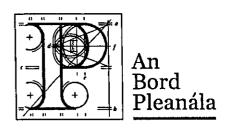
Our Case Number: ABP-314724-22

Your Reference: Earl Court Management Company DAC



Kavanagh Mansfield & Partners 37 Heather Road Sandyford Dublin 18 D18 R9T3

Date: 18 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 (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 refund of €50 will be made to the credit/debit card used to make the online observation.

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

PP ELE



An Bord Pleanála 64 Marlborough Street Dublin 1 DO1 V902

Ref: CL 2102A/JM/th

13 January 2023

RE: Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022

Earl Court Apartments, Adelaide Road

Dear Sirs,

This submission has been prepared by Kavanagh Mansfield & Partners on behalf of the Earl Court Management Company DAC who represent the owners of the Apartments in the block known as Earls Court at Adelaide Road.

The property is located in the City Centre, just before MetroLink Chainage 19+100.

Part 1:

The route selection including horizontal alignment, vertical alignment and depth of MetroLink below ground in the area adjacent to our Clients' building, should be reviewed by NTA / TII to satisfy themselves and to ensure that:-

- (a) MetroLink does not cause structural damage to the foundation system supporting our Clients' building, which comprises strip and pad foundations founded in boulder clay.
- (b) MetroLink does not cause structural damage to our Clients' building at any level.
- (c) MetroLink does not cause damage to the finishes of our Clients' building.
- (d) MetroLink provides the necessary vertical and/or horizontal clearance between the existing basements and the tunnels.
- (e) We enclose a copy of a drawing EARL-WMS-ZZ-ZZ-DR-S-21209 prepared by Waterman Moylan for your information and reference. Our Clients' building is located on the south eastern side of the building, as shown by Waterman Moylan. We are showing on that drawing our clients' building.



Part 2:

The construction information provided by MetroLink has been reviewed. We note that Drawing No. ML1-JAI-EIA-ROUT-XX-DR-Y-13038 (a copy is attached to this submission) does not identify any potential receivers in the area of our Clients' building, therefore essentially ignoring potential damage to our Clients' building. We refer to the following points:

- a) MetroLink has assessed the "Groundborne Noise from Tunnel Boring Machine" and presents its findings on Drawing No. ML1-JAI-EIA-ROUT-XX-DR-Y-14009 (a copy is attached to this submission). This drawing indicates MetroLink will generate an additional 50db directly under the location of our Clients' building, which is unacceptable.
- b) MetroLink has assessed the predicted "Settlement" and presents its findings on Drawing No. ML1-JAI-EIA-ROUT-XX-DR-Y-21149 (a copy is attached to this submission). The deflexion drawing shows settlement between 1 and 45mm occurring underneath our Clients' building. Their building is a conventional masonry and concrete building, which will find it difficult to absorb such a high level of differential settlement. It is also close to the adjoining Cadenza Building which was constructed beside and below their building. This movement cannot be accommodated by the building's structure and could cause damage to foundations, basement, superstructure, façade and internal finishes.

Part 3:

The operational information provided by MetroLink has been reviewed. We note that drawing No. ML1-JAI-EIA-ROUT-XX-DR-Y-13038 (a copy is attached to this submission) does not identify any potential receivers in the area of our Clients' building. We refer to the following point:

a) MetroLink has assessed the "Groundborne Noise from Operation" and presented its findings on Drawing No. ML1-JAI-EIA-ROUT-XX-DR-Y-14041 (a copy is attached to this submission). This drawing indicates MetroLink will be generating an additional 35db directly under the location of our Clients' building which is unacceptable.

Part 4:

MetroLink has proposed to acquire the substratum land located under our Clients' building, which is outlined in drawing no. ML1-JAI-EIA-ROUT-XX-DR-Y-01097 (a copy is attached to this submission). This is unacceptable to our Client, as the future potential to develop this prominent site in the future will be damaged.

In summary, our Client requests that the route of the proposed MetroLink tunnels are diverted away from their current proposed location (under our Clients' building) to either below the public carriageway or buildings that will not be damaged or compromised by the presence of the tunnels located under.

Should you have any queries or wish to discuss any aspect of this submission, please contact me.

