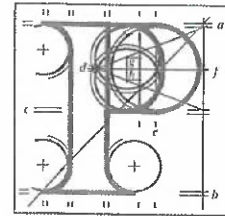


Our Case Number: ABP-314724-22

Your Reference: Irish Life Assurance plc.



**An
Bord
Pleanála**

Waterman Moylan
Engineering Consultants
Block S
EastPoint Business Park
Alfie Byrne Road
Dublin 3
D03H3F4

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

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Websíte	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Barrow Street
Dublin 4, Ireland
D04 TR29
DX11 Dublin
+353 1 614 5000
dublin@mhc.ie

An Bord Pleanála,
64 Marlborough Street,
Dublin 1, D01 V902

VIA WEB PORTAL : <https://www.pleanala.ie/en-ie/case/314724>

13 January 2023

Your ref:

Our ref: MAN.42781.359

MHC-30355570-1

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

Our Client: Irish Life Assurance plc

Written Submission on behalf of Irish Life Assurance plc, the owner of the commercial office building and premises known as Cadenza, 19-20 Earlsfort Terrace and 65A Adelaide Road, Dublin 2

Dear Sir/Madam

We act on behalf of Irish Life Assurance plc and enclose the written submission of our client.

Yours faithfully

Sent by email, no signature

MASON HAYES & CURRAN LLP

Dublin

London

New York

San Francisco

MHC.ie

Partners - Declan Black (Managing) | Christine O'Donovan (Chair) | Catherine Allen | Julie Austin | Paul Bassett | Ron Boucher | Liam Brazil | Sanyo Bruen | Susan Bryson | Nicola Byrne | Vanessa Byrne | Janet Cafferty | Niamh Caffrey | Niamh Callaghan | Neil Campbell | William Carmody | Rachel Carney | Eoin Cassidy | Gemma Coady | Tonya Colbert | Ger Connolly | Keelin Cowhey | Melanie Crowley | Tom Davy | Muireann Dennehy | Robert Dickson | William Dillon-Leetch | Shane Dolan | Michael Doran | Conor Durkin | James Fenelon | Helen Ferguson | Oliver Fitzgerald | Rowena Fitzgerald | Jamie Fitzmaurice | Frank Flanagan | Liam Flynn | Conor Fottrell | Kara Fox | Mark Fry | Conall Geraghty | Stephen Gillick | Edward Gleeson | Micheál Grace | Liam Guildera | David Gunn | Jason Harte | Wendy Hederman | Jennifer Henry | Michaela Herron | Brian Horkan | Margaret Hughes | Brian Johnston | Peter Johnston | Lisa Joyce | Rachel Kavanagh | Martin Kelleher | Gerard Kelly | Tara Kelly | Marcus Kennedy | Niamh Keogh | Rory Kivane SC | Claire Lord | Michael Madden | David Mongan | Robert McDonagh | Hazel McDwyer | Dermot McGirr | Justin McKenna | Peter McLay | Nicholas Metcalfe | Niall Michel | Colin Monaghan | Dairé Munnely | Alice Murphy | Deirdre Nagle | Jevan Nolan | Ronald Neville | Philip Nolan | David O'Donnell | Ian O'Herrin | Sara O'Reilly | Daragh O'Shea | Maurice Phelan | Kevin Power | Elizabeth Quinn | Shane Reynolds | Judith Riordan | Liam Riordan | Elizabeth Ryan | Oisín Tobin | John Troute
Cf Counsel - Una Burke | Paul Egan SC

Mason Hayes & Curran LLP is an Irish partnership authorised by the Legal Services Regulatory Authority in Ireland to operate as a limited liability partnership under the Legal Services Regulation Act 2015.

v31

Our Ref : 18-020.046.docx
Your Ref :
E-mail : r.osborne@waterman-moylan.ie
Date : 10 January 2023

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

**Re : Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022
19-20 Earlsfort Terrace (former Seagrave House) and 65A Adelaide Road (former
Davitt House)**

Dear Sirs,

This submission has been prepared by Waterman Moylan on behalf of Irish Life Assurance plc. who are the owners of the existing commercial building located at 19-20 Earlsfort Terrace (former Seagrave House) and 65A Adelaide Road (former Davitt House).

