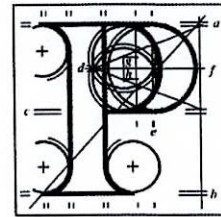


**Our Case Number:** ABP-314724-22



**An  
Bord  
Pleanála**

An Taisce  
Tailor's Hall,  
Back Lane  
Dublin 8  
D08 X2A3

**Date:** 24 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.

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

Tell	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

**20230116-ABP-314724**

An Bord Pleanála  
64 Marlborough Street  
Dublin 1

Sent by email to: [bord@pleanala.ie](mailto:bord@pleanala.ie)

16<sup>th</sup> January 2023

**Ref: 314724**  
**App: Transport Infrastructure Ireland (TII)**  
**For: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order**

A Chara,

Thank you for referring the above railway order application to An Taisce for comment.

### **1. Introduction and Overarching Comments**

We welcome the overall proposal as it is a long overdue strategic priority for the improvement and expansion of the public transport network in and around Dublin.

The proposal needs to be integrated with a wider transportation initiative for the catchment area to reduce private car use and dependence, including the promotion of cycle-and-ride to use the Metrolink stations.

The remainder of our submission concerns options for the Tara Station due to considerations about the loss of community infrastructure and city centre residential accommodation.

The applicant, Transport Infrastructure Ireland (TII), in its Preferred Route - Public Consultation Document - March 2019, stated:

*Tara is an important station as MetroLink will interconnect with DART and Iarnród Éireann services here, one of the major strategies behind the new alignment. The Emerging Preferred Route necessitated acquiring and demolishing the College Gate complex and the Sport and Fitness Markievicz centre owned by Dublin City Council.*

*While the site would be available afterwards for new development, the loss of the current apartment block and valued public amenity is a serious impact. As the financial and social costs here are so high, we've spent significant time and resources investigating alternatives.*

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**Directors:** Philip Kearney (Chair), Trish O'Connell (Vice-Chair),  
Stuart McCaul (Secretary), Aoife O'Gorman (Treasurer), Hugh O'Reilly, John Sweeney, Olivia Rogers, Rónán O'Brien



*We have therefore reluctantly concluded that the original proposal remains the most feasible option for construction of the MetroLink station at Tara Street.*

*We realise this has a severe impact and will take whatever measures we can to mitigate the impact on the residents and users of the fitness centre.*

The following sections of our submission will focus on engineering project risks and constraints for the selected option for Tara Station, which involves the demolishing the College Gate complex and the Markievicz Sport and Fitness Centre as well as two alternative design options, which would allow for its retention, if deemed appropriate.

## **2. Option 0: Base Scheme**

The design for Tara Station, as shown in the Railway Order, will be located alongside the DART railway line and aligned in a north-west to south-east direction. The station box is constrained by Poolbeg and Townsend Street and has been designed to fit into this space. The northwest end of the station box lies between the junction of Tara Street and Poolbeg Street, the alignment crosses Luke Street, and the south-east end is confined by Townsend Street.

Tara Station will act as a multi-modal interchange station between Metrolink and the DART railway line. The main point of interchange between the two stations will be via the southern entrance to Tara Station.

Tara Station is designed as an underground cut and cover station, "*which will require the demolition of existing built structures over the alignment, comprising an office building Ashford House on Tara Street, a four-storey office building on Poolbeg Street, residential properties at 22 Luke Street and Nos. 24 and 26-32 on Townsend Street, and the Markievicz Leisure Centre including College Gate Apartments*" (Preferred Route Design Development Report – PRDDR<sup>1</sup>).

