

Submission No.			110	
Organisation Name or Name of Submitter			Hammerson ICAV (represented by Stephen Little & Associates)	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
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				
1	Section 1 Introduction	2	Our Client is requesting that the Board convenes an Oral Hearing prior to making its decision. Further to telephone consultation with An Bord Pleanála, we were advised to and will make this request by email to sids@pleanala.ie. We understand that this request does not attract an additional fee.	<p>An overview of the Oral Hearing process is provided in the EIAR Chapter 8.9.2. As detailed, An Bord Pleanála may, at its absolute discretion, hold an oral hearing on the Railway Order application. The Board has confirmed that an oral hearing will be held.</p> <p>The purpose of the oral hearing will be to allow issues relevant to an application for approval be examined. The oral hearing can be attended by anyone, but only those that have made a written application may make an oral submission at the oral hearing. The oral hearing is managed by the An Bord Pleanála inspector.</p>
2	Section 2 Executive Summary	2	<p>It is with grave concern that our Client welcomes the opportunity to make this submission. It raises issues of concern to Hammerson ICAV and Swords Pavilions relating to the impact of proposed Metrolink Railway Order and Compulsory Purchase Order on the 'Pavilions Development Lands' and on the operational Swords Pavilions Shopping Centre.</p> <p>Hammerson and Swords Pavilions, as a key stakeholder, would welcome the opportunity to continue to consult with TII to ensure that the future development plans for the Pavilions lands, the existing and future operational success of Swords Pavilions shopping centre and the retention of safe and efficient access to Swords Pavilions for its customers, employees and the wider community are realised, in harmony with Metrolink.</p>	<p>TII have reviewed the submission and provided response for the observations/ concerns raised in detail below.</p> <p>TII are committed to the continued engagement with stakeholders such as Hammerson and Swords Pavilions, to resolve the concerns presented in this submission.</p>
3	Section 2.1 'Pavilions Development Lands'	3	The entirety of our Client's lands proposed to be acquisitioned by Metrolink are required by Hammerson to make its planned development scheme viable. It would not be plausible to relocate, reduce or limit the number of residential units planned as part of this scheme, as this would jeopardise the viability of the entire mixed use town centre masterplan. The lands to be acquisitioned must be the first phase of any residential development component for a number of legal and operational reasons.	<p>The temporary/permanent acquisition of the lands in the ownership of Hammerson's ICAV are required for the demolition of the footbridge across the R132. The temporary land take lands will be returned to Hammerson's ICAV on completion of these works, which will take approximately 18 - 24 months.</p> <p>The lands in question are zoned as part of the Metro Economic Corridor under the Fingal Development Plan 2023-2029. Therefore, the potential of these lands to develop to the desired density and mix is predicated on the delivery of MetroLink.</p>
4	Section 2.2 Operational Pavilions Shopping Centre	3	It is of concern that, for 'major town centre' land that will be immediately adjacent to Metrolink's significant construction and operational works, and where direct land take and traffic impacts are inevitable, Swords Pavilions shopping centre receives no direct consideration in respect of the magnitude and duration of effect of the project on its existing operations and future development potential. The project shows no appreciation of the significant contribution of the current and ongoing success of Swords Pavilions within its community.	<p>Please refer to response item (3) in relation to the return of temporary land take.</p> <p>TII fully recognise the importance of the Swords Pavilions Shopping Centre to the local economy and community of Swords, and fully support its operations and future growth ambitions. As detailed in Chapter 5 (MetroLink Construction Phase), the programme for the construction of the proposed Project has been optimised to minimise the duration of the Construction Phase, where possible, in order to lessen the duration of potential environmental impacts, while ensuring that the areas surrounding the works sites remain operational and functional. Traffic management plans for the construction of the MetroLink have been developed to minimise the impact of the scheme on road users, and to maintain access to businesses and other premises. As such, whilst potential severance and disruption in the area surrounding the shopping centre may occur, mitigation measures such as diversions, alternative routes, and advance notice will reduce the severity of the predicted impact on Swords Pavilions. Land take and traffic impacts on Swords Pavilion have been covered in the EIAR as outlined below.</p>

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5	Section 2.2 Operational Pavilions Shopping Centre	3	<p>It is submitted that Metrolink should continue to support the role and function of the Swords Pavilions, and its future development ambitions, as part of the Major Town Centre of Swords, in its recognition that:</p> <ul style="list-style-type: none">• Of critical importance to Swords Pavilions continued significant contribution to the growth of the local economy, employment and retail services provision, and its significant contribution to local rates at circa €2.2M, that Swords Pavilions must remain fully accessible by car, with uninterrupted access to its car parks, and no disruption or inconvenience to its customers, tenants and service vehicles. Otherwise this will critically damage a very successful business and major employer in Fingal.• Access to Swords Pavilions is primarily via the R132 Swords Bypass and R106 Malahide Road, on which the main vehicular and pedestrian access points to the Centre are currently located, both of which are critical to the 11m customers and 2.85M vehicles that currently enjoy visits to the centre.• Swords Pavilions is ideally located for further compact consolidation of town centre development, being well served along the R132 and Malahide Road, by car, existing bus services and pedestrian facilities.• The long term sterilisation of its land, pending the commencement or completion of the construction of Metrolink, or due to poor road design, is not acceptable to Swords Pavilions.	<p>Please refer to response item (4) in relation to TII's support for the continued operation of Swords Pavilions during the construction works. As detailed, traffic management plans for the construction of the MetroLink have been developed to minimise the impact of the scheme on road users, and to maintain access to businesses and other premises.</p> <p>As noted in Appendix A9.5 Scheme Traffic Management Plan, alternative HGV routes within the Swords area have been identified to reduce the volume of traffic that is moving through the works. The promotion of these alternative routes for traffic will form part of the construction traffic management for the scheme and has the potential to decrease congestion by 30%. These movements are designed to improve movements within local areas. These routes will primarily be promoted through a combination of signage including static signage, variable signage and community publicity. While these routes will be encouraged throughout the duration of the construction of the MetroLink project, the analysis presented in Appendix A9.5 Scheme Traffic Management Plan does not utilise these alternative routes, and therefore the impacts presented could be reduced (hence further reducing congestion in the area and therefore improving car access to the shopping centre).