

Submission No.			64	
Organisation Name or Name of Submitter			Devonmill Limited (represented by Tom Phillips & Associates Planning Consultants)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
RE: Submission in respect of Application for Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022 Travelodge (Dublin Airport North), Pinnockhill, Swords, Co. Dublin. (Land owner- Devonmill Limited)				
1	Section 3.1 Hotel as a Sensitive Land Use	9	As evident in Section 2.0 of this Submission, the Travelodge Hotel will be significantly affected by the proposed works associated with the Metrolink project for a prolonged period of time (4-6 years). The construction works will result in restricted hotel access, traffic congestion in the surrounding area due to road closures and diversion, disturbance arising from the construction works and a potential permanent loss of car parking.	<p>Impacts of construction traffic to the vicinity of the property is limited to vehicles serving Pinnockhill site only, where a general movement of less than 50 vehicles per day throughout construction has been calculated. See Section 5.5.4 of Appendix A9.5.</p> <p>The proposed closure of the R125 South arm will be limited to 18 months for unavoidable works, building the cut &amp; cover section beneath the R125 - with pedestrian and cyclist access to be maintained to limit adverse impacts to the area. The detailed plans for traffic management around this property during the construction phase are detailed in Section 5.5 of Appendix A9.5 of the EIAR.</p> <p>While diversions from the north and west are considerable, there is also alternative routing via Mountgorry Way. Further, traffic coming from Dublin City Centre and Dublin Airport will experience a much reduced level of diversion compared to northwest originating traffic, with only a 200m difference in route distance compared to 1.7km for traffic from the north and west.</p> <p>Other impacts arising from the construction works, including loss of car parking, are summarised below.</p>
2	Section 3.1 Hotel as a Sensitive Land Use	9	<p>We highlight the sensitivity of a hotel in this regard and the resultant potentially significant impact of the proposed works on the operation of the hotel.</p> <p>Both the physical and perceived attractiveness of the hotel will be acutely affected by its proximity to the construction works, resulting in a detrimental impact on the guest experience.</p>	<p>TII note your concern about hotel attractiveness, accessibility and operation during construction works for MetroLink and will continue to engage with Devonmill Limited to find ways to maintain guest experience during the delivery of MetroLink.</p> <p>TII can confirm that construction works will be managed during the duration of works and that appropriate mitigation measures to reduce negative construction phase effects on the Travelodge from noise and dust will be implemented, where practicable. The Outline Construction Environmental Plan (CEMP) (EIAR Appendix A5.1) provides a framework under which the construction activities will be managed to minimise potential negative environmental effects during the construction phase. Contractors will be required to comply with the appropriate mitigation, monitoring, inspection and reporting mechanisms outlined in this document, in addition to all legislation and by laws relating to the construction activity (EIAR Appendix A5.1, Section 1.1 ). Specific mitigation for noise and dust are outlined in EIAR Chapter 13 Airborne Noise and Vibration (Section 13.6.1) and the Dust Management Plan (EIAR Appendix A16.4). Measures to reduce negative construction phase effects on the Travelodge from noise and dust will be implemented, where practicable and are detailed in EIAR Chapter 13 Airborne Noise and Vibration (Section 13.6.1), the Dust Management Plan (Appendix A16.4) and the Outline CEMP (Appendix A5.1).</p> <p>During cut and cover works, the Travelodge will remain above the Construction Noise Threshold (CNT) of 75dB, with the inclusion of on-site control measures and enhanced hoarding heights in line with the TII Airborne and Groundborne Mitigation Policy (EIAR Chapter 13, Section 13.7.1.1.1 ). As a result, residual impacts are determined to be Moderate to Significant for the Travelodge. Appendix A14.6 of the EIAR sets out a noise mitigation policy for residential properties adversely affected by the construction phase. Although this does not cover commerical property TII intend to engage positively with the Travelodge to agree suitable mitigation measures.</p> <p>In terms of air quality, when the dust minimisation measures detailed in the mitigation section of Chapter 16 (Air Quality) are implemented, fugitive emissions of dust from the site are not predicted to be significant and pose no nuisance, human health or ecological risk to nearby receptors. The air dispersion modelling assessment of Construction Phase traffic emissions has found that the proposed Project resulted in no significant adverse effects (EIAR Chapter 16, Section 16.7.1 ).</p> <p>Vehicle and pedestrian access to the Travelodge will be maintained at all times during the construction phase, through planned diversions along the R132 that maintains full access to residents and businesses as the works are progressed. Please refer to Chapter 9 Traffic and Transport, Appendix A9.5, figure 5-41: R125 Pinnockhill Diversions, Scheme Traffic Management Plan. During construction under the R125, a dedicated off road active travel link will be built to provide a safe link for pedestrians, cyclists and vulnerable road users (EIAR Chapter 9, Section 9.6.1.2.1.3).</p>