The properties are located in the City Centre between MetroLink Chainage 18+900 and Chainage 19+100.

Submission 1:

The route selection including horizontal alignment, vertical alignment and depth of MetroLink below ground in the area between Chainage 18+900 and Chainage 19+100 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 client's building which comprises a mixture of CFA piles (some extending 16.5m below ground level) and pads foundations which are founded on the competent rock.
- (b) MetroLink does not cause structural damage to our client's building at the basement level. The basement structure forms the waterproof envelope to our Clients building and any damage would result in the ingress of water into the basement.
- (c) MetroLink does not cause damage to the bespoke cladding; glazing and fragile finishes of our client's building.
- (d) MetroLink provides the necessary vertical and/or horizontal clearance between the existing basements and the tunnels.
- (e) We note the existing piles and tension anchors appear to clash with the proposed route of the MetroLink route, these elements form part of the substructure and cannot be ignored. We believe that these elements have not been correctly assessed by MetroLink and the impact the proposed route will have on our Client's building. We have enclosed a copy of our drawing EARL-WMS-ZZ-ZZ-DR-S-21209, for your information and reference.

Block S, EastPoint Business Park, Alfie Byrne Road, Dublin D03 H3F4
t. 00 353 1 664 8900 f. 00 353 1 661 3618 e. info@waterman-moylan.ie w. www.waterman-moylan.ie

Directors: J. Gibbons, P. O'Connell, R. Osborne, C. Beresford (British), A. Steele (British)
Consultants: J. Caffrey, B. McCann, J. Moylan, P. Opdebeeck
Registered as Waterman Moylan Consulting Engineers Limited
Registered in Ireland 98095 Registered Office: Block S, EastPoint Business Park, Alfie Byrne Road, Dublin D03 H3F4
Offices: Australia, India, Ireland, United Kingdom



Submission 2:

The construction information provided by MetroLink has been reviewed. We note that drawing 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 client's 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 client's 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). This drawing indicates MetroLink will be causing a 45mm settlement directly under the location of our client's building which is unacceptable. Settlements of this magnitude cannot be accommodated by the building's structure and will cause damage to foundations; basement; superstructure; façade and internal finishes. As previously stated the basement structure forms the waterproof envelope to our client's building and any damage would result in the ingress of water into the basement.

Submission 3:

The operational information provided by MetroLink has been reviewed. We note that drawing 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.

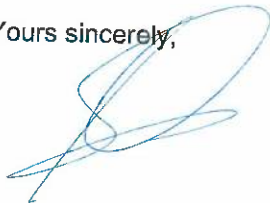
Submission 4:

MetroLink has proposed to acquire the substratum land located under our client's 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 commercial 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 client's 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.

