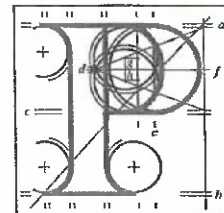


**Our Case Number:** ABP-314724-22

**Your Reference:** RGRE Burlington Limited (freehold) and RGF  
Harcourt Terrace Limited (leasehold)



**An  
Bord  
Pleanála**

John Spain Associates  
39 Fitzwilliam Place  
Dublin 2  
D02 ND61

**Date:**

**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 and oral hearing request (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 cheque refund of €50 is enclosed.

The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you on this matter in due course.

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.

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Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Yours faithfully,



Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

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64 Marlborough Street  
Dublin 1  
D01 V902

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

**AN BORD PLEANÁLA**  
LDG- 060445-23  
ABP- \_\_\_\_\_  
13 JAN 2023  
Fee: € 50 Type: cheque  
Time: 16.40 By: hand

Date: 13<sup>th</sup> January 2023  
Our Ref: BC 22105

Dear Sir or Madam,

**RE: SUBMISSION ON THE METROLINK ON BEHALF OF RGRE BURLINGTON LIMITED (FREEHOLD) & RGRE HARCOURT TERRACE LIMITED (LEASEHOLD) REGARDING A SITE AT 6 & 7 HARCOURT TERRACE, DUBLIN 2 (D02 P210 & D02 FH73)**

**ABP Ref. NA29N.314724**

**Description - MetroLink Railway Order – Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin**

**Submission on behalf of:** RGRE Burlington Limited (freehold) & RGRE Harcourt Terrace Limited (leasehold), c/o Cooney Carey Consulting Limited, Units 15/16 Carmanhall Road, Sandyford, Dublin 18

## Introduction

Our clients, RGRE Burlington Limited (freehold) and RGRE Harcourt Terrace Limited (leasehold), welcomes the opportunity to make a submission on the Railway Order for the MetroLink line.

Our client has a number of observations and concerns in relation to the Railway Order. This submission is broken down under the following headings:

1. Site Location
2. Local Planning Policy
3. Engineering Considerations
4. Development Potential
5. Concluding Comments

The following is enclosed with this submission:

- Engineering Commentary prepared by Cronin Sutton Consulting Engineers
- Fee of €50

Managing Director: John P. Spain  
Executive Directors: Paul Turley | Rory Kunz | Stephen Blair | Blaine Cregan  
Senior Associate Directors: Luke Wymer | Meadhbh Nolan | Kate Kerrigan  
Associate Directors: Ian Livingstone | Tiarna Devlin

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.  
Registered in Ireland No. 396306. Registered Office: 39, Fitzwilliam Place, Dublin 2 D02 ND61. VAT No. IE 6416306U

### Site Location

The site is located at 6 & 7 Harcourt Terrace, Dublin 2. The site is currently occupied by a four-storey commercial building located within the city centre of Dublin City. The site is in close proximity to existing public transport such as the Luas Green Line located c. 150m to the southwest.

