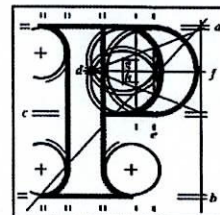


Our Case Number: ABP-314724-22

Your Reference: Alstead Securities Limited



**An
Bord
Pleanála**

Virtus
5th Floor, Glass House
11 Coke Lane
Smithfield
Dublin 7
D07 WNP2

Date:

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 (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.


Please be advised, there is no fee for an affected landowner, listed on the schedule, to make an observation on this case, therefore, a cheque refund of €50 is enclosed.

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

Tell	Tel	(01) 858 8100
Glaao Áitliúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
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An Bord Pleanála
64 Marlborough Street
Dublin 1

AN BORD PLEANÁLA	
LDG-	<u>060542-73</u>
ABP-	
16 JAN 2023	
Fee: €	<u>50</u> type: <u>cond</u>
Time: <u>15.36</u>	By: <u>hand</u>

Date: 16th January 2023

Dear Sir/Madam,

Case Reference: NA29N.314724

Railway (MetroLink-Estuary to Charlemont via Dublin Airport) Order 2022

Submission on behalf of Alstead Securities in relation to Ashford House, Tara Street, Dublin 2

Virtus, The Glass House, 11 Coke Lane, Smithfield, Dublin 7 is instructed by Alstead Securities Ltd, 48 Upper Drumcondra, Dublin 9, D09 9F3C to submit this observation in relation to the Railway (MetroLink-Estuary to Charlemont via Dublin Airport) Order [2022] (ABP Ref: NA29N.314724). In particular, the submission relates to Alstead Securities' ownership of Ashford House, Tara Street, Dublin 2, D02 VX67.

This submission follows two earlier submissions to MetroLink consultations dated 11th May 2018 and 21st May 2019. These submissions sought the omission of the proposed Metrolink works at the Ashford House site from the proposals in its entirety.

This observation is submitted in advance of the revised deadline of 17.30 on 16th January 2023 and the statutory fee of €50 has been paid.

Ashford House is a prominent office building located on the south east corner of the junction of Tara Street and Poolbeg Street, Dublin 2. The office building is very centrally located, adjacent to excellent existing transport routes and has several well established tenants.

The building offers Grade A, high quality, modern office floorspace and is well occupied by businesses with long leases employing up to 500 people. This has been the case since the building's completion in the early 1990s.

The building is an important asset to Alstead Securities as well as providing employment floorspace in this central and sustainable location.

Alstead Securities' ownership is shown in **Figure 1** and the building is highlighted in **Figure 2**.

In summary, it is considered that the proposals for MetroLink so far as they relate to the area surrounding the proposed Tara Street Station fails to respond to national, regional and local planning policies and fail to capitalise on the benefits which MetroLink will bring to the area.

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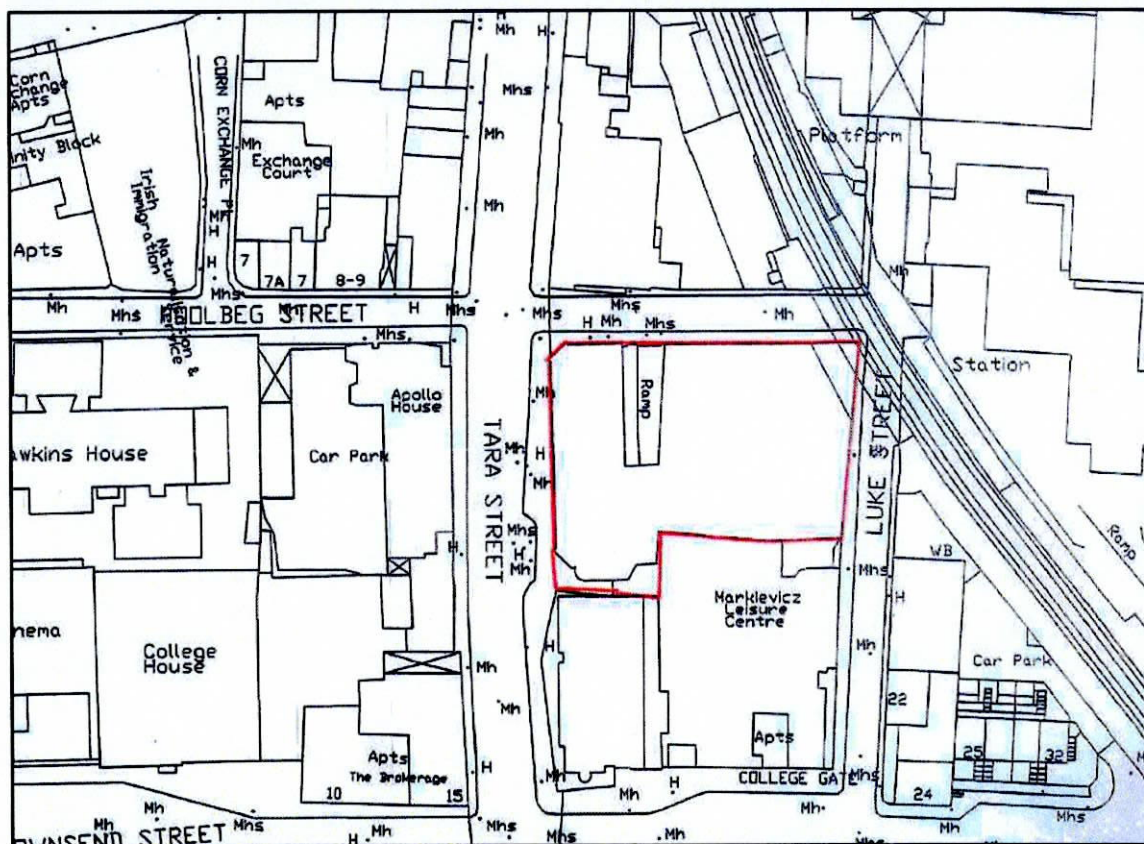
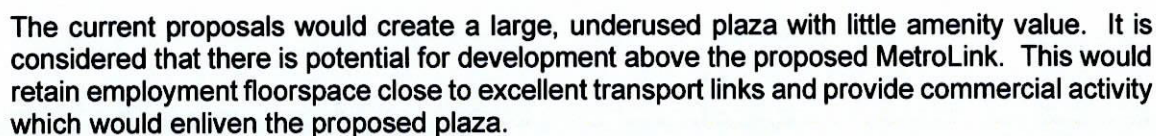


Figure 1: Ashford House Location Map

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Figure 2: Ashford House

MetroLink Proposals in relation to Ashford House

We have reviewed the MetroLink proposals insofar as they relate to Ashford House and the surrounding area. In summary, Ashford House is proposed for demolition and the site of Ashford House is proposed for part of the main Tara Street station.

The Draft Railway Order identifies Ashford House for compulsory purchase. The lands are identified as ML6O-A5 in the Property Details book submitted as part of the application (**Figure 3**).

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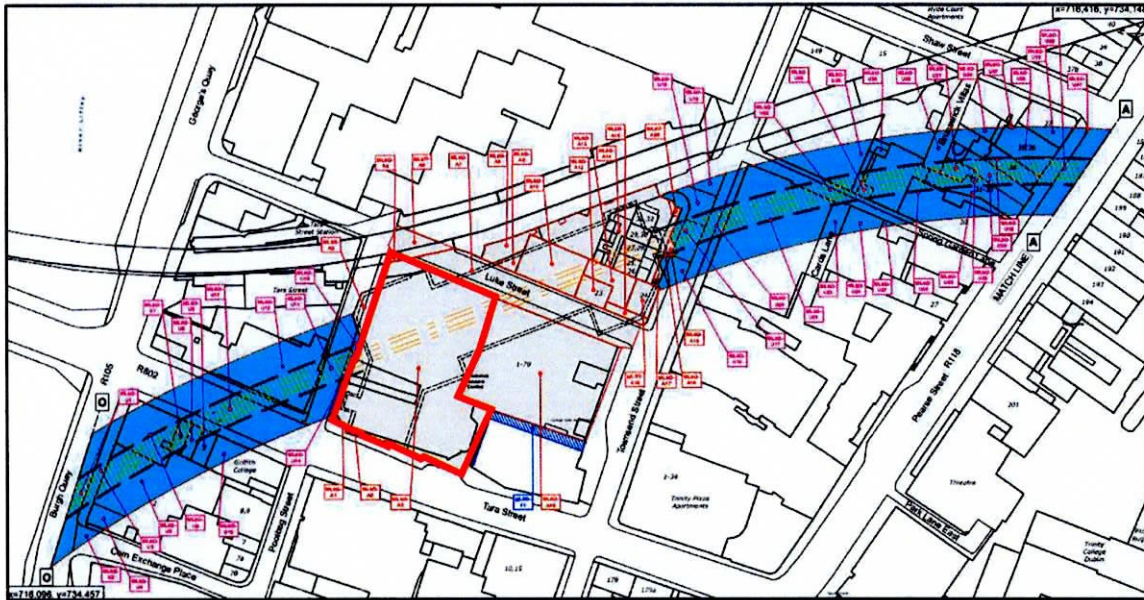


Figure 3: CPO Map with Ashford House (red line enhanced)

The Draft Railway Order proposes the Tara Street station on the site of Ashford House and adjacent sites. The proposals retain an area for 'Proposed Future Development By Others' which is mostly contained within the current ownership of Alstead Securities. The proposals show the creation of an underground station with entrances at the Poolbeg Street and Townsend Street ends of a large plaza which is proposed at street level (**Figure 4**).

As shown, an area marked 'Proposed Future Development By Others' over washes Alstead Securities landholding as shown in blue on **Figure 4**. This area of 'Proposed Future Development by Others' comprises c. 840m². It is an irregular parcel of land and its development for a viable new building is severely compromised by the shape and configuration of the parcel of land left over after the Metrolink proposals.

In addition, the Metrolink proposals include a number permanent structures at ground floor / surface level of the future of the future development site, including for example a fireman's lift. This is a very poorly considered arrangement and will severely impact development potential of the site.

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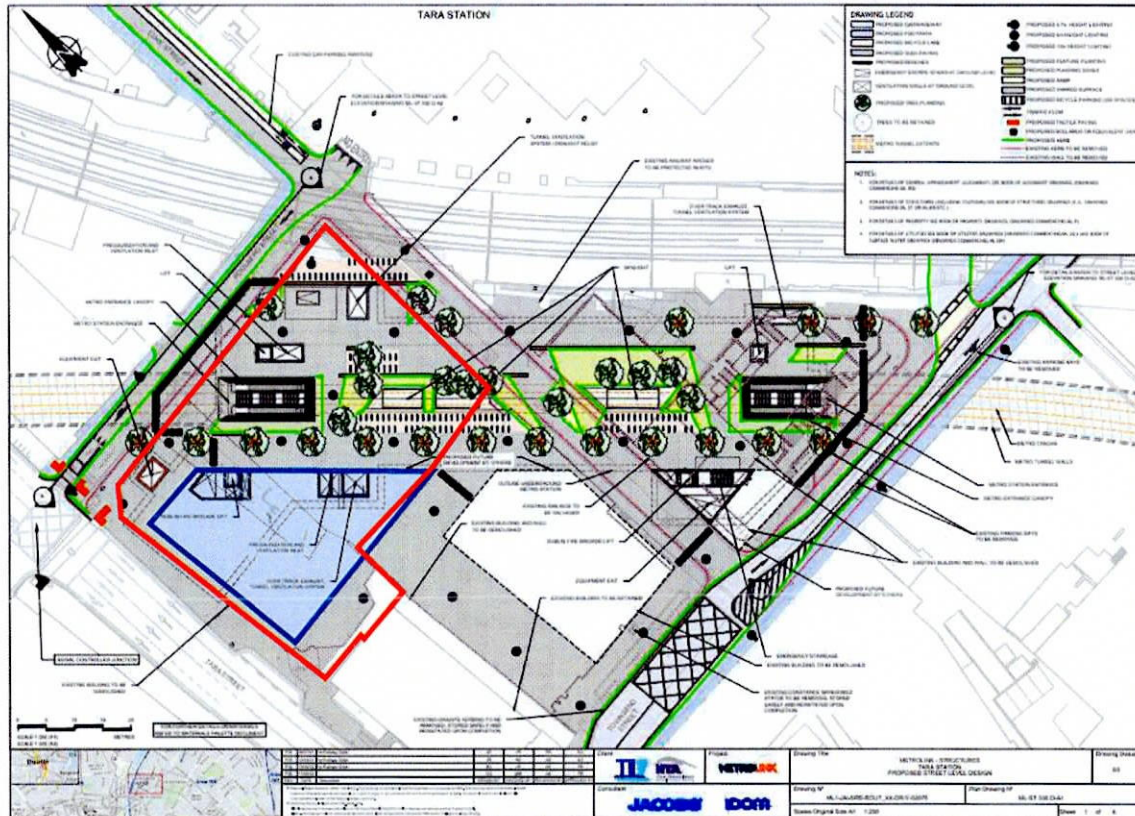


Figure 4: Tara Street Proposed Street Level Design (Alstead Securities' ownership in red and Proposed Future Development by Others highlighted in blue)

National, Regional and Local Policy Context

The following is noted in summary:

- There is significant national, regional and local policy support for the MetroLink project.
- The Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly promotes the MetroLink and encourages intensification of development and the delivery of jobs along good public transport routes.
- The Dublin City Development Plan 2022-2028 encourages the development of urban sites close to high quality public transport routes.
- The Dublin City Development Plan also encourages the creation of good quality and safe, public realm spaces.

The Eastern and Midland Regional Assembly (EMRA) Regional Spatial & Economic Strategy (RSES) promotes intensification of employment uses in conjunction with good transport links.

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RPO (Regional Policy Objective) 4.3 seeks to ensure that the development of future development areas is co-ordinated with the delivery of key public transport projects such as MetroLink. RPO 5.6 seeks the development of future employment lands with a focus on the intensification of employment lands *"at selected strategic development areas and provision of appropriate employment densities in tandem with the provision of high quality public transport corridors"*

Several growth enablers are set out for the Dublin City and Metropolitan Area within the RSES which includes: *"To increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes..."*. Further, integrated transport and land use is noted as a 'guiding principle', the RSES states:

"To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks".

With regard to 'increased employment density in the right places' the RSES states:

"To plan for increased employment densities within Dublin City and suburbs and at other sustainable locations near high quality public transport nodes, near third level institutes and existing employment hubs, and to relocate less intensive employment uses outside the M50 ring and existing built-up areas".

Finally, Regional Policy Objective 5.2 states it is an objective of the EMRA RSES to:

"Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned".

The Dublin City Development Plan 2022-2028 came into force on 14th December 2022.

The site of Ashford House is zoned Z5 City Centre in the Development Plan. The objective for such land is:

"Land-Use Zoning Objective Z5: To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity".

The primary purpose of the Z5 zoning is *"to sustain life within the centre of the city through intensive mixed use development"*. Chapter 14 states that *"ideally, a mix of uses should occur both vertically through the floors of buildings as well as horizontally along the street frontage"*.

Policy CEE8 The City Centre promotes development within the city centre. It states it is the

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Policy of Dublin City Council:

"To support the development a vibrant mix of office, retail, tourism related and cultural activities in the city centre and to facilitate the regeneration and development of key potential growth areas such as the Diageo lands, the St. James' Healthcare Campus and Environs and the TU Dublin campus at Grangegorman".

Policy CEE21 Supply of Commercial Space and Redvelopment of Office Stock further encourages office development of a high quality and states that the following is Council Policy:

- "(i) To promote and facilitate the supply of commercial space, where appropriate, including larger office floorplates suitable for indigenous and FDI HQ-type uses.*
- (ii) To consolidate employment provision in the city by incentivising and facilitating the high-quality redevelopment of obsolete office stock in the city".*

Chapter 8 of the Development Plan considers Sustainable Movement and Transport. This chapter supports Metrolink and, in section 8.5.2, encourages higher density development along public transport routes including MetroLink. General support for MetroLink is provided in Policy SMT22:

"To support the expeditious delivery of key sustainable transport projects so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region and to support the integration of existing public transport infrastructure with other transport modes. In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:

- *Dart +*
- *Metrolink from Charlemount to Swords*
- *BusConnects Core Bus Corridor projects*
- *Delivery of Luas to Finglas*
- *Progress and delivery of Luas to Poolbeg and Lucan".*

Submission

Alstead Securities broadly welcome the proposals for MetroLink and recognise the significant benefits that the project will bring to the city as a whole. However, it is considered that the proposals, insofar as they relate to the Tara Street area, are poorly considered and will have significant negative long term impacts on our client's property, fail to improve the area, and fail to meet relevant planning policies and objectives which promote compact growth.

MetroLink, as proposed, does not appropriately recognise the potential for integrated higher density development at this location.

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National, regional and local policy, as set out above, clearly encourages intensification of employment and other uses around public transport routes. The policies are very clear in encouraging intensification along the MetroLink lines to take advantage of the new infrastructure. The proposals fail to encourage significant development in line with these policies.

Further to this, the creation of a public plaza at this location has not been well considered. The plaza will be overshadowed by neighbouring buildings resulting in a lack of sunlight, and will not offer positive public realm as the majority of users of both the DART and MetroLink Stations will pass through the area quickly to access transport. Opportunities for commercial development feeding into this square, both from retail/food and beverage at ground level and from offices at upper floors, has not been considered. New public plazas should be carefully planned with future users in mind; it is considered that this plaza has been created as a result of a left-over area of land and will offer little by way of public amenity. The creation of this plaza is by virtue that it is easier for the MetroLink project to have nothing above the station than to give detailed consideration to the function of this area which would result in a better outcome for all.

If, as proposed, the lands are subject to CPO as part of the Railway Order, it is not considered that the creation of this plaza represents a good return for the people of Ireland in terms of public realm, the opportunity missed to provide well connected employment floorspace or the potential commercial return for the Exchequer should this area be more comprehensively developed.

There is significant potential for more substantial development over the proposed MetroLink Station. This would allow for a significant amount of employment floorspace in very close proximity to both the DART and MetroLink.

Alstead Securities Ltd have engaged RKD Architects to undertake a study of the potential for development at Ashford House alongside the proposed Tara MetroLink Station. The Draft Concept, prepared by RKD, is enclosed with this submission.

The Draft Concept outlines the potential for the development of a commercial building above the proposed MetroLink station, on the site of Ashford House (**Figure 5** and enclosed).

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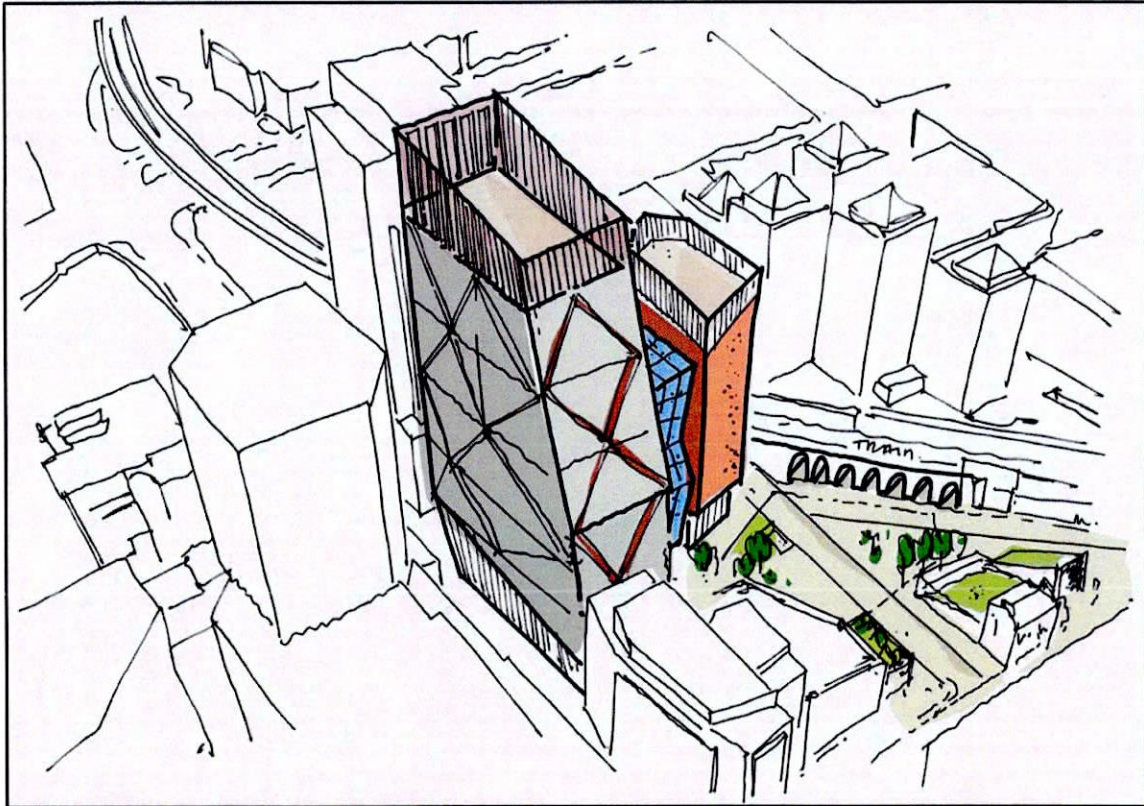


Figure 5: Aerial View of the Alternative Proposal (RKD)

The provision of increased office space would accord with planning policy which encourages commercial development close to sites with good public transport connections and public transport interchanges.

This would also create an improved public plaza to the southeast which would benefit from increased commercial activity feeding into it (**Figures 6 and 7**).