</p> <p>During enabling works, construction and operation of MetroLink, Swords Pavilions will remain fully accessible by car. Traffic impacts from construction works will be inevitable, however measures will be implemented to reduce negative effects on customers, staff and residents surrounding Swords Pavilions. The Main Works associated with Swords Central Station and the Pavilions Compound did not progress to the stage 2 assessment, as minimal impacts on the road network are expected. At Malahide Junction, there will be reduced capacity on the eastern arm on approach and exit of the junction, resulting in increases in traffic flow on the other junction arms. Redistributed traffic is primarily visible on local roads to the west of the R132 around Swords Town Centre, resulting in slight delays. Construction works will be developed and phased with the aim of avoiding simultaneous road diversions and / or closures at the four major junctions along the R132 Swords Bypass. As the proposed project alignment travels south and under the Malahide Roundabout, it will be necessary to implement temporary diversions via local alternative routes and closure of the R106 Swords Road and Drynam road during cut and cover works (Section 5.7.10.3, EIAR Chapter 5).</p> <p>Bus services will continue to operate along the R132 during construction. To maintain pedestrian access, the footbridge will be replaced by alternative access across the R132 Swords Bypass by the R132 Connectivity Project. Signalised crossings for pedestrians will also be maintained during construction.</p> <p>Further information on traffic management during construction can be found in EIAR Chapter 5 (MetroLink Construction Phase) and EIAR Appendix A9.5 (Scheme Traffic Management Plan).</p> <p>As noted in response item (4) above, lands at this location will not be sterilised, as MetroLink require the lands for 18-24 months only before returning to Hammerson's ICAV.</p>
6	Section 2.3 Compulsory Purchase Order	4	<p>It is clear that the impact of the proposed CPO on Swords Pavilions and the Pavilions Development Lands, in terms of both the location of the proposed Metrolink construction compounds and their intended use (construction compounds accommodating substantial volumes of heavy construction and goods vehicles), has not been properly assessed or thought through.</p> <p>The proposed CPO for both temporary and permanent land acquisition will most certainly severely, adversely impact the existing vehicular operations of Swords Pavilions Shopping Centre, which is estimated to accommodate c. 2.85M customer vehicles per annum (c. 15,600 per day entering and exiting the car park areas via the R132 and Malahide Road).</p>	<p>Please refer to response item (4) above in relation to land take at this location. TII confirm that the Permanent CPO landtake is the minimum landtake required to build and operate the scheme and that the Temporary CPO lands are only required for the duration of removing the existing pedestrian bridge across the R132, approximately 18-24 months and will not be utilised for managing construction vehicles.</p> <p>Please refer to response item (5) in relation to the impacts on traffic and vehicular movements at this location during the construction works. The proposed mitigation measures are also detailed. Further information on traffic management during construction can be found in EIAR Chapter 5 (MetroLink Construction Phase) and EIAR Appendix A9.5 (Scheme Traffic Management Plan).</p> <p>Impacts of these works were assessed as part of Chapter 11, proposed mitigation measures such as diversions, alternative routes and advance notice will be in place to reduce these impacts identified, and will result in residual impacts that can be classified as negative, slight and short term (Table 11.54 Chapter 11 Population and Land Use).</p>

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7	Section 2.3 Compulsory Purchase Order	4	Swords Pavilions attracts c. 12M customers per annum. The proposed use of the Pavilions lands for the purpose of a construction compound and construction traffic management will inevitably have an adverse impact on customers, footflow and trade, impacting the overall viability of the Shopping Centre which is a significant employment hub. It is likely to raise construction nuisance effects, including noise, dust and health and safety concerns for customers, who may be put off visiting Swords Pavilions and with a consequent adverse impact on trade and viability over the estimated 5 year construction period for Metrolink Swords Central Station.	<p>Please refer to response items (3) to (6), inclusive, in relation to the land take at this location and the associated impacts. As noted in Chapter 11 (Population and Land Use), the potential severance and disruption during the construction works may result in reduced footfall and//or spending. However, mitigation measures such as diversions, alternative routes and advance notice will be in place to reduce these impacts.</p> <p>TII can confirm that their highest priority at all times is to the Health and Safety of all persons directly or indirectly affected by the MetroLink scheme including construction workers, operational staff, business staff and customers, the general public and anyone else that may interact with the scheme.</p> <p>Chapter 13 (Airborne Noise and Vibration) and Chapter 14 (Groundborne Noise and Vibration) detail that noise levels at Swords Pavilions will be 'not significant'.</p> <p>The potential risk from dust emissions has been reviewed for the most important activities and each of the construction areas. Further details on construction methods can be found in Chapter 5 of the EIAR (MetroLink Construction Phase) which contains an overview of the typical activities and methods that are anticipated to be used during construction and commissioning of the proposed Project. In addition, the mitigation measures document in this section should be considered in parallel with the Outline Construction Environmental Management Plan (Appendix A5.1). Before commencing relevant works, an Air Quality Management Plan shall be prepared and submitted for approval to the relevant planning authority. The plan must include all appropriate dust and emissions mitigation measures including for asbestos and aspergillus, applicable to the circumstances of the relevant site, based on the local authority requirements and industry best practices. The plan will be developed by the contractor and for each worksite shall include:</p> <ul style="list-style-type: none">* An inventory and timetable of activities which may give rise to emissions or dust;* Alert levels;* Alert system to be used (including notification process);* Details of control measures;* Details of dust monitoring arrangements, including the location of sensitive receptors, monitoring locations, and monitoring equipment to be used; and* Details of the air quality reporting requirements. <p>In order to ensure that no dust nuisance occurs, a series of measures will be implemented, these have been detailed in Appendix A16.4. In summary, the measures which will be implemented will include:</p> <ul style="list-style-type: none">* Material handling systems and site stockpiling of materials will be designed and laid out to minimise exposure to wind. Water misting or sprays will be used as required if particularly dusty activities are necessary during dry or windy periods;* Any blasting will be completed by specialised contractors with a specific blasting dust management plan;* Liaison with local authorities and community groups;* Hoarding will be provided around the construction compounds; and* It is anticipated that methods of collecting rainwater and recycling for general site use, will be adopted where practical. Requirements for dewatering installations at deep station and tunnel portals can also provide a valuable source of water for general site use. Strict dust prevention will be in place at all times, to minimise any potential emissions and these procedures will be strictly monitored and assessed. In the event of dust nuisance occurring outside the site boundary, movements of materials likely to raise dust will be curtailed and satisfactory procedures implemented to rectify the problem before the resumption of construction operations.

