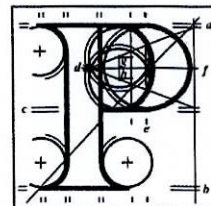


**Our Case Number:** ABP-314724-22

**Your Reference:** Devonmill Limited



**An  
Bord  
Pleanála**

Tom Phillips Associates  
80 Harcourt Street  
Dublin 2  
D02 F449

**Date:** 01 December 2022

**Re:** Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]  
Motrolink. 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 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

RA05 (No Receipt to Issue)

Tel  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Fax  
Website  
Email

(01) 858 8100  
1890 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

<b>AN BORD PLEANÁLA</b>	
LDG-	_____
ABP-	_____
<b>23 NOV 2022</b>	
Fee: €	_____ Type: _____
Time: <u>11.43</u>	By: <u>hand</u>

Friday, 25<sup>th</sup> November 2022  
[By Hand]

Dear Sir / Madam

**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)**

## 1.0 INTRODUCTION

Devonmill Limited<sup>1</sup> has retained Tom Phillips + Associates<sup>2</sup>, Town Planning Consultants, in association with Transport Insights, Transport Consultants, to prepare this submission in respect of the application, made by the Transport Infrastructure Ireland, for a Railway Order for the Metrolink-Estuary to Charlemont via Dublin Airport.

This submission relates to the Travelodge Hotel and associated lands at Pinnock Hill, Swords, Co. Dublin and should be read in conjunction with the Transport Insights' traffic and transport related observations enclosed as Appendix C. The purpose of this submission is primarily to ensure that the operation of the Travelodge Hotel at Swords is safeguarded during the construction and operation stages of the project. We note that our client also owns the building element to the front of the hotel building which is currently occupied by Smokin Bones Restaurant.

From the outset, we highlight our support for the Metrolink project and the delivery of nationally and strategically important infrastructure project.

<sup>1</sup> Devonmill Limited, 31 Northwood Court, Northwood Park, Santry, Dublin 9 (Company Reg. No. 589941)  
(Note: the operating company is Smorgs ROI Limited; Company Reg. 541986; also registered at the above address.)

<sup>2</sup> TPA, 80 Harcourt Street, Dublin 2, D02 F449.

TOWN PLANNING CONSULTANTS



In accordance with statutory public notice, this submission has been made to An Bord Pleanála before 5.30pm on 25<sup>th</sup> November 2022. For information purposes, we enclose the public notice as Appendix A.

This submission is not accompanied by a fee on the basis that our client's land is proposed to be acquired under the draft Railway Order (Landtake Ref. ML1S-A3 as described in Section 2.0 below and Appendix B).