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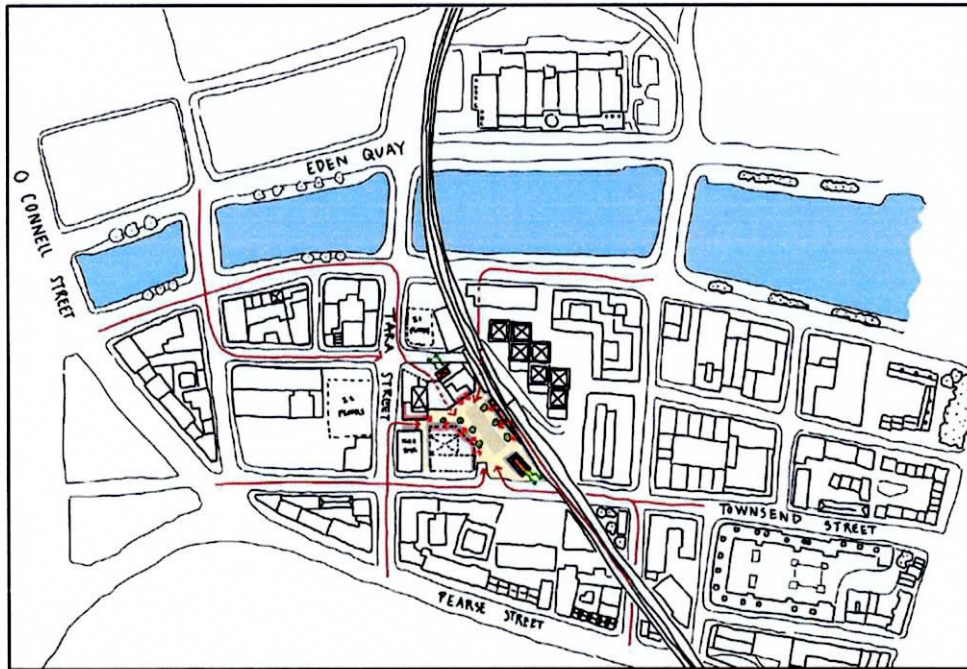


Figure 6: Layout of the Alternative Proposal



Figure 7: Indicative layout and floorplans

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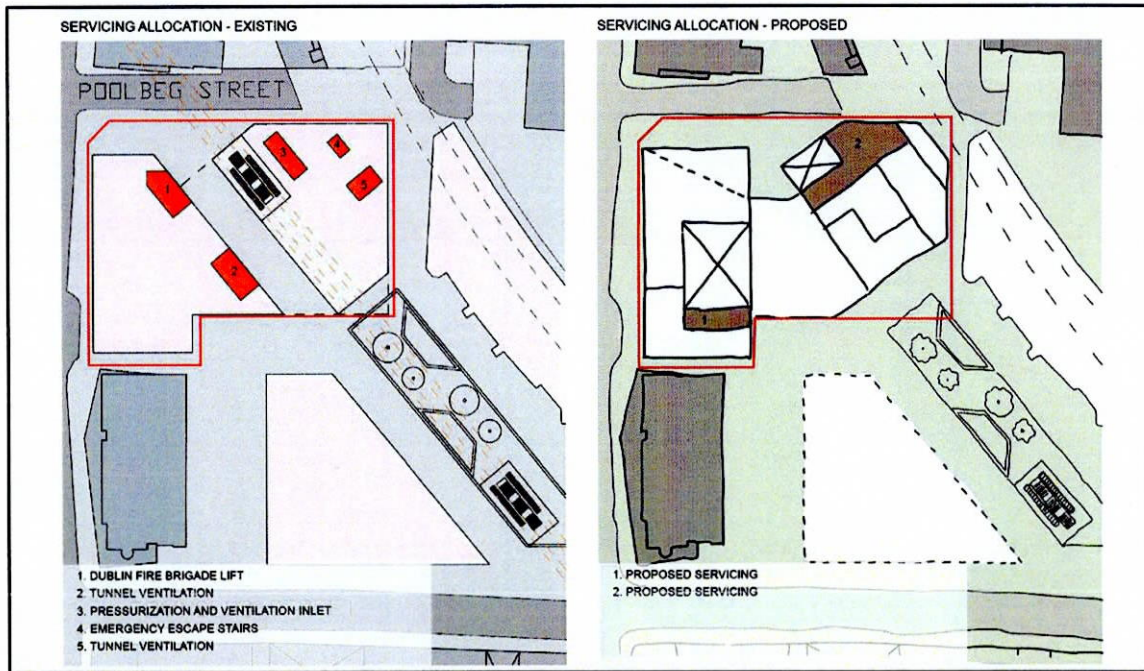


Figure 8: Servicing Allocation - Existing and Proposed

We have considered the operational and structural considerations of the proposed MetroLink project. RKD have worked considerably on similar schemes and have fully accounted for the extract and intake vents and fire access required to facilitate the MetroLink Station (**Figure 8**). These can all be provided in the Alternative Proposal as set out in the RKD document.

This letter is also accompanied by a Technical Review prepared by DBFL Consulting Engineers. This review fully considers the proposed station and demonstrates how the proposed development above the station can be delivered. The review demonstrates that there are no structural reasons why lands above the station need to be sterilised.

We conclude by reiterating our general support for the scheme with the following comments. The following is requested:

- The permitted scheme should accommodate development above the MetroLink station. This would better achieve the aims and objectives set out in policy to promote development at sites with excellent public transport links.
- Development should be allowed in advance or alongside the MetroLink construction stage so as to not sterilise the owner's lands. Appropriate protection for the proposed MetroLink scheme can be incorporated in the development above.

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- The Metrolink proposal should be amended to have better consideration of future development potential of lands above and adjacent to the proposed station. This should include a reconsideration of the location and arrangement of above ground structures and 'pop-ups' associated with the Metrolink proposals.
- We request that the CPO is amended so that there are revisionary rights to Alstead Securities to allow for development above and adjacent to the Metrolink works. This submission demonstrates that there are no design or technical reasons as to why this cannot be accommodated. As currently drafted, the Draft Railway Order and associated CPO would severely limit the development potential of this key urban site and would fail to allow for national and regional planning policy targets for integration of land use and transportation to be met.

We also wish to identify the significant potential sterilising effect that an approved Railway Order will have on our client's lands. In the event of an approved Railway Order (as drafted) and a lag in commencement of works on the MetroLink, our client's lands will not be capable of any development. The ability to realise a high density of development at this central location in accordance with national and regional planning policy will be limited should there be any uncertainty in delivery of the MetroLink scheme. In addition, such a situation would create uncertainty from a tenancy perspective and could lead to loss of existing tenants and extreme difficulty in attracting new tenants. In this respect, we request that An Bord Pleanála is fully satisfied and has sufficient assurances to the effect that there is a strong business case for the MetroLink scheme.

At this time, we reserve our position to participate in the Oral Hearing when it is scheduled and to expand the observations made in this submission at such Oral Hearing.

Yours faithfully,

Brian Coughlan
BA, MSc, MIPI, MRTPI
Virtus

Enclosures:

- Draft Concept, RKD
- Ashford House / Metro Station, Tara Street Technical Review, DBFL

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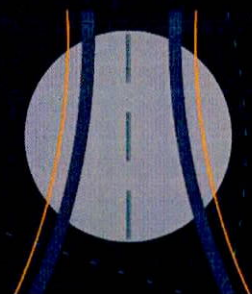
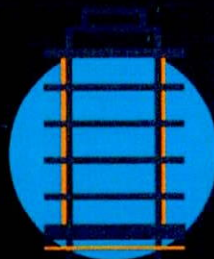
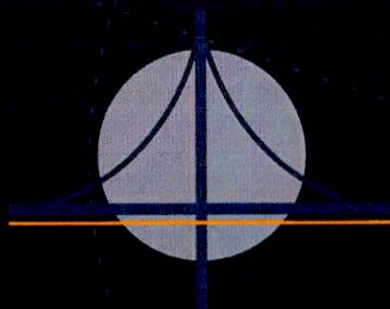
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Ashford House / Metro Station, Tara Street

Technical Review

220190-X-20-Z00-ZZZ-RP-DBFL-SE-0001

STRUCTURES



January 2023



DBFL CONSULTING ENGINEERS



Project Title:	Ashford House / Metro Station, Tara Street		
Document Title:	Technical Review		
File Ref:	220190-X-20-Z00-ZZZ-RP-DBFL-SE-0001		
Status:	P1 - Information	Rev:	P02
	S - Issued		

Rev.	Date	Description	Prepared	Reviewed	Approved
01	10/01/23	First Issue	John Keane	John Hayes	John Hayes
02	16/01/23	Second Issue	John Keane	John Hayes	John Hayes

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2 Discussion..... 4

3 Conclusion 7

Appendix A: Scheme Layouts A

1 Introduction

This technical note has been prepared to outline the potential for the construction of a commercial development on the site of the existing Ashford House building in conjunction with the proposed new underground Tara Metro station. The location of the proposed station is as described in the Metrolink Railway Order application documentation issued by TII/ NTA in October 2022.

The proposal in the Railway Order Application is for the compulsory purchase of the site by TII and the demolition of the existing 6 storey Ashford House office building to facilitate the construction of the Metro station. The drawings within the Railway Order Application indicate a small triangular area fronting onto Tara Street alongside the Metro station noted as a site for future development with the remainder of the site shown as an open linear public space.

This Technical Note, in addition with draft concepts carried out by RKD Architects on behalf of Alstead Securities Ltd, demonstrates the potential for better use of the site by developing a commercial building over the proposed Metro Station while limiting the intervention with the Metro station structure to a minimum. The open public space can still be retained.

Figure 1 shows the approximate outline of the part of the site in the ownership of Alstead Properties.

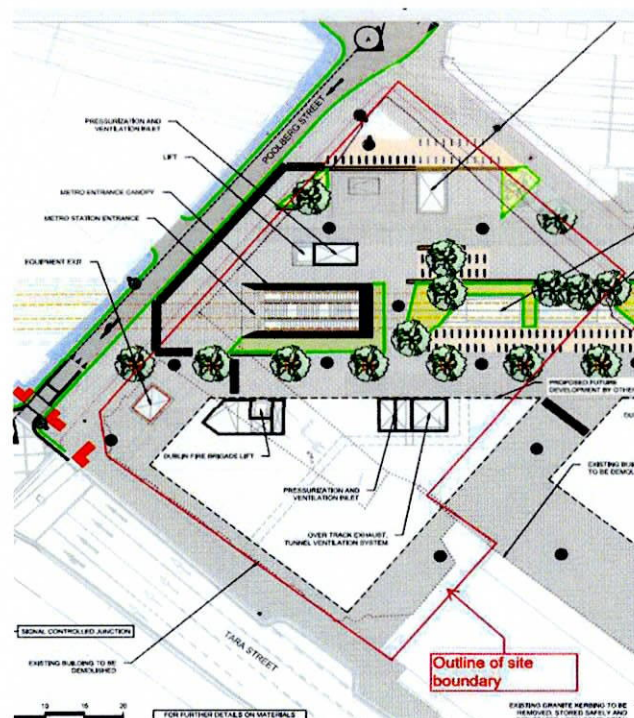


Fig 1: Outline of site indicated in red



2 Discussion

The main box to the proposed Metro station crosses the site diagonally in a north-south direction and track levels are approximately 30m below the existing ground level. The primary station box incorporating tracks, platforms, vertical access to ground level and plant and machinery space is 27m wide. There is a smaller annex to the north-west corner of the station that extends to the boundary with Tara Street and to a depth of 11m below ground level and incorporates an electrical sub-station. To maximise the full development potential of the site a building could potentially be constructed that straddles the main station box. Some co-ordinated intervention within the periphery of the station box would be required in order to keep the structural spans for the new building within acceptable limits.

Figure 2 below indicates where it is proposed that structural columns could be incorporated within the Metro construction to support vertical loads from the building overhead. One of these columns would be located within the wall between the emergency stairs and the platform at platform level and would extend vertically alongside the tunnel ventilation room at mezzanine level and the ticket area at concourse level. The other 2 interventions would come off the station wall to the north end of the main box and the internal station wall to the north-east alongside the emergency stairs and passenger lift. In one location to the north-west corner of the Metro box in the sub-station annex, minor adjustment to the layout is proposed to facilitate the introduction of a column outside the Metro box.



Fig 2: Metro Station Floor Plan

These secant piled walls would form part of the structure to the permanent station box.

level below the lowest part of the station.

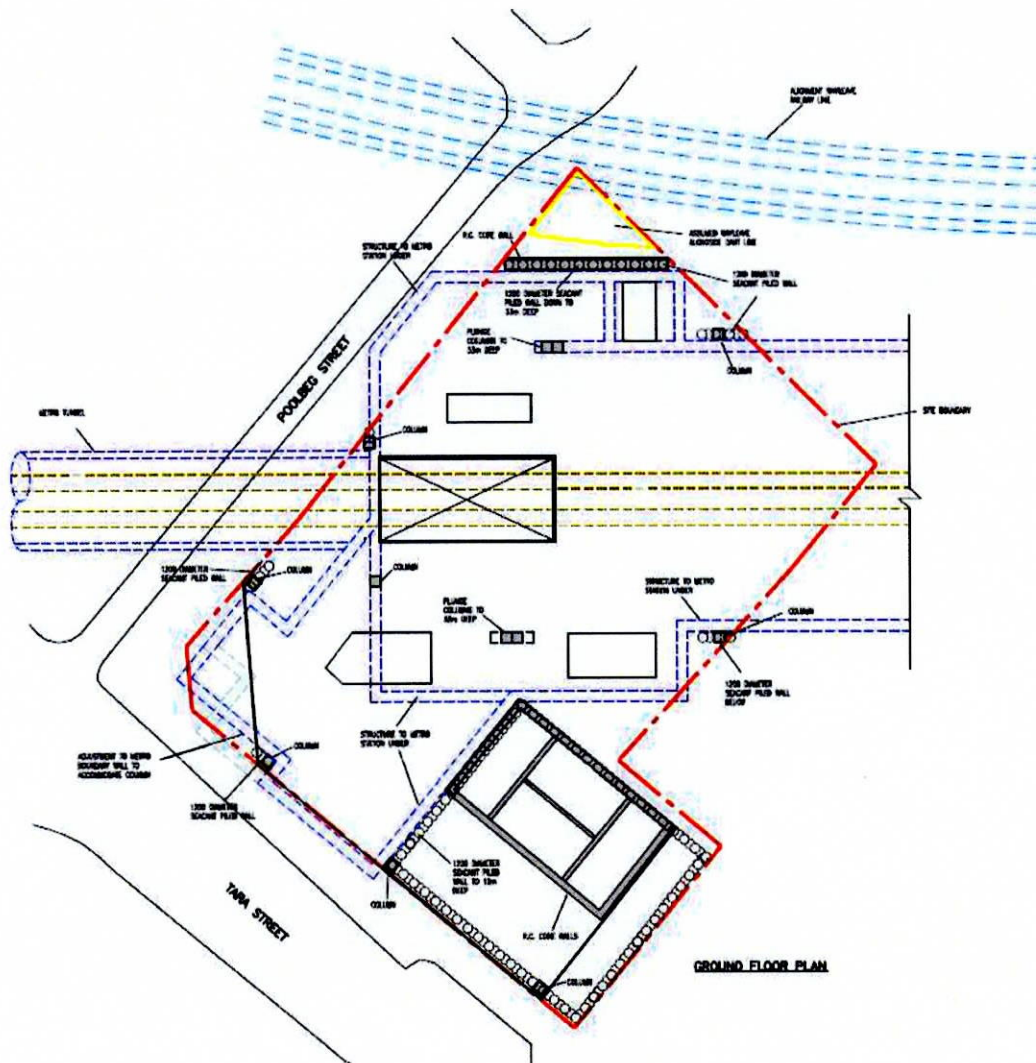


Fig 3 : Ground Floor / Plaza Plan

The area at ground level above the Metro station will be kept clear of structure to allow for passenger circulation and ventilation of the station. It is proposed that a transfer structure be constructed at 3rd floor level (approx. 10m above ground level), to span over the station and support the building loads above. Maximum clear spans will be of the order of 30m to clear the 27m wide station. It is proposed that bespoke steel trusses are utilised for this transfer structure.

In order to minimise the dead load from the structure overhead and maximise the speed of construction a structural steel frame is envisaged with concrete floors on profiled metal deck at each level. Plan bracing will be required at each floor level to transfer horizontal loads into the vertical shear elements.

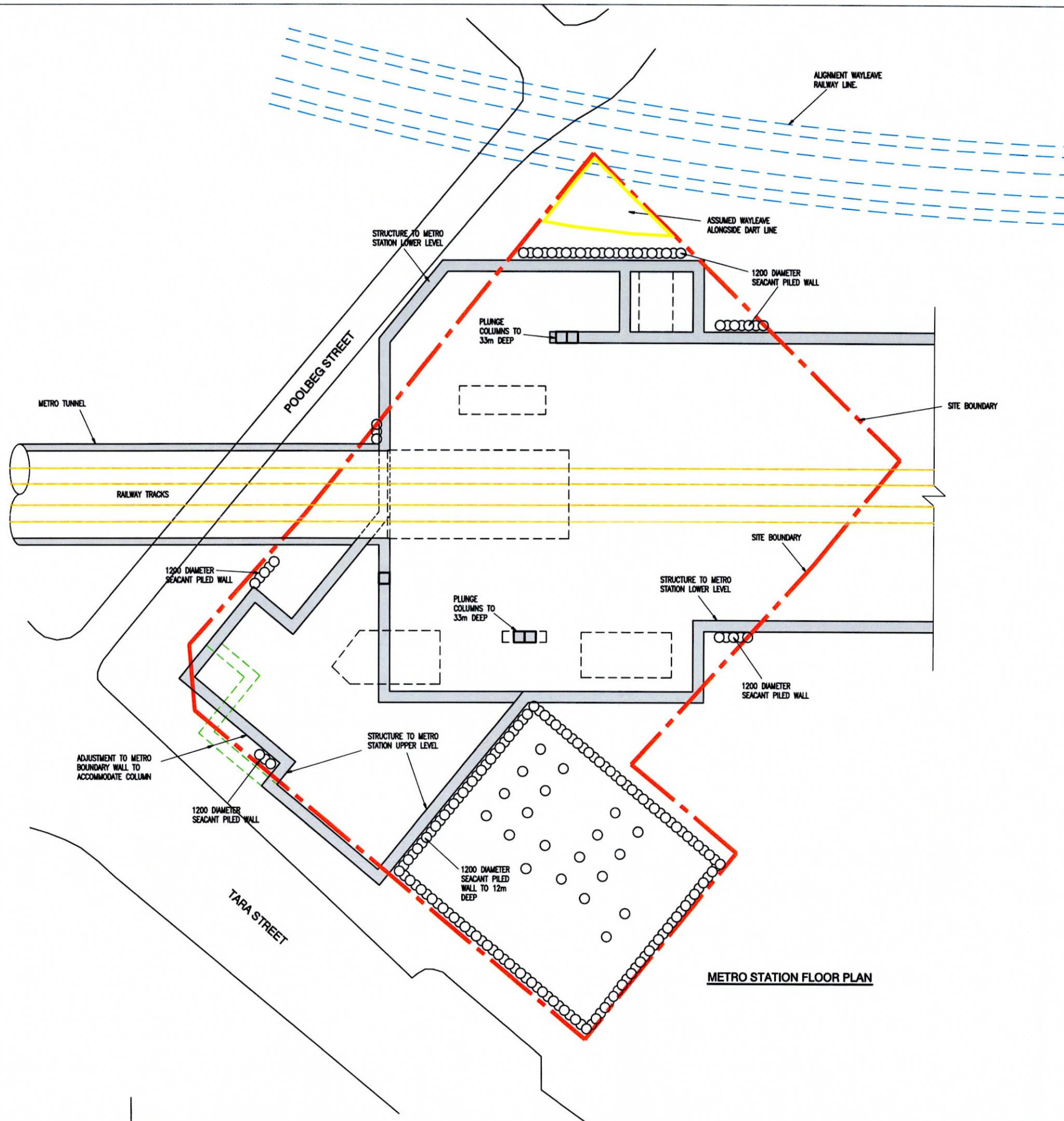


3 Conclusion

Based on a review of the drawings within the Railway Order Application for the construction of the proposed new underground Tara Metro station on the existing Ashford House site, and preliminary modelling carried out, it is concluded that from a structural perspective, there is no reason why development of the Ashford House site could not be accommodated above the MetroLink station as proposed. Whilst it is assumed above that development of the site would precede construction of the Metro station below, the sequence of work, whether station box first, commercial building first or concurrent would not impact on the conclusion reached above.



Appendix A : Scheme Layouts



ON ORIGINAL

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project ref.

