

Submission No.			122		
Organisation Name or Name of Submitter			Institutional Investment Partners GmbH (represented by Savills Commercial Ltd.)		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
PROPOSAL: RAILWAY (METROLINK - ESTUARY TO CHARLEMONT VIA DUBLIN AIRPORT) ORDER [2022], ABP REFERENCE: NA29N.314724 OBSERVATION FOR: INSTITUTIONAL INVESTMENT PARTNERS GMBH ACTING FOR THE ACCOUNTS OF PKD AEW EUROPAFONDS OBSERVATION RE: 2-4 O’CONNELL STREET LOWER, NORTH CITY, DUBLIN 1, CO. DUBLIN					
1	Cover letter	1	<p>Our client is the owner of 2-4 O’Connell Street Lower in Dublin. While our client fully supports the delivery of this important piece of infrastructure for Dublin, we have identified some concerns with the proposed construction works.</p> <p>This correspondence outlines our client’s concerns, which are as follows:</p> <ul style="list-style-type: none">• The MetroLink tunnel earthworks will be within 30 metres of our client’s property• The property is of historical architectural significance and highly sensitive to disturbance• A banking vault is located at basement level of the property. Bank vaults can be more prone to adverse issues from vibration disturbance• A ‘MetroLink Property Owners Protection Scheme’ will be established for any residential property within 30-50 metres of the MetroLink works. It is unclear why commercial property owners are not offered a similar level of monitoring and protection. In particular, properties of historic value should be afforded a high level of protection from these significant engineering works. <p>Accordingly, we request that the ‘MetroLink Property Owners Protection Scheme’ is extended to include commercial properties of historical significance within 30-50 metres of the MetroLink works.</p>	<p>We have reviewed the submission and provided response for the observations/ concerns raised in detail below.</p> <p>TII recognize the historical architectural significance of your property and confirm your property has been listed as protected structure in EIAR Chapter 26 (Architectural Heritage), Table 26.21: Architectural Heritage Constraints between O’Connell Street Station and Tara Station. The EIAR Chapter 26 (Architectural Heritage) describes and assesses the likely direct and indirect significant effects of the proposed Project on Architectural Heritage. The protected structure status of your property is known hence your property has been subject to impact assessment and the results are presented in the Section 26.5.4.11 O’Connell Station to Tara Station. According to the findings of impact assessment, there will be no direct or indirect impacts on architectural heritage during Construction and Operational Phase in this section of the study area.</p> <p>As your building is outside the zone of influence if the tunnel there is no risk due to ground movement.</p>	
2	Construction Impact on 2-4 O’Connell St Lower	2 & 3	<p>From O’Connell Street Station to Tara Station the proposed tunnel alignment crosses from beneath the buildings on the western side of O’Connell Street Upper, running beneath the GPO to cross O’Connell Street Lower, Abbey Street Lower, Harbour Court, Eden Quay, the River Liffey, and George’s Quay to meet the proposed Tara Station at Tara Street. As outlined in Figure 2 below, the distance from the tunnel to the boundary of 2-4 O’Connell St Lower is approximately 30 metres.</p> <p>As noted previously, 2-4 O’Connell St Lower is a five storey over basement property. It is occupied by Ulster Bank, who have operated a retail bank from the building for some time. The basement of the property contains Ulster Bank’s secure vault.</p> <p>The planning application documents indicate that the railway tunnel will be 16 metres below ground level in the area. This does not account for properties with basements, which reduces the distance to the proposed tunnel by a further 4-5 metres. Clearly this increases the potential for disturbance of properties with basements.</p> <p>Our client’s concern is exacerbated by the use of the basement at 2-4 O’Connell St as a secure banking vault. Banking vaults can require seismic monitoring for the purposes of security, making them more sensitive to disturbances from vibration.</p>	<p>TII welcome this additional information in relation to your property, and is happy to engage further with Institutional Investment Partners GmbH regarding this requirement.</p> <p>EIAR Appendix A 5.17, Building Damage Report, covers the assessed impacts of construction generated ground movements and settlement on property. The settlement contours calculated were used to undertake the buildings damage assessment. Please note that your building (B-181) is not on the tunnel alignment and is outside the ground movement contours and will not therefore be impacted by ground movement.</p> <p>With regards to noise and vibration, at this location the predicted groundborne noise level from TBM passage will be 44 dB LASmax at the surface, increasing by 2 dBA to 46 dB LASmax in the lowest basement, which is higher than the 45 dB LASmax threshold for the relatively short duration of the TBM passage through this area. Groundborne vibration from the TBM is predicted to be 0.19 ms-1.75 VDV (Vibration Dose Value is a parameter that combines the magnitude of vibration and the time for which it occurs) at surface level increasing to 0.25 ms-1.75 VDV with the two basements and piles. These are below the threshold level of significant effect of 1.6 ms-1.75 VDV, but could trigger bank vault monitors.</p> <p>Groundborne noise from railway operation will be 22 dB LASmax at ground level, increasing by 2 dBA to 24 dBA taking account of the basements and foundations. The threshold of significant effect is 40 dB LASmax, which will not be exceeded in the basement. For operational vibration the velocity in the vaults will be 5 micrometres/second. This is unlikely to trigger a seismic sensor. In VDV terms it will be 0.004 ms-1.75 .