### 1.1 The Subject Site

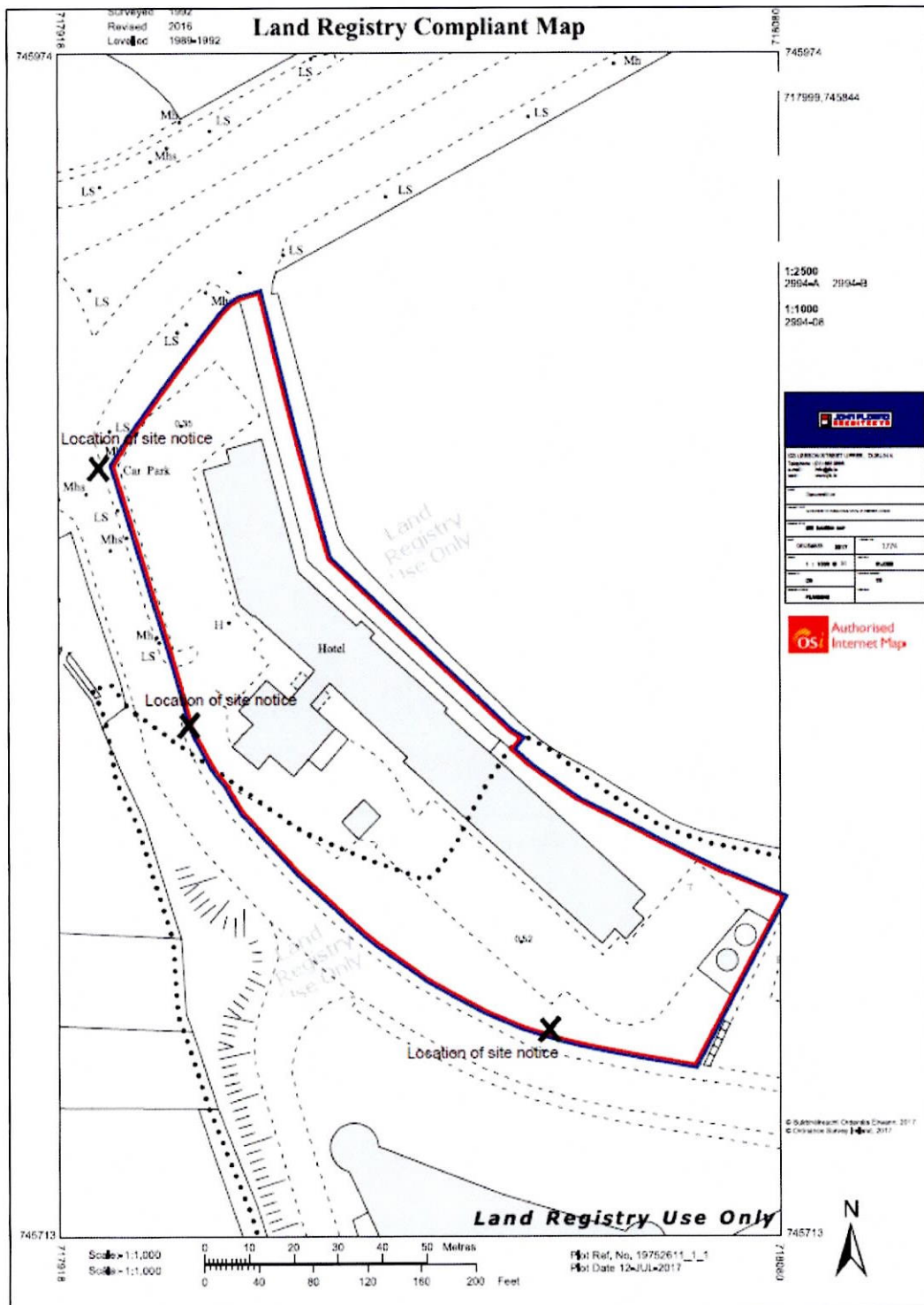
The lands affected by the Railway Order are located to the immediate southeast of the Pinnock Hill Roundabout, to the south of the R132 and east of the R125. The site is irregular in shape and is approximately 0.93 ha.

The site is occupied by an existing two storey hotel building with 130 no. bedrooms and 116 no. associated car parking spaces which was granted planning permission in 1991 (FCC Reg. Ref. 91A/1759).

Access to the site is via the entrance off the R125, which is accessed from the R132 via the Pinnock Hill roundabout. The site is located in close proximity to Dublin Airport (c.3km) and is located approximately 14km from the city centre. The Airside Retail Park is immediately accessible from the site via the R125.



Figure 1.0: Aerial image showing subject site (Google Earth, 2022).



**Figure 1.1: Extract from Site Location Map submitted with application for permitted development - FCC Ref. Reg. F17A/0756 showing the full extent of the subject site area (John Fleming Architects, 2017)**





Figure 1.2: Extract from Existing Site Layout Plan submitted with application for permitted development - FCC Ref. Reg. F17A/0756 (John Fleming Architects, 2017).

### 1.3 Planning History

#### ***F17A/0756 – Extant Planning Permission Granted for Extension to Hotel***

On 25<sup>th</sup> April 2018, planning permission was granted by Fingal County Council for the following development proposal at the subject site:

- Construction of a four storey hotel extension (1,944 sqm GFA) with overall height of 13.8 m;
- Demolition and reinstatement of existing hotel floorspace (172 sqm);
- Removal of 3 no. hotel bedrooms;
- Relocation of existing ESB sub-station in order to facilitate the physical connection of the extension;
- Installation of plant room and reorientation of hotel lobby at ground floor level;
- Resulting in 55 no. new hotel bedrooms, and a combined overall total of 182 no hotel bedrooms.

The above planning permission has not yet been implemented.

#### ***BusConnects***

We also note that the Pinnock Hill Roundabout (R836/R125/R132) will be replaced by a signalised junction as part of the proposed BusConnects project.

## 2.0 HOW THE SITE IS AFFECTED BY THE METROLINK

This section provides an overview of how the existing hotel and associated lands are affected by the proposed Metrolink project, both permanently and temporarily during the construction phase.

### ***Proposed Landtake – Part of Travelodge Car Park (ML1S-A3)***

We note that it is further proposed to acquire part of our client's land comprising part of the hotel car park, located to the north of the hotel building. The red outline below denotes the extent of proposed acquisition of land. This would give rise to the loss of 24 no. car parking spaces.