DEVELOPMENT AT TARA STREET

drawing title

PROPOSED BASEMENT LEVEL

designed by	author	scale	sheet size
JAK	JJK	AS SHOWN	A2
drawing no.	revision		
220190-DBFL-ZZ-ZZ-DR-S-8000	P02		



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R

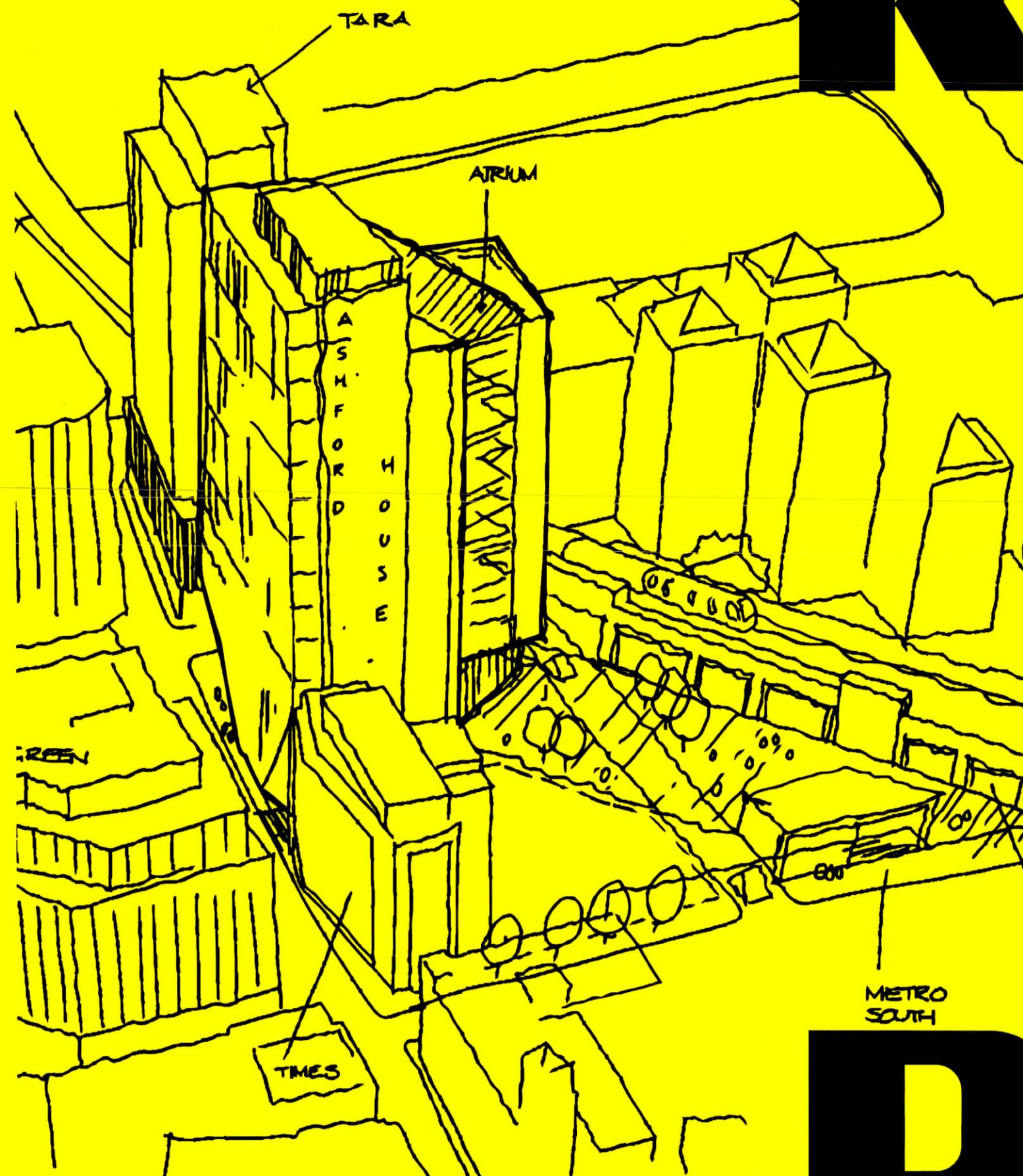
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ASHFORD HOUSE TARA STREET DUBLIN

DRAFT CONCEPT

JANUARY 2023

ALSTEAD SECURITIES LTD



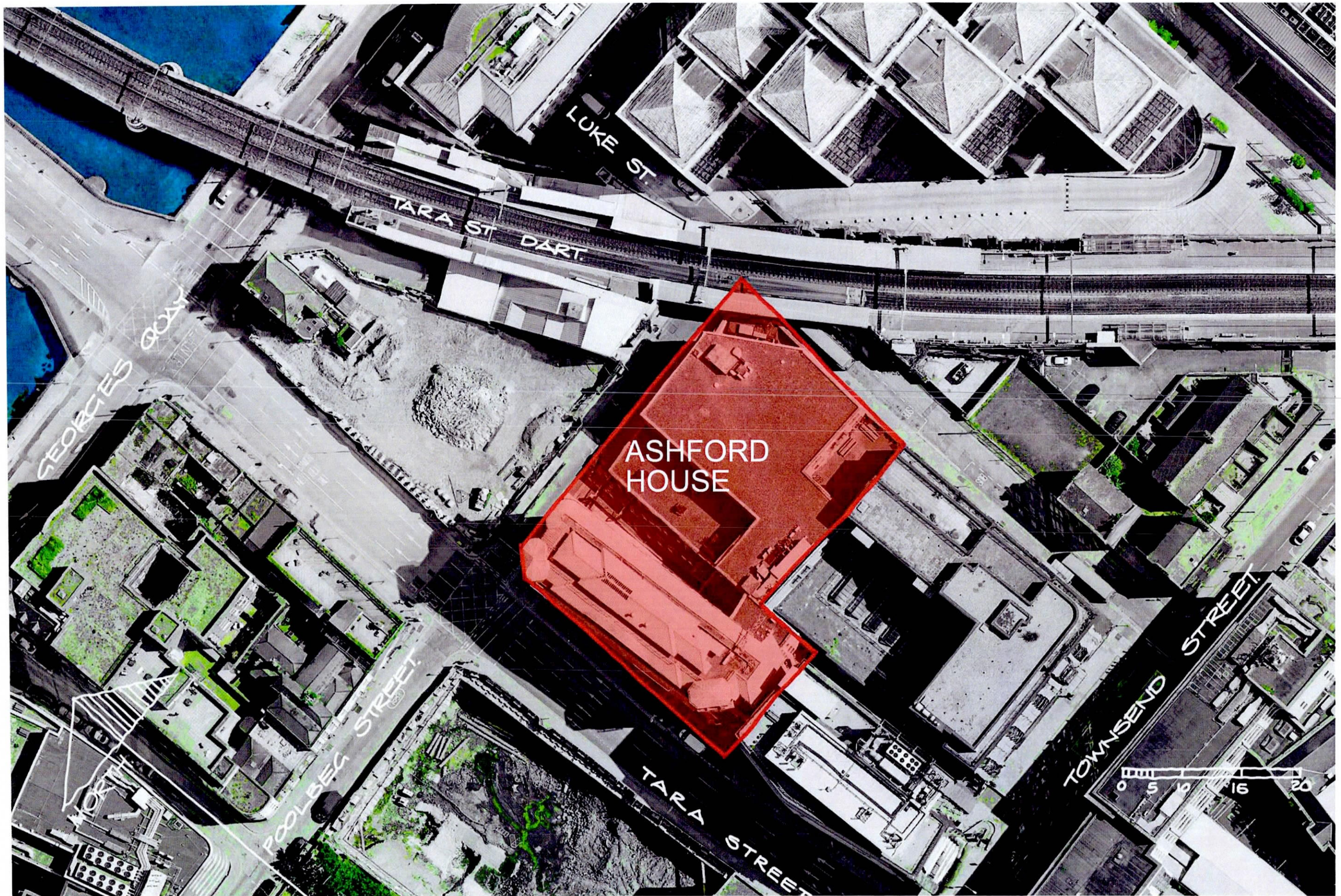
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SITE CONTEXT

SITE CONTEXT

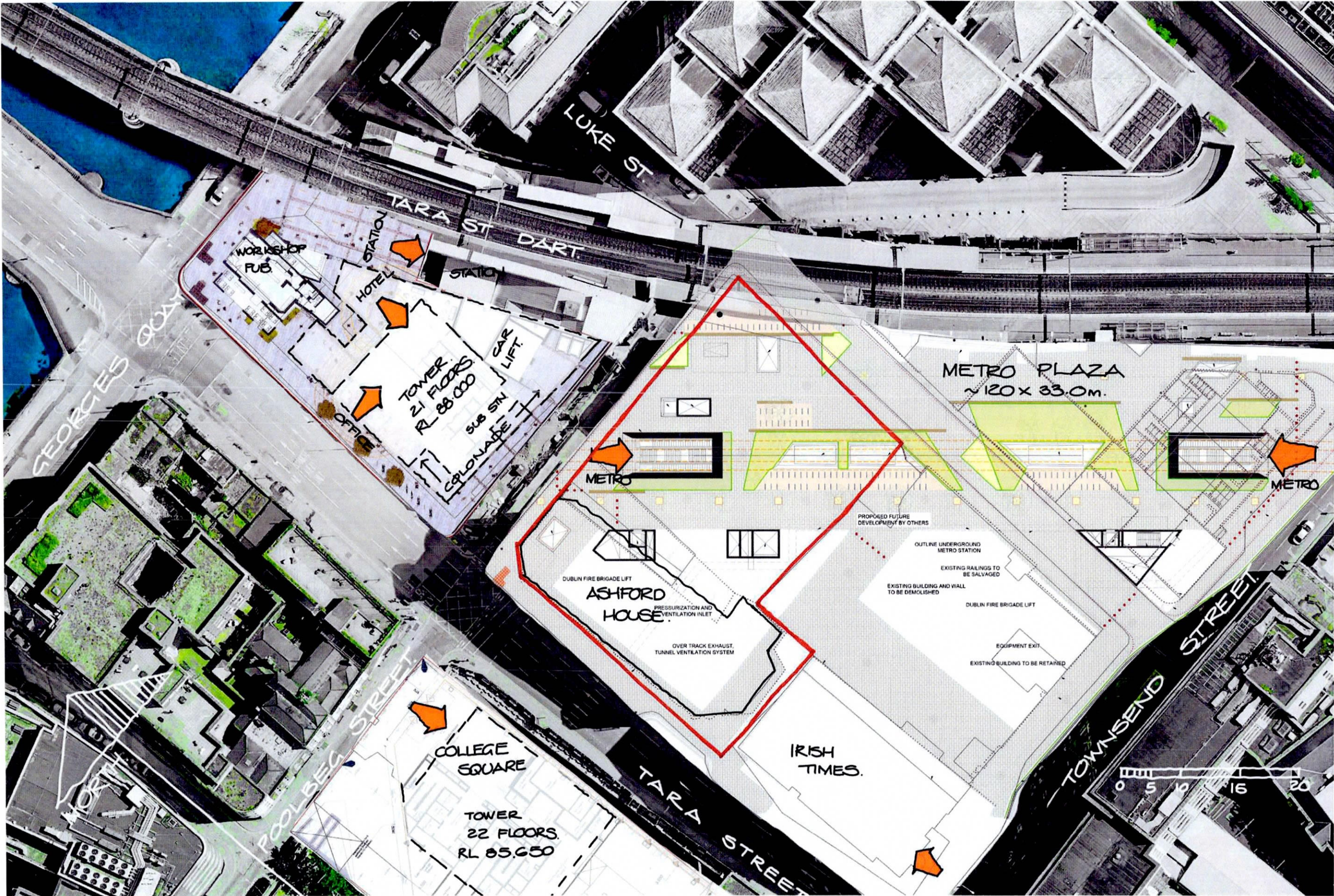
ASHFORD HOUSE SITE LOCATION

3



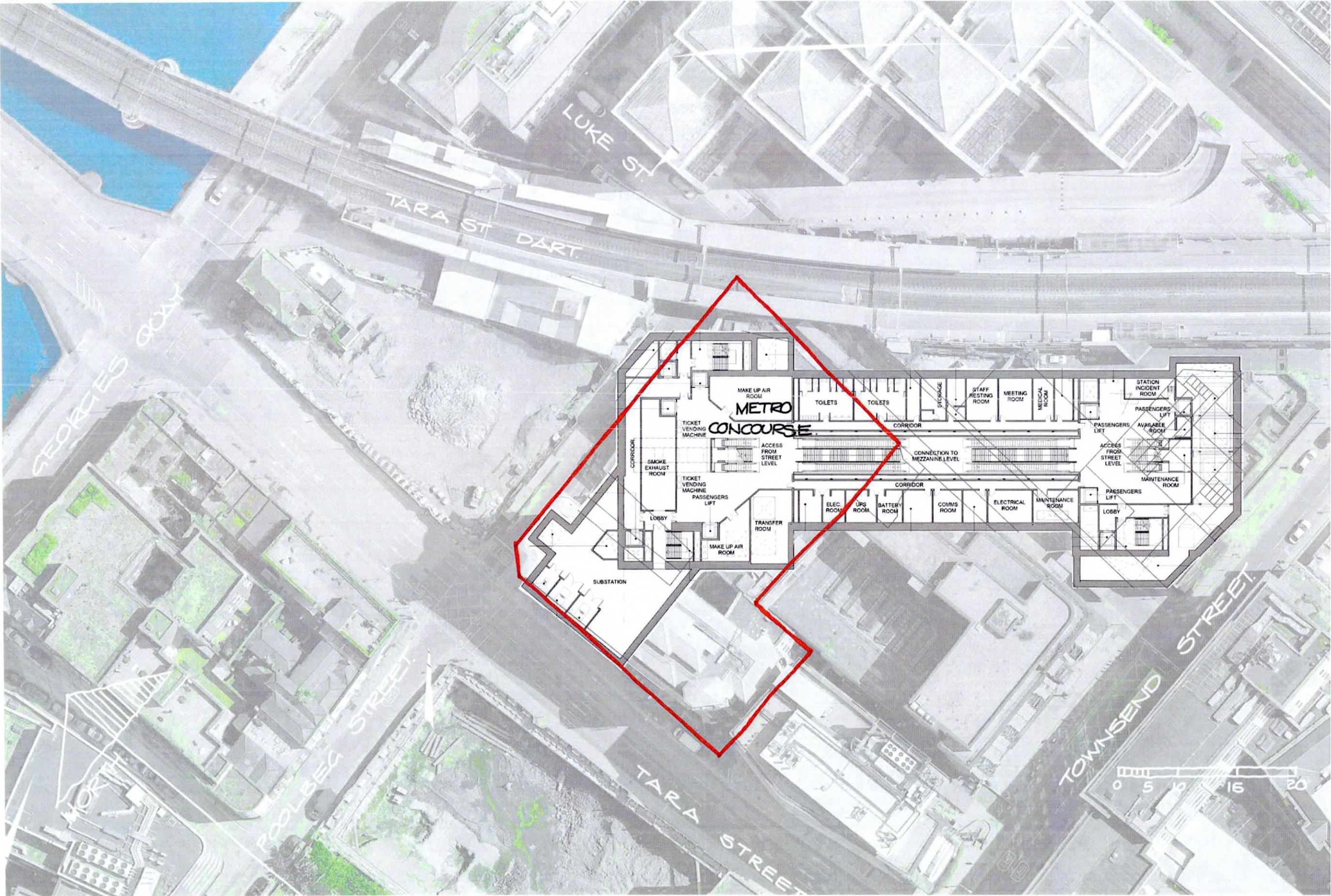
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UNDER CONSTRUCTION & PERMITTED DEVELOPMENT WITH PROPOSED METROLINK



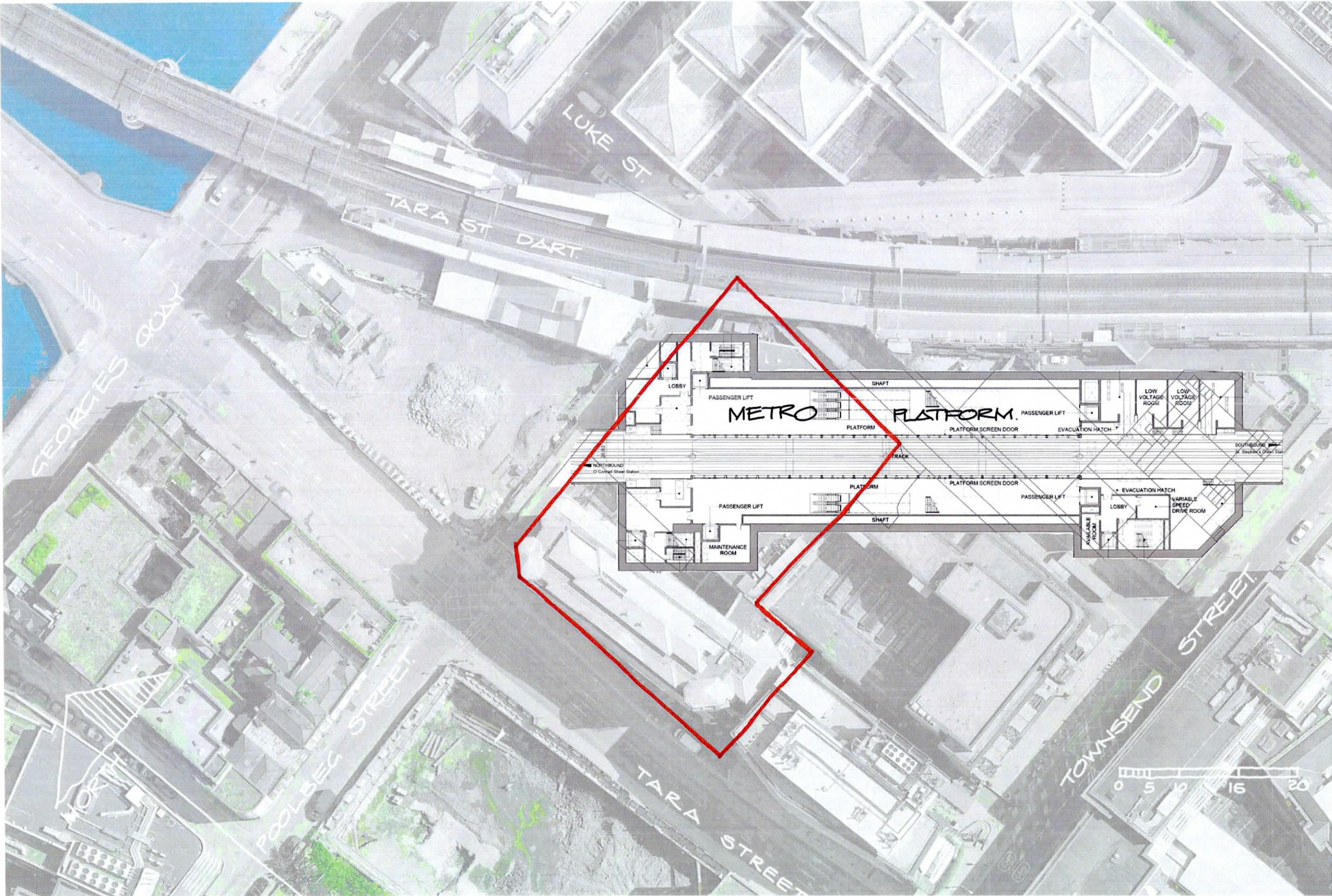
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PROPOSED METROLINK CONCOURSE WITH ASHFORD HOUSE SITE OUTLINE IN RED