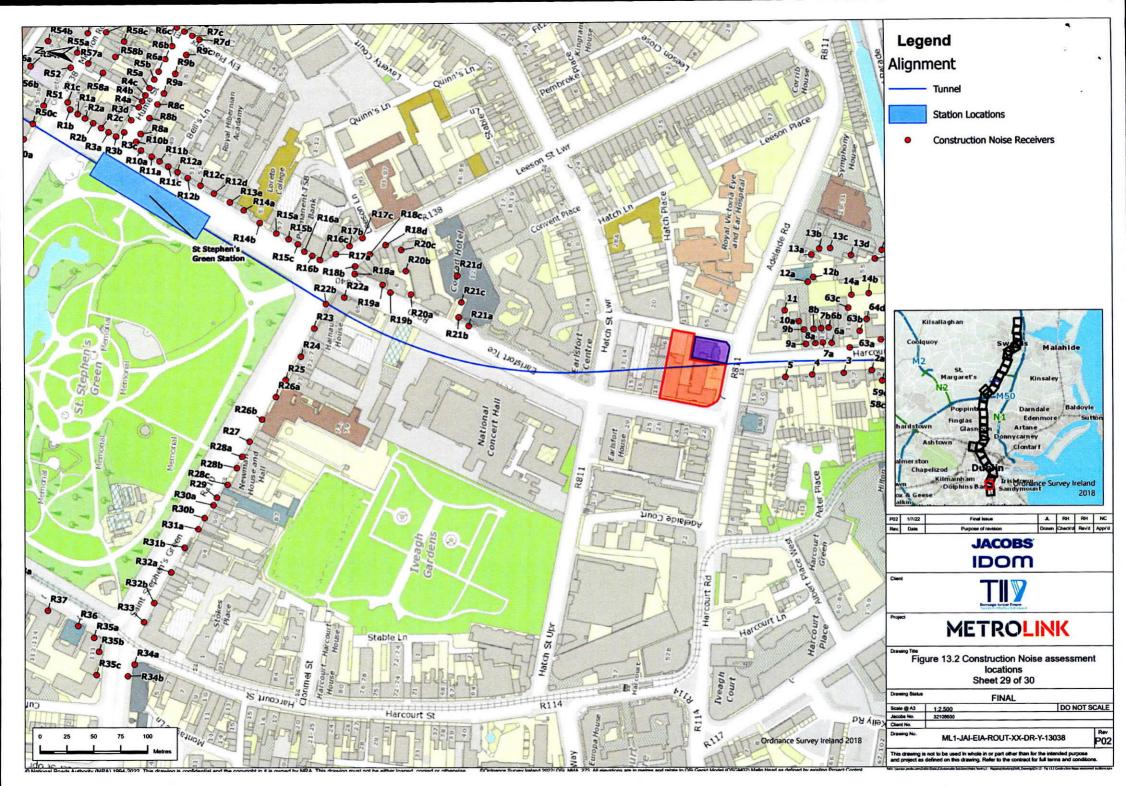
Yours faithfully,

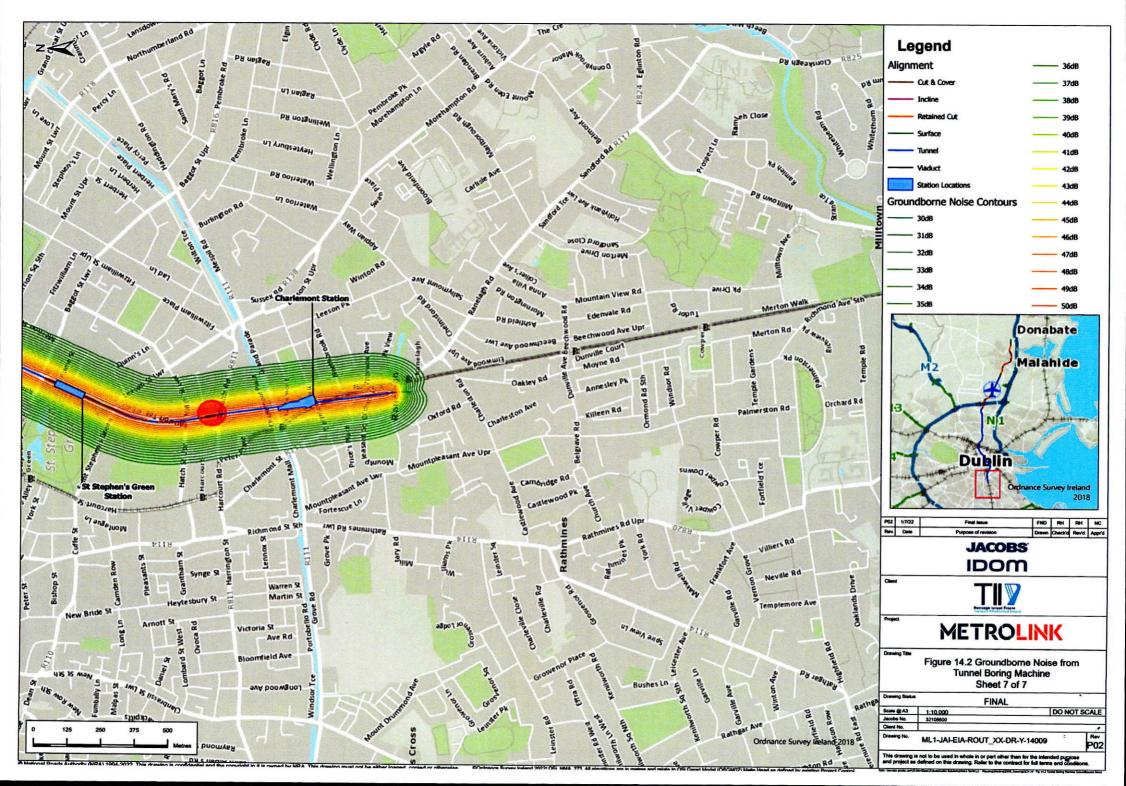