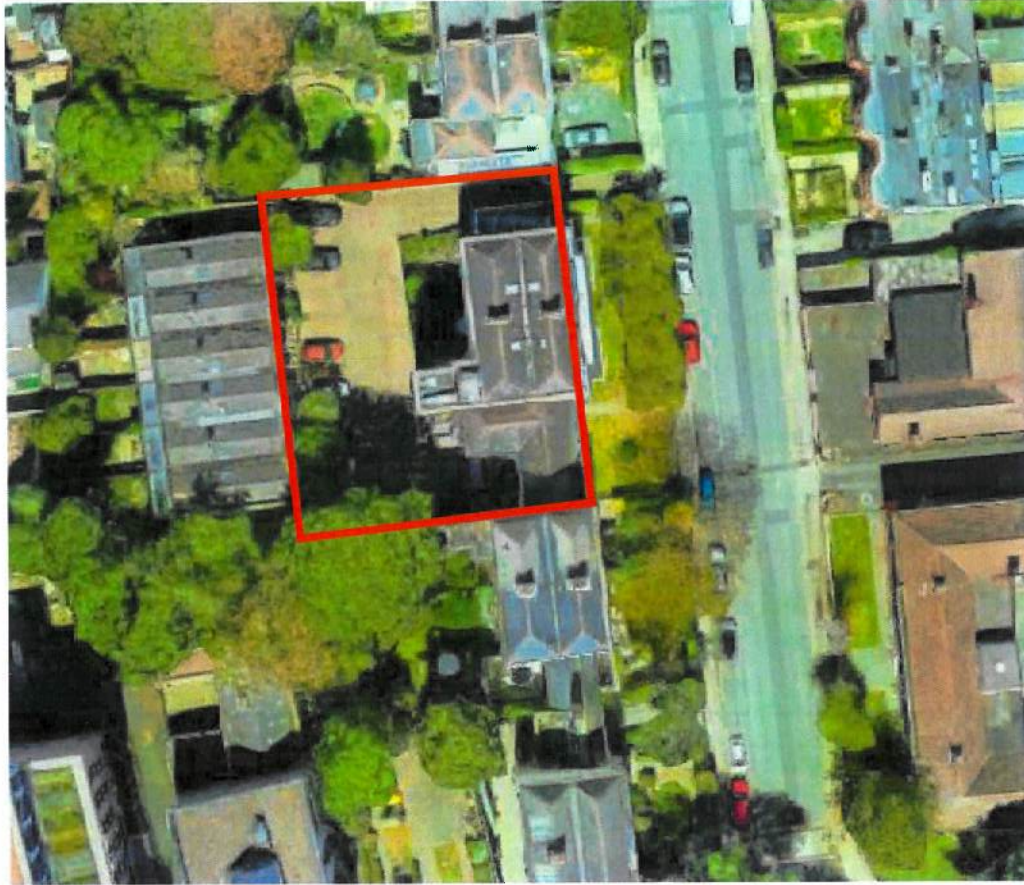


Figure 1: Site Location with approximately boundary outlined in red (Source: Google)



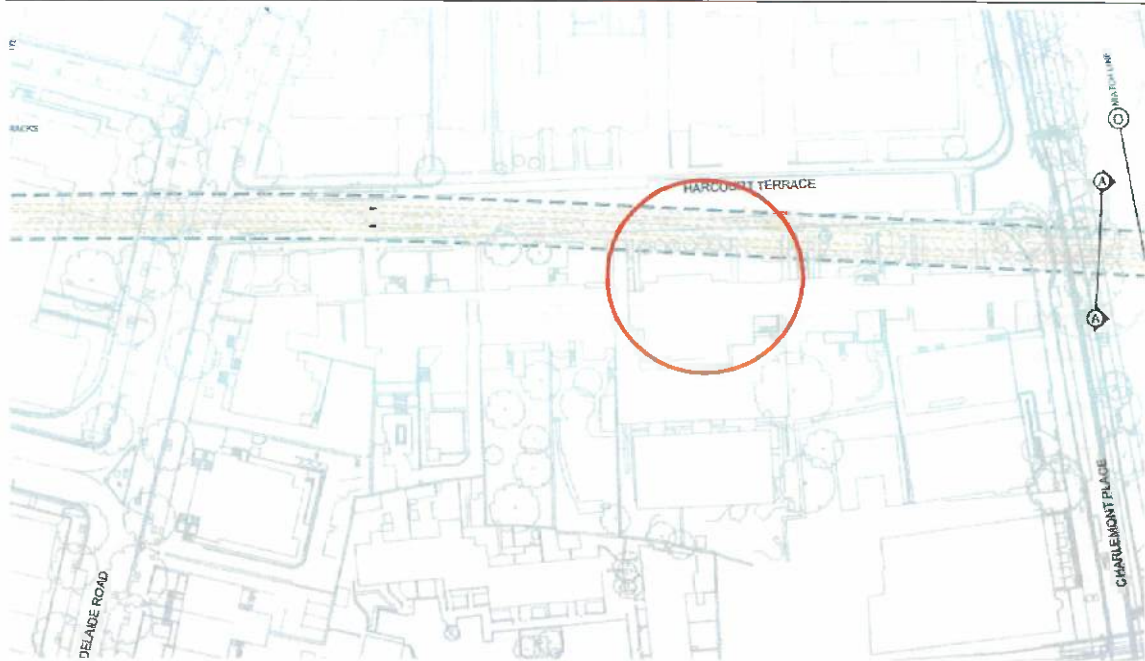


Figure 2: Proximity of the MetroLink line to the subject site (Source: metrolink.ie)

The Metrolink line is proposed to run down Harcourt Terrace and encroaches under the front of the site at 6 & 7 Harcourt Terrace. It is acknowledged that the construction of the proposed Metrolink will have a certain amount of impact on the subject site. However, our client has serious concerns in relation to the identified noise and associated disruption contained with the Railway Order documentation. A "Significant"<sup>1</sup> residual impact is identified to a neighbouring building (9 Harcourt Terrace). Whilst this impact is noted as being temporary, there is no clarity or estimate provided beyond this in relation to the duration of these works.