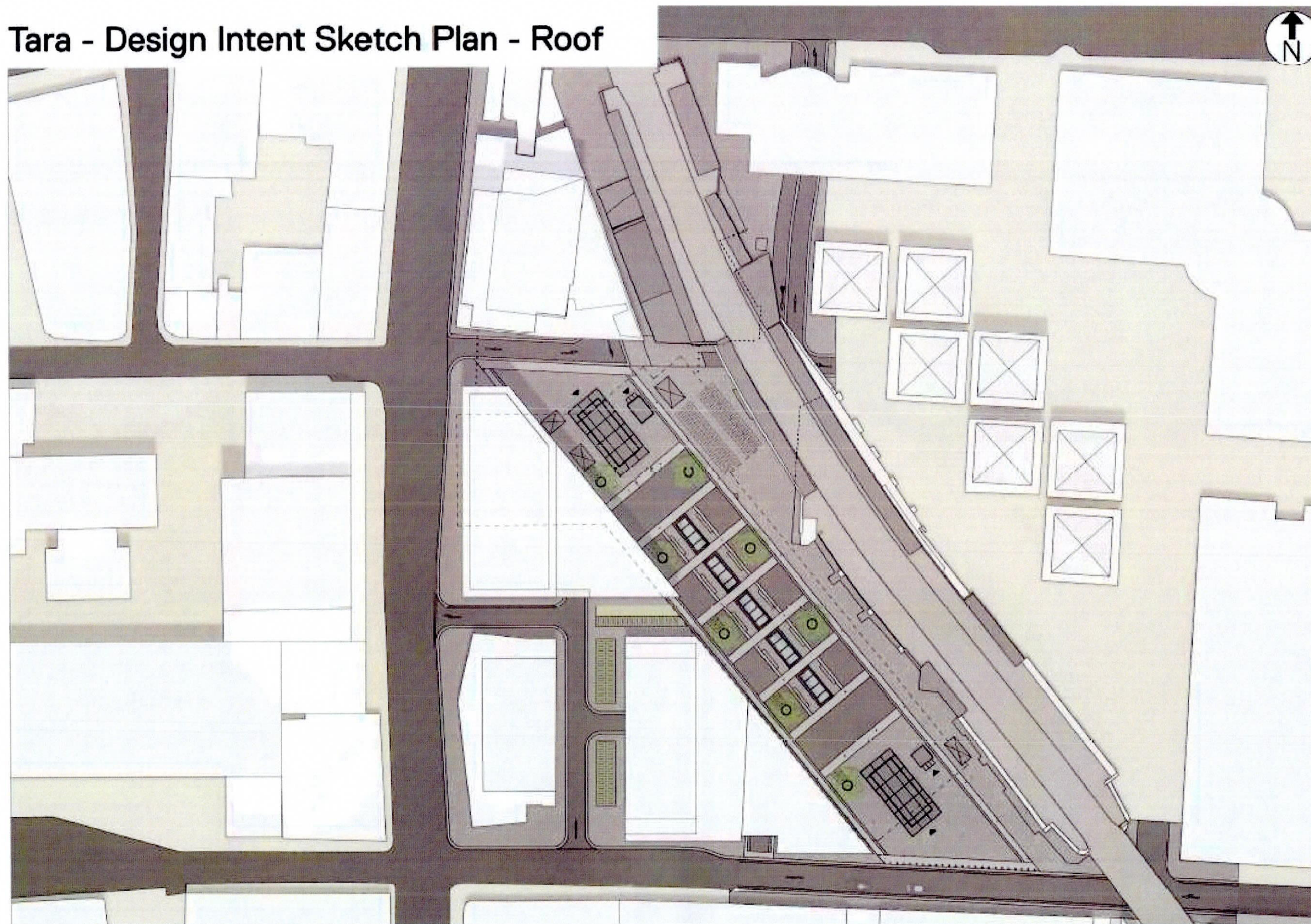
SITE CONTEXT

PROPOSED METROLINK PLATFORM WITH ASHFORD HOUSE SITE OUTLINE IN RED



CURRENT PROPOSAL

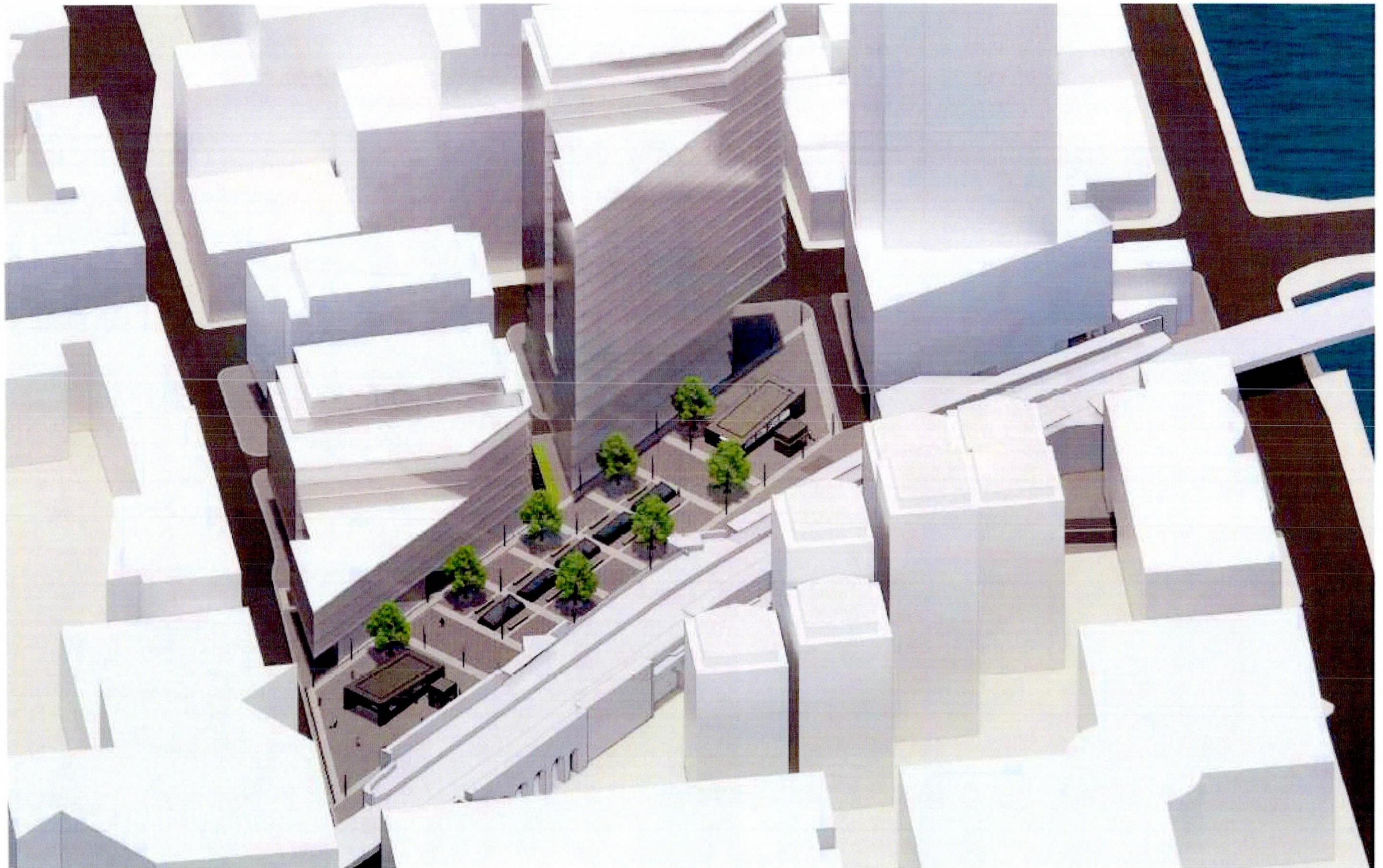
Tara - Design Intent Sketch Plan - Roof



CURRENT PROPOSAL

AERIAL VIEW

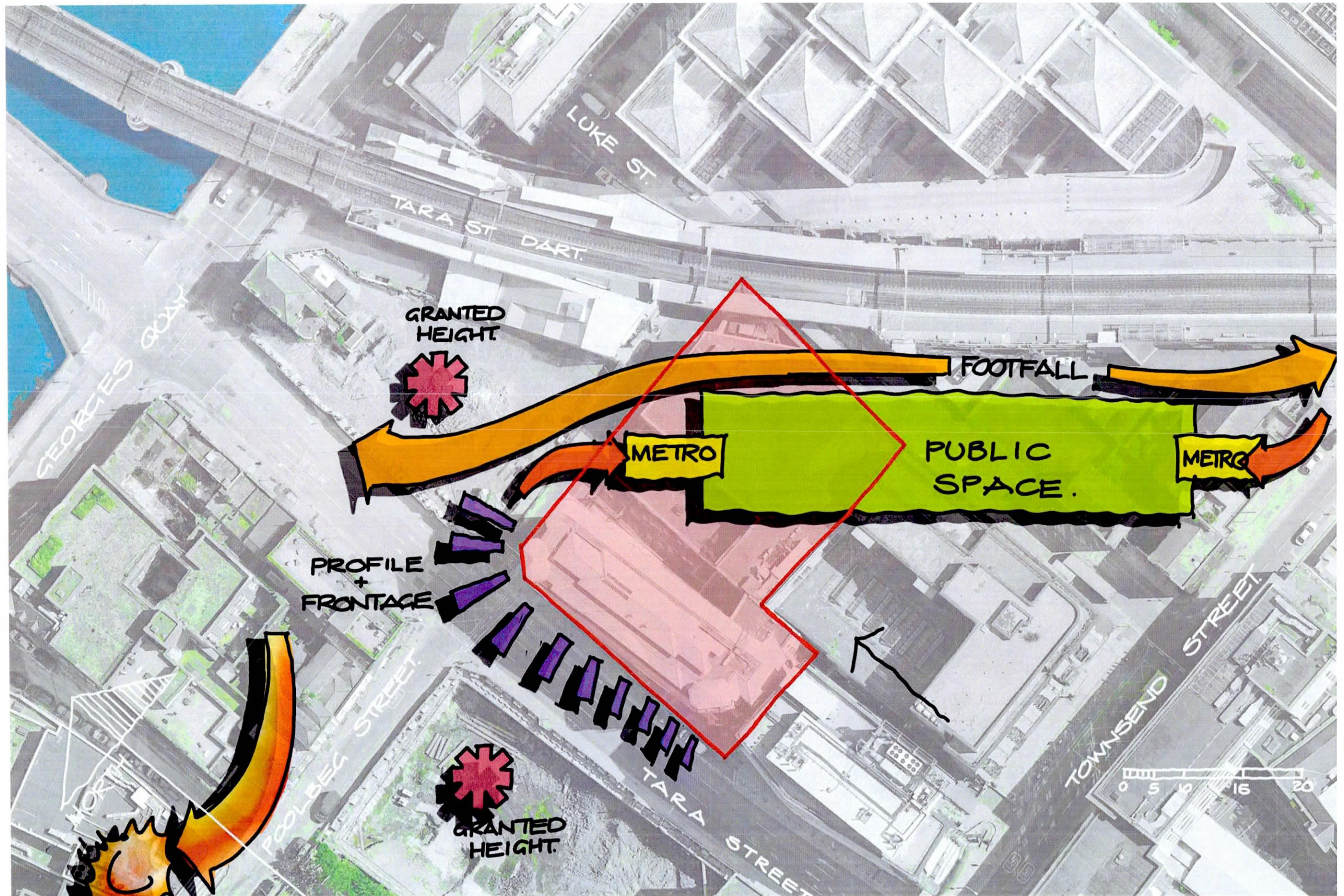
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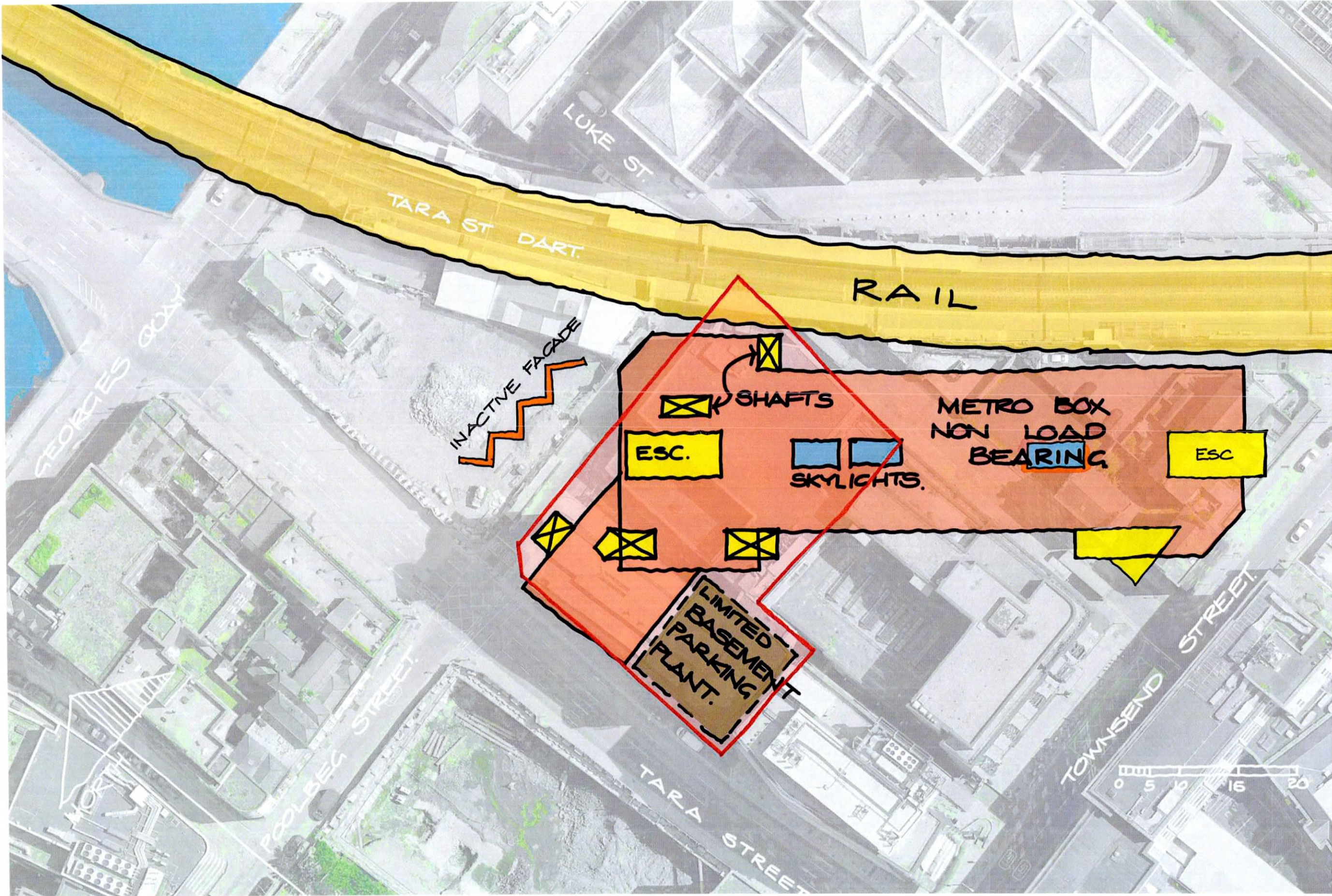


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ALTERNATIVE PROPOSAL

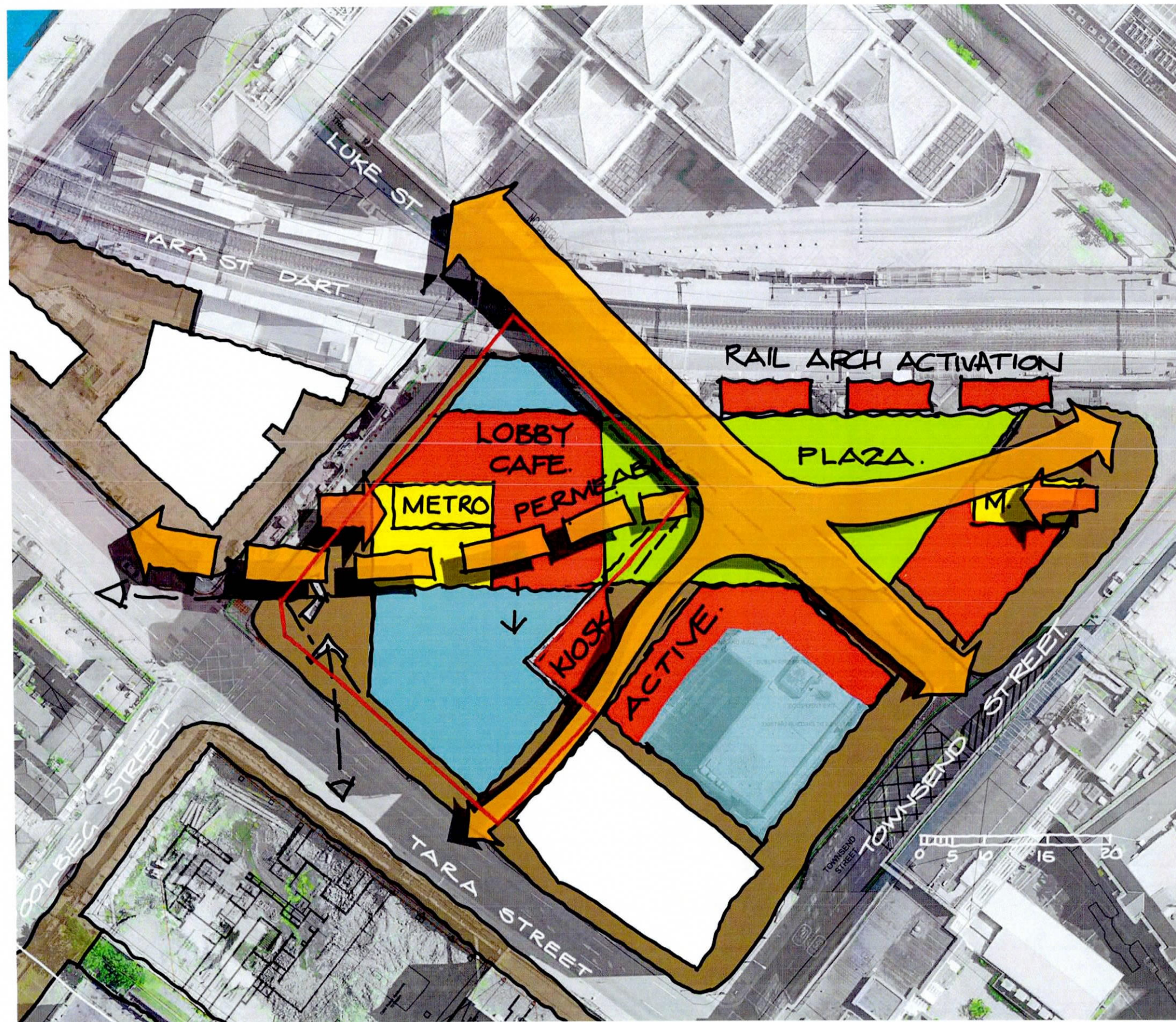




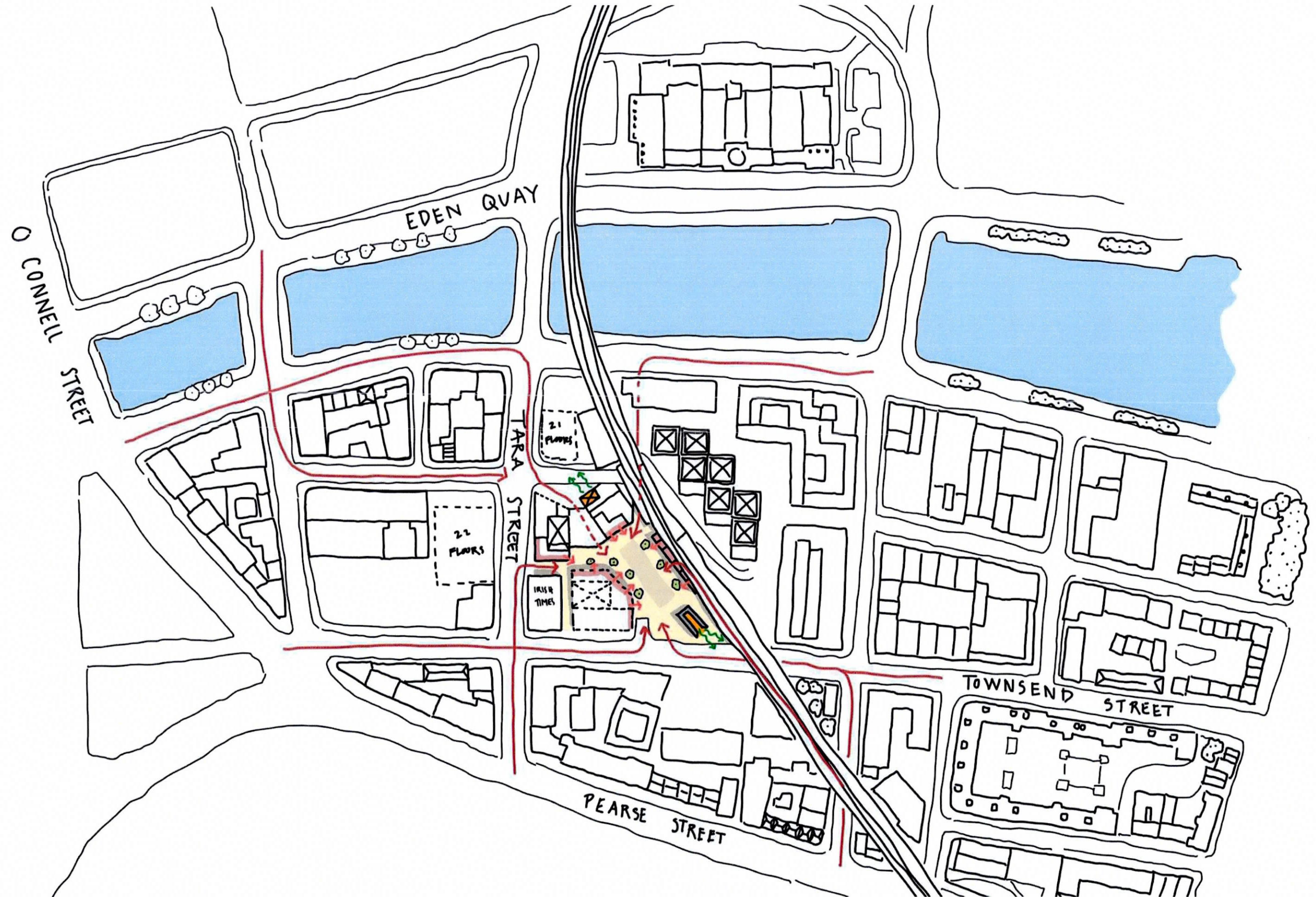
ALTERNATIVE PROPOSAL

PUBLIC REALM DIAGRAM

13



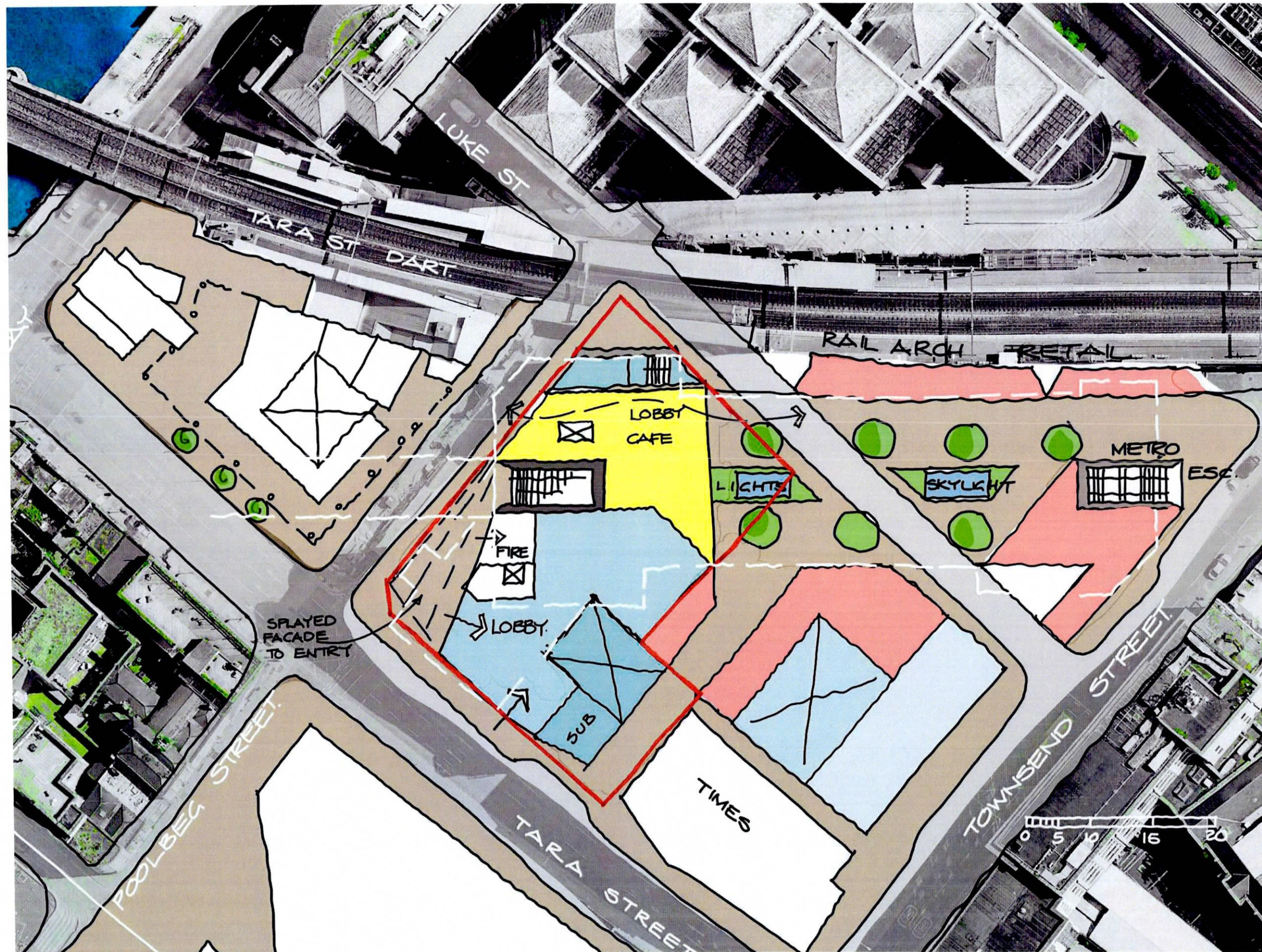
- OFFICE
- METRO
- RETAIL
- PLAZA
- PUBLICLY ACCESSIBLE ROUTES