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3	Section 3.1 Hotel as a Sensitive Land Use (page 9 of submission)	9	<p>We raise significant concerns that potential customers researching the hotel prior to booking a room will have major apprehensions regarding issues of noise, dust, ambience and ease of accessibility (including using online tool such as Google earth and streetview) all of which are among the key criteria used to gauge whether or not to book accommodation in a given hotel. The fact that the hotel will adjoin construction works over a very prolonged period has the potential to seriously affect the hotel's core trading performance in the short to medium term and ultimately affect the reputation of the hotel as somewhere to stay in this part of the city.</p> <p>We are cognisant that a level of disruption and disturbance is unavoidable in these circumstances. However, we seek assurance that the construction works, where in such close proximity to sensitive land uses, will be genuinely managed to reduce impact upon the hotel, including noise, accessibility and appearance of the immediately surrounding area. As part of this, we seek assurance that the hotel will continue to be visible from the surrounding area, with limited impact upon views of the hotel from key approaches. We request that Travelodge is closely consulted with during every stage of construction.</p>	See response (2) above. TII will work with Travelodge to ensure that in so far as practicable the hotel will continue to be visible from the surrounding area, with limited impact upon views of the hotel from key approaches.	
4	Section 3.2 Loss of Car Parking	9 & 10	<p>As detailed above, it is proposed that land is acquired at the subject site (land take ref. MUS- AS) which would result in the loss of a section of the Travelodge car park, comprising 24 no. spaces.</p> <p>The Travelodge is strategically located in an out of city location, directly accessible from Dublin Airport and the surrounding national road network (M1) via the R125. As a result, accessibility by car and car parking availability are integral to the operation of the hotel. The loss of 24 no. car parking spaces would therefore result in a detrimental impact upon the business operation of the hotel.</p> <p>We therefore request that consideration is given to an alternative/ interim car parking solution for hotel guests during the construction process to ensure the optimal operation of the hotel during this time. Transport Insights in their observations, query whether temporary car parking spaces could be facilitated to the immediate east of the R125 road closure.</p> <p>Notwithstanding this, from reviewing the landscaping proposal, there appears to be provision for the reinstatement of the Travelodge Hotel's car park post-construction, despite it being highlighted for permanent landtake (see Section 2.0 above for details). We request clarity in this regard and would welcome the full reinstatement of the car parking area, in addition to an interim parking solution for the hotel during the construction process. As noted previously, the loss of car parking spaces will result in an adverse impact upon the operation of the hotel.</p>	<p>CPO Landtake (reference ML 1S-A3) is required for a portion of the car park to facilitate the cut and cover section of the project past the Travelodge Hotel. Upon completion of construction this landtake will be returned to Devonmill Limited and as per the landscaping drawings the car parking will be reinstated. It is anticipated that this land will be occupied for an estimated 3 years, while the works are completed through this area, before it is reinstated in accordance with the proposed landscape design and returned to Hotel use.</p> <p>TII will not be able to provide alternative car-parking at the site during the construction, however we are willing to work with Travelodge to identify the provision of suitable alternative carparking arrangements.</p>	
5	Section 3.3 Diversions and Traffic Disruption	10	<p>As noted in Transport Insights' observations, the proposed construction works, due to their proximity to the hotel, will result in significant diversions and restricted access to the hotel for a prolonged period of time. For example, if approaching from the R132 to the west, visitors accessing the hotel would face a significant diversion, in excess of 1.7 kilometres. Refer to Transport Insights' observations (Appendix C) for further details surrounding the estimated traffic related impacts that will result from the diversions, closures and construction-related traffic.</p> <p>In summary, we highlight that the proposed construction works will result in significant restricted vehicular access to the hotel. As a hotel that is strategically located in close proximity to the national road network, we raise serious concerns surrounding the impact on this on the hotel's trading performance. Transport Insights' observations should be referred to for full details in this regard.</p>	See response (1) above.	