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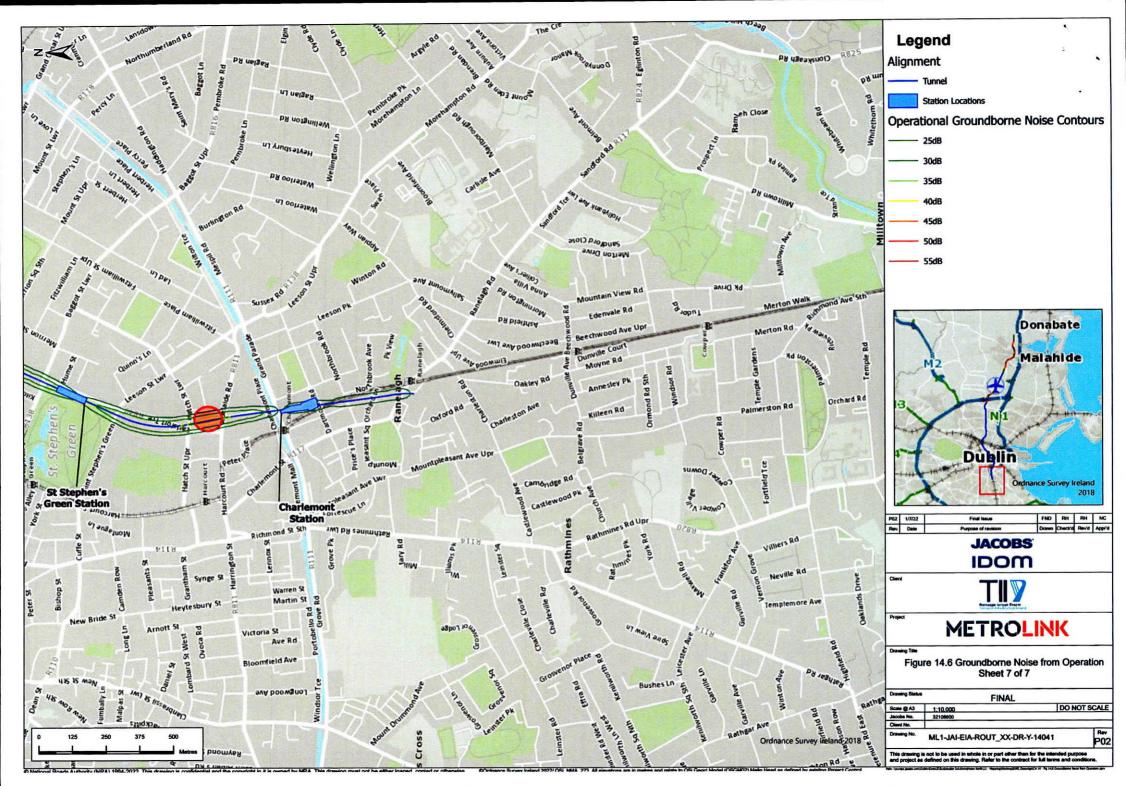
KAVANAGH MANSFIELD & PARTNERS

