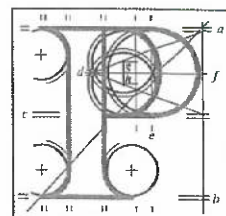


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Frank McDonald
6 The Cedar
Glensavage
Avoca Road
Blackrock
Co. Dublin
A94 T2F4

Date: 06 December 2022

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont,
Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission and oral hearing request (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

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

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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6 The Cedar
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25th November 2022

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

Re: Railway Order application for MetroLink project (ref 314724)

Dear Sir,

According to its promoters, MetroLink will deliver a “high-capacity, high-frequency, modern and efficient metro railway” with 16 new stations along a route running from Swords to Charlemont, linking Dublin Airport, Irish Rail, DART, Dublin Bus and Luas services to “create a fully integrated public transport network” with major interchanges at Glasnevin and Tara Street stations.

In reality, however, it is a classic example of the absence of joined-up thinking on transport in Dublin — a stand-alone project that doesn’t make sense in its own terms and would need to be extended southwards in order to do so. An Bord Pleanála is, therefore, in the invidious position of being asked to make a decision on part of a much larger project without having any idea of where the rest of it would go.

It is also very curious that the application for a Railway Order has been made by “the National Roads Authority (operating as Transport Infrastructure Ireland)”, even though it is now seven years since the Railway Procurement Agency was effectively taken over by the NRA under the Roads Act 2015. Successive ministers for transport have simply neglected to specify a name for the merged agency, as provided by Section 13 of that Act.

1. Relevant ‘transport planning’ history:

It is surely no secret that public transport planning in Dublin has long been marked by a combination of vaulting ambition and political indecision as plans for major capital investment projects are first announced and then pigeonholed before being dusted down, or chopped and changed, to emerge in a new guise — and then announced again.

The lack of a coherent vision over time would make anyone despair. And it’s been going on like this at least since 1975 when CIÉ published its Dublin Rail Rapid Transport Study, which proposed an extensive electrified commuter rail network — with an underground line in the city centre, including a huge transportation centre in Temple Bar/Ormond Quay.

All Dublin had then was a clapped-out diesel commuter line between Howth and Bray, so the first step towards realising the grand plan was to electrify the existing line. DART eventually opened for service in 1984, 150 years after the inauguration of Ireland’s first railway line incorporating the same route between Westland Row and Kingstown (Dún Laoghaire).

DART is an acronym for Dublin Area Rapid Transit, of which the Howth-Bray line was to be merely the first phase. But the country was in the midst of a deep recession in the 1980s that left the Government so impoverished that the rest of it was shelved on cost grounds. The central station at Temple Bar never happened. Instead, it became Dublin's "Cultural Quarter".

Transport planning in the city took a decisively positive turn in 1991, when the first report by the Government-sponsored Dublin Transportation Initiative – a genuine effort to achieve consensus – proposed light rail to upgrade public transport on key routes, including the former Harcourt Street railway line. And light rail was also a lot cheaper than heavy rail.

Trams were back in fashion, with a sleek modern tramway already up and running in the French city of Grenoble. Three lines were proposed for Dublin, linking Tallaght, Sandyford and Ballymun with the city centre. But the Ballymun line was dropped, so we were left with what became the Luas Red and Green lines, which were to join up in the city centre.

But in May 1998, the then Fianna Fáil-Progressive Democrat coalition decided not to proceed with the planned Sandyford line running on-street through the city centre to connect with the line serving Tallaght because ministers balked at the audacious notion of taking road space from private cars on Dawson Street and giving it to public transport in the form of trams.

Instead, then Minister for Public Enterprise Mary O'Rourke produced a crude and hastily drawn diagram showing Luas going underground at St Stephen's Green and emerging at Broadstone. As a result, two free-standing light rail lines were delivered in 2004, each with its own fleet of trams, at an overall cost of €770 million, and they were not joined up until 2017.

In September 2000, emboldened by the "Celtic Tiger" economy, the Dublin Transportation Office unveiled an €8 billion plan for the city, with an underground metro line between St Stephen's Green and Broadstone, running on to Dublin Airport, as well as Dart Underground between Heuston Station and Spencer Dock to link suburban rail services.

Five years later, all of this was incorporated into the FF-PD government's €35 billion "Transport 21" programme, announced amid great fanfare in November 2005, with Bertie Ahern insisting that it was "not an aspirational plan" while Transport Minister Martin Cullen predicted that St Stephen's Green "will be to Dublin what Grand Central is to New York".

