at an estimated cost of €48 million would be a huge loss for the south inner city. Apart from CGI images of the proposed MetroLink station, I have seen no indication that any urban design scheme has been prepared for the balance of the site slated to be cleared of buildings. Given its central location, this should be a condition attached by An Bord Pleanála to a Railway Order.

5.4 I still find it inexplicable that NTA/TII did not avail of the clearance in recent years of the entire city block bounded by Tara Street, Poolbeg Street, Hawkins Street and Townsend Street for redevelopment by entering into an agreement with the developer, similar to the deal done at Charlemont, to make provision for a “cut-and-cover” MetroLink station box on that site. TII’s response indicated that it was one of 11 locations considered, but the current plan was preferred “as it retains good interchange facility with DART”. Nevertheless, I believe that an equally good interchange could have been provided on the already cleared — and now substantially redeveloped — site on the west side of Tara Street, thereby avoiding the need to demolish College Gate, Ashford House and other properties, with the wanton waste of their embodied carbon.

5.5 I strongly agree with the submission made to this hearing by Ian Lumley, on behalf of An Taisce — in particular his analysis of alternative options for the Tara station. It concluded that a mined cavern would not only avoid all of this destruction but would also be significantly more economic than the proposed “cut-and-cover” scheme, after taking into account the costs of demolition, relocation of the Markievicz leisure centre and compensation of the owners of 70 apartments in College Gate for their loss.

6. O'Connell Street station

6.1 Hammerson's hugely ambitious "Dublin Central" scheme for the west side of O'Connell Street Upper, stretching back to Moore Street, will have an enormous impact on the built fabric of this area, if it actually goes ahead — which is doubtful, given the downturn in Dublin's commercial property market. Even if it doesn't proceed, the west side of the street will be directly affected by the installation of a MetroLink station box at a depth of 28 metres from the surface. As I pointed out in my submission, the largest single casualty would be the former Carlton cinema, all but the façade of which would be demolished.

6.2 "Unfortunately as identified in Chapter 26 of the EIAR, whilst the impressive facade of the Carlton Cinema will be retained, other elements will be demolished", TII stated in its response. "However the impacts at this site and the adjacent site have to be considered in the context of this building not being used since 1994 and the adjacent site being vacant since 1976". This is indeed "unfortunate" given that the entire volume of this Art Deco-style cinema still survives and could have been brought back into use. Propping up its façade would require an exceptional level of structural steel support, given the extraordinary depth of the excavation to its rear, to prevent it toppling into the void.

6.3 I am somewhat reassured by TII's commitment that a project conservation architect — Belfast-based Alistair Coey Architects — has been appointed to "oversee to the implementation of the project and will be thoroughly engaged throughout the construction works to ensure that No. 42 O'Connell St [the last surviving intact Georgian house on O'Connell Street] is not damaged during the works adjacent to the building". TII also stated that "prior to the demolition of number 52-54 O'Connell Street Upper [the Carlton] the building is to be recorded to English Heritage level 3". I would urge An Bord Pleanála to impose a condition requiring a full photographic record of the cinema's interior, including the former Carlton Grill on its first floor.

7. Drumcondra versus Glasnevin

7.1 TII states, in item 6 of its response to my submission, that the selection of the Glasnevin alignment as an alternative to the proposed Metro North route via Drumcondra resulted from "robust decision-making" in the assessment of options. "The identification of a preferred route took account of the interchange capability of a location with other modes

of transport, including the existing rail commuter services, and the future proposed DART+ network. Other criteria were also identified, such as potential trip demand, key trip attractors in the area, and directness of route (and subsequent impact on cost)."

7.2 Although I noted that the Glasnevin station would be relatively remote from Croke Park, unlike the Drumcondra option, TII had nothing to say about this obvious downside of MetroLink even though the GAA's huge stadium — with a capacity of 82,300 and an increasing number of conferences, concerts and other events held there — is clearly a major trip generator in its own right. Suffice to say that I do not believe sufficient weight, or any weight at all, was given to Croke Park in the supposedly "robust decision-making" on what alignment to choose, as between Drumcondra and Glasnevin.

https://www.buildingsofireland.ie/building-images-iiif/niah/images/survey_specific/original/50130022_2.jpg



7.3 As someone who attended both primary and secondary school at St Vincent's CBS in Glasnevin, I cannot fail to mention Hedigan's Brian Boru pub, a local landmark now slated for demolition to make way for the proposed MetroLink station, in what the EIS concedes would have a "very significant" impact on the area". It is described in the National Inventory

of Architectural Heritage as a “well-preserved mid-nineteenth-century public house ... neatly proportioned on a symmetrical plan, with stucco detailing characteristic of its period, and a good original pubfront enhanced by glazed and gilded signage”. The NIAH’s appraisal also refers to its “notable painting of Brian Boru going into battle by Fergus O’Ryan, reflecting the belief that Brian Boru’s army camped nearby, prior to the Battle of Clontarf in 1014”. Its loss will be sorely felt in Glasnevin.

