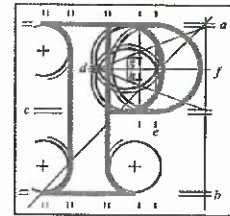


**Our Case Number:** ABP-314724-22

**Planning Authority Reference Number:**

**Your Reference:** Institutional Investment Partners GmbH  
(PKD AEW)



**An  
Bord  
Pleanála**

Savills  
33 Molesworth Street  
Dublin 2

**Date:** 07 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 (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 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.

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaao Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
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The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902

23 November 2022

Dear Sir or Madam

**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

We write on behalf of our client, Institutional Investment Partners GmbH acting for the accounts of PKD AEW Europafonds, to provide a submission on Railway Order Application (RAO): NA29N.314724. The RAO seeks permission for the new MetroLink project in Dublin.

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.

This correspondence outlines our client's concerns, which are as follows:

- 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

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. This request is outlined in greater detail below.

## **2-4 O'Connell Street Lower**

2-4 O'Connell St Lower is a terraced eight bay, five storey over basement property. The property's main frontage is onto O'Connell Street, with a fire exit onto Harbour Court, to the rear of the property. It is occupied by Ulster Bank.

Directors and Leadership Group: Mark Reynolds (Managing), Angus Potterton (Chairman), Peter Callender (Company Secretary), Tom Barrett, Larry Brennan, David Browne, Gavin Butler, Darragh Cronin, Andrew Cunningham, Roy Deller, Shane Duffy, Niall Guerin, Ray Hanley, Michael Healy, Brian Kirwan, Catherine McAuliffe, Gerry McCarthy, John McCartney, Neal Morrison, Clarie Neary, Roland O'Connell, Fergus O'Farrell, Peter O'Meara, Isobel O'Regan, Domhnall O'Sullivan, David Potter, Andrew Smyth, Kevin Sweeney, John Swarbrigg, Ben Turtle, Paul Wilson

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and Middle East  
Savills Commercial (Ireland) Limited registered in Dublin No. 119887.  
Registered Office: 33 Molesworth Street, Dublin 2  
Savills Commercial (Ireland) Limited is a subsidiary of Savills plc.  
FSRA Registration No: 002233

The property is a protected structure (RPS. 5992) built 1923 and is within an Architectural Conservation Area. It is a building of significant architectural and heritage value originally built for Hibernian Bank. It comprises a flat roof concealed behind parapet wall, with balustrade to breakfront. Rectangular plan limestone ashlar chimneystacks. Granite ashlar walls with Portland stone detailing, channelling to superimposed double-height pilasters spanning first and second floors and to ground-floor of breakfront.



Figure 1. Site Location

#### Construction Impact on 2-4 O'Connell St Lower

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.