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8	Section 2.3 Compulsory Purchase Order	4	<p>It is expected that the proposed CPO will prevent the delivery of c. 786 new homes (which, assuming an average household size of 2.73 3 could house 2,146 persons) in Swords town centre, during the life of at least the next two County Development Plans. It will sterilize the use of the lands pending the Railway Order and CPO approval, contract and construction stages. It may also result in the permanent acquisition and sterilisation of lands at the north and eastern edges of the Pavilions Development Lands. These are all lands that are essential to properly construct and phase the overall Pavilions masterplan development. The viability of the planned development would be jeopardised by any restriction on the number of residential units planned, or where the 'buildability' of the scheme is hindered by the Metrolink CPO.</p> <p>We therefore ask that the CPO of the Pavilions Development Lands be refused by An Bord Pleanála.</p>	<p>Please refer to response item (3) above in relation to land take at this location.</p>
9	Section 3.3 Pavilions Access	6&7	<p>The Malahide Road and R132, sharing the access burden for Pavilions, are likely to be significantly impacted by Fingal County Council's R132 Connectivity Project and TII's Metrolink Railway Order. This submission seeks to highlight that the ongoing operational success of Pavilions is and will remain heavily reliant on vehicular access via the R132 left-in left-out access road. It is therefore critical that this access point continue to operate at maximum efficiently for car borne customers and visitors to Pavilions and Swords Town Centre, as well as by Metrolink and associated pedestrian and cycle links.</p> <p>Having regard to all of the above, and noting again that Swords Pavilions attracts 12M footfall and 2.85M vehicles per annum, it is of great concern to our Client that the significant daily footfall and traffic movements through Pavilions, which support its viability and success as a dynamic component of Swords Town Centre, should be duly recognised and protected in any assessment and determination of the Metrolink Railway Order and CPO.</p>	<p>Please refer to response item (5) in relation to the anticipated impacts on traffic during the construction works. The proposed MetroLink works will maintain the left-in-left-out vehicular access to Pavilions from the R132 Swords Bypass. A pedestrian crossing will be provided on this link to maintain pedestrian safety and desire lines.</p>
10	Section 3.4 Future Development Potential at Pavilions Lands	8	<p>(1)As discussed further in Section 7 of this submission, none of this existing or planned development has been taken into account in the impact of land take (Metrolink EIAR Chapter 21), which assumes the lands are brownfield, vegetated open land with no significant development potential. Furthermore, the significance of permanent loss or long term sterilisation of potential 'residential development land' is not assessed.</p> <p>(2) It is not either considered in Ch30 Cumulative Development, where the extant permission for the R132 access road, the existing permitted outdoor event space, and the</p> <p>(3) significant planning precedent for the redevelopment of the Pavilions expansion lands are not mentioned.</p>	<p>(1) Chapter 21 Land-Take assesses the impact of the temporary and permanent acquisition of lands at this location. Baseline Ratings & Impact Magnitude was applied to these areas based on the criteria outlined in Section 21.3.5.1 of the Chapter. For the lands in question, a baseline rating of very low and an impact magnitude of medium was applied to the temporary land take areas. The baseline rating was assigned due to its current status as a brownfield site which as per the Chapter has a "significantly greater capacity to accommodate change". The impact magnitude of medium was assigned as it was assessed that the "current use of the property can continue during and after permanent acquisition or temporary acquisition". In relation to the land designated as permanent land-take, this is required to facilitate the demolition of the footbridge across the R132 (noting that any permanent works such as this require TII to specify permanent landtake in order to have the powers to carry out the works). A baseline rating of medium and an impact magnitude of medium was applied. The lands at this location will not be sterilised and as such development potential is considered.</p> <p>(2) For Cumulative Impacts, in relation to extant permissions, F22A/0053 (Permitted outdoor space) was not assessed as it was minor in nature (erection of temporary structures). F08A/1057/E1 (Pavilions Phase 3) - This was not assessed as the granted planning had expired in August 2021. F20A/0180 - This was not assessed cumulatively as it was permission for continuation of use of the access road which is considered in the baseline assessments.</p> <p>(3) The Planning Report that forms part of the Railway Order documentation has taken all of the planning permissions within the MetroLink development area into account.</p>

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11	Section 4 Fingal County Council R132 Connectivity Project	10	While there is now more shared spaces for multi-modal use, it is expected that the loss of priority for car use will lead to an increase in traffic. This in combination with 60 months of construction works for the Swords Central Metro Station has potential to increase traffic volumes in the area, which will have a negative impact on customer experience.	<p>Please refer to response item (5) in relation to the anticipated impacts on traffic and transport during the construction phase.</p> <p>To clarify, the R132 Connectivity Project already has approval from the Board (Ref JP06F.310145) and is expected to be in place prior to the works associated with MetroLink, and therefore cumulative construction stage impacts will not arise. The traffic management has been designed adopting a hierarchical approach in line with the road user hierarchy identified in the Transport Strategy for the Greater Dublin Area. This prioritises pedestrian, cyclist, public transport and commercial needs provision over private vehicles.</p> <p>Appendix A9.5 provides the Scheme Traffic Management Plan, for which section 5.4 refers to sections along the R132, Malahide Junction to Pinnockhill Junction. While the works through this area will attract additional traffic, the assessments of vehicle movement during the peak construction phase will add a range of between 50 and 125 additional daily movements each way to the existing local traffic flows. The proposed access route to Swords Station to and from the M1 is provided on Figure 5-32.</p> <p>While moderate traffic impacts are anticipated to be managed for the construction of the Swords Station and alignment (Table 5-69), no impact is anticipated when accessing the Pavilions Compound to remove the pedestrian bridge.</p> <p>Prior to implementation, all traffic management measures will be agreed with FCC and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken. The design of traffic management measures and highways works is based on achieving the key objective of maintaining continual access to all properties during the works. Where necessary, a safe alternative route will be provided for pedestrians and vulnerable road users, such as children, and persons with restricted mobility, to maintain pedestrian access to premises. Where detour routes are required, these will be kept as short as possible and detour signage will be clear and easy to understand. All construction sites will be designed to be as unobtrusive as possible.</p>