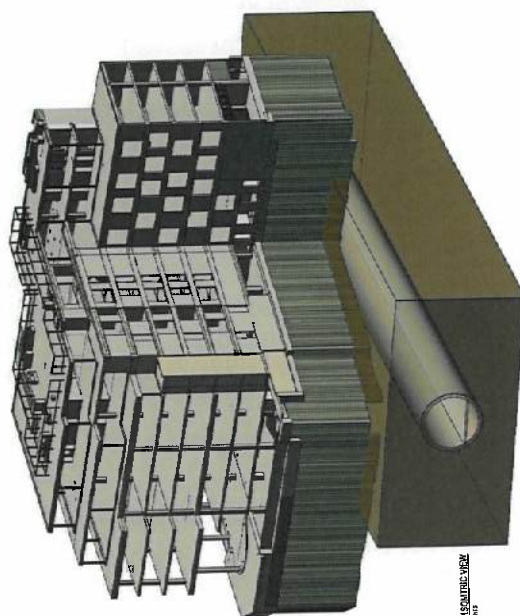
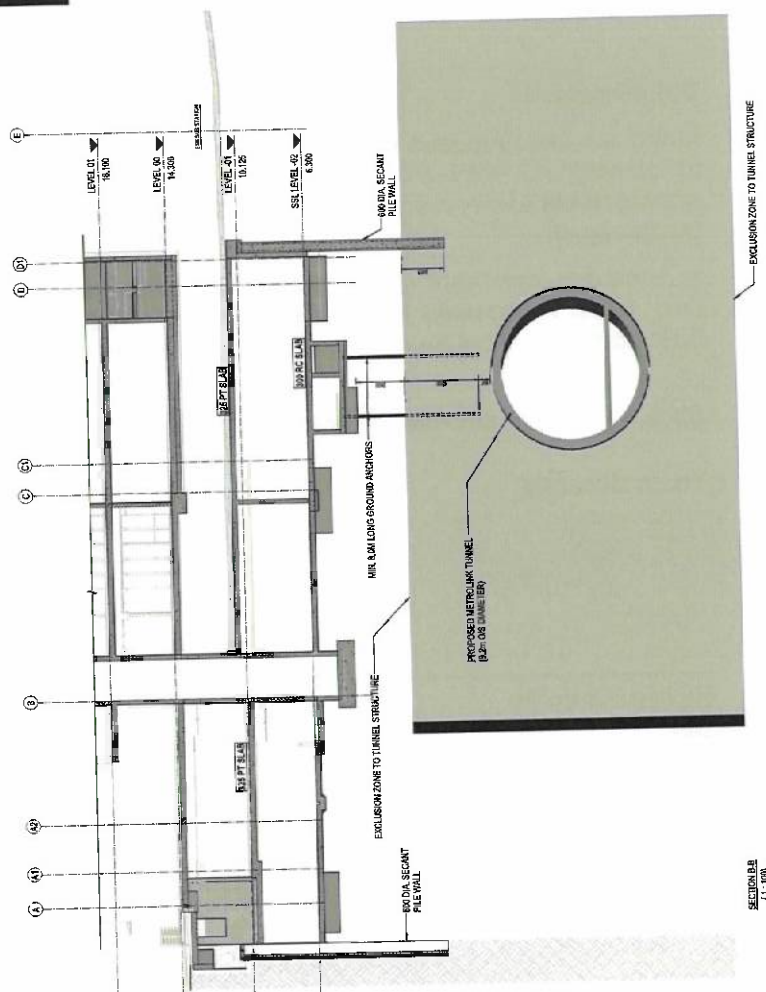