6	Section 3.4 Future Growth of the Hotel	10	<p>As noted in Section 1.3 of this Submission, the Travelodge Hotel has plans for future expansion, as reflected by extant planning permission (F17A/0756) for the construction of a four storey hotel and 55 no. additional hotel bedrooms. Whilst this permission is yet to be implemented, we confirm that our Client intends to further pursue the expansion of the Travelodge.</p> <p>We raise concerns that the future growth of the hotel will be impeded by the construction of the Metrolink project, in terms of ability to physically implement the permission and/or potential issues in securing a further planning permission in advance of the Metrolink project being complete.</p>	<p>TII are aware of the extant permission F17A/0756 and have assessed it as part of the Stage 2 Cumulative Impacts assessment in Chapter 30 of the EIAR. Based on the information available it was deemed that the projects would have no cumulative impacts.</p> <p>The MetroLink Project should have no impact on the ability to deliver existing or future planning permissions for development of the property. However, it is noted that decisions on future planning permissions will lie with Fingal County Council as the planning authority for the area.</p> <p>TII are happy to engage with your Client for any construction management required should the projects overlap in construction phases.</p>	

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7	Section 3.5 Restaurant Tenant	11	<p>As noted in the introduction, the subject site also accommodates our client's tenant, Smoking' Bones (restaurant), who operate from the restaurant unit associated with the hotel. Like the primary hotel use, the restaurant will be acutely affected by the proposed construction works.</p> <p>In addition to the significantly reduced accessibility to the restaurant arising from the road closures and delays and general construction related disturbance, the restaurant will also be impacted by the loss of car parking spaces at the Travelodge Hotel site. The impact of this is amplified by the lack of on-street car parking opportunities in the surrounding area.</p> <p>In this context, we reiterate the serious impact of the loss of car parking spaces and the importance of facilitating an alternative parking solution during this period. Generally, the proposed works have the potential to significantly impact upon the attractiveness of the restaurant and therefore its viability. In turn, from our client's perspective, we highlight the potential consequences of this on the lease.</p>	See response (4) above
8	Section 3.6 Delays and Uncertainty	11	<p>We further highlight that any decision that is made by An Bord Pleanála to make a Railway Order has myriad consequences for an affected landowner that go beyond the rules governing the assessment of compensation. Primarily, these consequences arise from the uncertainty surrounding the commencement date and date of completion if the Railway Order is confirmed.</p> <p>We acknowledge that the uncertainty surrounding the timing of the scheme generally arises from delays surrounding funding approval. Therefore, in our opinion, An Bord Pleanála should not confirm the Railway Order until such time that they are satisfied that at the date of Making the Railway Order, the acquiring Authority has funding in place to design the scheme, acquire the lands required for the scheme, in addition to the funding for the construction and completion of the scheme, without limitation.</p> <p>It is our further opinion that the Board should satisfy itself that the acquiring Authority is bound to proceed in a timely fashion if the Railway Order is confirmed. We highlight that under existing legislation, a Notice to Treat must be served within 18 months of the Railway Order becoming operative. A Notice to Enter may be served at any time thereafter enabling the acquiring Authority to take possession of the lands being acquired.</p> <p>However, and importantly, there are no statutory time limits imposed on the acquiring Authority in terms of preparing the final design for the Scheme approved, or indeed in respect of commencing or completing the works (i.e. the duration of the works). The Board should therefore be asked to impose binding conditions on the acquiring Authority in respect of these matters.</p>	<p>The Railway Order Application was made following a Government Approval of the Preliminary Business Case which detailed the funding requirements for the scheme. As such Government have approved the required funding and the scheme will commence when an Enforceable Railway Order is in place.</p> <p>Once a Railway Order has been granted TII will immediately expedite the design and delivery of the scheme to ensure its efficient and timely delivery in accordance with TII's commitments to Government as detailed in the approved Preliminary Business Case for the Scheme.</p>
