



**BYRNE
WALLACE**

LAW FIRM

ByrneWallace LLP
88 Harcourt Street, Dublin 2, D02 DK18, Ireland
Tel +353 1 691 5000 Fax +353 1 691 5010
Email info@byrnewallace.com DX 18 Dublin
www.byrnewallace.com

The Inspector
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Delivered by hand

Our ref:
FR/33179.1

Date:
5 March 2024

Our client:	Earldev Properties Unlimited Company
Property:	Arthur Cox Building
Matter:	Oral Hearing ABP-314724-22 Railway (MetroLink – Estuary to Charlemont via Dublin Airport) Order Application

Dear Inspector

As you are aware, our client addressed the oral hearing in the Gresham Hotel on Thursday, 29 February 2024 in respect of Property for issues falling under Module 1 of the oral hearing. During our client's oral submission, it raised a number of questions for Transport Infrastructure Ireland ("TII") in respect of the proposed MetroLink alignment between St Stephens Green and Charlemont. As TII were unable to provide answers to all of our questions at that time, you directed that TII provide responses by Monday 4 March 2024 to give us an adequate opportunity to respond to TII before the end of Module 1.

TII only provided certain limited information to our client yesterday afternoon and today. Our two key technical witnesses are unavailable during office hours today. In addition, the information is being provided on a piecemeal basis and we are informed that updated information in relation to environmental impacts will not be furnished by TII until tomorrow. This unacceptable approach for the provision of information has resulted in our client having inadequate time to adequately prepare the remainder of its Module 1 submission. It is not even clear whether the required remaining information will be available prior to our scheduled submission tomorrow. However, in any event our client will not have sufficient time to consider and test such further information.

In light of the above, and in order to ensure fair procedures, we request that you allow our client to defer the submission of the remainder of its Module 1 submission until its scheduled Module 2 submission date so that it can properly consider this new information and the EIA update to be submitted to the Oral Hearing tomorrow morning.

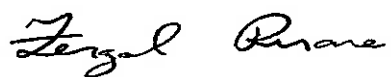
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Partners Feargal Brennan (Managing) Eamonn Carey Louise Carley Lisa Cawley Liam Connellan Martin Cooney Mona Costelloe Zelda Deasy Loughlin Deegan Catherine Dowling Alan Doyle Olive Doyle Neil Dunne Ronan Egan John Fitzgerald Helen Gibbons Laura Greene Aoife Hearne Daniel Holohan Valerie Hourigan Mark Kavanagh Sinéad Kearney Elaine Kelly Michael Kennedy Jon Legorburu Ross Little Deirdre McBennett Patrick McClean Morag McCullagh Eoin McGlinchey Michelle McVeigh Gráinne Murphy Michelle Ní Longáin Seán O'Donnell Bryan O'Gorman Paraic O'Kennedy Gillian O'Shaughnessy Mark O'Shaughnessy Alison O'Sullivan Ciara Ruane Fergal Ruane Elizabeth Ryan Triona Ryan Lorraine Smyth Lee Squires Victor Timon Eoghan Wallace Michael Walsh Emmet Whelan Derville White Fiona Wood

Consultants Sheena Beale Louise Holmes James Moran Rhona Murphy Colin Sainsbury Brian Wallace

Yours sincerely

A handwritten signature in black ink, reading "Fergal Ruane". The signature is written in a cursive, flowing style.

Fergal Ruane

Tel +353 1 691 5647

Email FRuane@byrnewallace.com