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**Dublin City Council,
Civic Offices,
Wood Quay,
Dublin 8**

Our Ref: 24227

Date: 23/04/2025

Re: Response to Request for Further Information for Planning Reference
WEBLRD6094/26-S3

Dear Sir/Madam,

In relation to the Request for further Information dated 06th March 2026, we respond as follows:

1. The Railway Safety Act 2005 places an obligation on all persons carrying out any works on or near the railway to ensure that there is no increase in risk to the railway as a consequence of these works. Because of the proximity of the site to the railway and given the details of the concern raised by the NTA and Iarnród Éireann in relation to the DART + South West Project, the Developer must take into account this obligation in Design, Construction and Operation of the scheme.

The Applicant is requested to address the following items of concern:

a) The applicant is requested to demonstrate that the proposed development will not impact the railway line and / or safe operations of the railway, confirming no piling or deep foundations will enter the soil anchor zone of influence within the DART+ South West substratum acquisition. The substratum acquisition is required to facilitate the installation and long-term protection of soil anchors along the railway corridor; and hence protect this mass transit route. Any works in proximity to the substratum acquisition shall maintain the required safe clearances to the soil anchors and shall be subject to prior agreement with the DART+ South West team and Iarnród Éireann, including compliance with Iarnród Éireann third-party approval procedures.

We have requested a design for the proposed soil anchors from Irish Rail that are to extend under the site that is the subject of this planning application. No design has been forthcoming, and it appears no design has been undertaken to date.

In order to demonstrate that this development will not impact the railway line or the proposed potential future widening of the railway line and in the absence of a design from Irish Rail, we have engaged the expertise of AGL Consulting Geotechnical Engineers to conduct a design of the potential soil anchors for a scenario of the site at present (predevelopment) and the site post development. Please refer to AGL report dated 17th April 2026.

The proposed design for the building is to utilise a piled raft foundation with piles kept in line with one another to minimise occupying space for the proposed Irish Rail soil anchors.

In order to develop this site, a significant overburden of made ground must be removed from the site in order to bring the site back to a consistent level at natural ground level. In doing so we are

removing loading from the proposed soil anchors. This is demonstrated in Figures 1 & 2 below which are extracts from AGL report. The AGL report clearly shows us that the factor of safety on the soil nails increases post development when comparing the same soil anchors to predevelopment. Therefore, the proposed development is improving the on-site situation for the soil anchors.

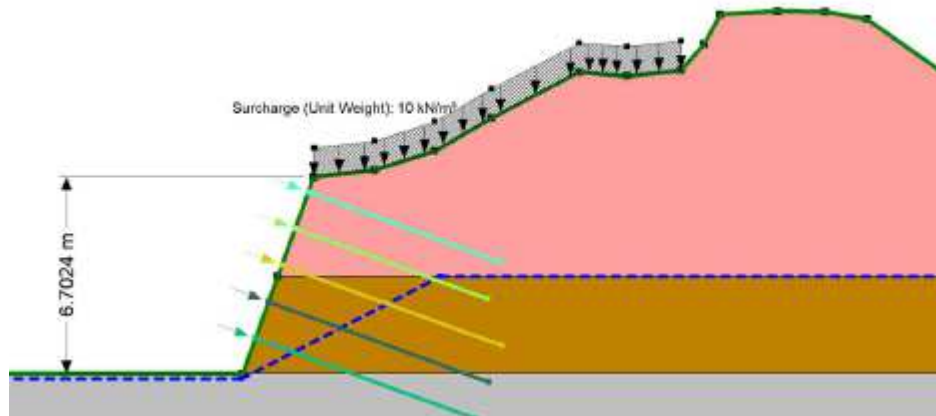


Figure 1
Extract from AGL report showing existing made ground over-burden

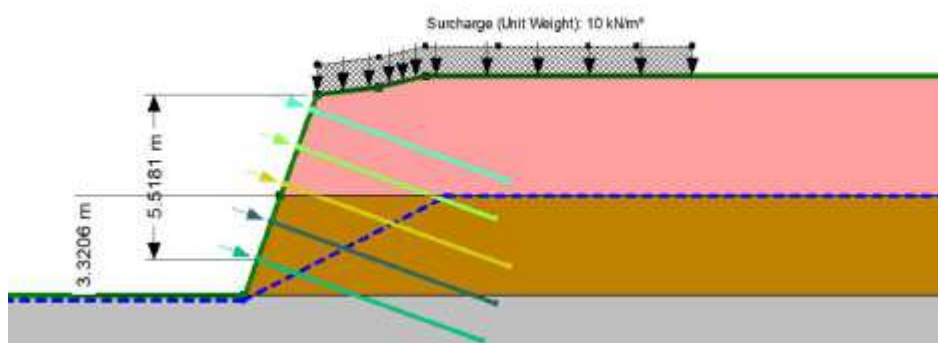


Figure 2
Extract from AGL report showing proposed site level

The key statement to take from the AGL report is the following:

“It is found that that using the same soil nail arrangement the margin of safety increases for the “Future Ground Profile” compared to the “Current Ground Profile”. Therefore the Future Ground Profile is less onerous which potentially would allow shorter nail lengths, with greater efficiency. However, for simplicity the same nail arrangement for both current and future conditions have been considered.”