12	Section 5.2 Retail Strategy for the Greater Dublin Area, 2008-2016	11	Metrolink now replaces the previous Metro North project. It should recognised the role of Pavilions in delivering retail use, as part of Swords town centre, in line with the strategic retail policy position outlined above.	<p>As noted in response item (4), TII fully recognise the importance of the Swords Pavilions Shopping Centre to the local economy and community of Swords, and fully support its operations and future growth ambitions. Please refer to response items (3) to (6) above in relation to the anticipated impacts at this location and the proposed mitigation measures.</p> <p>As noted in Chapter 7 (Consideration of Alternatives), the proposed Project presents an 'Optimised Metro North'. It follows the same alignment as Metro North but includes a number of significant variations such as shorter platforms, smaller stations, reduced rolling stock, fewer stations and vertical alignment changes.</p>
13	Section 5.3.2 Landuse Zoning	12	There is an objective to prepare a masterplan for the this high density mixed use development at the 'ME' lands, integrated with Swords Metro Stop and multi-modal connectivity with Swords Town Centre (see Barrysparks and Crowcastle Masterplan 2019).	<p>As noted in the Planning Report, the Masterplan for the Barrysparks and Crowcastle Masterplan was adopted in 2019. The MetroLink project has been designed having regard to the Masterplan and facilitates its objectives.</p> <p>TII have undertaken a full assessment of the planning policy and planning guidelines in the Planning Report that was submitted as part of the Railway Order Application. As planning and policy and strategy are being updated constantly, TII will undertake a further review of planning policy in advance of any oral hearing to allow for an updated presentation on the projects consistency with active policy requirements to be presented to An Bord Pleanála.</p>

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14	Section 7.1 Overarching Submission	17	The continued patronage, enjoyment and safety of its customers is of paramount importance to Swords Pavilions. Our Client has significant concerns regarding the proposal to use its lands for a Metrolink construction compound. The likely impact of construction activities within the temporary satellite construction compound on the Swords Pavilions access and car parking facilities is not clearly addressed.	<p>As detailed in response item (5), it is TII's intention for Swords Pavilions will remain accessible and that existing car parks will remain in use during the construction phase of MetroLink.</p> <p>As detailed in response item (11), prior to implementation, all traffic management measures will be agreed with FCC and where relevant, consultation with An Garda Síochána and other statutory stakeholders will be undertaken.</p> <p>Other construction stage impacts are addressed in response item (7).</p>
15	Section 7.1 Overarching Submission	17	The continued successful operations at Swords Pavilions, as a significant convenience and comparison retail and employment provider, is also heavily dependent on vehicular access via its left-in, left-out junction with the R132. It is critical that the Metrolink project, at construction or operational stage, does not adversely affect the capacity of the R132 or R106 Malahide Road to reasonably accommodate car borne movement into and out of Swords Pavilions, to the significant inconvenience of Swords Pavilions' existing customers and to the detriment of its future expansion and diversification potential as part of Swords major town centre. The R132 and R106 handle 80% of Swords Pavilions customer travel movements.	Please refer to response item (5) above in relation to vehicular access to Swords Pavilions.
16	Section 7.1 Overarching Submission	17	This submission also questions the adequacy of the Metrolink assessment of the severity of impact of the project on land use and land take on Swords Pavilions operating centre and on Pavilions Development Land. This relates to the quantum of Pavilions land to be permanently and temporarily sterilised to facilitate the Metrolink project, particularly where there is any significant delay in commencing and completing the 5 year construction phase for Metrolink Swords Central Station.	Please refer to response items (3) and (10) in relation to land take at this location. TII as the Government Agency responsible for delivering MetroLink, are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order.
17	Section 7.1 Overarching Submission	17	It would be totally unacceptable to our Client that Metrolink would negatively impact in any way the operational success of Swords Pavilions and undermine the significant investment expended to date to achieve this.	Please refer to response items (3) to (6), inclusive, in relation to the land take at this location and the associated impacts.
18	Section 7.2 Temporary and Permanent Land Acquisition	18	It should be acknowledged that the lands subject of the temporary construction compound area lie within the Swords Pavilions operational area and the Pavilions Development Lands . As previously mentioned, they are subject of an extant permission for a seasonal event space , which provides active use and a revenue stream from the site at key holiday periods not currently. Furthermore, their use for Metrolink construction activities during Swords Pavilions trading hours , will conflict with and negatively impact customer (pedestrian, cycle and vehicular) and deliveries access to Swords Pavilions shopping centre via the R132 and R106 for at least the 5 year Metrolink construction period for Swords Central. This is critical to the continued successful operation of Swords pavilions	<p>Please refer to response items (3) and (10) above in relation to the planning context at this location, and the associated land take.</p> <p>Extant permissions for the event spaces are outside of the temporary land take for the proposed Project and therefore it is not impacted at this location. The impact of the construction phase on the Pavilions Shopping Centre has been assessed in Chapter 11. With mitigation measures proposed such as diversions, alternative routes and advance notice with impacts are reduced to negative, slight, short-term.</p> <p>Please refer to response item (5) and (11) in relation to the anticipated impacts on traffic and transport.</p>
19	Section 7.2 Temporary and Permanent Land Acquisition	18	It further ignores the significant and immediate development potential of these lands. Planning precedent for significant mixed use development, including residential use, was established under F08A/1057 (ABP-PL06F. 232710) and has only relatively recently withered. The land remains appropriately zoned for Major Town Centre uses and its redevelopment is anticipated in Fingal County Council's Draft Sustainable Swords Strategy.	Please refer to response items (3) and (10) above in relation to the planning context at this location.

