

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1

Date: 29<sup>th</sup> February 2024  
Our Ref: BC 22102

Dear Sir or Madam

**RE: SUBMISSION REGARDING THE METROLINK RAILWAY ORDER ABP ORAL HEARING WITH RESPECT TO LANDS AT EARLSFORT TERRACE, DUBLIN 2**

### Introduction

On behalf of our client, Earldev Properties Unlimited Company, we wish to submit the enclosed evidence to An Bord Pleanála with respect to the Oral Hearing on the MetroLink Oral Hearing. The submitted evidence relates to the existing office building located at 10 Earlsfort Terrace, Dublin 2.

A submission was previous made on the MetroLink Railway Order with respect to the subject site during the public consultation process. TII have responded to the submission and on that basis this Oral Hearing submission is made on behalf of Earldev Properties Unlimited Company, to respond to the points made by TII.

We wish to note our client's overall support for Metrolink and the benefits it will bring to the city. Our client and their team however retain significant concerns following the TII response which are addressed in this submission.

The following documents, in addition to this cover letter are included with this submission:

- Punch Consulting Engineers
  - Project MetroLink – 13-14 Earlsfort Terrace, Rear Of 15-18 Earlsfort Terrace And 17-19 Hatch Street Lower, Dublin 2 (And Also Known As 10 Earlsfort Terrace) - PUNCH Civil/Structural Engineering Report – Module 1
- AGL
  - Oral Hearing Statement of Evidence on Tunnelling Induced Ground Movements & Building Damage Assessment by Mr. Conor O'Donnell 29<sup>th</sup> February, 2024 [Slide format]
  - Project Metrolink – Refined Phase IIa Building Damage Assessment for Arthur Cox Building at 13-14 Earlsfort Terrace

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- Project Metrolink – Refined Phase IIa Building Damage Assessment for Arthur Cox Building at 13-14 Earlsfort Terrace – Addendum No. 1
- Jacobs Idom – Preliminary Phase 3 – Ground Movement Induced Damage Assessment – Arthur Cox Building (Doc No. ML1-JAI-GEO-ROUT\_XX-RP-Y-00036)
- Legal Submissions of Eamon Galligan SC on behalf of Earldev Properties

#### **Draft Guidance Note for Developers**

A Draft Guidance Note for Developers has been published by TII on the Metrolink Railway Order website. There has been limited time to review this document and its potential implications. The purpose of the document is to assist developers in understanding TII requirements for protection of MetroLink, and to provide guidance to developers on future development which may be undertaken.

We are advised by Punch Consulting Engineers, that the depth of the tunnel has a direct correlation with the potential loading above i.e. the deeper the tunnel, the greater the loading that may be placed above, which has direct implications for development potential.

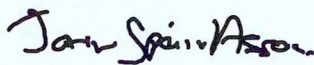
Having regard to the request for the tunnel to be lowered at this location relative to potential building damage, it is respectfully submitted, that lowering of the tunnel alignment may assist in addressing our clients concerns relative to the potential impacts on development potential of the subject site, subject to further structural assessment.

The matter of impacts of the positioning of the tunnel on development potential for the subject site will be addressed in Module 2 on behalf of our client.

#### **Concluding Comment**

We trust that An Bord Pleanála will take this submission into consideration in determining the Railway Order.

Yours sincerely,



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**John Spain Associates**