### **2.1 Project Risks and Constraints**

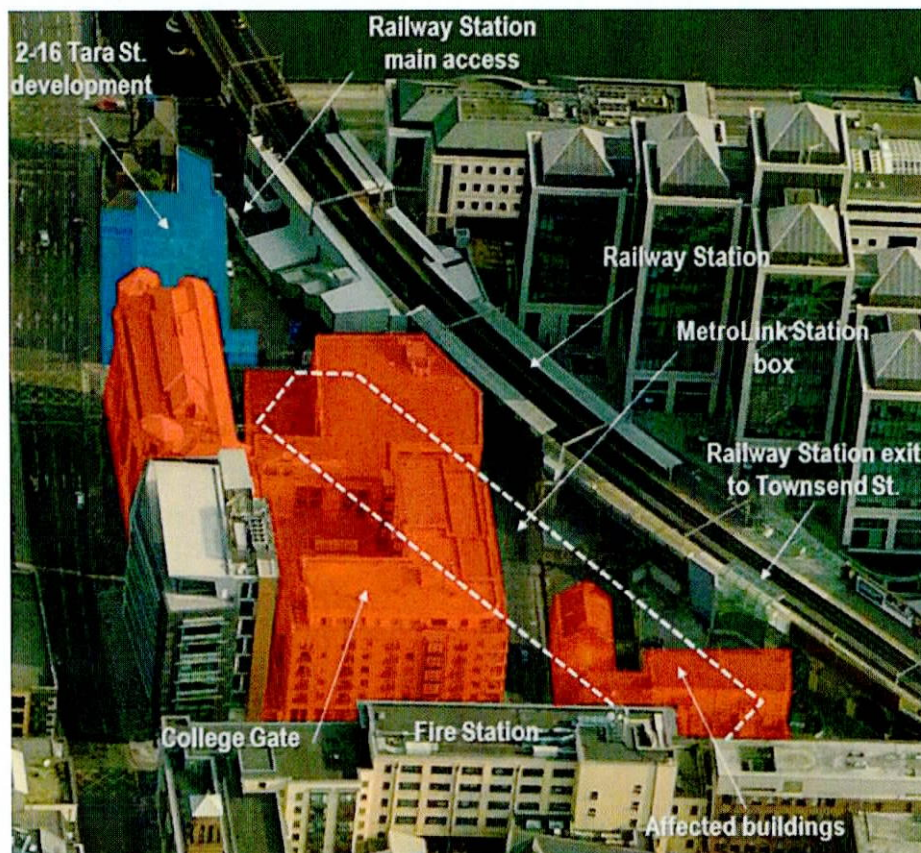
Project risks for the base scheme, Option 0, include the compulsory purchase of the 70 apartments and eviction of the 150 residents in College Gate, which are in private ownership. This could also lead to unpredictable delays to the Metrolink Programme. Also impacted are commercial and residential properties, loss of community infrastructure, increased construction phase noise, vibration and dust due to building demolition.

While engineering based constraints include: "*Potential for localised diversions Poolbeg St. and Luke St. closed during construction. Townsend St. affected. Significant impacts on Fire Brigade Emergency Routes also the proximity of the DART infrastructure will need careful engineering design and construction*" (PRDDR).

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<sup>1</sup> [https://www.metrolink.ie/media/vlip2lpw/metrolink\\_pr\\_design\\_development.pdf](https://www.metrolink.ie/media/vlip2lpw/metrolink_pr_design_development.pdf)





**Option 0 – Station location and demolitions shown in red** (image from PRDDR).

### 3. Alternatives to demolition of the College Gate Building

We will now review the alternative designs for Tara Station, which were listed in the Preferred Route Design Development Report (PRDDR), but were not recommended for a variety of engineering based constraints mentioned above, which we recommend be reviewed by the Board. These are a modified version of Option 3 Station moved southwards, which we suggest be considered if constructed as per option 4, to mitigate the major concerns outlined in the PRDDR.