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20	Section 7.2 Temporary and Permanent Land Acquisition	19	<p>The lands subject of proposed permanent acquisition accommodate existing footpaths, the pedestrian footbridge over the R132 and the Pavilions lands. The loss of these facilities at an early stage of the Metrolink Construction Programme conflicts with and negatively impacts customer access to Swords Pavilions via the R132 and R106, for at least the 5 year Metrolink construction period for Swords Central Station. The impact is reasonably identified as "very significant", but this must also identify the impact on Swords Pavilions.</p> <p>While Condition 5 of the recently withered Pavilions Phase 3 permission required a 10m setback from the western edge of the R132, the Metro North proposal is now replaced with Metrolink Swords Central Station and track alignment located to the east of the R132. On this basis it is not clear why the land aligned along the western edge of the R132 is proposed to be permanently acquired and sterised for use by the Pavilions land owners.</p>	<p>Please refer to response items (5) and (11) in relation to the anticipated impacts on traffic and transport, including impacts on access to Swords Pavilions.</p> <p>In relation to required permanent landtake, as noted in Chapter 5 (MetroLink Construction Phase) & Chapter 21 (Land Take), land will be required permanently to demolish and remove the pedestrian footbridge and connected footways. Lands will not be sterilised as a result of these works and the lands will be reinstated post-construction without the footbridge as existing landscape. TII are happy to continue ongoing discussions in relation to the landtake at this location.</p>
21	Section 7.2 Temporary and Permanent Land Acquisition	19	<p>The permanent acquisition of the lands then similarly takes no account of the aforementioned development potential of the Pavilions Development Lands. It is submitted that the sensitivity rating of the lands is misrepresented, in terms of its failure to address the Pavilions Development Lands mixed use retail, commercial and residential development potential, which exists under the life of the current and next Fingal County Development. The rating and impact assessment should be 'very sensitive' in recognition of their residential development potential and the long term sterilisation of the lands. The permanent acquisition and sterilisation of the Pavilions lands is unacceptable to our Client.</p>	<p>Please refer to response items (3) and (10) in relation to the planning context at this location.</p>
22	Section 7.2 Temporary and Permanent Land Acquisition	19	<p>In summary, the lands identified for temporary and permanent acquisition by TII to facilitate Metrolink conflict with the existing operations and emerging masterplan design for Pavilions future expansion and development at this location. It is submitted that the sensitivity of the lands to be acquired is misrepresented in the Metrolink EIAR. The removal or severe disruption of an existing active commercial use and the sterilisation of the lands for future redevelopment, pending the commencement and completion of the construction of Metrolink Swords Central station and associated R132 works, is unacceptable to our clients who would seek to have the 'temporary*' construction compound and permanent acquisition of its lands removed from the Metrolink CPO.</p>	<p>Please refer to response item (10) in relation to the assessment of landtake in the EIAR. Please refer to response item (3) and (10) in relation to the planning context at this location.</p>
23	Section 7.3 Commencement and Construction Duration of Swords Central Station and Metrolink R132 Alignment	24	<p>While it is stated that the FCC's R132 Connectivity Project and TII's MetroLink project can proceed independently of each other, the assumption of TII is that MetroLink will progress after the R132 Connectivity Project works promoted by Fingal County Council. As the R132 works shown on the Metrolink plans broadly reflect those permitted under the R132 Connectivity Project (with the exception of the omission of the dedicated northbound left turn lane to access Pavilions and the inclusion of a pedestrian and cycle toucan crossing immediate south of the Pavilions access), it is assumed that these works will be undertaken by whichever authority commences its project first.</p> <p>The construction works for Swords Central Station area (from Malahide Road junction to Pinnock Hill junction) are projected to take up to 5 years to complete. However, the commencement and completion dates are not clarified for this section of Metrolink.</p>	<p>The commencement and completion dates of the construction works are not confirmed at this stage of design (preliminary design) and are subject to the granting of the Railway Order. TII as the Government Agency responsible for delivering MetroLink, are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order.</p> <p>TII are committed to working with FCC around the timing and coordination of the relevant works proposed by both organisations.</p>

Submission No.			110	
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Item No.	Section Ref.	Page No.	Observation Statement	TII Response
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24	Section 7.3 Commencement and Construction Duration of Swords Central Station and Metrolink R132 Alignment	24	The standard construction of Swords Central Metrolink station will be 7am to 7pm (Mon-Fri) and 7am to 1pm Saturday. Activities at the temporary construction compound, such as at Pavilions, are identified as being restricted to these standard hours. It is noted that these hours are broadly commensurate with the peak operational hours of Swords Pavilions. It is not clear how construction access and activities within the compound will impact the operation of Pavilions R132 access road, car parking and service areas, or the R106 Malahide Road, so as not to inconvenience customer access and egress from the R132 and/or the R106 Malahide Road. Hindrance to either of the existing Swords Pavilions entrances is unacceptable to our Client, as it would have a significant adverse impact on the success and viability of Swords Pavilions as a going concern and area of future development potential.	During enabling works, construction and operation of MetroLink, Swords Pavilions will remain fully accessible by car. With regards to traffic impacts, please refer to response items (4), (5), (6), (11), and (38).
25	Section 7.3 Commencement and Construction Duration of Swords Central Station and Metrolink R132 Alignment	24&25	Furthermore, exceptional construction works outside these hours may include tunnel boring, rock excavation for tunnelling, large concrete pours, dewatering, track laying, M&E fit out, special (abnormal) deliveries, some utilities and roadworks, subject to agreement. It is likely that these construction activities will rely on construction access, to the Swords Central Station main compound, via the R132 and R106. It is not clear how this will impact traffic movement on the R132 and R106 in the evenings and weekends, when Pavilions retail and leisure facilities (e.g. cinema and food offerings) are also in operation.	Appendix A9.5 Scheme Traffic Management Plan details the two-stage assessment undertaken on the impacts of the temporary traffic management measures during the construction phase. This assessment takes into consideration the duration of the works to determine the potential magnitude of the impact. For works occurring on evenings and weekends, the impact was considered to be slight due to the off-peak timings, and therefore the works were removed from any further assessment and were not deemed to require a Stage 2 Assessment or any further mitigation measures. As the impact of works during peak hours has been assessed, it is considered that off-peak works will have reduced impacts.
26	Section 7.4 Development Potential at Pavilions Development Lands	26	<p>It is paramount that no part of the submission lands should be sterilized, in order to ensure that these much needed homes could be delivered in the short to medium term (estimated delivery within 3 to 7 years, for potential occupancy by 2026). However, given the time it will take to approve the Metrolink Railway Order and CPO, contract, commence and complete the works, the development potential of the Pavilions Development Lands will likely be sterilised for at least the life of the next Fingal County Development Plan.</p> <p>The entirety of our Client's lands proposed to be acquisitioned by Metrolink are required by Hammerson to make its planned development scheme viable. It would not be plausible to relocate, reduce or limit the number of residential units planned as part of this scheme, as this would jeopardise the viability of the entire mixed use town centre masterplan. The lands to be acquisitioned must be the first phase of any residential development component for a number of legal and operational reasons.</p> <p>We would query why the Pavilions lands are subject of CPO for Metrolink construction, rather than the undeveloped greenfield lands at Barrysparks to the east of the R132, or to the north at Lissenhall. We request that the CPO is removed from the Pavilions Development Lands.</p>	Please refer to response items (3) and (10) in relation to the planning context at this location.