</p> <p>2-4 O’Connell Street Lower property is located near the tunnel area between Chainage 17+000 and Chainage 17+200. The <i>Table 14.47 Location Summary where Track Support Measures will be Required</i> of the EIAR Chapter 14 (Ground-borne Noise and Vibration) indicates the sections of the tunnel where mitigation in the form of floating slab track or other track support measures are required to reduce Groundborne noise and vibration during operation. Floating Slab Track is proposed for a section between Chainage 17+000 to 17+200 as a mitigation measure for the nearby Abbey Theatre. Therefore groundborne noise and vibration at this building will also be lower than has been predicted.</p>	
3	Construction Impact on 2-4 O’Connell St Lower	3 & 4	<p>Furthermore, the Environmental Impact Assessment Report (EIAR) submitted with the application confirms that our client’s property is highly sensitive to construction disturbance due to its architectural heritage significance.</p> <p>We note that a ‘MetroLink Property Owners Protection Scheme’ will be established for any residential property within 30-50 metres of the MetroLink works. Owners of these properties can avail of protection and surveys before and after the MetroLink project is completed.</p> <p>It is unclear why commercial property owners are not offered a similar level of monitoring and protection. In particular, properties of historic value should be afforded a high level of protection from this significant engineering works.</p>	<p>Please refer to response Item (1) above.</p>	

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4	Requested Planning Condition	4	As stated previously, our client is supportive of the MetroLink project and welcomes its ultimate delivery. Irrespective of this, there are concerns with the construction impact on the property due to its architectural significance and basement banking vault. Accordingly, we request that the ‘MetroLink Property Owners Protection Scheme’ is extended to include commercial properties of historical significance within 30-50 metres of the MetroLink works.	Please refer to response on Items (1) and (2) above. TII do not intend to put in place a Property Owners Protection Scheme for Commercial Properties along the MetroLink route. To protect commercial properties, TII contractors appointed to carry out the works will, with the agreement of the owners of such properties, commission chartered building surveyors to carry out a precondition survey of commercial properties. In the event that it is determined that damage has occurred, TII’s contractor will be required to commission a follow up survey to confirm the extent of the damage and confirm if the damage has been caused by MetroLink works. Where property damage is confirmed to have been caused by MetroLink works the property concerned will have recourse to MetroLink project insurances.	
5	Requested Planning Condition	4	We request that An Bord Pleanála include a condition on the grant of planning permission requiring the following: • Structural surveys of buildings and other structures of architectural heritage significance to be completed prior to the commencement of works.	TII do not believe that additional conditions are required as in all cases where the built heritage structures are in the vicinity of the proposed tunnelling and are predicted to be impacted these buildings will be fully assessed, surveyed and monitored. Please refer to response item (1) and (2) in relation to anticipated impacts on your property. As noted, this building is outside the zone of influence.	
6	Requested Planning Condition	4	• Appropriate recording, protection, and reinstatement of items of architectural heritage, with method statements to be compiled by the Project Conservation Architect and the works supervised by suitably qualified professionals.	TII do not believe that additional conditions are required as the requested actions are planned to be undertaken as referred in the specific sections of the EIAR, such as Chapter 26 (Architectural Heritage) or EIAR Appendix A5.1, Outline CEMP. It is not applicable to this building as outside the zone of influence.	
7	Requested Planning Condition	4	• Mitigation in appropriate locations including damage and vibration monitoring to ensure that vibration at the building or other structure does not exceed defined limits.	The requested actions related to vibration monitoring will be undertaken as referred to in the EIAR Appendix A5.1, Outline CEMP. According to this document, the contractor(s) will prepare a Construction Noise and Vibration Management Plan (CNVMP) for the proposed Project which will be a live document. A full monitoring and auditing programme will form part of the CNVMP which will be agreed with the Local Authorities prior to the commencement of the Construction Phase. Table 6.2: Noise and Vibration Measures of the Outline CEMP outlines the monitoring programme requirements. Please refer to response item (1) and (2) in relation to anticipated impacts at your property. As noted, this building is outside the zone of influence and therefore does not require any ground movement monitoring. Appendix A5.1 Outline CEMP also details that the results of all environmental monitoring activities will be reviewed by the Environmental Manager on an ongoing basis to enable trends or exceedance of criteria to be identified and corrective actions to be implemented as necessary. External regulatory and statutory monitoring may also take place to monitor compliance with requirements.	