ALTERNATIVE PROPOSAL

GROUND FLOOR PLAN

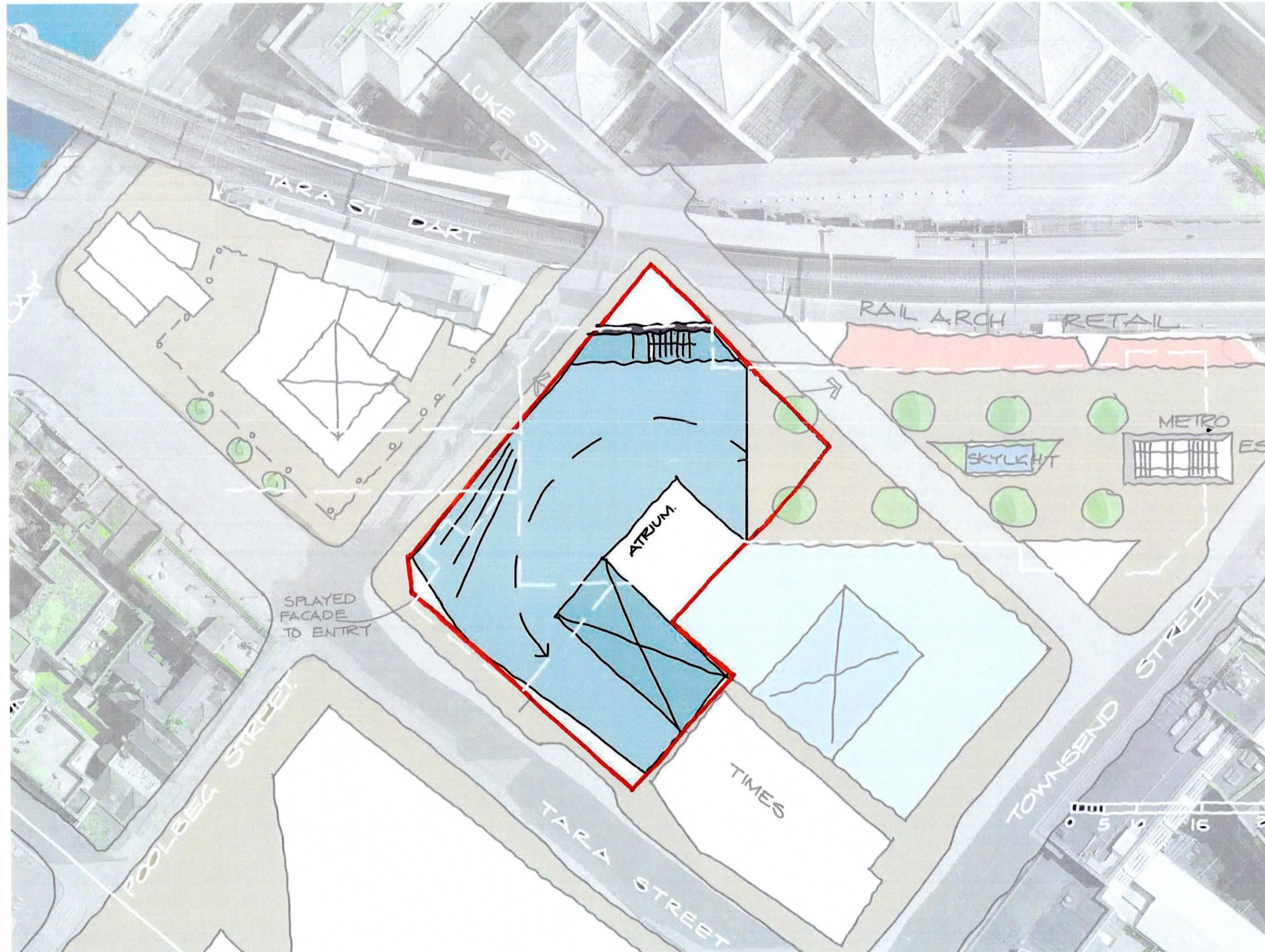
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ALTERNATIVE PROPOSAL

TYPICAL FLOOR PLAN

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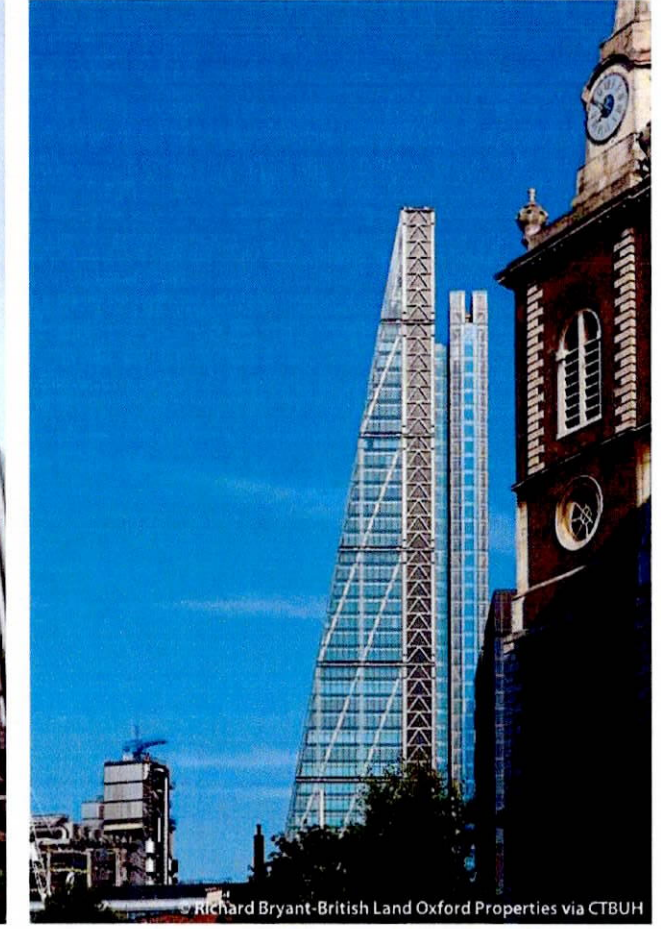
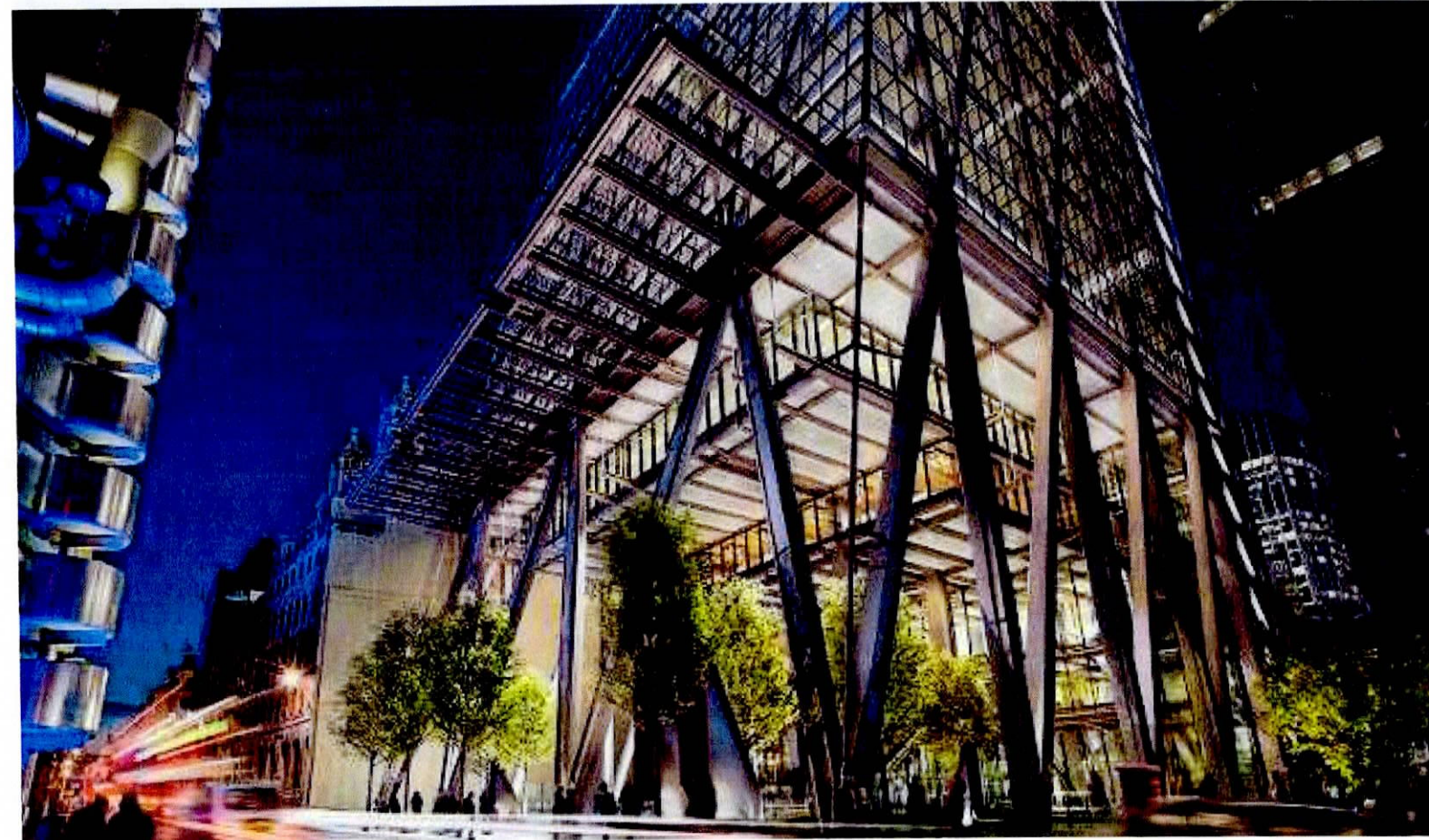
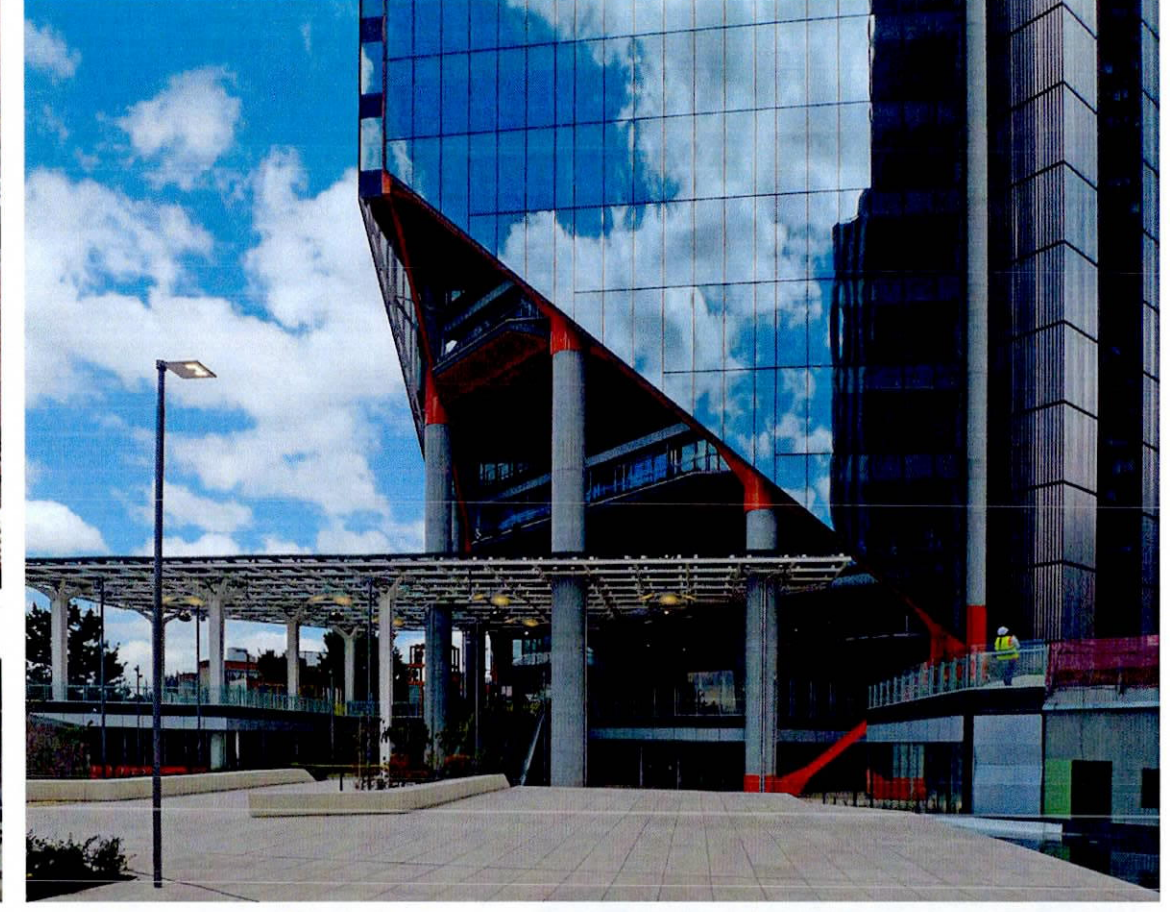
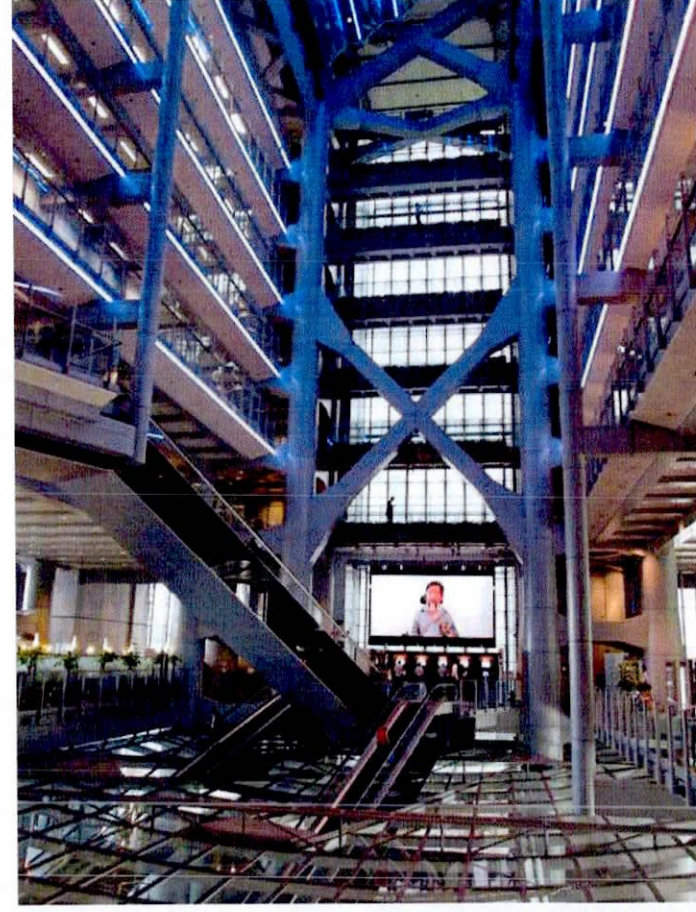
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ALTERNATIVE PROPOSAL

PRECEDENTS

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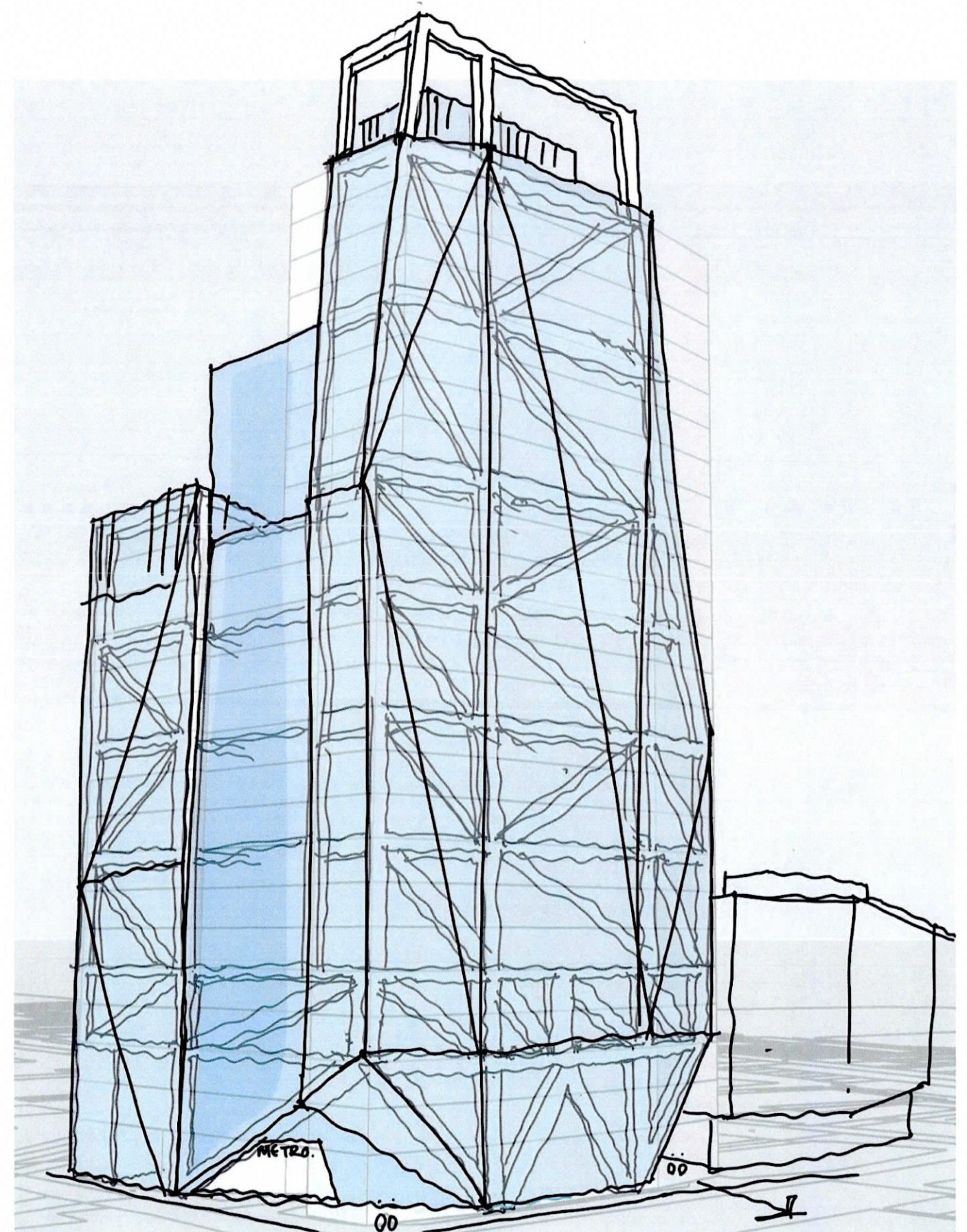
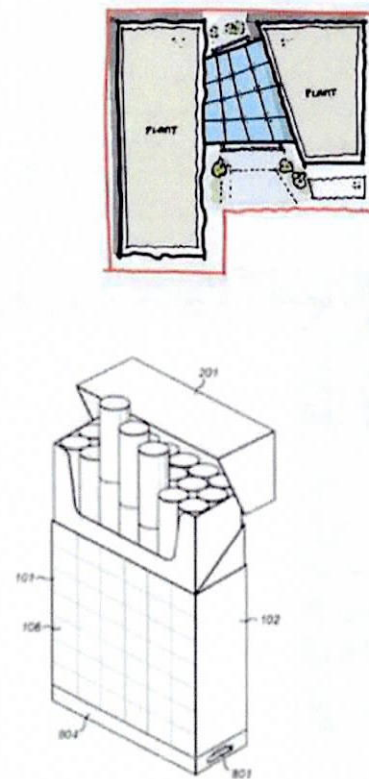
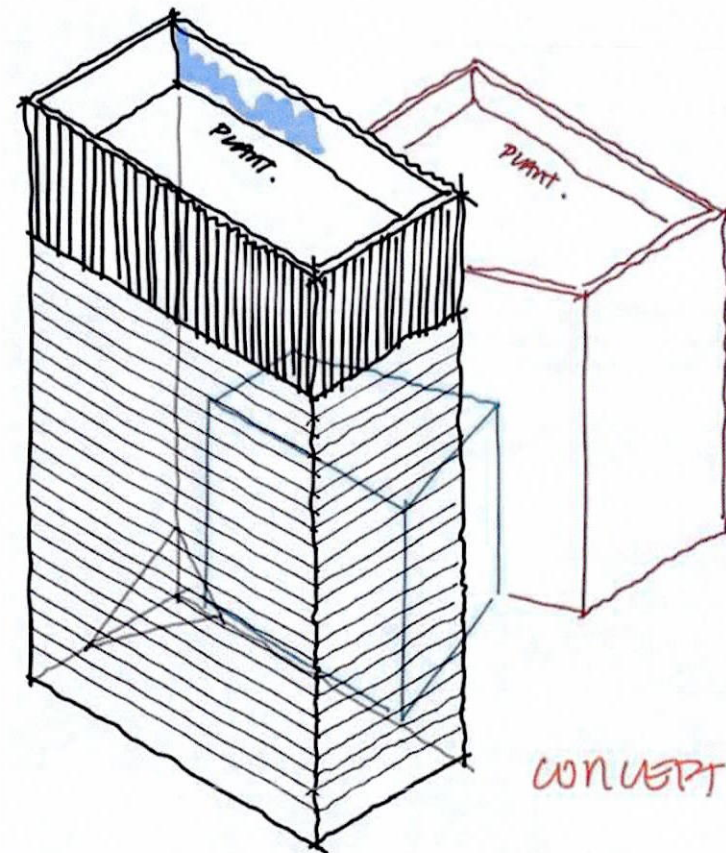
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ALTERNATIVE PROPOSAL