#### 3.1 Option 4: Mined station at the preferred location

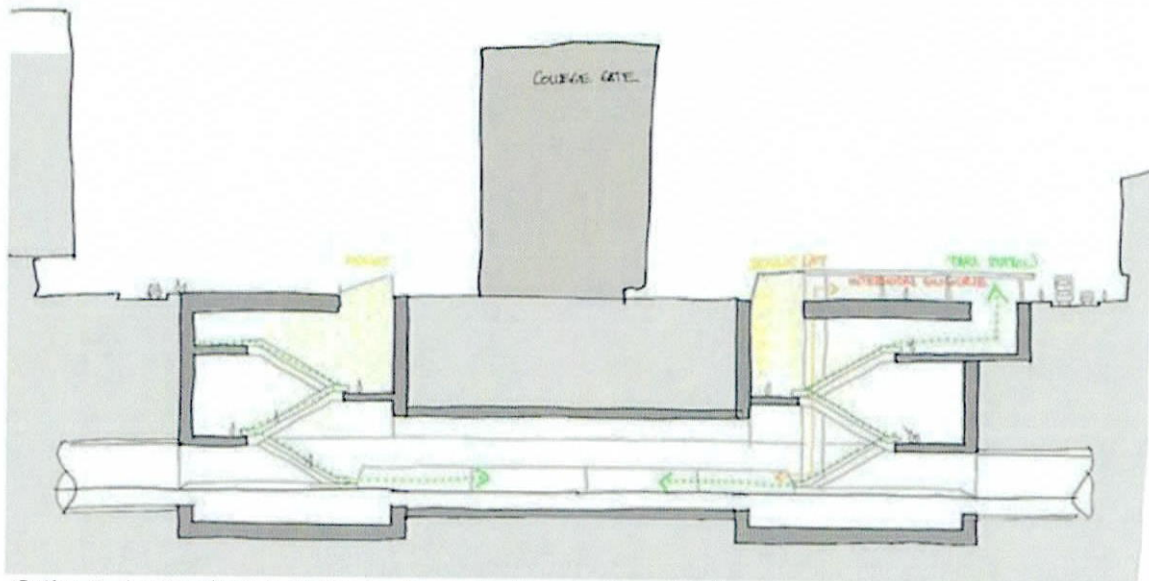
Located as per option 0 and option 4:

*"This solution would involve mining a gallery (or cavern) in rock between two access shafts, which would be placed each side of the College Gate building. The EPR route alignment would be unchanged apart from the single bore tunnel design. The shafts at each end of the station end would enclose the escalators, stairs, lifts and back-of-*