<b>Drawing Book</b>	Propery Details – Book 1 of 2
<b>Drawing Title</b>	Railway Works, Metrolink Property Details, Pinnock Hill Roundabout
<b>Drawing Number</b>	ML1-JAI-BOR-ROUT_XX-DR-Y-01022
<b>Plan Number</b>	ML-P 301 S-T
<b>Land Take Reference Number</b>	ML1S-A3

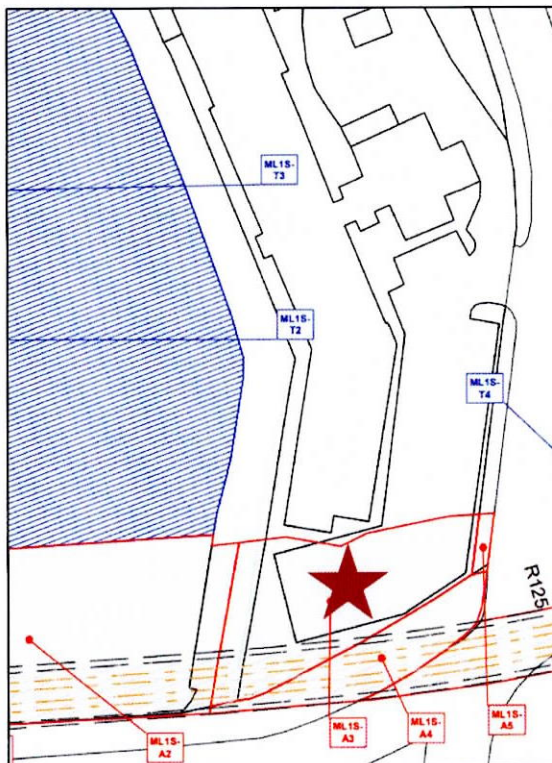


Figure 2.0: Extract from Dwg. No. ML1-JAI-BOR-ROUT\_XX-DR-Y-01022 showing the proposed land take at the subject lands.

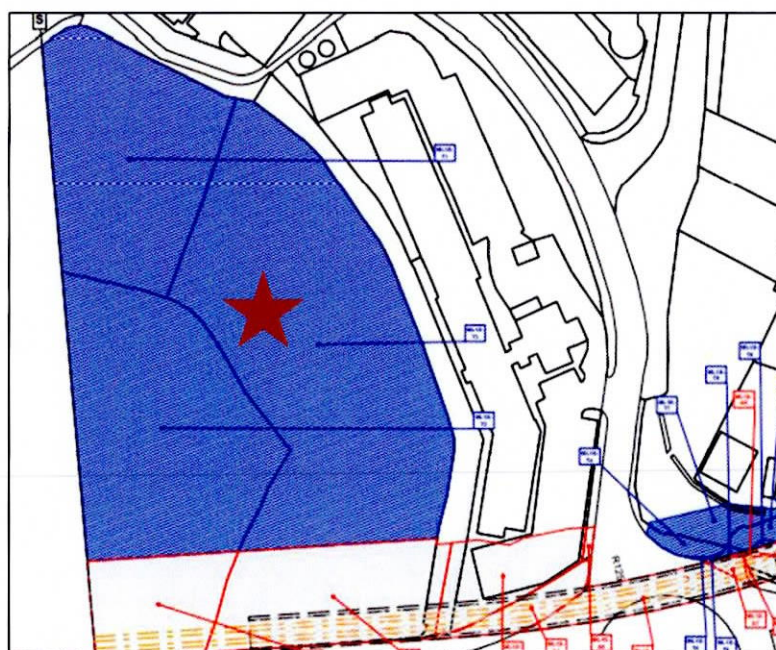


### ***Proposed Temporary Landtake – Construction Compound to West (ML1S-T3)***

We understand that the lands to the east of the subject site (currently a vacant field) will be used temporarily during the construction phase of the project. As noted in Chapter 4 of the EIAR, these lands will be a satellite<sup>3</sup> construction and logistics compound with an estimated construction duration of 51 months. The compound area will be located approximately 15 metres from the hotel and surrounded by a 2.4m high hoarding.

The relevant land reference is ML1S-T3. The relevant drawing details are:

<b>Drawing Book</b>	Property Details – Book 1 of 2
<b>Drawing Title</b>	Railway Works, Metrolink Property Details, Pinnock Hill Roundabout
<b>Drawing Number</b>	ML1-JAI-BOR-ROUT_XX-DR-Y-01022
<b>Plan Number</b>	ML-P 301 S-T
<b>Land Take Reference Number</b>	ML1S-T3



**Figure 2.1:** Extract from Dwg. No. ML1-JAI-BOR-ROUT\_XX-DR-Y-01022 showing the proposed neighbouring location for a construction and logistics site with satellite compound.