3D CONCEPT

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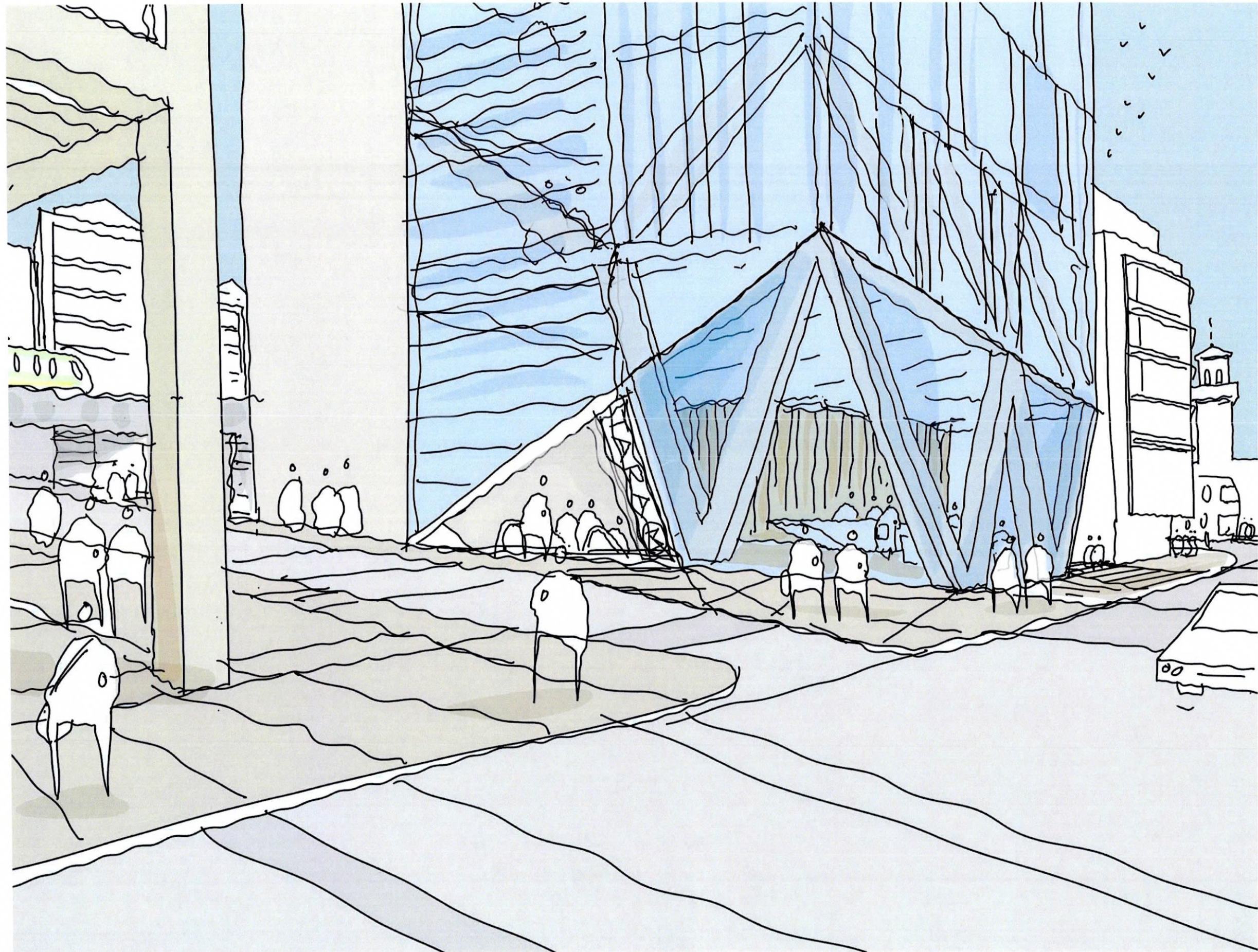
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ALTERNATIVE PROPOSAL

POOLBEG STREET ENTRANCE SKETCH

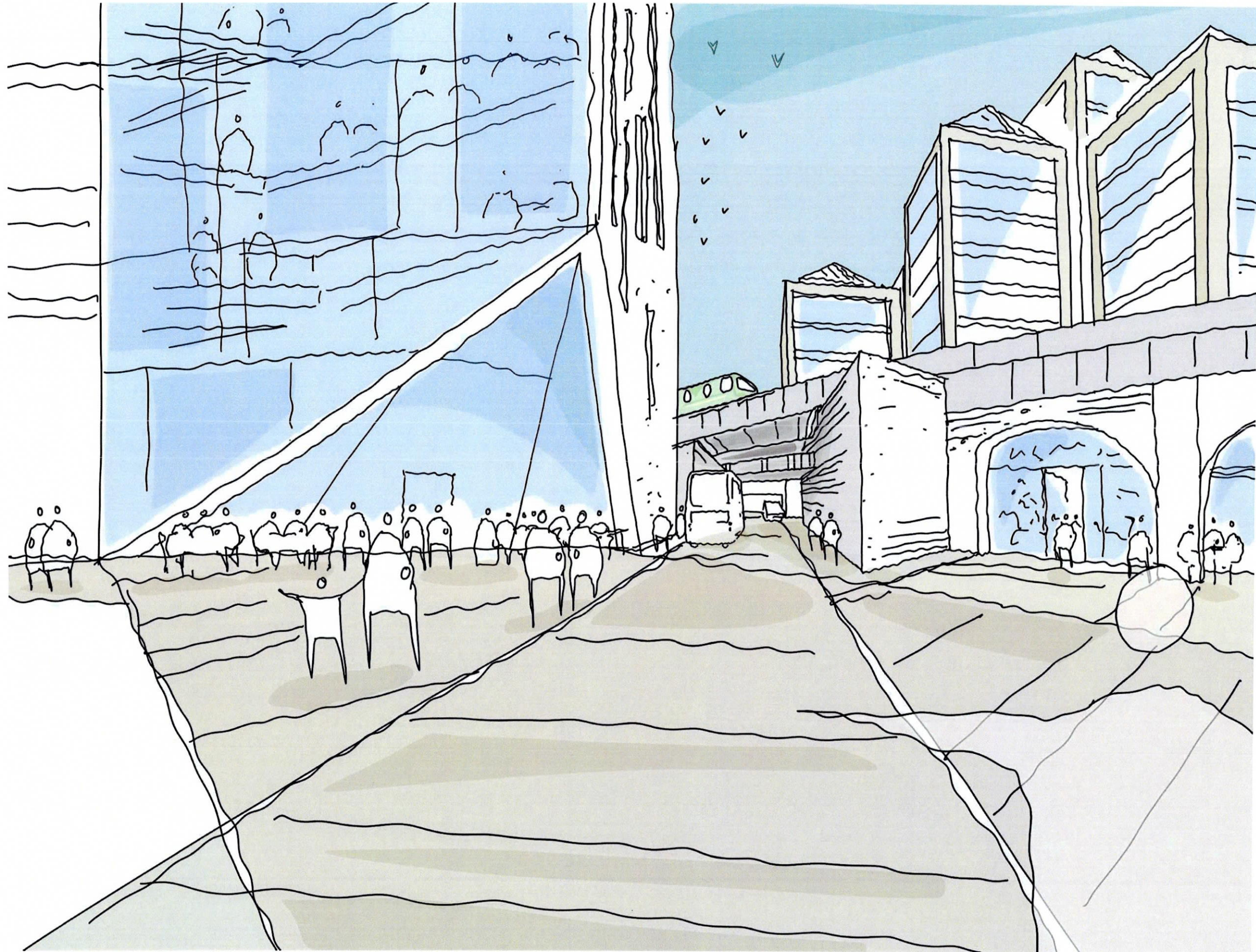
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ALTERNATIVE PROPOSAL

LUKE STREET ENTRANCE SKETCH

20



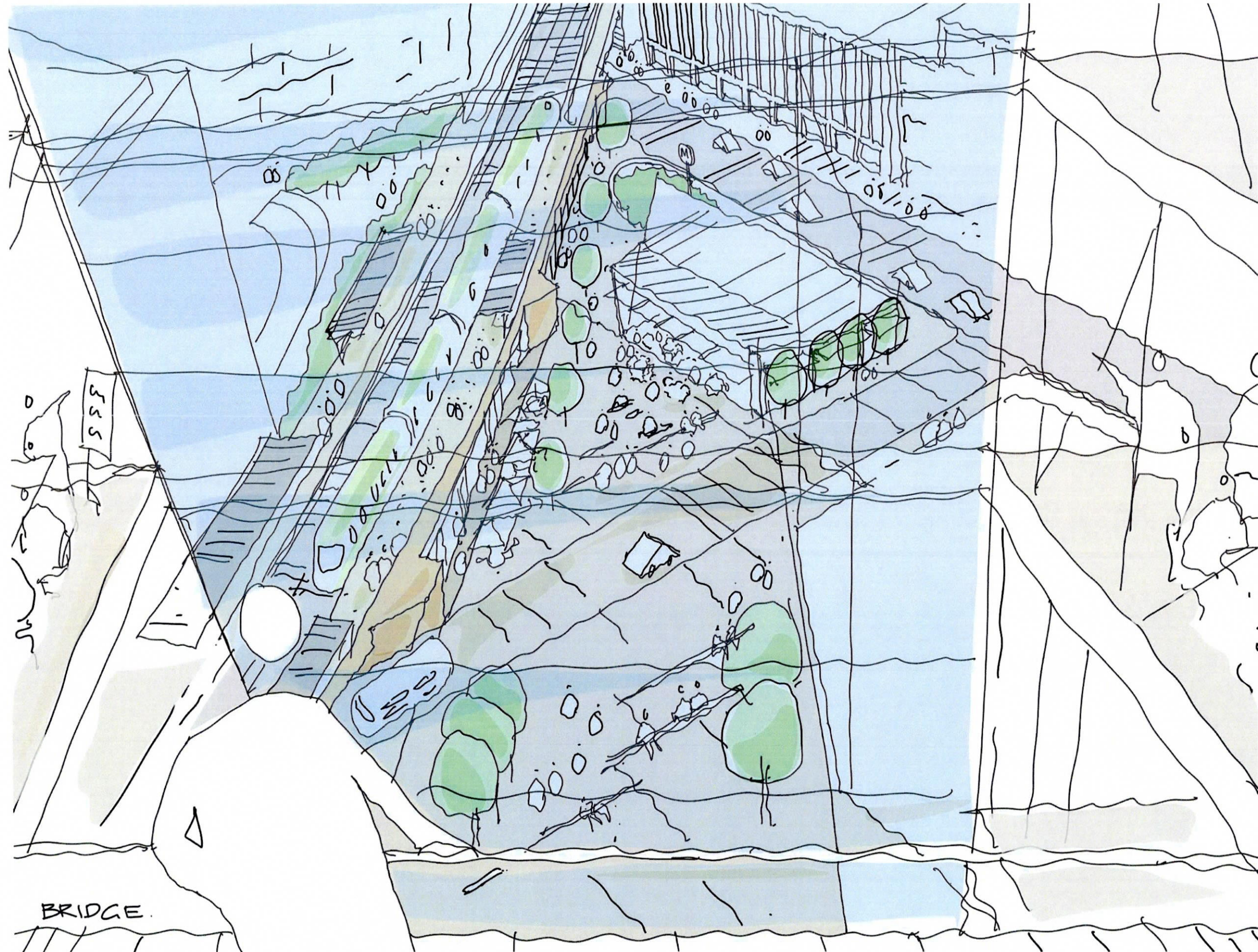
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ALTERNATIVE PROPOSAL

VIEW OF PLAZA FROM ATRIUM BRIDGE

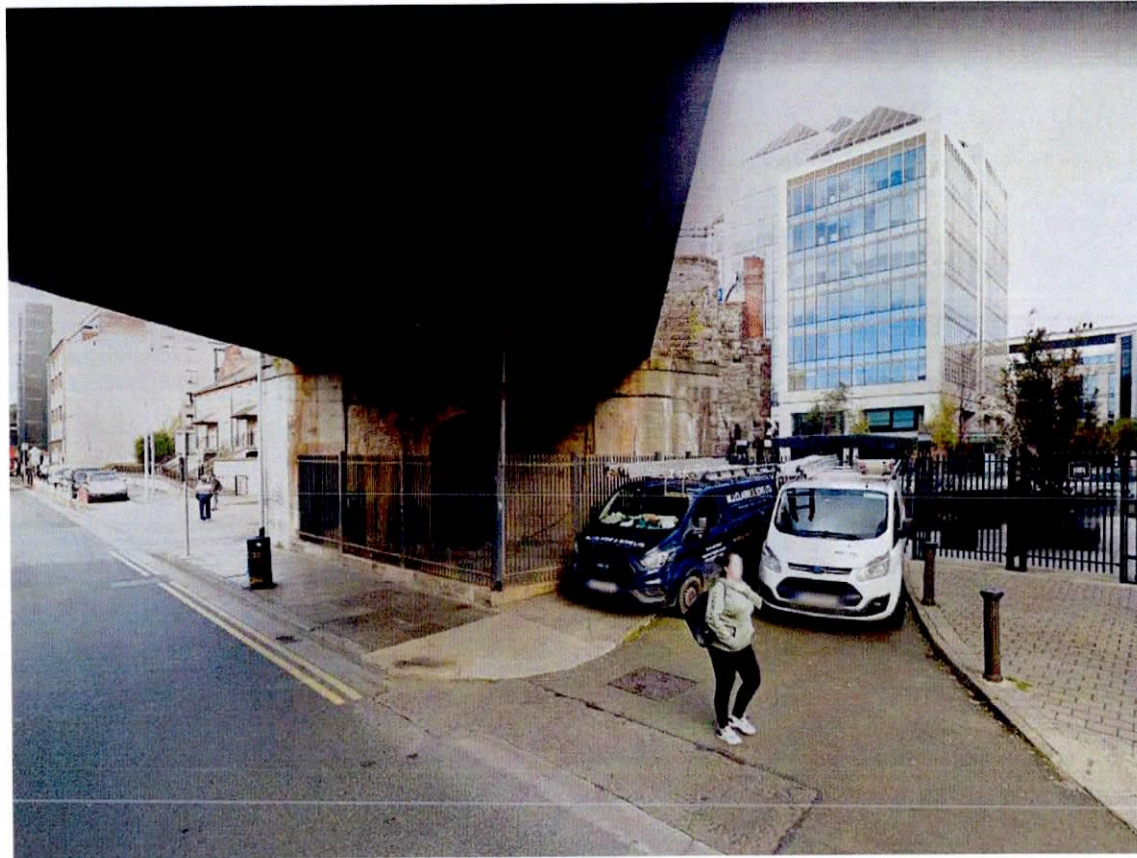
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ALTERNATIVE PROPOSAL

TARA STREET/KING'S CROSS COMPARISON

22



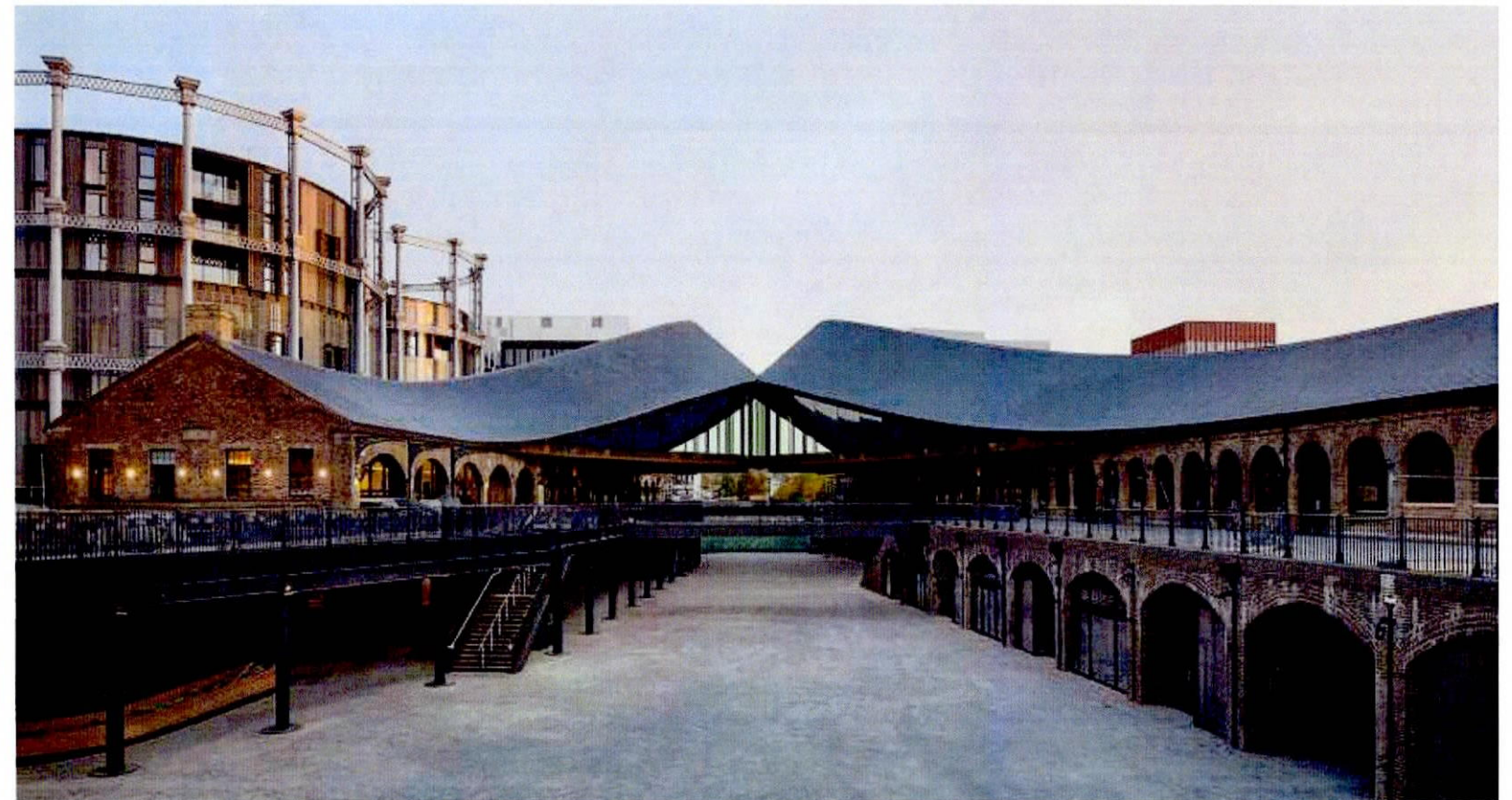
TOWNSEND STREET



TOWNSEND STREET



KING'S CROSS



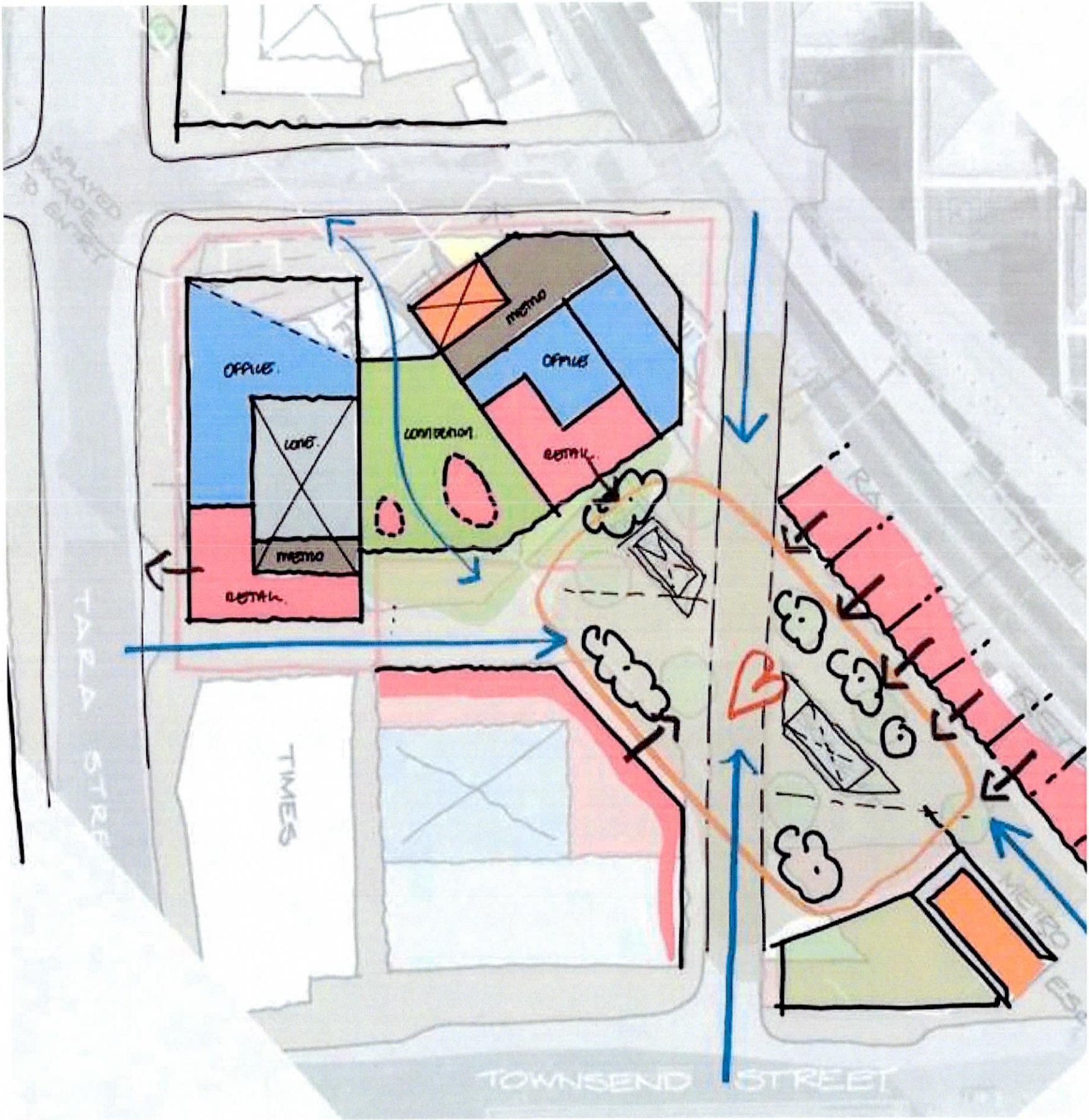
KING'S CROSS

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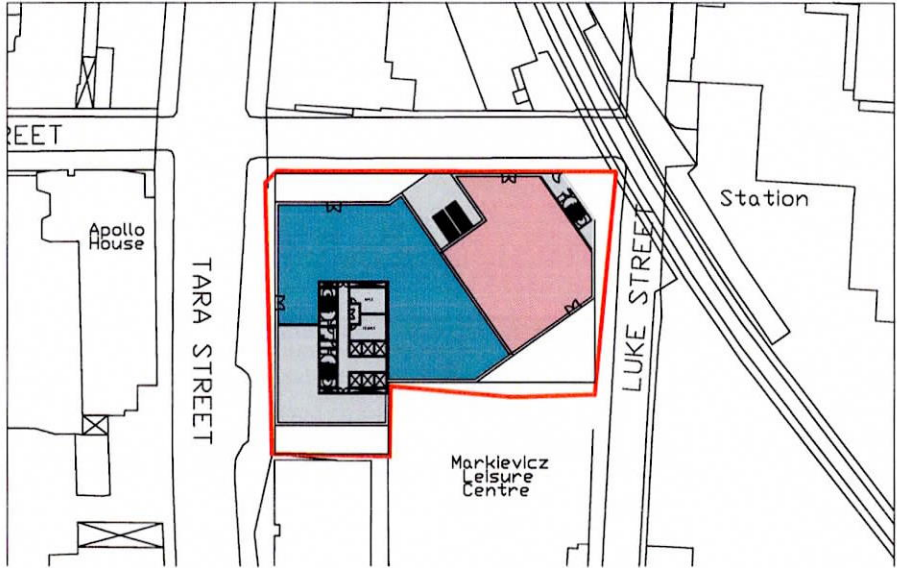
ALTERNATIVE PROPOSAL