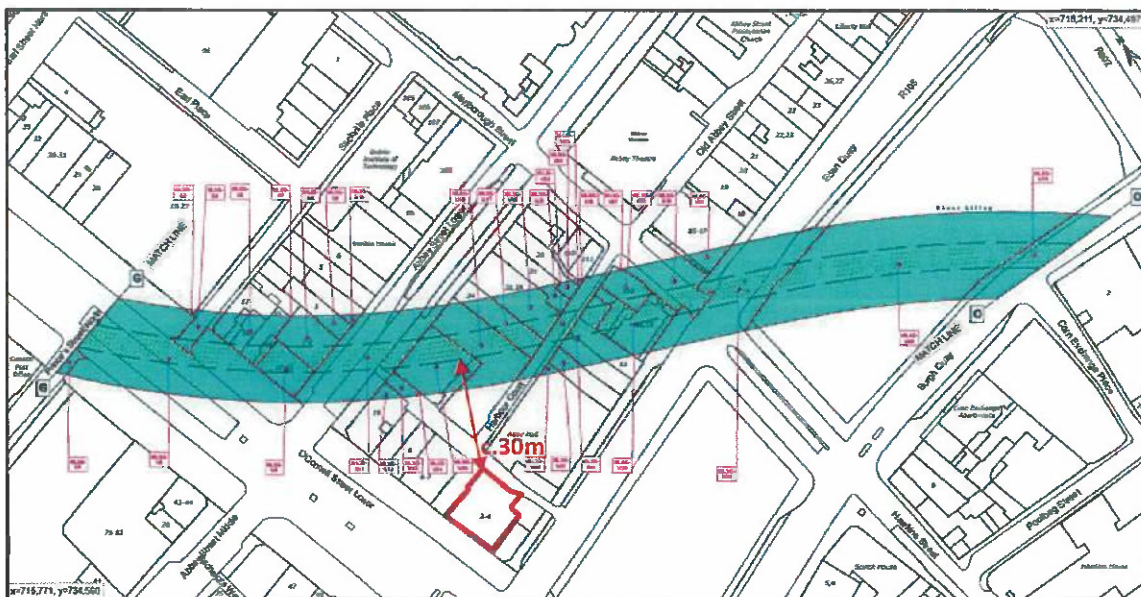


Figure 2. MetroLink Tunnel Extent

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.

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.

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.

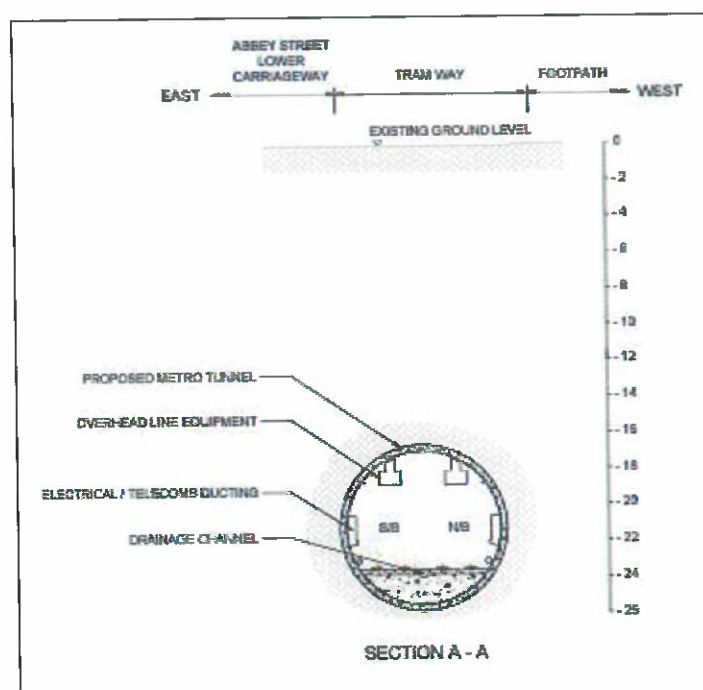


Figure 3. Tunnel Section – O'Connell Street to Burgh Quay (Lower Abbey Street)

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.

Table 1. Architectural Heritage Constraints between O'Connell Street Station and Tara Station

Constraint No.	Location	Description	Status	Sensitivity
BH-337	2 O'Connell Street Lower	Five-storey, three-bay terraced building with brick upper façade over granite first floor and modern shopfront	RPS 5992 DCC; NIAH 50010512	1 (High)
BH-338	3-40 O'Connell Street Lower	Five-storey, five bay bank building with second floor portico and with domed tower	RPS 5992 DCC; NIAH 50010511	1 (High)



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.

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.

#### **Requested Planning Condition**

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. 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.
- 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.
- Mitigation in appropriate locations including damage and vibration monitoring to ensure that vibration at the building or other structure does not exceed defined limits.

We trust that this correspondence outlines our client's concerns with the construction of the proposed MetroLink scheme.

Please direct any correspondence in respect of this matter to Raymond Tutty or Mark Keenan at these offices.

Yours faithfully

*Savills*

**Savills Commercial (Ireland) Ltd**