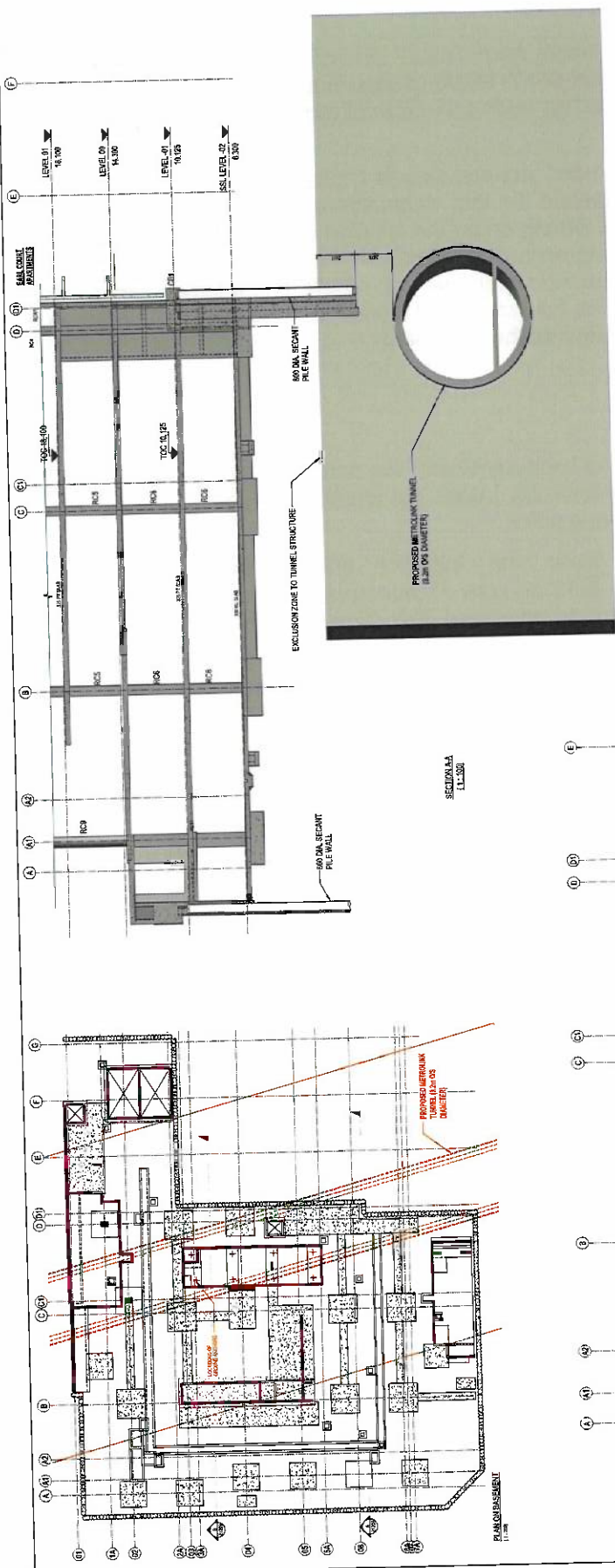
Yours sincerely,