9	Section 4.0 Conclusion	12	<p>In this context, we highlight the potential significant impact that the construction of the Metrolink project will have upon the operation of the hotel and associated restaurant, including the significant challenge that will arise in respect of maintaining a viable hotel business. As set out above, the hotel, due to the nature of the land use, will be acutely affected by the identified disruptions during the construction process and potentially into the long term, having regard to the loss of car parking.</p> <p>It is therefore imperative that the proposed works and associated impacts upon the Travelodge Hotel are given full consideration by An Bord Pleanála during the application process and by the relevant authorities throughout the construction process.</p>	See response for item (2) above

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10	Appendix C, Transport and traffic related observations, Current Operational Concern	23	The primary approach to the hotel (via Pinnock Hill Roundabout) will be closed for an 18-month period (years 4-6) causing a diversion of 1.7 kilometres for traffic travelling from/ to the west. As a result, the construction phase will have significant negative impact on the hotel access for the guests, staff and servicing (e.g. suppliers, refuse collection etc.). Furthermore, the proposed route for HGVs will result in a deterioration in traffic conditions along the R125 which will be the only approach to the hotel during the 18-month closure of the access from the west.	<p>Impacts of construction traffic to the vicinity of the property are limited to vehicles serving Pinnockhill site only, which will be considerably less than the average figure of 50 vehicles per day throughout construction. The proposed closure of the R125 South arm will be limited to 18 months for unavoidable works, building the cut &amp; cover section beneath the R125 - with pedestrian and cyclist access to be maintained to limit adverse impacts to the area. See Section 5.5 of Appendix A9.5</p> <p>While diversions from the north and west are considerable, there is also alternative routing via Mountgorry Way. Further, traffic coming from Dublin City Centre and Dublin Airport will experience a much reduced level of diversion compared to northwest originating traffic, with only a 200m difference in route distance compared to 1.7km for traffic from the north and west.</p> <p>HGV routes for the works are highlighted on Appendix A9.5 Scheme Traffic Management Plan, figure 5-38: Access to Pinnock Hill Junction to North Portal construction sites. All site entrances are proposed to be situated directly off the R132, including the Pinnock Hill Construction and Logistics Compound.</p>
11	Appendix C, Transport and traffic related observations, Car Parking	22 &23	Based on the construction boundaries contained within the Draft Railway Order drawings, 24 no. car parking spaces of the north facing car park are to be permanently acquired for construction purposes, with uncertainty as to whether these would be returned to the hotel following the completion of construction works. This is deeply concerning for both the hotel and restaurant as the car park is vital for their operation since no on-street parking is available in the site’s vicinity. It would also represent a significant risk to the future redevelopment of the site (see Tom Phillips + Associates Observation for elaboration).	<p>Permanent land required for the MetroLink Alignment and Temporary land take required for construction activities has been minimised wherever possible and boundaries adjusted to avoid and/or minimise impacts as far as possible. TII will continue to engage with Devonmill Limited to limit the impact of the works adjacent to the Hotel, including the acquisition of car park.</p> <p>In relation to the section of carpark at Travelodge Hotel proposed for CPO, TII confirm that this subject land (ML 1S-A3) will not be permanently taken following the completion of MetroLink Construction works. The land is required to support construction of the permanent cut and cover section within Pinnock Hill Roundabout area and to accommodate pedestrian and cyclist diversions around the works when the R125 leg is closed to create the cut and cover section under the R125 at the junction. Upon completion of construction works, the land will be landscaped as detailed and returned to its former use as a carpark. The proposed final landscape is provided on drawing ML1-JAI-ARL-SC03_XX-DR-Y-00006, sheet 8 of 13 Landscaping Drawings, Railway Order Plans\Drawings.</p> <p>The general arrangement drawing within the area of Travelodge Hotel (please refer to drawing no.ML1-JAI-ARD-ROUT_XX-DR-Y-03022) has been enclosed to the Notification letter CAP_ML_2400_97 issued on 20th of September 2022.</p>