The AGL design and this statement clearly demonstrates that the proposed development will not impact the railway line and or safe operations of the railway.

In relation to confirming no piling or deep foundations will enter the soil anchor zone of influence within the DART+ South West substratum acquisition we note the following:

If a shallow foundation design is adopted, the bulb of pressure from these foundations would be from the underside of the shallow foundations and extend down through the zone of influence of the soil nails. Therefore, the loading on the soil anchors would increase and the stresses in the

soil anchors would increase, requiring more soil anchors or a more robust design to cater for this additional loading. Taking this into consideration, a piled raft foundation has been opted for to support the proposed building. The proposed piles would take the building loading to a depth below the zone of influence of the proposed soil anchors. This then ensures that the proposed development has no reliance on any future Irish Rail slope stabilisation works such as soil anchors and therefore also mitigates any risk to Irish Rail of undermining and/or subsidence of the proposed development. Although the proposed piles extend down through the zone of influence of the soil anchors, the loading does not which is a key factor to note. This has already been proved within the AGL report where the design has proved that the piled solution increases the margin of safety for the soil nails.

The AGL report further demonstrates that there is ample space for Irish Rail soil anchors to be installed with the proposed piles. The proposed piling solution occupies circa 10% of the available elevation space, thereby leaving circa 90% of the elevation clear for soil anchors. Refer to Figure 3 below for a view of part of the elevation of the slope depicting the array of soil anchors (square with a central dot) and the proposed piles for the development (amber colour).

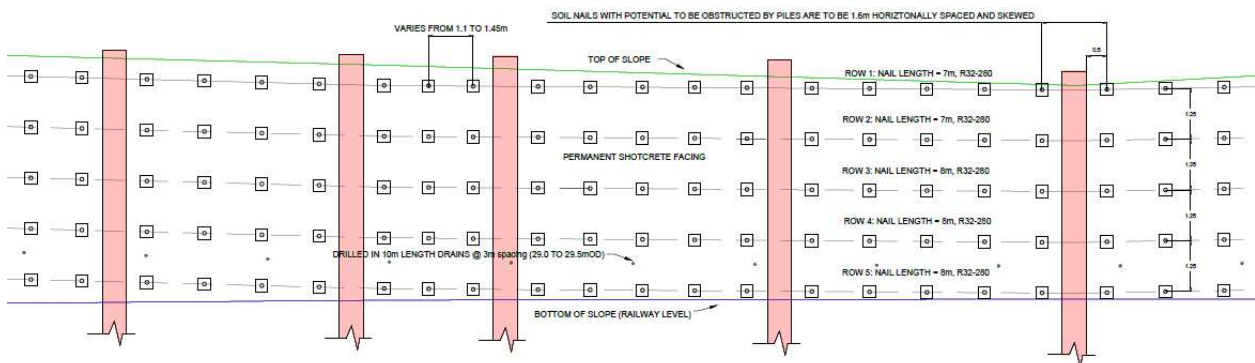


Figure 3

Extract from AGL report indicating part elevation of slope with soil nails and piles behind.

As per the AGL report the general tolerance on the soil nail locations would be $\pm 100\text{mm}$ and $\pm 50\text{mm}$ for soil anchors adjacent to the proposed piles. The piles themselves for the proposed development would have a tolerance of $\pm 75\text{mm}$. Regardless of which development comes first, either the soil nails or the proposed piles for the development, both will be installed to ITM co-ordinates and within their specified tolerances. As-build drawings will be available for whichever comes first. Therefore, there is minimal risk that one could clash with the other. That being said, and to further mitigate risk, should the proposed development come first a sacrificial “dummy” pile is to be installed on the railway side of each bearing pile that is within the plan extent of the soil anchors. This ensures that the piles supporting the building can’t be damaged by the soil anchor works. This is also described in section 13.1.1 of the AGL report.

We trust that this is in order, but should you have any queries on the foregoing, please do not hesitate to contact the undersigned.

Yours sincerely,

Gordon Poyntz B.E., C.Eng., M.I.E.I.
Chartered Engineer

For Lohan & Donnelly Consulting Engineers.

Date: 23rd April 2026