While the Railway Procurement Agency (RPA) was progressing plans for Metro North, to connect Swords and Dublin Airport with the Luas Green Line at St Stephen's Green, CIÉ was putting together plans for Dart Underground – the vital missing link needed to transform suburban rail services into a network, with St Stephen's Green as its central station.

In order to accommodate Dublin's version of New York's Grand Central, it transpired that the entire northwestern quadrant of the Green – including its duck pond – was to be turned into an huge hole in the ground to make this happen; at one stage, incredibly, the RPA was even planning to take down the Fusiliers' Arch and re-erect it after the work was done.

An Bord Pleanála approved a Railway Order for Metro North in October 2011, but the project was put on hold just one month later by then transport minister Leo Varadkar because the technically bankrupt Fine Gael-led government couldn't afford to proceed with three "big-ticket" transport projects: the 19km metro line, Dart Underground and Luas Cross City.

The latter, which involved connecting the Luas Red and Green lines on-street through the

city centre, was the cheapest of this trio, so it went ahead. Delivered for €368 million in 2017, it littered Dublin's principal streets with steel poles and utility boxes due to a dogged unwillingness by the RPA to adopt the wire-free solution successfully pioneered in Bordeaux.

Metro North was subsequently rebranded as "MetroLink" and its route was altered by the National Transport Authority (NTA) to connect with Tara Street station, even though this would entail the demolition of College Gate, a 1990s apartment block on Townsend Street containing 70 flats and the Markievicz Leisure Centre and swimming pool on its ground floor.

Given the sensitivity of St Stephen's Green, gifted to Dublin as a public park by Lord Ardilaun in 1880 under an Act of Parliament, the revised alignment envisages excavating a station box on its east side — partly within the public park itself — even though this location would be relatively remote from the Luas line on its west side as well as the Grafton Street area.

The re-routing also meant writing off a €25 million investment in excavating and installing a metro station box beneath the Mater Hospital's new main block because the latest plan would dig up the triangular park on Berkeley Road instead. The thorny issue of whether MetroLink would consume most of the original Luas Green Line was parked for another day.

2. The need for more 'joined-up thinking':

The single most strategic public transport project in Dublin is not MetroLink, but rather Dart Underground — the "on-again/off-again" project to transform disparate commuter rail services into a coherent network, with an underground line running from Heuston Station to Spencer Dock via Wood Quay, St Stephen's Green and Pearse Station, Westland Row.

Although a Railway Order to permit construction of Dart Underground was approved by An Bord Pleanála in December 2011, the project did not proceed because the cash-strapped Government decided to defer funding until at least 2016. By then, the NTA was already "reviewing" the project and putting its delivery on the long finger, until after 2042.

In April 2021, the NTA engaged Jacobs Engineering to examine "lower cost" options for Dart Underground — now branded as Dart+Tunnel — by shortening the city centre tunnel and making recommendations on the "location of new stations required (if any)". To have no new stations at all within the city centre would be patently ridiculous in transport terms.

In November 2021, according to an *Irish Times* report, the NTA had decided to develop Luas lines serving UCD Belfield and Knocklyon/Rathfarnham to take pressure off the existing Green Line and remove the need for it to be upgraded to a metro south of Charlemont — but only after 2042. What all of this indicates is that the NTA is making it up as it goes along.

In this case, it appears to be a stratagem to overcome the most glaring downside of the metro project, as first envisaged — the fact that it would have cannibalised most of the original Green Line, which had been installed just a few years earlier. So why, then, is the current plan to terminate the proposed 19km metro line at Charlemont being pursued?

This issue was raised by An Bord Pleanála representatives during "pre-application consultations" with TII/NTA when they queried "the appropriateness of the selection of Charlemont as the end-point in the light of the decision to omit the Luas Green Line upgrade". That question has never been satisfactorily answered and needs to be rigorously

pursued.

The Board's representatives queried the rationale for Glasnevin being chosen for one of the principal Northside stations, as opposed to Drumcondra, which was the location under the earlier scheme — given that Glasnevin is relatively close to the Luas Green Line terminating in Broombridge and also relatively remote from Croke Park (unlike Drumcondra).

Also raised was “the selection of the east side of St Stephen's Green, given the distance from Grafton Street and possible future interchange with Dart Underground”. The Board should also have queried the costly diversion of Metrolink's alignment to link up with DART at Tara Street when such an interchange would ultimately be provided by Dart Underground.