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27	Section 7.5 Access, Permeability and Connectivity, 7.5.1 Construction Stage	26&27	<p>The residual impact is then identified as "negative, slight, short term". There is however little to no discussion of how Pavilions Operational Centre specifically, particularly access to same, will be impacted for the significant duration of the construction period of Metrolink Swords Central Station and R132 route alignment.</p> <p>It is noted that the R132 footbridge is proposed to be demolished and it is assumed this will be included with the early stage Site Enabling Works demolition noted in Figure 10 above. At present, a 120m footbridge over the R132 ensures that pedestrians travelling from east of the R132 can cross the road safely, while also avoiding an impact on R132 / Malahide Road Roundabout vehicular traffic flow.</p> <p>Under the R132 Connectivity Project, Fingal County Council is to replace this footbridge with controlled crossing points at the Malahide Road junction. However, if the R132 Connectivity Project is not complete before the commencement of the Metrolink Swords Central station works, the demolition of the footbridge at early construction stage is likely to give rise to severance for pedestrians and cyclists and adversely affect trading at the Pavilions Shopping Centre during at least the 5 year construction period.</p> <p>We would highlight our Client's concern regarding the likely adverse impact of a significant quantum of heavy construction vehicles entering the R132/R106 junction, on major east-west pedestrian route along the R106, in addition to impacting significantly on Swords Pavilions vehicular traffic and giving rise to potential environmental nuisance factors (noise, dust, health and safety, etc.).</p>	<p>Appendix A9.5 Scheme Traffic Management Plan indicates that the R132 Connectivity Project will be in place prior to the commencement of MetroLink construction works, and as such is considered to make up the baseline receiving environment. A hierarchical approach has been adopted when designing the temporary traffic management measures, with priority given to pedestrian/cyclist, public transport and commercial needs provision over private car usage. This approach would be maintained in the event that the traffic management measures need to be revised if the R132 Connectivity Study was not in place prior to the commencement of MetroLink construction works.</p> <p>Please refer to response items (5) and (11) in relation to the anticipated impacts on traffic and transport, including pedestrians.</p> <p>Please refer to response item (7) in relation to impacts of noise and dust at Swords Pavillion during the construction phase.</p>
28	Section 7.5 Access, Permeability and Connectivity, 7.5.1 Construction Stage	27	<p>For Swords Pavilions Shopping Centre, a key metric will also be to ensure the total number of vehicle kilometres travelled on the local road network do not unreasonably increase, arising from road closures and diversions during construction stage. It seems clear that there will need to be road or lane closures along the R132 and at Malahide Roundabout to facilitate construction, and it is of significant concern to our Client that the impact of this on Pavilions operating centre is made fully transparent. Ongoing and detailed consultation on traffic management will be critical for Pavilions operations during the construction phase.</p>	<p>Please refer to response items (5) and (11) in relation to the anticipated impacts on traffic and transport.</p> <p>TII confirm that the assessment undertaken indicated that a minimal impact is expected in the direct vicinity of the Pavilions Shopping Centre during the course of the main works (See Section 5.4.6.3.2 of Appendix A9.5). Works relating to Malahide Junction will impact on the location with the largest predicted delay being 55 seconds on the R132 Northbound approach (Section 5.4.5.3.1 Appendix A9.5).</p>
29	Section 7.5.2 Operational Stage	27	<p>The successful operation of Swords Pavilions relies fundamentally upon the ease of access to and availability of car parking to support increased customer 'dwell time' (i.e. period of time to browse and shop) and an easy way to transport multiple or heavy goods home (particularly food shopping). A decrease in dwell time due to inconvenient or convoluted access to customer car parking would significantly adversely impact the operation of Swords Pavilions, as customers will seek a more favourable alternative shopping destination.</p> <p>It is essential that this total quantum of 2,000 spaces is maintained, in order to protect the operational requirements of Swords Pavilions and its current customer shopping experience.</p>	<p>As presented in Section 5.4 of Appendix A9.5 Scheme Traffic Management Plan, there will be no impact on commercial parking and loading during the construction works.</p>
30	Section 7.5.2 Operational Stage	27	<p>It is imperative to the ongoing success of Pavilions, as a recognisable and accessible destination within Swords town centre and the wider catchment area, that its existing physical access by customer and service vehicles, as well as by pedestrians, bicycles and public transport, be maintained and protected.</p>	<p>Please refer to response items (5) and (11) in relation to the anticipated impacts on traffic and transport.</p>

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31	Section 7.5.2 Operational Stage	27&28	It is noted that the dedicated left turn lane to this junction (provided in the R132 Connectivity Project) has been removed, necessitating difficult vehicular movement across a bus lane, cycle lane and the toucan pedestrian crossing to access the junction. The reduced vehicular lanes and potential for conflicting movement across the carriageway to access the R132 junction is likely to result in traffic safety and congestion issues arising at Metrolink operational stage. We would submit that the dedicated left turn lane into Pavilions should be reinstated, to reduce potential for traffic conflict.	Please refer to response item (9) in relation to the left-in-left-out access road. The prioritisation of pedestrian and cyclist movements, and public transport needs above private cars is in line with the Road User Hierarchy defined in the Transport Strategy for the Greater Dublin Area. As outlined in Appendix A9.2-N Traffic and Transportation Assessment-Swords Central Station, in the operational phase Swords Central Station will provide for improvements to the public transport network resulting in decreases in private car usage/trips, increases in public transport usage/trips and will facilitate walking and cycling to the station, without significantly impacting on the operation of the road network in the area.