Richard Osborne
Director
Waterman Moylan

Enc (6)

GENERAL NOTES

[illegible]

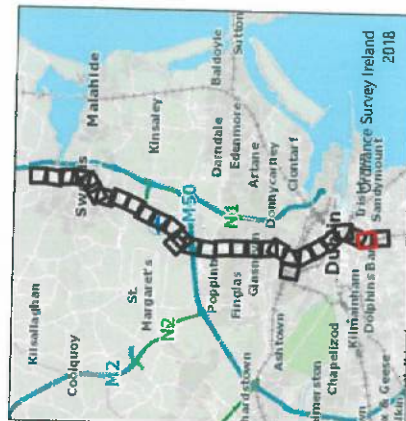
Legend

Alignment

Tunnel

Station Locations

Construction Noise Receivers



Rev	Date	By	Check	App'd
P02	17/02	Paul Lunn	James Lunn	James Lunn

JACOBS
IDOM

TII

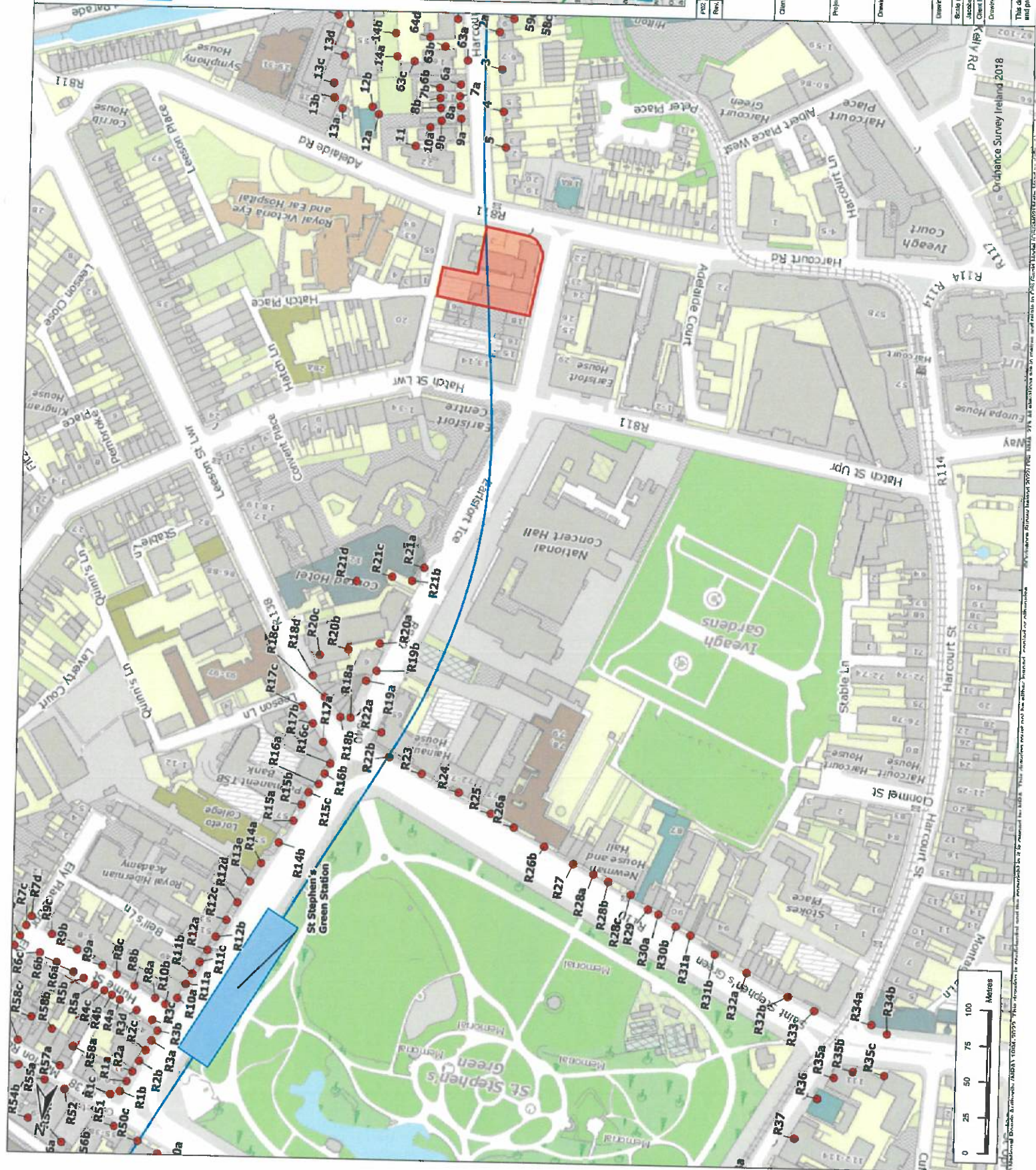
METROLINK

Drawing Title
Figure 13.2 Construction Noise assessment locations
Sheet 29 of 30

Drawing No.	Client No.	Scale	DO NOT SCALE
ML1-JAI-EIA-ROUT-XX-DR-Y-13038	12.800	1:2,800	1:2,800

Rev	Date	By	Check	App'd
P02	17/02	Paul Lunn	James Lunn	James Lunn

This drawing is not to be used in whole or in part other than for the intended purpose and project as stated on this drawing. Refer to this drawing for full terms and conditions.