The abrupt termination of MetroLink at Charlemont, without any firm plan for a future extension, would involve excavating both the station as well as a substantial turn-back loop deep enough underground to avoid the Grand Canal and the main sewerage line serving Tallaght that runs alongside it. This would add immensely to the overall cost of the project.

To put it mildly, more “joined-up thinking” is urgently required. This needs to embrace the integration of *all* public transport modes serving Dublin — Luas lines, bus routes, commuter rail services and mainline rail. In regard to the latter, an All Island Strategic Rail Review is now under way to consider how the rail network can promote “sustainable connectivity”.

A meeting of the North South Ministerial Council at Dublin Castle in July 2020 agreed to commission a major study of the possibility of a Belfast-Dublin-Cork high-speed rail line, with Taoiseach Micheál Martin stating that such a project would bring “huge economic and tourism benefits for the entire island”. So this is something that's on the agenda.

If there is to be a new high-speed link between Belfast, Dublin and Cork, it should obviously be routed through Dublin Airport — not only to cater for Northern Ireland residents using the airport but also to free up the existing coastal railway line south of Drogheda for commuter services, which are currently impeded by having to share the same tracks.

But if the mooted high-speed rail line was to run through Swords and Dublin Airport, running underground into the city centre and then onwards to Cork, where would that leave MetroLink? Clearly, it would make little sense to have *two* tunnelled rail lines serving the airport — both of these in addition to the Port Tunnel, which feeds into the M1 that also serves the airport.

As far as I can see, this issue is not mentioned at all in the voluminous EIAR submitted in support of the MetroLink scheme; clearly, a high-speed mainline rail line running through Dublin Airport is someone else's department — CIÉ or Iarnród Éireann — whereas MetroLink is TII's (and NTA's) baby. Such compartmentalisation is the enemy of “joined-up thinking” on transport.

3. Negative impact on architectural heritage:

The EIAR's Architectural Heritage chapter lists seven buildings on the west side of O'Connell Street Upper dating from the reconstruction of the street in neo-classical style after the 1916 Rising and Civil War that are either protected structures or listed in the NIAH, all of which are located within the site of the proposed MetroLink station. Only façades would be retained.

Table 26.55: Potential Direct Impacts During Construction at O'Connell Street Station

rates the impacts of demolishing all but the façades of these buildings as "Significant" or "Very Significant" — whether this is done "on a standalone basis" or (as TII intends) in conjunction with Hammerson plc's redevelopment of "Site 2" of its Dublin Central mega-scheme.

The last surviving Georgian house from Luke Gardiner's development of Sackville Street — 42 O'Connell Street Upper — is endangered by the demolition of No.43 and the excavation of its site to a depth of 28 metres. This would have "significant implications" for its stability, "requiring underpinning of the party walls/foundations" to keep the long-vacant house standing.

The most tragic loss would be the former Carlton cinema, dating from 1938, which was one of the anchors of O'Connell Street for decades until its closure in 1994. With seating for 2,000 in its original format before it was subdivided into three cinemas in 1976, the entire volume of the Art Deco cinema still survives, including a significant amount of its original fabric.

More than 20 years ago, the Carlton was proposed as a location for the National Conference Centre; indeed, its name was appropriated to refer to the development site even then being assembled by forerunners of Hammerson plc as the "Carlton site". It would be ideal for conversion into a concert hall or music venue to enliven this stretch of O'Connell Street.

Instead, as the EIAR notes, "the Carlton ... is to be demolished, except for the façade, as part of the works to construct O'Connell Station. The section to be demolished [the entire interior] is not part of the protected structure, though it is included in the NIAH. To facilitate the supports for the façade during construction, the cellars beneath the footway will be infilled with concrete ...

Again, the predicted impact is rated as "very significant". As someone who remembers the cinema in its heyday as well as the Carlton Grill on the first floor, overlooking O'Connell Street, I sought to persuade Hammerson to retain and refurbish its Art Deco glory. They were also open to considering options for its future use, including the idea of turning it into a music venue.

But that was before the alignment of MetroLink was altered so that, instead of excavating a station box in the middle of O'Connell Street as originally envisaged, it was now to be done behind propped-up façades along its west side. It is clear that the combined impact of MetroLink and Hammerson's Dublin Central scheme will fundamentally change the character of the street.