32	Section 7.5.2 Operational Stage	27&28	<p>It is also critical that the project design ensures the safest passageway for pedestrians and cyclists to cross the R132 to and from Swords Central Station. We note that the proposed toucan crossing is a Metrolink proposal and was not included in the R132 Connectivity Project. Its current position in the Metrolink drawings makes little sense, on the basis that there is currently no direct pedestrian link to the Pavilions shopping centre from the R132 access road. Pedestrians and cyclists would therefore be better directed towards the approved new pedestrian and cycle crossing facilities at the Malahide Road junction (see R132 Connectivity Project), approximately 170m to the north.</p> <p>Failing that, and in the interests of greater pedestrian and cyclist safety, future connectivity and improved free flow of left turning vehicles into Pavilions, we would submit that an alternative preferred solution would be to reintroduce a pedestrian / cycle bridge over the R132 connecting the Barrysparks and Pavilions lands.</p>	<p>Fingal County Council proposals at modernising the Malahide Junction under the R132 Connectivity Project recently consented is to urbanise the R132 under the Fingal Development Plan 2017-2023 (Draft Development Plan 2023-2029). The proposed Malahide junction modifications when completed will make the existing pedestrian bridge spanning the R132 redundant.</p> <p>MetroLink will remove this bridge to create access for the Works, but as a consequence of the R132 Connectivity upgrade, this bridge will not be required to be reinstated on the completion of MetroLink.</p> <p>In keeping with the Fingal Development Plan and as presented in EIAR Appendix A9.2-N Traffic and Transportation Assessment-Swords Central Station, the proposed pedestrian crossing on the R132 will be located to the north of the station entrance, providing a direct route between the proposed station and the future proposed Pavilions Development Lands.</p>
33	Section 7.6 Transportation Assessment	28&29	<p>Understandably great focus is directed to prioritising pedestrians and cyclist movement. However, failure to address Pavilions reliance and need to accommodate into the future its car borne customers is a significant omission from the assessment In this respect we would highlight the following:</p> <ul style="list-style-type: none">• Page 81: Malahide roundabout junction - Swords Pavilions not identified as a key design consideration for traffic generation.• Page 86: R132 Corridor interventions - Existing R132 slip road not identified, notwithstanding this is a key access point for Pavilions. This demonstrates a lack of understanding that 80% of Pavilions customer arrive by car and are key to sustaining successful business operations, which in turn is significant to the success of Swords town centre.• Page 114: It is stated that by 2030 Metrolink will reduce traffic by 4 to 5% (2,750 cars) and by 2045 between 1 and 3%. However, Pavilions currently handles approx. 53,000 cars per week. Even assuming a 60:40 ratio split between Malahide Road and the R132 slip road, this appears to totally disregard Pavilions operational car levels and how the customers access the site. On this basis, the Metrolink reference to annual average daily traffic is questionable, including only 13,212 cars using the Malahide Road to access Pavilions. Rather, as previously noted in this submission, average daily traffic into the centre in 2019 was 7,842 vehicles, who would then also exit the centre (representing 1% increase on 2018 average day).• Page 117; Charts are wrongly labelled and therefore misleading. When labelled correctly the charts would identify that traffic will be up by 13% in 2030 DS+M and up 13% in 2045 on 2018 levels• Page 119: Point 5.4.18 states that there will be more pressure on East to West traffic movement on the Malahide Road. This will negatively impact Pavilions operations due to lanes being taken away and the facility to supplement traffic flow via the R132 slip road being eroded due to the designs of R132 and Metro around pedestrian movement and carriageway redesigns.• Page 136: Positive gains for pedestrian of 5 mins into the centre walking time identified. However, there is no walking time gains as seen	<p>The page numbers and comments provided do not correlate to those of EIAR Chapter 09 Traffic and Transport, Appendix A9.2 Overall Traffic and Transport Assessment, Appendix A9.2 N Traffic and Transportation Assessment Swords Central Sation or Appendix A9.5 Scheme Traffic Management Plan (which assesses traffic impacts during the construction phase). Additionally, the Opening Year assessed in each of these documents is taken to be 2035, with a Design Year of 2050, and therefore the comments in your submission do not correlate with any of the analysis presented in these documents as part of the EIAR.</p> <p>The page numbers and comments you are referring to have been cross-checked and wholly correlate with the Traffic and Transportation Assessment as part of the R132 Connectivity Project (available at https://consult.fingal.ie/en/consultation/application-bord-pleanala-fingal-county-council-r132-connectivity-project). Therefore, these comments are not in relation to the MetroLink transport assessment provided in the Railway Order, and will not be commented on by TII or NTA.</p> <p>In the above-mentioned documents, Swords Pavilions has been recognised as a key trip attractor in the area, and has been used as a key point of origin/destination in much of the analysis, such as demonstrating journey time improvements once the MetroLink is operational. The Project will result in public transport journey time savings of up to 50 minutes from Swords Pavilions to Glasnevin, with up to 30 minute public transport journey time savings between Swords Pavilions and Dublin City Centre locations such as O'Connell Street and St. Stephen's Green. It is predicted that up to 18,500 passengers movements will be facilitated at Swords Central Station over the 12hr period. The origins and destinations of passengers at Swords Central Station is shown in Figure 5.2 and 5.3 of Appendix A9.2N, indicating that a high proportion of passengers will have origins or destinations at Swords Pavilions, and therefore will not be requiring car parking facilities</p>

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			<p>on Page 137 from the Swords Central Metro stop. What is referenced is the walking time gains from the Seatown stop. However, there is very little walking traffic currently from the Seatown area, as its mainly all industrial sites. The reasoning appears flawed.</p> <ul style="list-style-type: none">• Page 174: It is stated that no cars turn left at Malahide Road Roundabout to head down the Malahide Road to access Pavilions. It should be evident that this is because they have used the R132 slip road to enter the centre. All left turning traffic at the roundabout is then limited to trips to Swords Main Street or Dublin Road. This again highlights the importance of maintaining the performance of the R132 slip road in the smooth running of local transportation links.• Page 204: Conclusions: Whereas Sustainable Swords recognises realistically that car trips to Pavilions will remain high notwithstanding the implementation of alternative transport strategy measures, the simplistic, inaccurate and misplaced assumption of the Metrolink transportation assessment is that access to Pavilions will be pedestrian / cyclist driven in the future not cars. Also, while the benefits to the area for both residents and new development is highlighted, there is no mention of the significant current or future Pavilions operations that sustain Swords and its hinterland and which are put at risk by failure to acknowledge the transportation needs of Pavilions.	<p>at Swords Pavilions. Car mode share in the zones around Swords Central Station is also anticipated to reduce by 3-4 percentage points, with a corresponding 7 percentage point increase in public transport at this location when MetroLink is operational.</p> <p>As noted in Chapter 06 (MetroLink Operations and Maintenance), the Project has been designed to ensure maximum interchange with other modes of transport, specifically sustainable modes such as public transport, as well as walking and cycling. Therefore, the demand for vehicle trips to and from this area will be reduced by the provision of MetroLink. In overall terms, the Swords Central Station will provide for improvements to the public transport network, resulting in decreases in private car usage/trips, increases in public transport usage/trips and will facilitate walking and cycling to the station without significantly impacting on the operation of the road network in the area.</p> <p>Please refer to response items (5) and (11) in relation to the anticipated impacts on traffic and transport during the construction phase.</p>