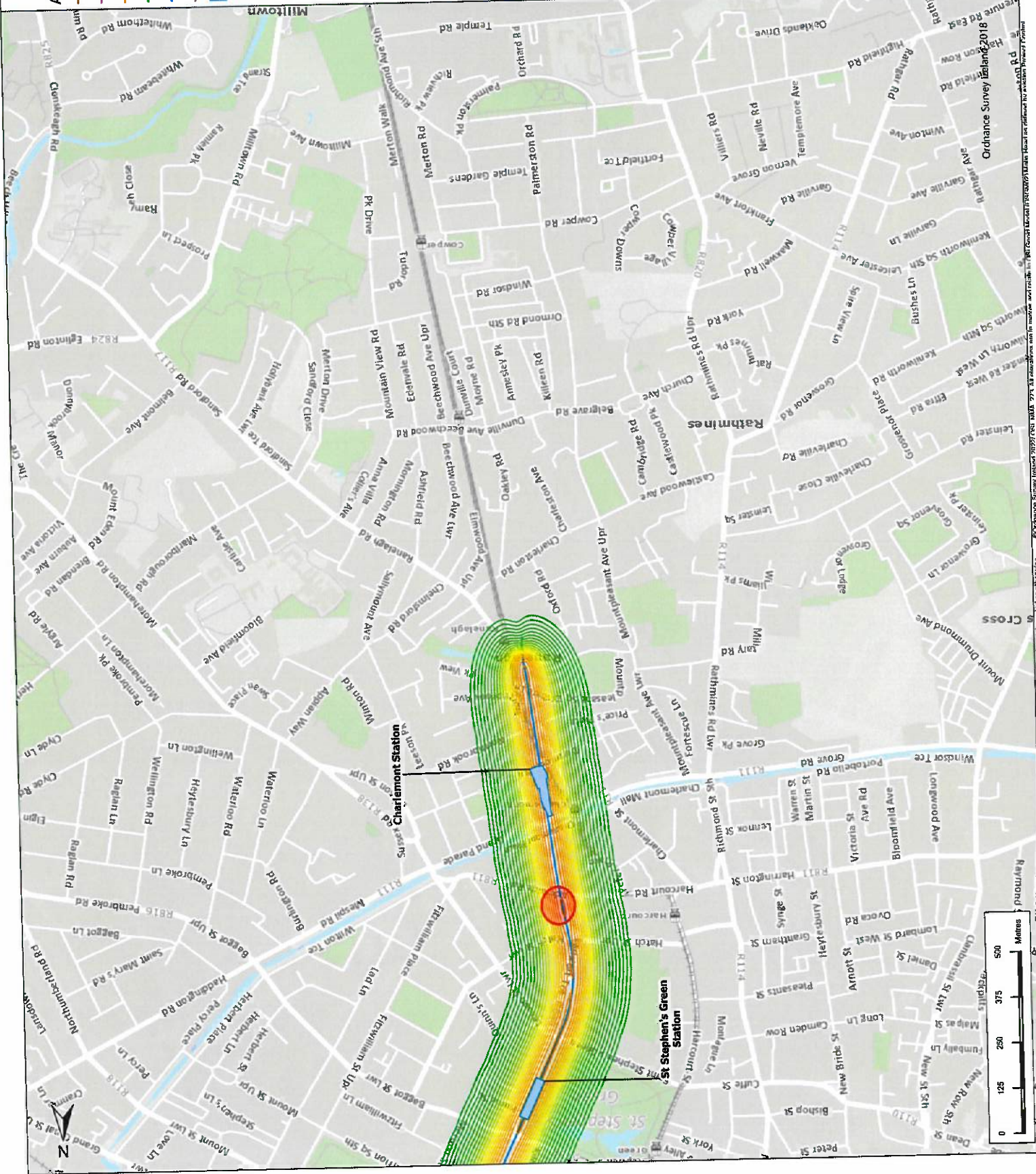


Legend

- Alignment**
- Cut & Cover
 - Incline
 - Retained Cut
 - Surface
 - Tunnel
 - Viaduct
- Station Locations**
- Charlmount Station
 - St Stephen's Green Station
- Groundborne Noise Contours**
- 30dB
 - 31dB
 - 32dB
 - 33dB
 - 34dB
 - 35dB
 - 36dB
 - 37dB
 - 38dB
 - 39dB
 - 40dB
 - 41dB
 - 42dB
 - 43dB
 - 44dB
 - 45dB
 - 46dB
 - 47dB
 - 48dB
 - 49dB
 - 50dB



Project No.	17722	Project Name	Malahide to Donabate	Rev'd	Rev'd	Rev'd	Rev'd
Date	17/02/2018	Revision	1	2	3	4	5
Client	JACOBS	Project	IDOM	Client	METROLINK	Project	Figure 14.2 Groundborne Noise from Tunnel Boring Machine
Sheet	7 of 7	Scale	1:100,000	Scale	1:100,000	Scale	1:100,000
Drawing Title	FINAL	DO NOT SCALE	DO NOT SCALE	DO NOT SCALE	DO NOT SCALE	DO NOT SCALE	DO NOT SCALE
Client No.	ML1-JAI-EIA-ROUT_XX-DR-Y-14009	Client Name	ML1-JAI-EIA-ROUT_XX-DR-Y-14009	Client No.	ML1-JAI-EIA-ROUT_XX-DR-Y-14009	Client Name	ML1-JAI-EIA-ROUT_XX-DR-Y-14009
Revision	P02	Revision	P02	Revision	P02	Revision	P02





Legend

Alignment

Tunnel

Station Locations

Operational Groundborne Noise Contours

25dB

30dB

35dB

40dB

45dB

50dB

55dB



Rev	Date	Issue	Drawn	Checked	By	App'd
002	17/02	Final Issue				

JACOBS
IDOM

TIIV
Transport Infrastructure
Investment & Development

METROLINK

Client
Project
Drawing Title
Figure 14.6 Groundborne Noise from Operation
Sheet 7 of 7

Drawing Status	FINAL	DO NOT SCALE
Scale @ A3	1:10,000	
Scale @ A4	1:20,000	
Client No.	ML1-JAI-EIA-ROUT_XX-DR-Y-14041	
Drawing No.	P02	

This drawing is not to be used in whole or in part other than for the intended purpose and project as defined on the drawing. Refer to the contract for full terms and conditions.