### Engineering Considerations

A letter has been prepared by CS Consulting Group to accompany this submission. The letter makes reference to our client's intentions to redevelop the site in the future to include a lower ground floor and basement level and potentially 6+ floors of development. The letter states:

*"The owners of 6-7 Harcourt Terrace confirm that they are proposing to redevelop this site in the future which will include the provision of a lower ground floor and basement below existing ground level."*

*We note that the proposed crown of the proposed tunnel works for the Metrolink transit is at a datum of -17.3m which is at a considerable depth below the site and located in bedrock. The buildings currently on site are commercial and it would be hoped to redevelop to a height of 6 + floors."*

*Therefore, the proposal to redevelop, which will include a reinforced concrete raft slab foundation supported on the underlying rock, will ensure load spread over the rock strata to minimise local future loading on the underground tunnel."*

*We would request that this proposal is acceptable and can be catered for in the future. Please confirm that no vent shafts or the like to service the underground tunnels are to be located on our site as this would be problematic both now and for future development."*

<sup>1</sup> Table 14.49 of the EIAR titled "Summary of Residual Impacts during Tunnel Boring in AZ4"

## **Development Potential**

The subject site is located along Harcourt Terrace, c. 150m from the Luas Stop at Charlemont which is served by the Luas Green Line. The site is located in a prominent location within Dublin City, adjacent to the Grand Canal, close to all necessary services and facilities, including the Green Luas Line Stop at Charlemont and numerous bus stops. The site is therefore considered to be suitable for redevelopment which would see the further densification of the site, in line with national, regional and local policy guidance which encourages the redevelopment of brownfield sites in close proximity to public transport hubs.

The redevelopment of the subject site for a building of greater height would be compliant with planning policy guidance which encourages compact growth and would promote the concept of the 15-minute city. The site currently provides for a 4 no. storey commercial building, however, it is our client's intentions to provide for a building of increased height in line with recent surrounding developments such as Zendesk located less than 100m to the east and Two Grand Parade which is located a similar distance to the south.

The surrounding area has seen significant redevelopment in recent years to provide for both commercial and residential developments. It is considered appropriate for the subject site to provide for a similar redevelopment in line with the emerging context surrounding the Charlemont Luas Stop. It is therefore the development potential of the subject site is not hindered by the proposed Metrolink.

## **Concluding Comments**

Our client welcomes the opportunity to make a submission on the Metrolink Railway Order and the sustainable transport benefits which would be delivered. Our client acknowledges that a scheme of this scale will result in impacts, however, these should be carefully managed to minimise the effects on the surrounding landholdings.

Our client reserves the right to elaborate further on these issues as necessary should the Board decide to hold an oral hearing or require any clarification and would welcome any responses from the applicant. Our client also reserves the right to ensure that the development potential above and below ground of the lands in question are not compromised by the MetroLink proposal

We trust this submission will be taken into consideration in assessing the proposals.

The assessment of compensation would not be limited to the content of this submission.

Yours sincerely,



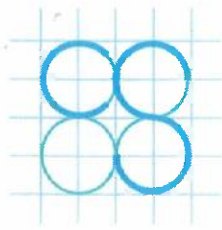
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**John Spain Associates**

**APPENDIX 1: NOTE PREPARED BY CS CONSULTING**







CS CONSULTING  
GROUP

## CS CONSULTING GROUP

HEAD OFFICE: 19-22 Dame Street, Dublin 2, D02 E267, Ireland

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Attn. Cian McGarry  
Ronan Group Real Estate  
32 Burlington Road  
Dublin 4

**Sent By:** Email

**Job Ref:** N/A

A - PS

**Date:** 13-Jan-23

**RE: Proposed Railway Works MetroLink – 6-7 Harcourt Terrace, Dublin 2**

### Engineering Submission

Dear Sir/ Madam,

The owners of 6-7 Harcourt Terrace confirm that they are proposing to redevelop this site in the future which will include the provision of a lower ground floor and basement below existing ground level.

We note that the proposed crown of the proposed tunnel works for the MetroLink is at a datum of -17.3m which is at a considerable depth below the site and located in bedrock. The buildings currently on site are commercial and it would be hoped to redevelop to a height of 6 + floors.

Therefore, the proposal to redevelop, which will include a reinforced concrete raft slab foundation supported on the underlying rock, will ensure load spread over the rock strata to minimise local future loading on the underground tunnel.

We would request that this proposal is acceptable and can be catered for in the future. Please confirm that no vent shafts or the like to service the underground tunnels are to be located on our site as this would be problematic both now and for future development.

The Railway order section 6. Deviations, (d) ii. states, "*deviate vertically by any distance not exceeding 5 metres upwards from the levels show on the plans*" as we proposed to construct a

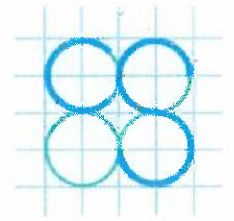
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double level basement which will be supported on the underlying rock, due to the level of the crown of the tunnel and the formation level of our concrete raft foundation, the above section 6.(d) ii. would not be acceptable, in which we would request that writing confirmation is needs to be provided by our client before on any deviations from the current -17.4 metre level below existing ground as indicated on the current sections.

Also we seek writing confirmation from the NTA and TII that the MetroLink will not impede our ability to construct or maintain/operate our building/basement in the future.

Yours sincerely,

**Pearse Sutton**

Director

BSc(Eng), CEng, Dip Struct Eng, FIEI, FIStructE, MAPEGS,

PEng, FConsEI, Dip Env Eng, Eur Ing, LEED AP

**for Cronin & Sutton Consulting**