34	Section 7.7 Cumulative Development	29	<p>None of the Pavilions Shopping Centre operations, R132 access road and event space permissions, or the 'Pavilions Development Lands' development potential is mentioned in the cumulative impacts chapter of the EIAR (Ch. 30). We consider the failure to acknowledge and consider the existing and potential development at Pavilions in EIAR Chapter 30 'Cumulative Development' to be an oversight that should be addressed.</p>	<p>Please refer to response items (3) and (10) in relation to the planning context at this location.</p>
35	Section 8 Conclusion	29	<p>For 'major town centre' land, in Swords 'Key Town', that will be immediately adjacent to significant construction and operational works related with MetroLink, and where direct land take and traffic impacts are inevitable, it is very concerning to our Client that Swords Pavilions and Pavilions Development Lands receive no direct consideration in respect of the magnitude and duration of effect of the project on its existing operations and future development potential. The project shows no appreciation of the current and future success of Swords Pavilions within its community, or its strategic role as a driver of Swords town and hinterland economy and employment.</p>	<p>Please refer to response items (3), (4), (5), (10), and (11) above.</p>
36	Section 8 Conclusion	29&30	<p>The principal areas of concern for Pavilions operational centre arising from the proposed Metrolink project primarily include:</p> <ul style="list-style-type: none">• Temporary and Permanent land take.• Duration of construction stage and severance to Pavilions Shopping Centre.• Traffic Management and Access during construction and operational stages.• Impact on future significant development potential, including prevention of delivery of 786 homes (for c.2,146 residents) within the next 3 to 7 years. <p>It is evident from the review of the current planning context that the Swords Pavilions plays a critical role in the realisation of Fingal County Council's aspirations for Swords and its wider catchment aspirations for Swords. These aspirations align with the current stated objectives at the Regional level, where Swords is identified as a Key Town in the Metropolitan Area. This is not reflected in consideration of the significance of the Metrolink project impact on successful operations of Pavilions Shopping Centre, in particular in respect of land take, construction, access, development potential and cumulative development</p>	<p>Thank you for sharing your observations related to the MetroLink project. TII have provided responses to the observations raised in the response items above.</p>

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37	Section 8 Conclusion	30	It is clear that the impact of the proposed CPO on Swords Pavilions and the Pavilions Development Lands, in terms of both the location of the proposed Metrolink construction compounds and their intended use (construction compounds accommodating substantial volumes of heavy construction and goods vehicles), has not been properly assessed or thought through.	<p>TII do not agree that the potential impacts of the construction works has not be properly assessed or thought through.</p> <p>EIAR Chapter 21 (Land Take) assesses the impact of the temporary and permanent acquisition of lands. The land take impacts at this location are summarised at Item 10 above.</p> <p>EIAR Chapter 7 (Description of the Alternatives) outlines the evolution of the proposed Project and of how alternatives to the alignment, station locations/layout and construction methods have been considered and assessed. This process of assessment and refinement of the route and station layouts has largely determined the proposed requirements for permanent land take. 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. The siting of construction compounds is considered in Section 7.8 of EIAR Chapter 7 (Description of the Alternatives).</p> <p>Construction compounds have been located in proximity to the required working areas to ensure the maximum efficiency of the Construction Phase works and to minimise potential environmental effects. In the case of the Pavilions Compound this is required to remove the existing footbridge across the R132, minimising impact to existing landscape and no other alternative is available. The rationale for this compound was an area of open accessible space for construction activities adjacent to the Pedestrian Bridge to be removed.</p> <p>The location of the Swords Central Main Construction Compound was the only feasible option and is located in current undeveloped grassland area. The compound size has been reduced at Landowner request to current minimum size required to manage works in this area. The rationale was that the construction area has to be located immediately by the station, and no other alternative has been considered.</p> <p>Construction impacts (traffic, noise and vibration, air quality and dust, etc.) within the construction compounds will be controlled and managed in accordance with the Construction Environmental Management Plan (CEMP) and will be kept to a minimum. The EIAR (Chapter 9 to Chapter 31) fully details all impacts, mitigation techniques and the types of measures to be employed to minimise the impacts generated by the proposed Project during the Construction Phase (including due to site establishment of construction compounds).</p>
38	Section 8 Conclusion	30	The proposed CPO for both temporary and permanent land acquisition will most certainly severely, adversely impact the existing vehicular operations of Swords Pavilions Shopping Centre, which is estimated to accommodate c. 2.85M customer vehicles per annum (c. 7,800 per day entering and exiting the car park areas / 15,600 vehicle journeys via the R132 and Malahide Road). While the future development of Pavilions can also facilitate the enhancement of pedestrian and cycle connectivity, where possible, its existing and future development will continue to rely heavily on vehicular access for car borne customers via the R132 left-in left-out road and the Malahide Road, for its existing and future operational success and development.	Please refer to response items (3), (4), (5), (6), (9), (10) and (32) in relation to the associated landtake at this location and the impacts on all modes of transport.

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39	Section 8 Conclusion	30	The proposed use of the Pavilions lands for the purpose of a construction compound and construction traffic management will inevitably have an adverse impact on customers, footflow and trade, impacting the overall viability of the Shopping Centre which is a significant employment hub. It is likely to raise construction nuisance effects, including noise, dust and health and safety concerns for customers, who may be put off visiting Pavilions and with a consequent adverse impact on trade and viability over the estimated 5 year construction period for Metrolink Swords Central Station.	Please refer to response items (3) to (6) above in relation to the anticipated impacts of the construction works at this location.
40	Section 8 Conclusion	30	Part of the attraction of Pavilions is that it is highly accessible locally by car, bus, foot and bicycle, and in the future by BusConnects and Metrolink. Pavilions is therefore ideally located for further compact consolidation of town centre development. Hammerson can confirm that considerable resources and expenditure have been spent to date in preparation for the delivery of a mixed use town masterplan with critical residential component (c.786 new dwellings, which assuming an average household size of 2.737 could house 2,146 persons) on the specific site which is the subject of the Metrolink CPO. The timeline from Pavilions project commencement to delivery of residential accommodation on site is on average 3 to 7 years, or by approximately 2026. However, pending the completion of Railway Order and CPO approval, contract and construction stages, the Metrolink CPO would sterilise the land for the period of at least the next Fingal County Development Plan, thus jeopardising the Pavilions potential to deliver urgently needed houses to Swords. It may also result in the permanent acquisition and sterilisation of lands at the north and eastern edges of the Pavilions Development Lands. These are all lands that are essential to properly construct and phase the overall Pavilions masterplan development. The viability of the planned development would be jeopardised by any restriction on the number of residential units planned, or where the 'buildability' of the scheme is hindered by the Metrolink CPO. It is not clear why the Pavilions lands to the west of the R132 are required to accommodate the construction of the proposed Metrolink project at greenfield undeveloped lands to the east of the R132. We therefore ask that the CPO of the Pavilions Development Lands be refused by An Bord Pleanála.	Thank you for sharing your concerns related to the land sterilisation. TII have reviewed your concerns and provided responses above at Items (3) to (6) and (10).