FLOOR PLANS

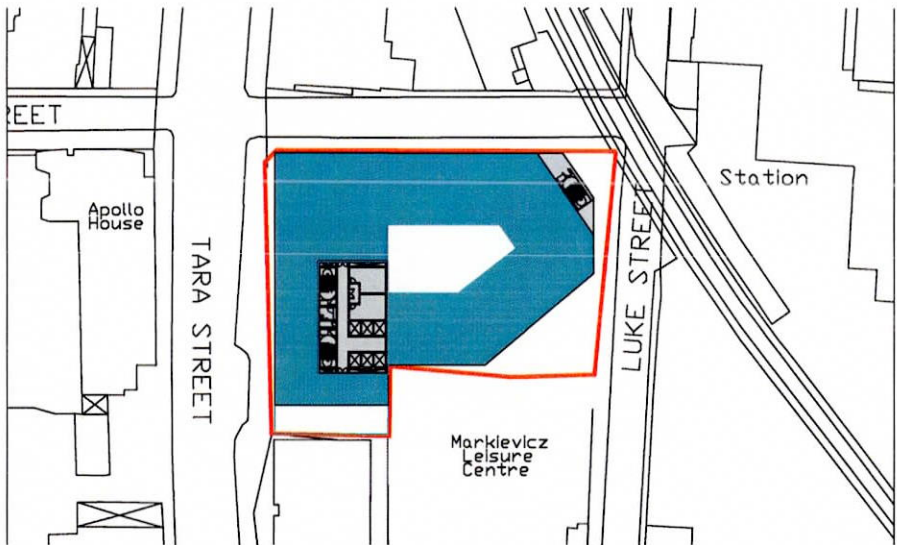


GROUND FLOOR CONCEPT

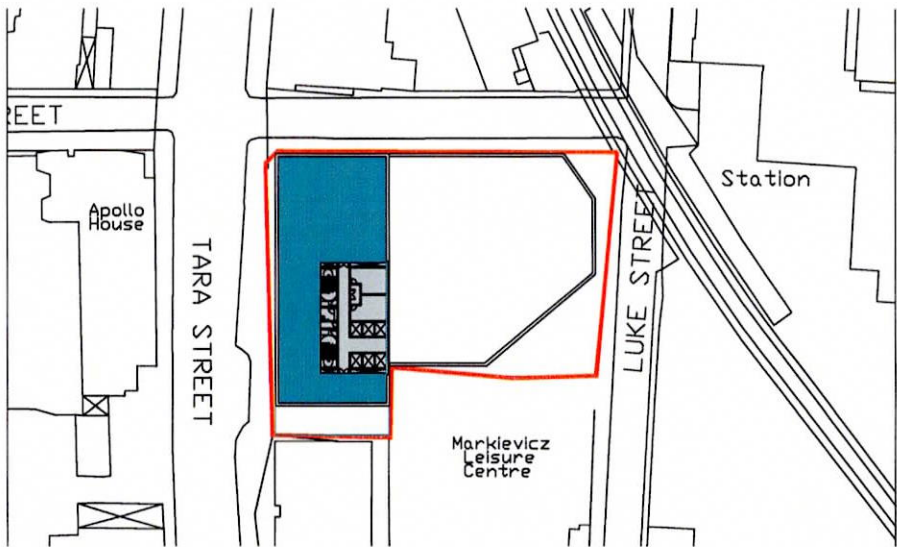
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GROUND FLOOR PLAN