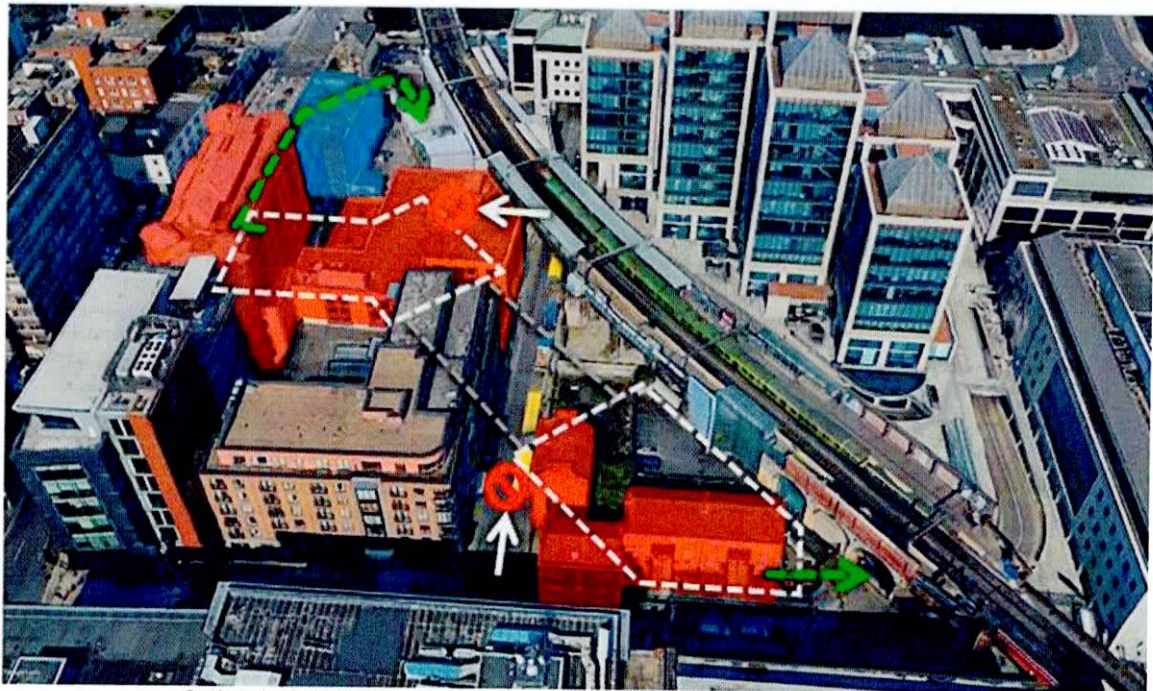


house facilities. The side platforms would be inside the excavated gallery between shafts at track level.

There would be two points of access to the underground station; one from Tara Street and the other connecting to Tara Station, similar to option 0."



Option 4– Section through Station location indicating retention of College Gate building, (image from PRDDR).



Option 4– Station location and demolitions shown in red (image from PRDDR).



### **3.1.1 Project Risks and Constraints**

Buildings at Townsend Street and on Tara would need to be demolished. Agreement and design details would need to be finalised with adjacent property owners, including access points, emergency exits, etc. Passenger transferring to the DART Tara Street Station would use the existing southern access, which would need to change from a peak hour access to a permanent access. Townsend St. and Spring Garden Lane would be closed during demolition works.

The PRDDR states in Section 4.2:

*"Option 4 involves the mining of a cavern below the existing College Gate building, which carries substantially more safety risks during its construction than all the other options. Whilst the initial construction cost would be slightly more than Option 0, the potential for additional risk and cost associated with mining could easily lead to increased costs during construction and it could be expected that the tendered cost would make allowance for such risk. While Option 4 would retain the College Gate building there would be significant disturbance to residents because of the shaft construction directly adjacent to the building and the mining of the tunnel directly underneath part of the building. These construction activities are estimated to take up to 2 years. During this period there would be risk to the building from the mining activities including potential for structural damage, and significant construction disturbance, including noise and vibration, such that it is envisaged that this would require moving everyone out of the building during construction for a period of up to two years."*

### **3.1.2 Comment**

TII state that for the above reasons Option 4 is not recommended. However, the listed Project Risks and Constraints have been successfully mitigated on other underground metro stations, in other jurisdictions, where similar construction techniques were utilised, where it was required to retain specific structures. We would suggest that Option 4 for Tara Station could be successfully implemented, once again here. We would therefore recommend that Option 4 be considered, if An Bord Pleanála deem that the College Gate building should be retained.

### **3.2 Option 3: Station moved southwards**

Here, it is proposed to move the station box towards the south and amending the station box alignment to be parallel to the overhead train infrastructure, which would be result in minor, re-alignment of the Metrolink route. Open box construction (similar to Option 0) was to create the station shape and all properties on the station footprint would need to be acquired.

The PRDDR states: *"Agreement and design details would need to be finalised with adjacent property owners to integrate the station box and above ground elements in the*



*development, including access points, emergency exits and ventilation shafts... Passenger transfer to the DART Tara Street Station would use the existing southern access, which would need to change from a peak hour access to a permanent access."*

Once again Tara Station will act as a multi-modal interchange station between Metrolink and DART railway line. The main point of interchange between the two stations will be via the southern entrance to Tara Station.

### **3.2.1 Project Risks and Constraints** (refer to illustration below)

As stated in the PRDDR:

*"Buildings at Townsend Street and Spring Garden Lane would need to be demolished with Townsend St. and Spring Garden Lane closed during construction. Agreement and design details would need to be finalised with adjacent property owners to integrate the station box and above ground elements in the development, including access points, emergency exits. Passenger transfer to the DART Tara Street Station would use the existing southern access, which would need to change from a peak hour access to a permanent access. Townsend St. and Spring Garden Lane closed during construction. Significant impact on East/ West cycle movements."*

This option would also directly impact existing large sewers along Townsend Street (including a 2.4m circular brick foul sewer and 1.2m circular concrete foul sewer) which would require diversion. TII deemed this diversion unlikely to receive approval from Irish Water.