Table 26.58: Potential Direct Impacts During Construction at St Stephen's Green Station acknowledges that "part of the park will become a construction site during the works to provide St Stephen's Green Station, with the removal of paths, railings alongside paths, vegetation, the addition of hoardings, the installation of plant and other equipment, the removal of trees ..."

Railings, plinth walls and gates around part of the park's eastern perimeter would also be removed along with some of the lamp posts and bollards as well as the Wolfe Tone monument, its array of granite columns and the adjoining Famine sculpture for the duration of the station's construction. All of this will have a "profound" impact on the architectural heritage of the park.

The main entrance to the Metrolink station would be located within the park close to its north-eastern corner, to the rear of the Wolfe Tone monument, along with "the introduction of

pop-ups, the re-positioning of monuments and alterations to the landscaping". These would all "represent permanent changes to the setting of the park ... and the impact will be very significant".

Socially, the proposed demolition of the mid-1990s College Gate apartment block on Townsend Street and the Markievicz Leisure Centre on its lower levels as well as a nearby terrace of social housing adjoining the railway bridge would be the most serious negative impact of MetroLink in the city centre, as it would result in the loss of more than 80 homes.

Chapter 8 of the EIAR states that "the Project Team is acutely aware of the potential [!] impact of the proposed Project to these property owners" and that TII would negotiate a scheme of compensation to allow for relocation of residents. It would also "support DCC in the identification and development of a replacement site for a leisure centre and swimming pool".

Ashford House on Tara Street, a substantial eight-storey office block dating from the 1990s, is also targeted for demolition to make way for the excavation of the Tara station — all as a direct result of the project promoters' decision to divert the MetroLink alignment further east to provide a multi-level connection with the overground Tara Street DART station.

It should be noted that the entire city block bounded by Tara Street, Poolbeg Street, Hawkins Street and Townsend Street has been cleared in recent years for redevelopment. Had the alignment been drawn differently, it would surely have been possible to provide a station box for Metrolink on that extensive site. However, it appears to have been overlooked by TII/NTA.

Instead, an equally large urban block immediately to the east — bounded by Tara Street (with the sole exception of the Irish Times building), Townsend Street, the Loopline and Poolbeg Street, and incorporating much of Luke Street — is now slated to be turned into another huge hole in the ground for several years to facilitate construction of Metrolink's Tara station box.

4. Conclusion:

In the 1970s and '80s, when Dublin Corporation was engaged in its destructive road-widening frenzy in the inner city, its road engineers and their apologists used to defend what they were doing on the basis that "you can't make an omelette without breaking eggs". The real issue then and now is whether the proverbial "omelette" is worth making in the first place.

There is an almost universal view in and around Swords that MetroLink must proceed, irrespective of its negative impacts further down the line. Fingal County Council is hugely enthusiastic about the project, viewing it as a game-changer that would promote further development in the area, particularly in the areas that would be served by Metrolink.

Landowners and property speculators have long been betting on the project delivering an "uplift" in land values while property developers are gearing up to build higher density residential schemes that would cash in on the availability of high-capacity public transport in the area — much as DART and Luas added value to houses and apartments along their routes.

It is now up to An Bord Pleanála's inspectorate and the Board itself to examine this

huge transport project objectively, bearing in mind that it carries a minimum price-tag of €9.5 billion. Given the complexity of what has been proposed, it will need to hold an oral hearing to tease out many of the issues, including the downsides I have highlighted in this submission.

If MetroLink has an Achilles heel, it is surely the abrupt termination of the 19km line at Charlemont and the extensive turn-back loop that would be required to accommodate it. To overcome this fatal flaw, TII/NTA should be sent back to the drawing board to devise a viable continuation of the line that would sensibly extend it into Dublin's southern suburbs.

In this regard, I agree with the submission made by architect Peter Twamley that the line should be extended 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.

I also agree with Mr Twamley that the diversion of MetroLink to connect with DART at Tara Street must be revisited. As he writes, "based on distance alone, the cost of a direct route from O'Connell Street to St Stephen's Green will be considerably less than the proposed diversionary loop from O'Connell Street to Tara Street and on to St Stephen's Green ..."

This would not only make much more sense economically but also eliminate the drastic requirement to demolish several important assets in and around Townsend Street, including the College Gate apartments and Markievicz Leisure Centre, the nearby small social housing scheme adjoining the Loopline and the Ashford House office block on Tara Street.

I earnestly hope than An Bord Pleanála will listen to and take account of these proposals.

Yours sincerely,

Frank McDonald