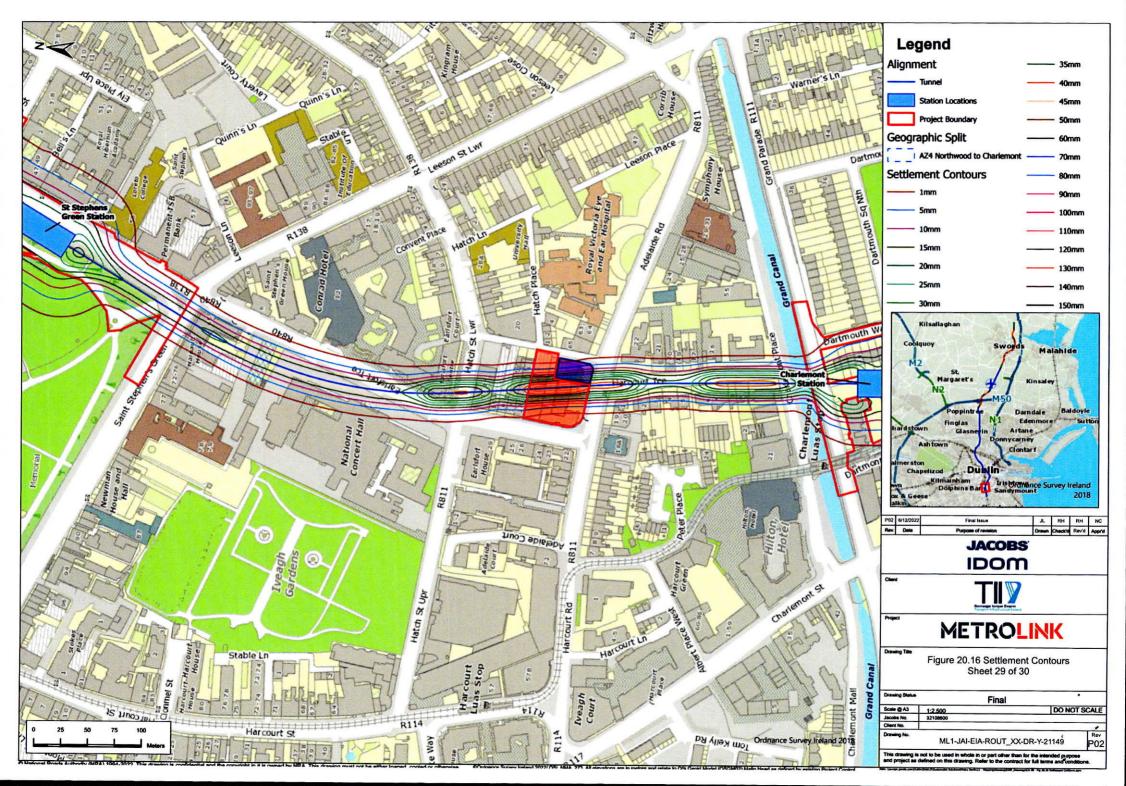
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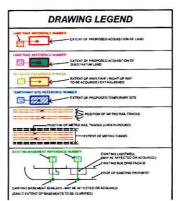


LOCATION PLAN

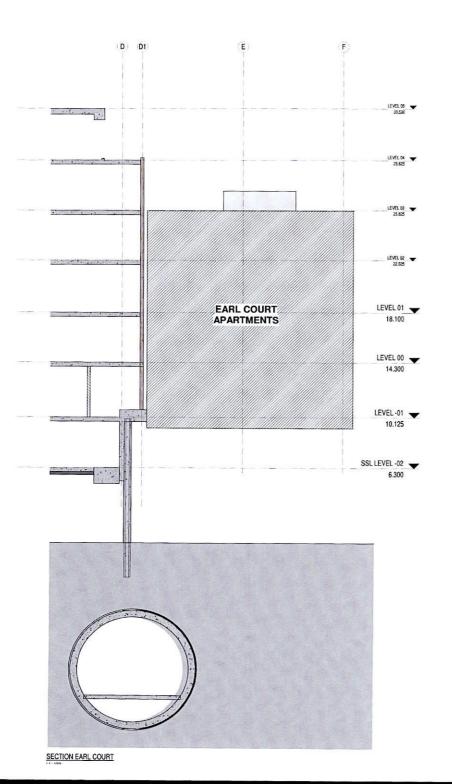
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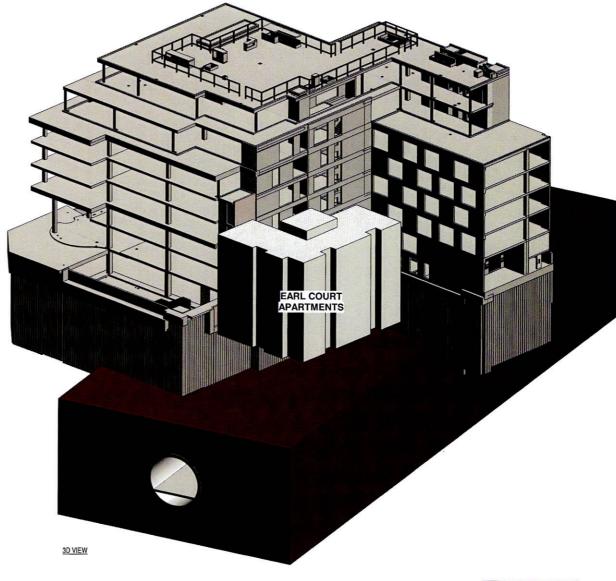
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Bluesky International Ltd. © Ordnance Survey Ireland 2022/ OSI_NMA_273. All elevations are in metres and relate to OSI Geoid Model (OSIGMO2) Main Head as defined by existing Project Control. All Co-ordinates are in this Transverse Mercator Grid (ITM) as defined by OSI active GPS station Tallaght College (TLLG).









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