In the PRDDR Assessment Summary, TII deemed option 3 not recommended due to traffic disruption during construction, this utility diversion and significant property impacts to the entire city block between Tara Street and Corn Exchange Place.

### **3.3 Option 3A. Suggested alternative to Option 3 (using construction techniques of option 4)**

By adopted same construction methodology of option 4 the major disruption with the diverting of mains sewers, the closing of Townsend Street to traffic during construction and the building on Spring Garden Lane needing to be demolished could be mitigated.

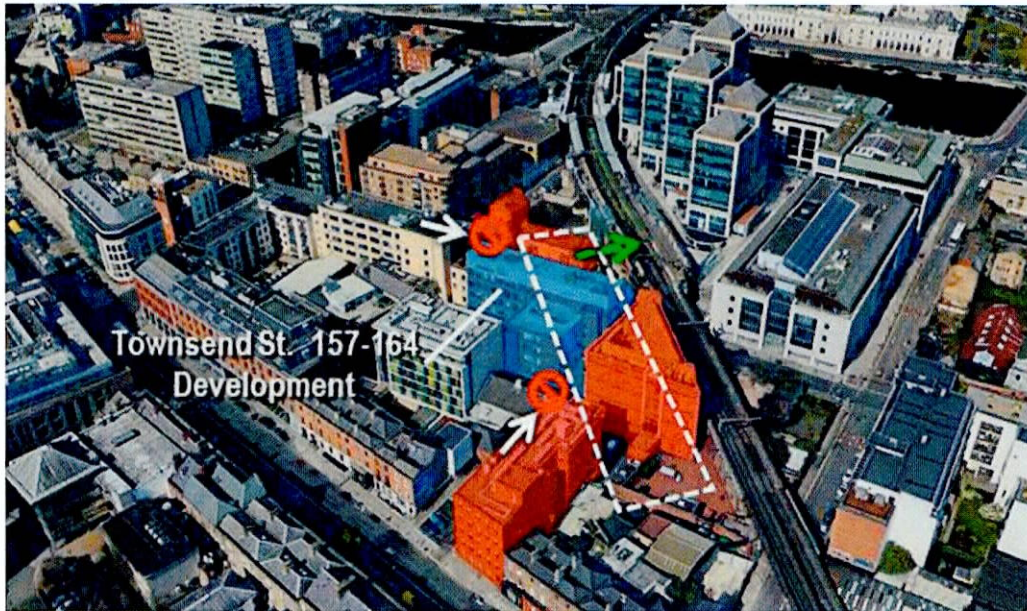
Also, as per options 0 and 4, Tara Station will act as a multi-modal interchange station between Metrolink and DART railway line. The main point of interchange between the two stations will be via the southern entrance to Tara Station, with Metrolink access remaining as per option 3.

#### **3.3.1 Comment**

Although the same construction methodology of option 4, would involve mitigating similar engineering related constraints and risks as per this option, but as per our comments on



option 4, these Project Risks and Constraints have been successfully mitigated on other underground metro stations, elsewhere, and we would therefore recommend that Option 3A be considered, as an alternative to Option 4, if An Bord Pleanála deem that the College Gate building should be retained.



*Aerial View of proposed Tara Station box location, with buildings to be demolished highlighted in red (figure 16 in PRDDR)*

#### **4. Replacement of Community Infrastructure**

Should the subject project proceed as proposed in the application, it is submitted that the Markievicz Sport and Fitness Centre should be replaced elsewhere in the local area as part of the Metrolink project, given the Centre's importance as a community resource. It also submitted that further consideration is required regarding the loss of the substantial number of city centre residential units in the College Gate building.

Please acknowledge our submission and advise us of any decision made.

Yours sincerely,

Ian Lumley

*Head of Advocacy*

*An Taisce – The National Trust for Ireland*