12	Appendix C, Transport and traffic related observations, Significant Risk of Programme Extension	23	The MetroLink project is unique in Ireland in relation to its technical complexity, duration and investment cost, with a significant risk of both programme and cost overruns arising. Such programme risks amplify our Client’s concerns regarding the severe construction phase impacts outlined above.	<p>TII have reviewed your submission and noted your concerns/observations. Please refer to responses to the issues/ concerns raised in detail.</p> <p>Once an Railway Order has been granted TII will immediately expedite the design and delivery of the scheme to ensure its efficient and timely delivery in accordance with TII’s commitments to Government as detailed in the approved Preliminary Business Case for the Scheme.</p>
13	Appendix C, Transport and traffic related observations, Summary and Outcome Sought	23	As set out within this letter, proposals contained within the Draft Railway Order represent a significant risk to the ongoing operation of the hotel. In particular, the severance of access from the west for an 18-month period, and traffic impacts (i.e. diversions, HGV movements) along the proposed approach for the first 6 years of construction works that will result in an unacceptable and severe impact to the hotel.	See responses (1), (2), (4), (6) and (10) above.

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14	Appendix C, Transport and traffic related observations, Summary and Outcome Sought	23	Our Client believes that construction of the MetroLink project can be completed without the need to impact significantly on the hotel's operation. They request: <ul style="list-style-type: none"><li>• Further engagement with our Client in relation to construction and traffic management plans for the Swords area.</li></ul>	TII welcome your submission and are happy to engage further with Devonmill Limited regarding construction and traffic management plans within the area.
15	Appendix C, Transport and traffic related observations, Summary and Outcome Sought	23	<ul style="list-style-type: none"><li>• Consideration of changes to the traffic management plan to minimise the impacts on the hotel operation during the construction phase. This could include 'spreading' construction traffic onto other roads rather than the significant current concentration on the R132 and R125 in the site's immediate vicinity, and potential use of bailey bridge to lessen the duration of the R125 road closure adjacent to the hotel site.</li></ul>	The approach taken by TII to deliver the rail alignment beneath the R125 is the most practical solution at this location. The method of cut & cover construction proposed through the R125 is a top down construction phasing that minimises the duration that the road will be closed. Once the road is closed and utilities diverted, piling for the sides walls will take place followed by the casting of the roof slab for the structure. The road and utilities are then reinstated for the R125 across the partially completed structure. With the road now reopened, the works continue underneath with access provided from land on either side of the road.
16	Appendix C, Transport and traffic related observations, Summary and Outcome Sought	23	<ul style="list-style-type: none"><li>• Confirmation, via further design development if needed, that the 24 no. hotel car parking spaces within the MetroLink construction site boundaries will be returned to the hotel following the completion of construction works.</li></ul>	Please refer to response item (11) above.
17	Appendix C, Transport and traffic related observations, Summary and Outcome Sought	23	<ul style="list-style-type: none"><li>• Provision of alternative temporary car parking facilities, e.g. immediately to the east of the R125 road closure to mitigate the impact of the loss of on-site car parking during the construction phase.</li></ul>	Please refer to response item (4) above.
18	Appendix C, Transport and traffic related observations, Summary and Outcome Sought	23	<ul style="list-style-type: none"><li>• Consideration of expansion plans for the Travelodge Hotel to ensure such plans are not jeopardised by current MetroLink construction phase traffic management arrangements.</li></ul>	Please see response to item (6) above.