8. Conclusion

8.1 On the opening day of this hearing, MetroLink project director Aidan Foley noted that congestion is “reaching critical levels” along the Swords/Dublin Airport/City Centre corridor and cited figures from Census 2016 showing that “almost 8,000 workers currently commute from Swords to Dublin City Centre, but only 12% of those commuters use public transport”. I would suggest that the number of commuters on the N11 is even higher, as is the proportion of them using public transport — because there is an excellent bus service on the route, using dedicated bus lanes that have been in place for more than 20 years. Yet the solution being offered to cater for commuters from Swords is high-frequency tram service running mainly in a bored tunnel, with cut-and-cover stations along the route, and a price-tag that would make MetroLink by far the most expensive infrastructure project in Ireland’s history.

8.2 Dublin Airport is well-served by bus transport, both local and national. It also benefits from the Dublin Port Tunnel, which offers a faster route into the city centre. And now a second tunnel is being proposed to serve the airport by MetroLink. It is even possible at some stage that a third tunnel will be needed within the airport zone to accommodate a high-speed mainline rail line linking Belfast with Dublin and Cork on foot of the ongoing All-Island Strategic Rail Review. I raised this in my submission, and TII responded by saying that this review related to “the inter-urban rail network while the proposed MetroLink project is a high capacity urban metro system required to serve predicted future population needs from Swords via Dublin Airport to Dublin City Centre and onwards to Charlemont”. I accept that distinction, but would still maintain that having three separate tunnels serving the airport would amount to infrastructure overkill.

8.3 The NTA’s Greater Dublin Area Transport Strategy 2022-2042 proposes to extend the Luas Green Line northwards from Broombridge to Finglas and southwards from Bride’s

Glen to Bray, as well as extending the Luas Red Line from The Point to Poolbeg and creating a new Luas line between Lucan and city centre. None of these proposals involve any tunnelling; instead, they will run on-street, like most of the tramways in European cities. In that context, it is quite baffling to me why NTA/TII has singled out the Swords to Charlemont corridor for a mainly tunnelled line to carry longer automated trams at greater speed and frequency than the more modest and significantly less costly on-street solutions being planned for other significant corridors in the city.

8.4 The French city of Bordeaux offers an object lesson in how to plan an integrated public transport system. In 1995, with the city severely congested by traffic and long-standing plans for an underground metro unrealised, its visionary new mayor, Alain Juppé, embarked on an intensive round of public consultations on what should be done. This led to the adoption in 1997 of a plan to create a tramway network, all of it running on-street. Construction started in 2000 and the first line opened in 2003, with a novel ground-level power supply enabling trams to travel through the historic core without overhead lines or poles. Over the following years, three more lines were constructed, extending the network to 77km, with a total of 130 stops and carrying more than 100 million passengers per year.

8.5 By contrast, public transport investment plans have been chopped and changed so often that it is difficult to keep track of them. What we are now being offered by MetroLink is a half-baked scheme for another disparate element of a jigsaw made up of pieces that don't fit together. The most terrifying aspect of it is the spiralling cost, which was estimated at €3 billion in 2018 and ballooned to €9.5 billion in 2022. Now, as a result of construction price inflation, I understand that this has already been revised upwards to €11.5 billion. And in a "worst-case scenario", it could end up costing as much as €23.5 billion — or *ten times* the current projected cost of the National Children's Hospital. If this turns out to be true, there will be no money left to fund other public transport projects in Dublin, such as Dart Underground, or indeed anywhere else in Ireland. I emphatically do not believe that this would be a price worth paying for what is, in effect, a single souped-up Luas line.

8.6 I would strongly recommend that, if An Bord Pleanála is minded to grant a Railway Order for construction of the proposed line, it should only be approved in part, as far as O'Connell Street or Tara Street; this would permit significant construction to proceed while creating time for a thorough review of where MetroLink should be routed south of the River Liffey — including an alternative to inflicting incalculable damage to St Stephen's Green.

8.7 Granting full approval for the scheme as proposed would simply permit NTA/TII to create facts on the ground by “locking in” Charlemont as the interim terminal stop, thereby making it almost inevitable that the Luas Green Line is cannibalised, with the significant public investment made in creating it all but written off as well as causing severe disruption to public transport on this important corridor for three years or more and ending up with a disjointed “mix & match” between MetroLink and Luas. This would be an act of supreme folly, as well as being the opposite of “proper planning and sustainable development” — the ultimate goal of the Planning and Development Act, 2000.