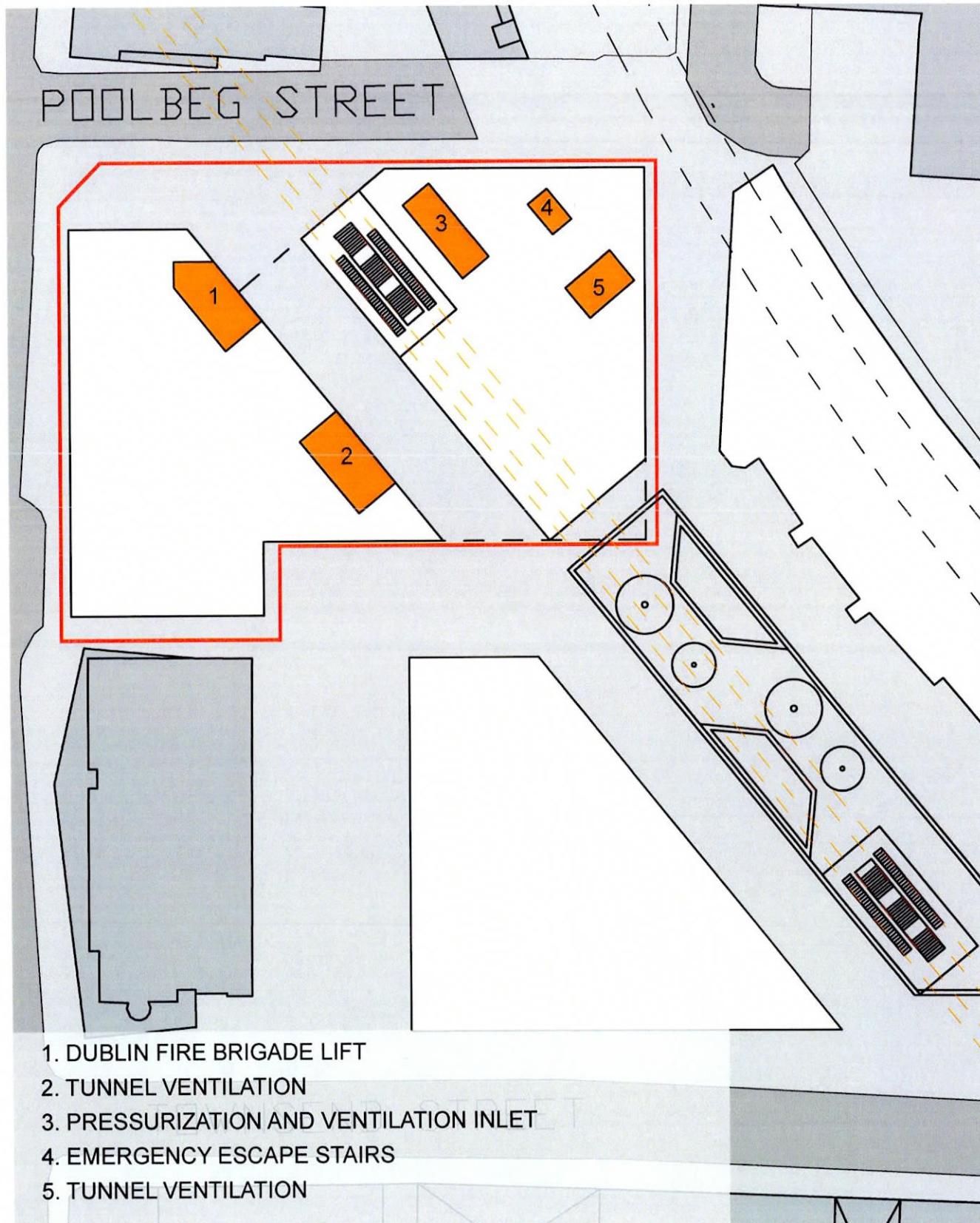


TYPICAL FLOOR PLAN

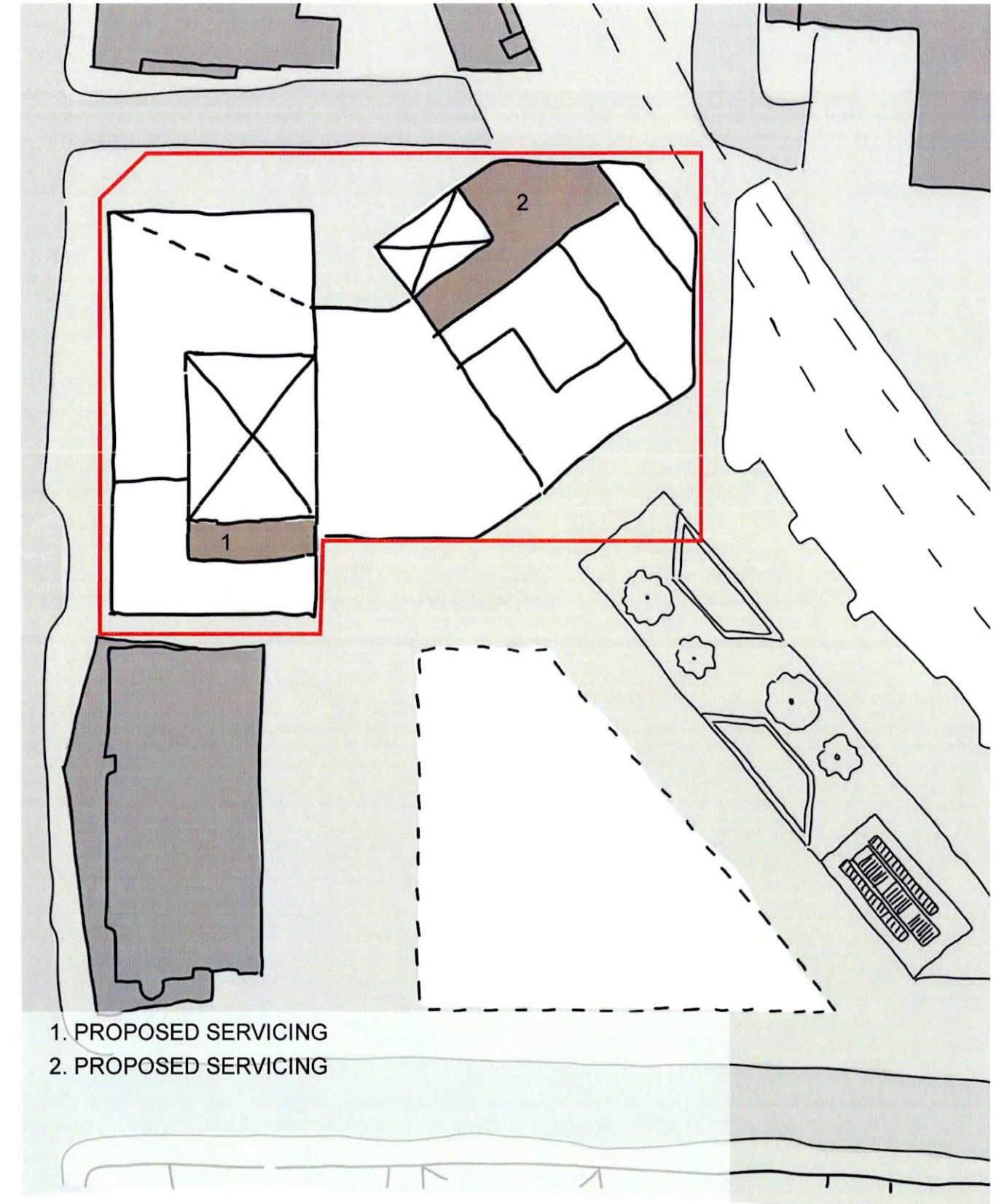


TOWER FLOOR PLAN

SERVICING ALLOCATION - EXISTING



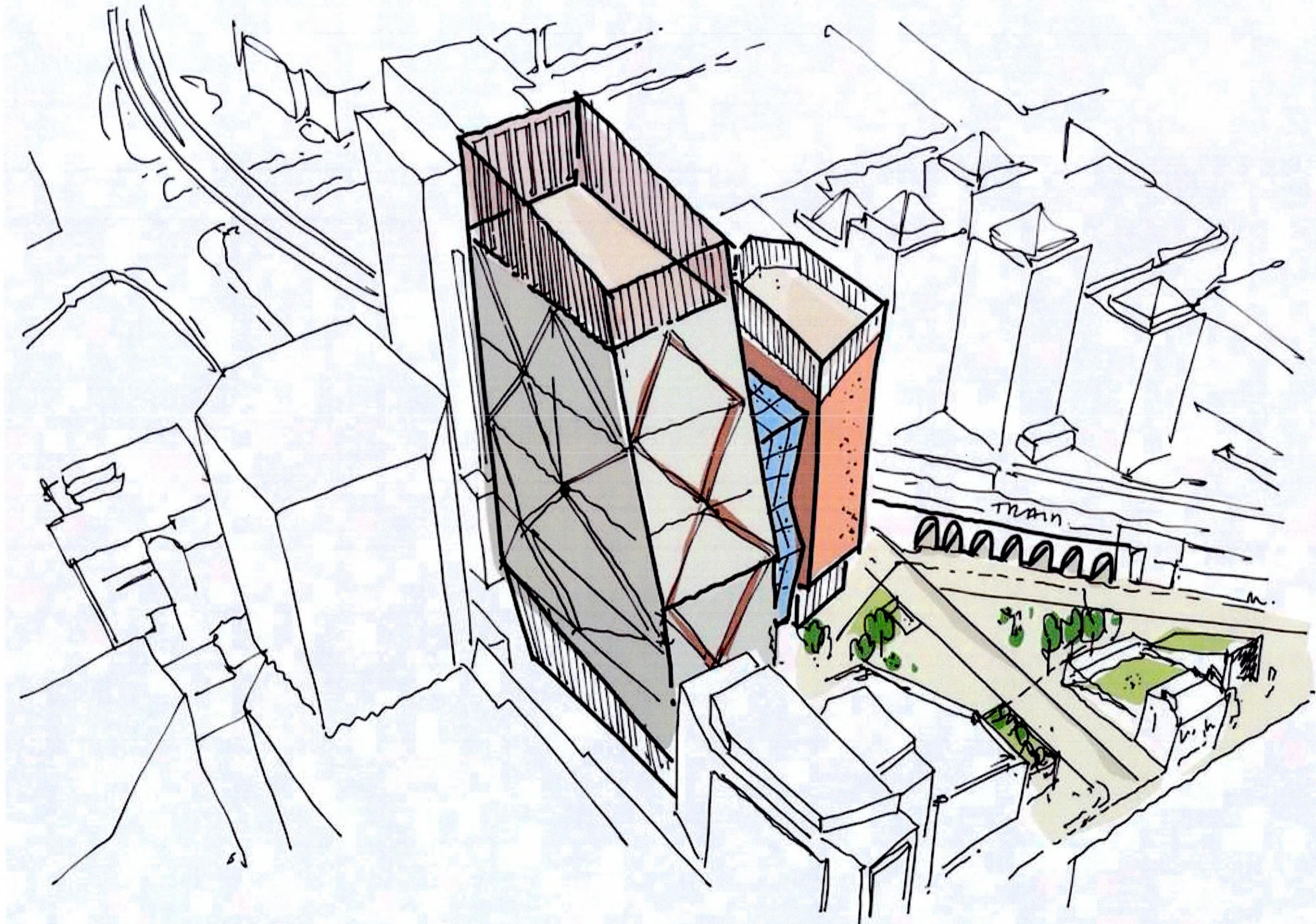
SERVICING ALLOCATION - PROPOSED



ALTERNATIVE PROPOSAL

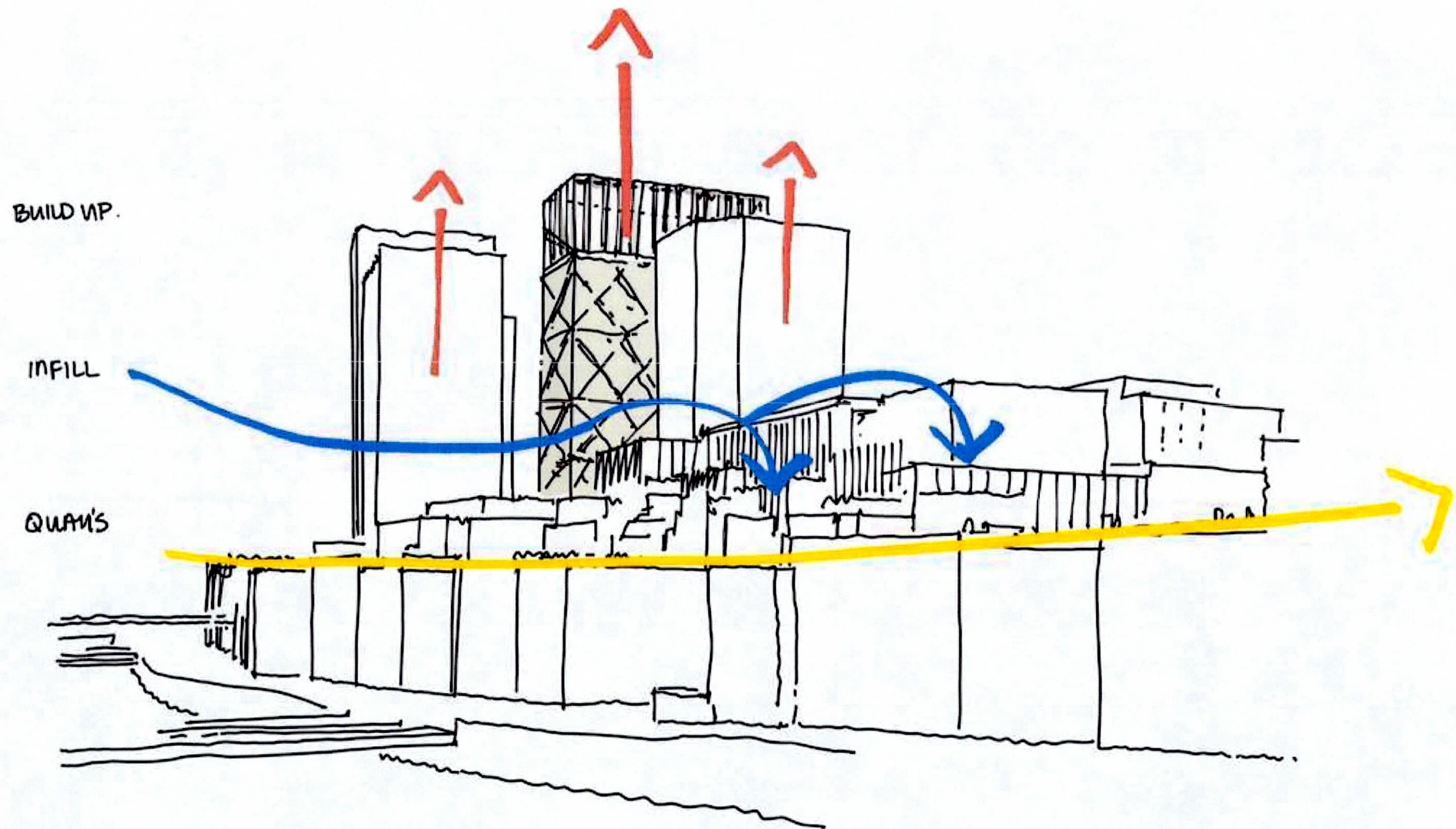
AERIAL VIEW

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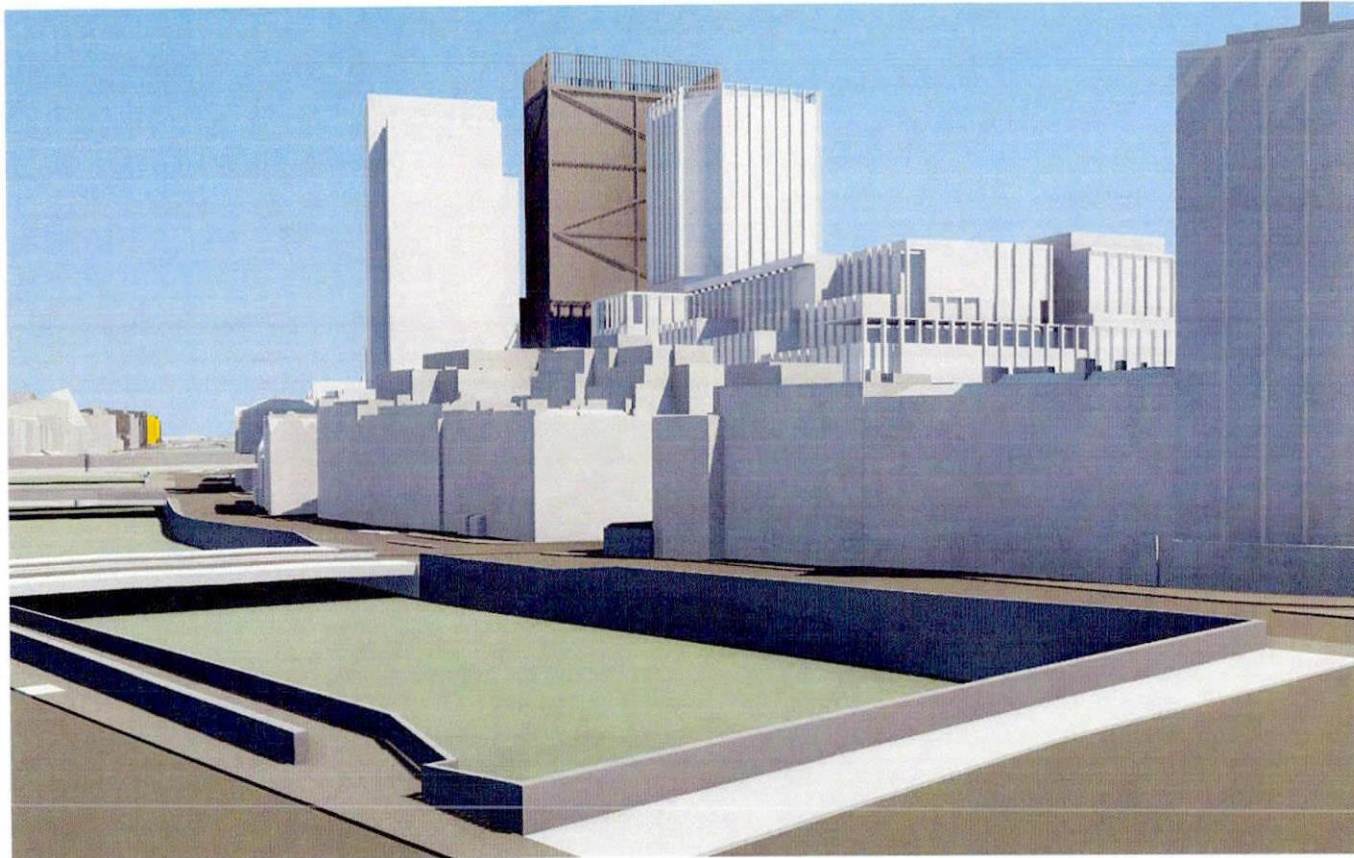
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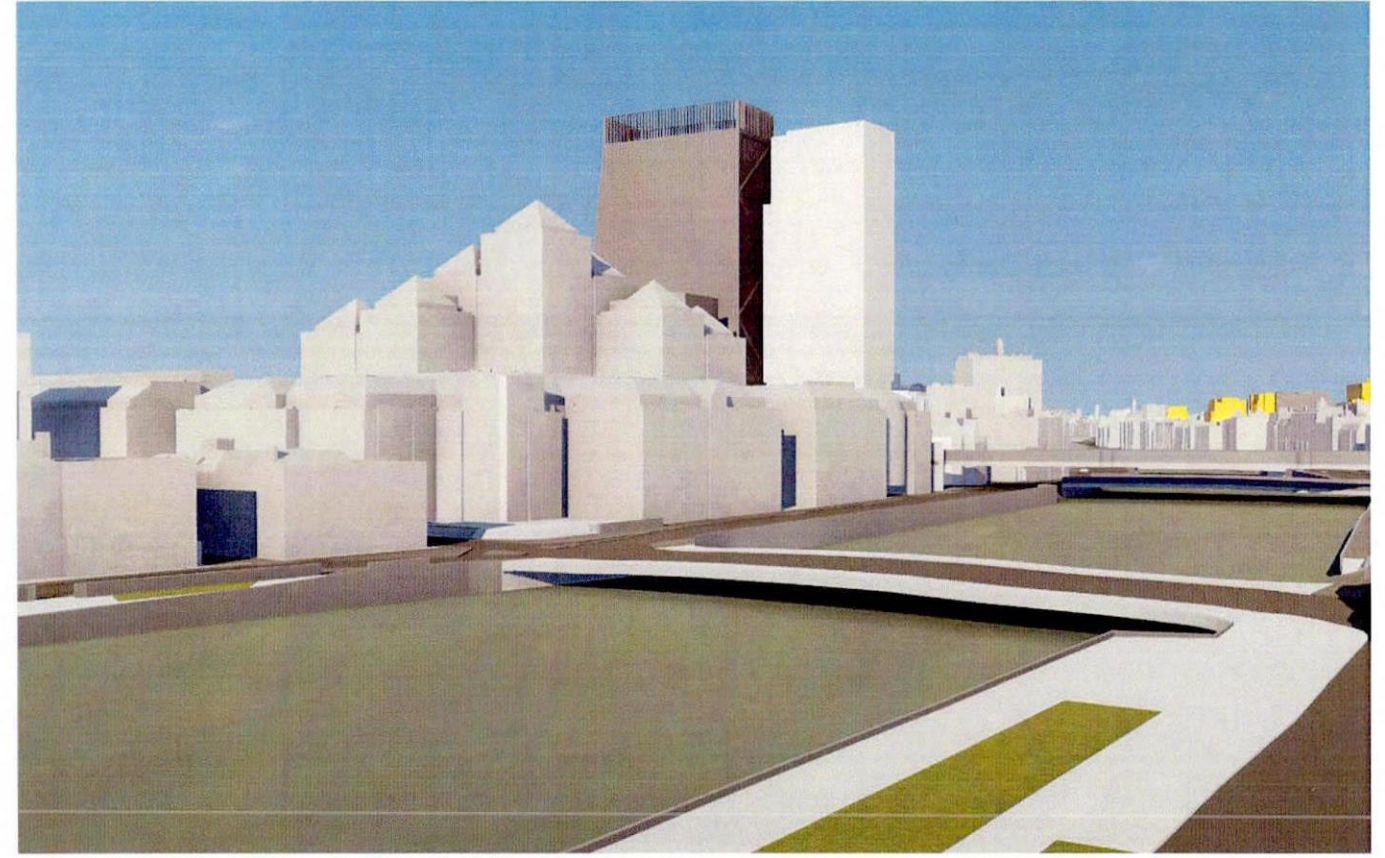
ALTERNATIVE PROPSAL

STREET VIEWS

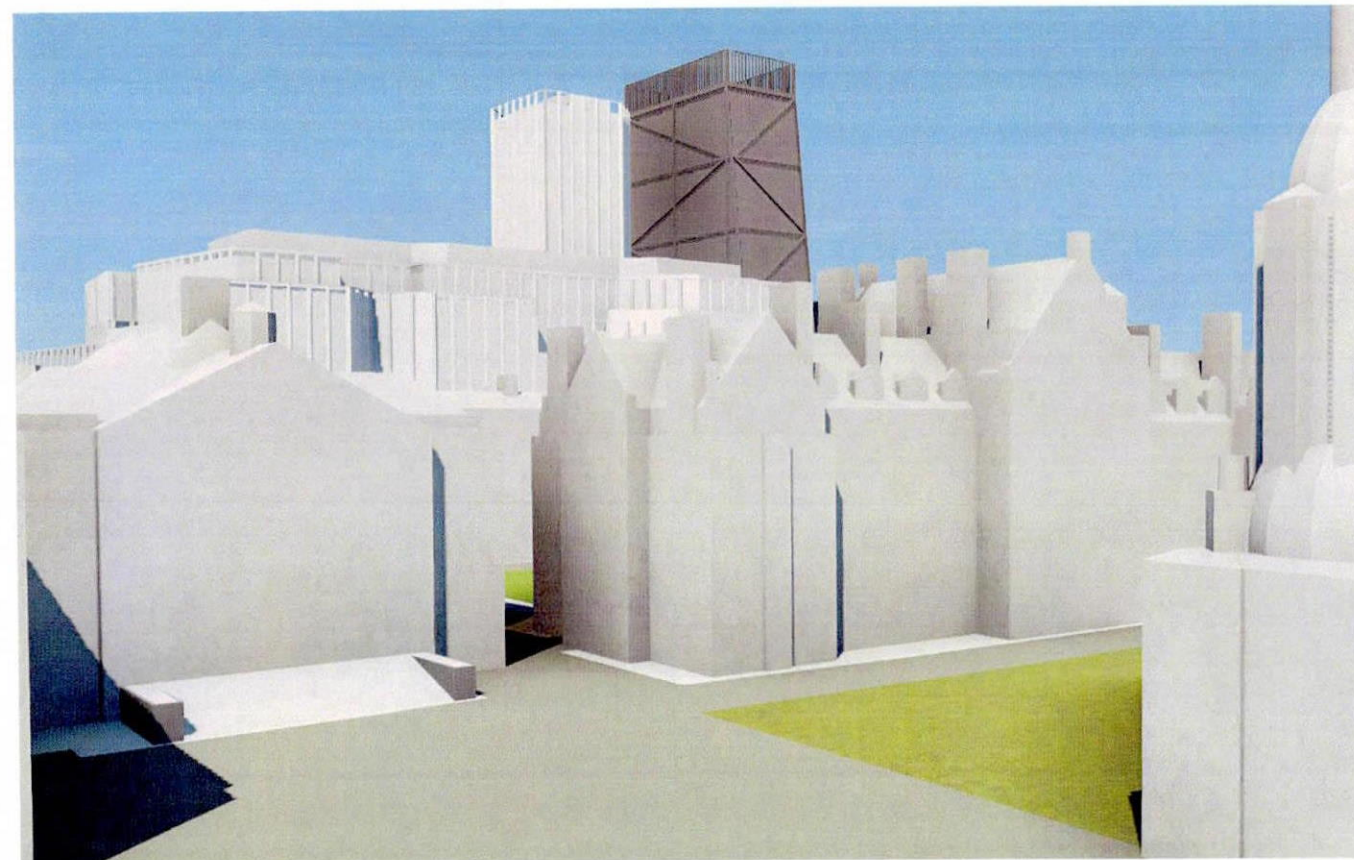
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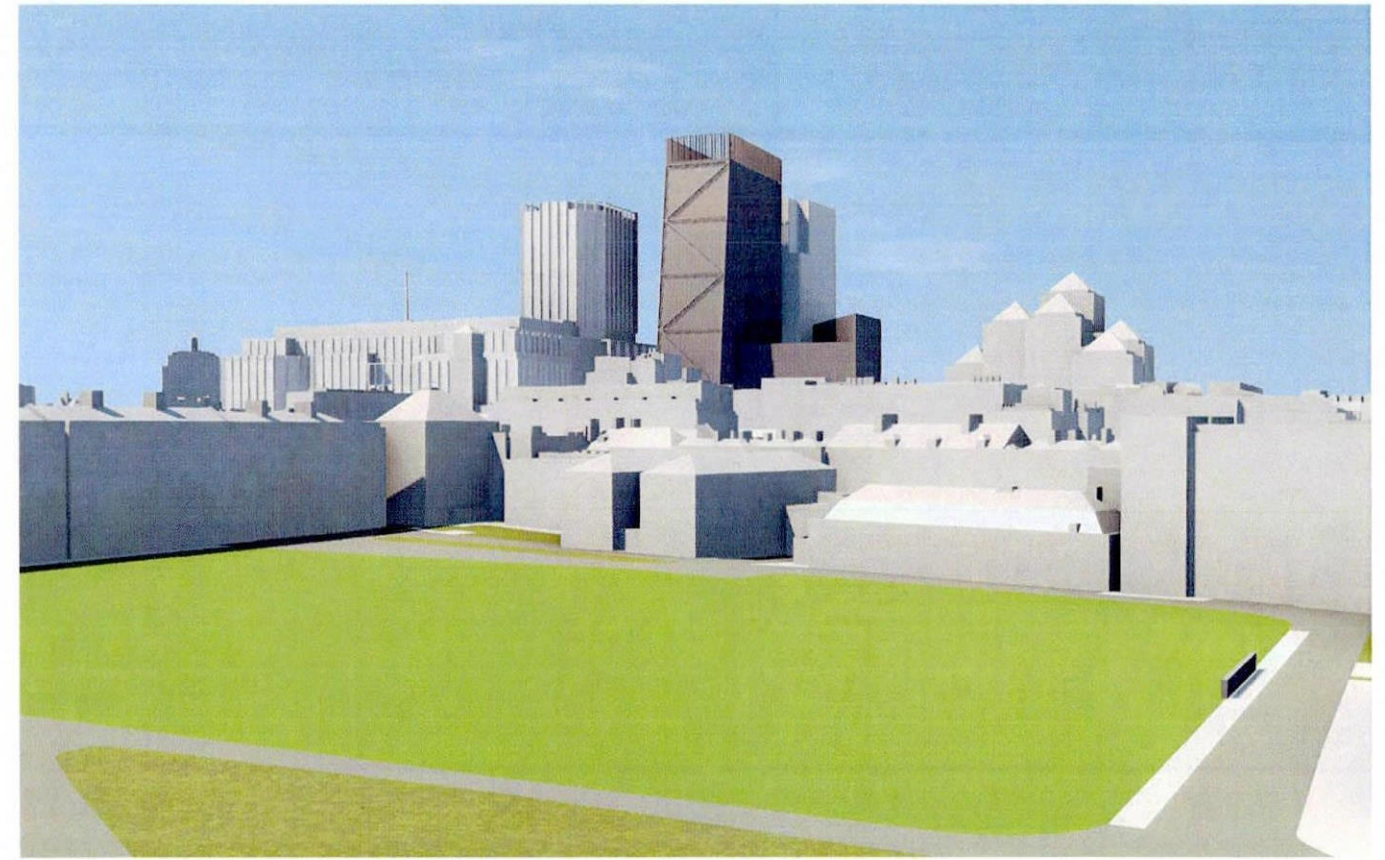
VIEW FROM O'CONNELL BRIDGE



VIEW FROM CUSTOM HOUSE QUAY



VIEW FROM TRINITY COLLEGE



VIEW FROM TRINITY COLLEGE

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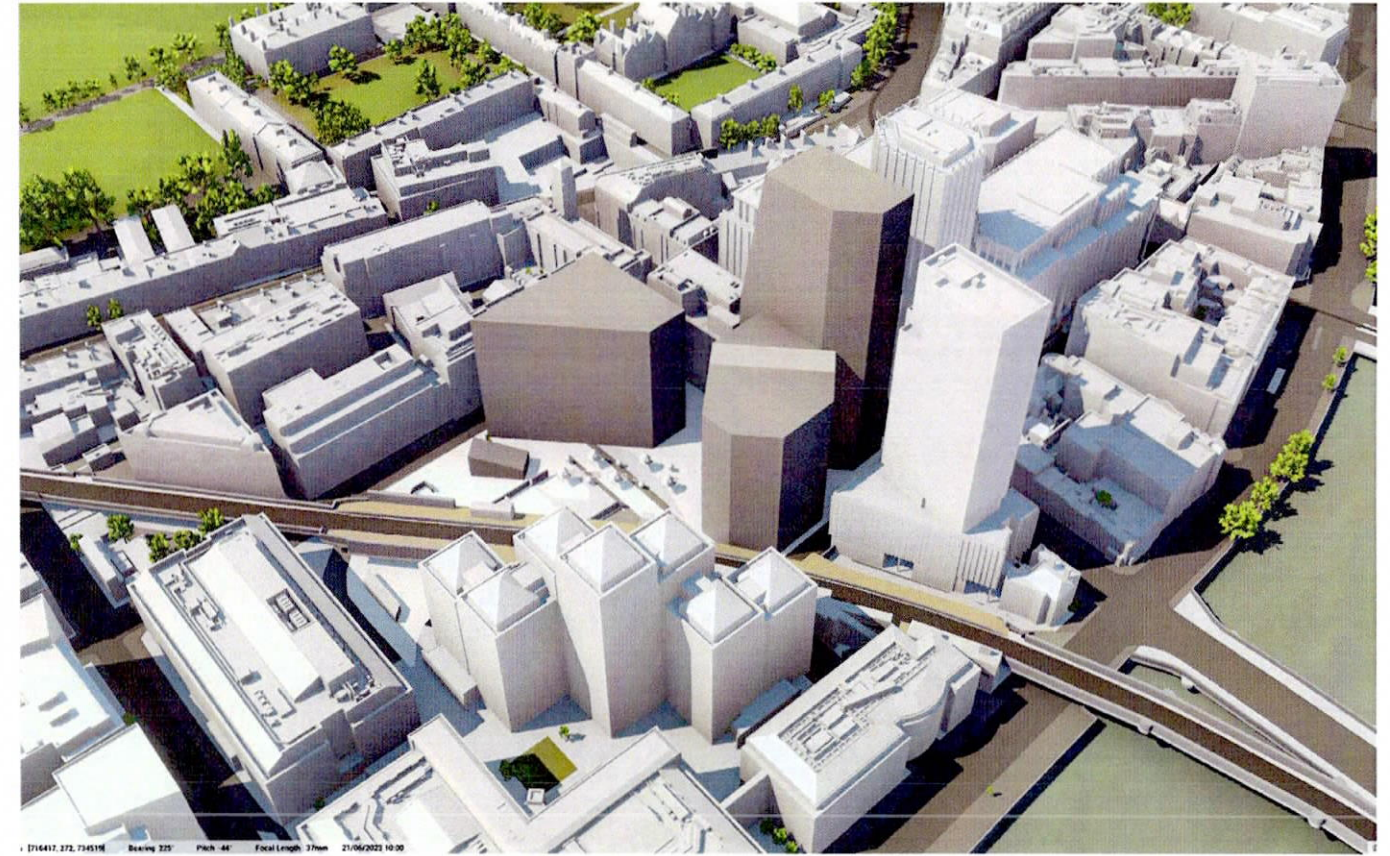
ALTERNATIVE PROPOSAL

AERIAL VIEWS

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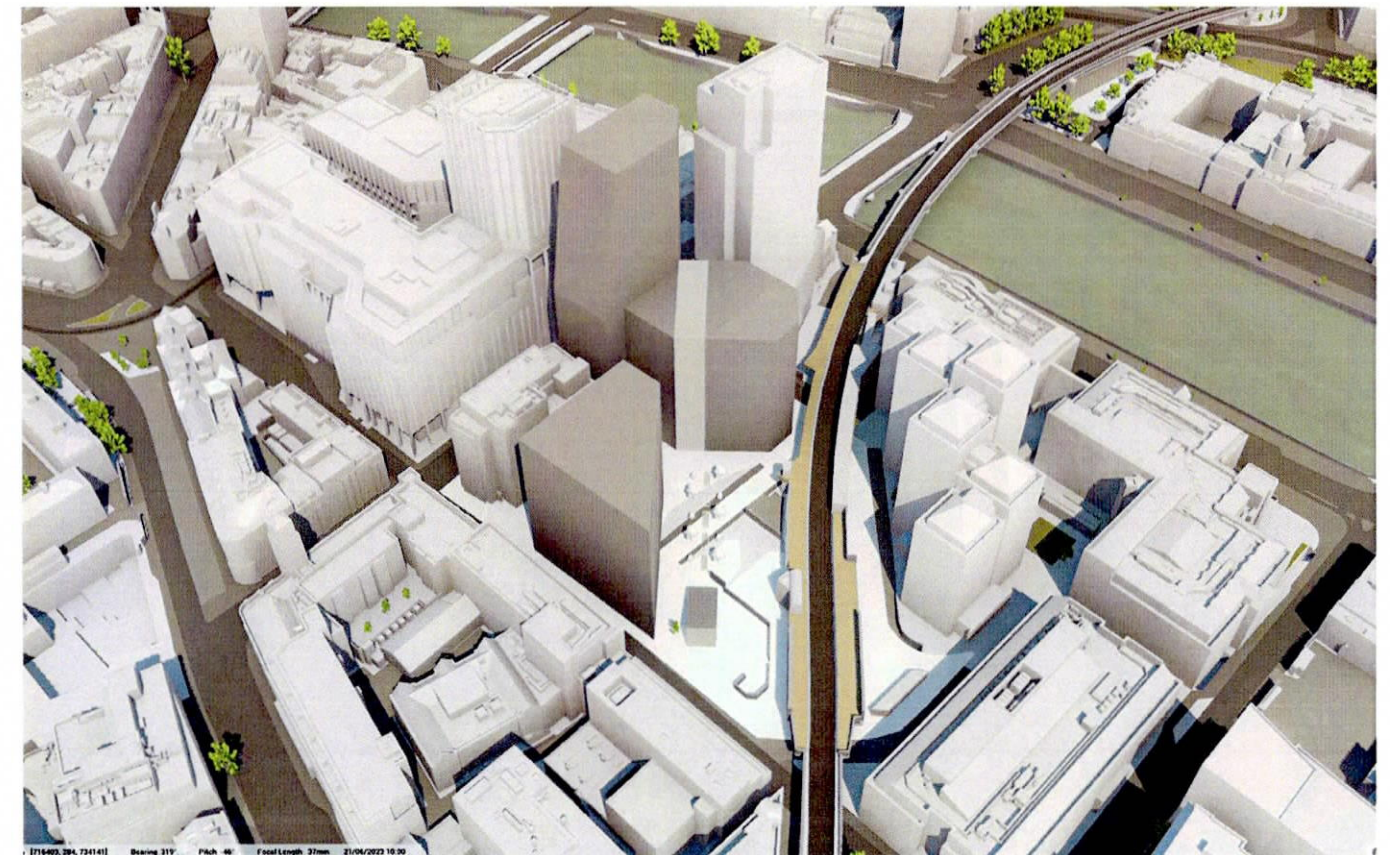
VIEW FROM NW



VIEW FROM NE



VIEW FROM SW



VIEW FROM SE

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