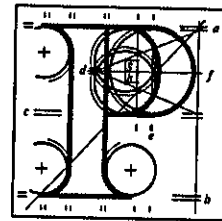


Our Case Number: ABP-314724-22

Planning Authority Reference Number:

Your Reference: Hertz Europe Service Centre Limited



**An
Bord
Pleanála**

Corr Property Consultants
3A Sycamore House
Millennium Park
Naas
Co. Kildare
W91 WN72

Date: 13 December 2022

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 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.

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.

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

| | | |
|---------------------------|----------------|--|
| Tel | Tel | (01) 858 8100 |
| Glaao Áitiúil | LoCall | 1890 275 175 |
| Facs | Fax | (01) 872 2684 |
| Láithreán Gréasáin | Website | www.pleanala.ie |
| Ríomhphost | Email | bord@pleanala.ie |

| | |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1 | Dublin 1 |
| D01 V902 | D01 V902 |

Niamh Thornton

From: SIDS
Sent: Monday 21 November 2022 12:57
To: Niamh Thornton
Subject: FW: METROLINK Railway Order Application - Objection/Submission
Attachments: Objection Lr. to ABP (Hertz).pdf

From: jennifer.ryan@corrconsult.ie <jennifer.ryan@corrconsult.ie>
Sent: Monday 21 November 2022 11:19
To: SIDS <sids@pleanala.ie>
Cc: 'Tom Corr' <tom.corr@corrconsult.ie>
Subject: METROLINK Railway Order Application - Objection/Submission

Dear Sirs,

I attach an Objection/Submission Letter prepared by Tom Corr on the Metrolink Railway Order Application Project. Tom Corr is representing Hertz Europe Service Centre Limited who is an affected property owner.

Please confirm safe receipt of this email.

Kind Regards,

Jennifer Ryan
Office Manager
Corr
3A Sycamore House
Millennium Park, Naas
Co. Kildare, W91 WN72.

Mob: (083) 8169000
Tel: (045) 254211
Email: jennifer.ryan@corrconsult.ie
Web: www.corrconsult.ie



SCSI

VALUER
Chartered Fellow



RICS®

CORR is the trading name of Corr Property Consultants Ltd.

Company Registered Number: 520536, PSRA Licence Number: 003033

Registered Office: 3A Sycamore House, Millennium Park, Naas, Co. Kildare, W91 WN72.

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Our Ref: TC/JR

CORR

An Bord Pleanála
64, Marlborough Street
Dublin 1.
Via Email: sids@pleanala.ie

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info@corrconsult.ie

www.corrconsult.ie

21st November 2022

Re: Metrolink Railway Order Application and Supporting Documentation
Client: Hertz Europe Service Centre Limited
Address: 25-28 North Wall Quay, Dublin 2
Ref No: ML1L-A1, ML1K-A7 and ML1K-A6

Dear Sirs,

We act on behalf of the above client who has been served with notice of the making of the above Railway Order Application. Having reviewed the drawings and documentation accompanying same, our client has instructed us to object to the confirmation of the Metrolink Railway Order Application and all of the supporting documentation to include the proposal Railway Works and Land Requirements, the Book of Reference, the EIAR and the Natura Impact Statement etc. on the following grounds:

1. Surplus Lands – Permanent

There appears to be an acquisition of surplus lands on a permanent basis. This is particularly the case at the bicycle hub building and at the attenuation area at the southern side.

2. Surplus Lands - Temporary

The acquisition of temporary lands is completely excessive and unless it is modified, will have extreme consequences for the daily operations of the premises. As currently planned, the following severe problems are being created:

(a) Health and Safety

The temporary acquisition area runs right up to the fire exits on the western side of the main building. The fire exits will be blocked by the temporary acquisition. This is completely unacceptable. As the acquisition is currently planned, the premises would not be operational because it would not be compliant with fire regulations and health and safety regulations.

(b) Computer Systems and Cooling Units

For the continued operation of the business, it is critical that there is access at all times to the cooling units which are on the south west corner of the main building. These cooling units are essential for the large comms rooms that are located immediately inside the building at the location of the cooling units. Hertz is a major international company and the subject premises in

Swords serves the European market. The continued operation of the IT's section of the business is critical for its operations.

(c) Access to Power Supply Services and Storage Areas

It is critical that the power location point on the south west side is accessible at all times. All of the manholes to the various services, that are located in the temporary acquisition area, will need to be accessible at all times.

(d) Mitigation in Relation to Temporary Areas

An alternative location for a temporary area is at the south east side of the Hertz owned lands. This would facilitate a storage and parking which could reduce the requirement for temporary acquisition areas to the west and south of the main building. In addition, the temporary areas must be set back at all locations around the perimeter of the building so that all the hard surfaces are not being interfered with and there is a minimum pathway of three metres around the entire perimeter of the building.

(e) Temporary Acquisition of Car Parking Area

There is a completely excessive temporary acquisition of the car parking area to the northern end of the site. This will cause major problems as the area is the visitor car parking area. In addition, it will have a serious impact on the business plan for this Hertz location as it is the intention of the company to lease further space and this leased space will greatly increase the car parking requirements. One of the main issues here is that there is no current start date indicated for the Metrolink Project that is in any way definite. Everything ultimately will be subject to funding and as it stands at the moment, all these temporary areas could be in existence for very many years with negative consequences for the future plans of Hertz.

(f) Power and Data Networks

At this point in time, there is no clarity with regard to how power and data networks and other services including sprinkler piping and so on, will be relocated into the building. Clarity around this point is essential. Currently these services are in the area proposed for the station that will be permanently acquired.

3. Scheme Time Frames and Funding

There is no definite time frames in relation to the Metrolink Project. As a consequence of this, the Hertz premises is blighted as a property.

4. Noise

There is a large telephone service section within the premises and construction noise will interfere with the operations of this section of the business. Adequate mitigations in relation to noise and noise monitoring have not been made available.

5. Vibrations

Vibrations caused from excavations and construction work may have very serious consequences for the sensitive IT equipment and servers within the premises. There is an IT development centre located in the main building and this will also be severely impacted by the excessive vibrations that are likely to arise from construction. No details have been provided as to how vibrations can be mitigated or monitored.

6. Dust

Construction dust has the potential to cause very serious issues in relation the premises given the sensitive IT equipment and servers and outside cooling units for the servers. This is a matter of major concern to the business.

7. Drainage

Adequate details have not been provided in relation to the control of surface water and drainage during the construction period. Any negative consequences in relation to temporary flooding or interfering with drainage, would have serious impacts on the business.

8. Access

As currently proposed, one of the main access points for the carparking area is being blocked off by the temporary acquisition area. This is the assembly point for a fire evacuation. In addition, having only one access point, will potentially cause future problems given that there is an intention to expand the use of the premises by letting surplus space.

9. Security

Site security is a matter of major concern for the business as large volumes of sensitive data are stored on the premises. Details in relation to how security will be controlled have not been properly provided.

10. Design and Build Construction

Because this will be a design and build project, there are serious concerns in relation to how the contractor will be controlled. On other design and build projects, it would appear that the Acquiring Authority's main aim is to reduce construction costs regardless of the negative consequences for property owners. This is a major concern to the owner.

11. Additional Grounds of Objection

We reserve the right to include other grounds of objection and to elaborate on the above listed grounds of objection and to tender these at the An Board Pleanála Oral Hearing which we request be held.

Yours faithfully,



Tom Corr MAgrSc, FSCSI, FRICS, ACI Arb
RICS Registered Valuer
PSRA Licence No. 003033-004513
Agronomist