### ***Linear Working Area/ Road Diversions and Closures***

In addition to the construction areas detailed above, we have identified that there will be working areas, and associated road closures and diversions, from the Pinnock Hill roundabout and the R132, including the closure of the R125 arm. Access to the Travelodge Hotel will be restricted during this time.

<sup>3</sup> Satellite construction compounds will generally be smaller and provide: Local office and welfare facilities; local storage for plant and materials; and limited parking for construction vehicles. (EIAR, Chapter 4, page 13)

It is understood from consultation with TII that this area will be disrupted in various parts throughout years 1 and 6 of construction. It is further understood that the proposed roundabout alignment and Pinnock Hill closure will take place between years 4 and 6 for a period of 18 months. We note that there will be controlled access to the Travelodge Hotel during this time. The impact of the proposed diversions is further detailed in Transport Insights' observation at Appendix C.

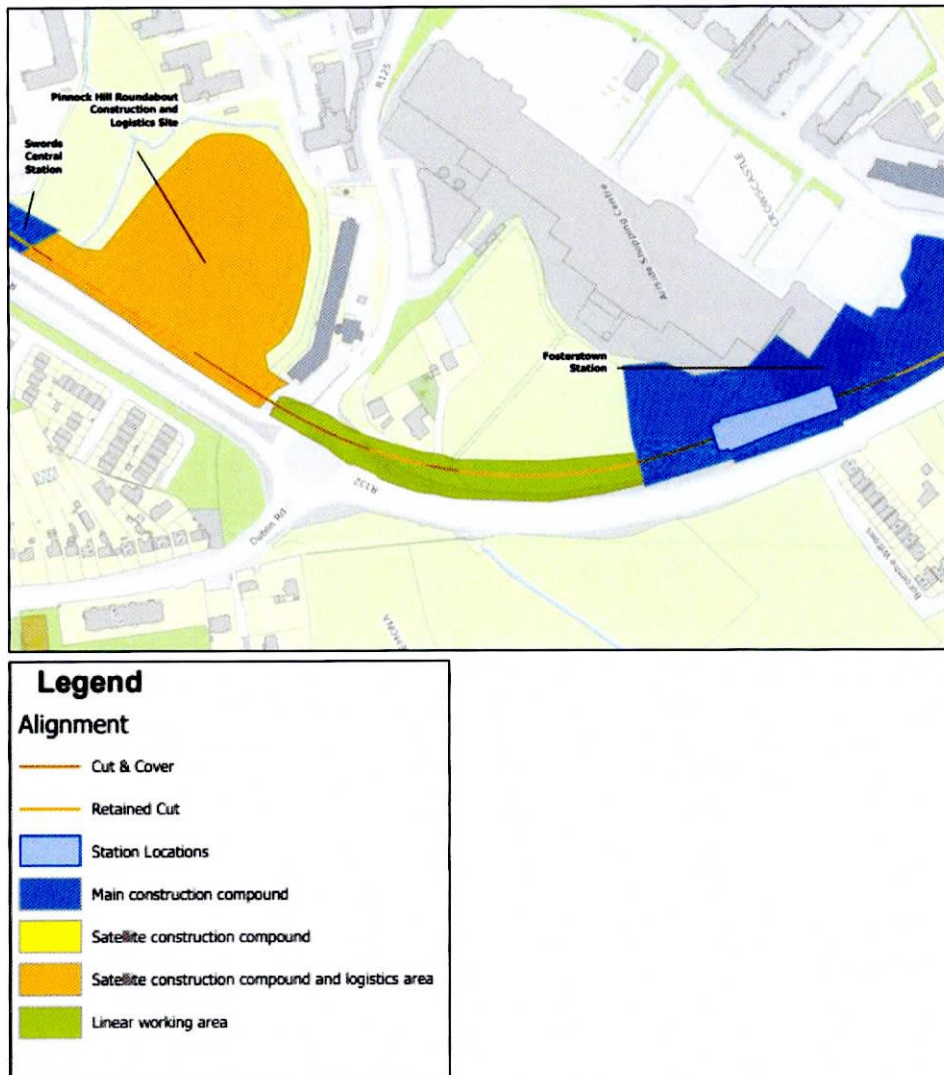


Figure 2.2: Extract from Figure 5.1 Construction Compounds Sheet 6 of 26 (Dwg. No. ML1-JAI-EIA\_ROUT\_XX-DR-Y-05007 Rev P02), contained within Chapter 5 'Metrolink Construction Phase' of the EIA (prepared by Jacobs, 2022).

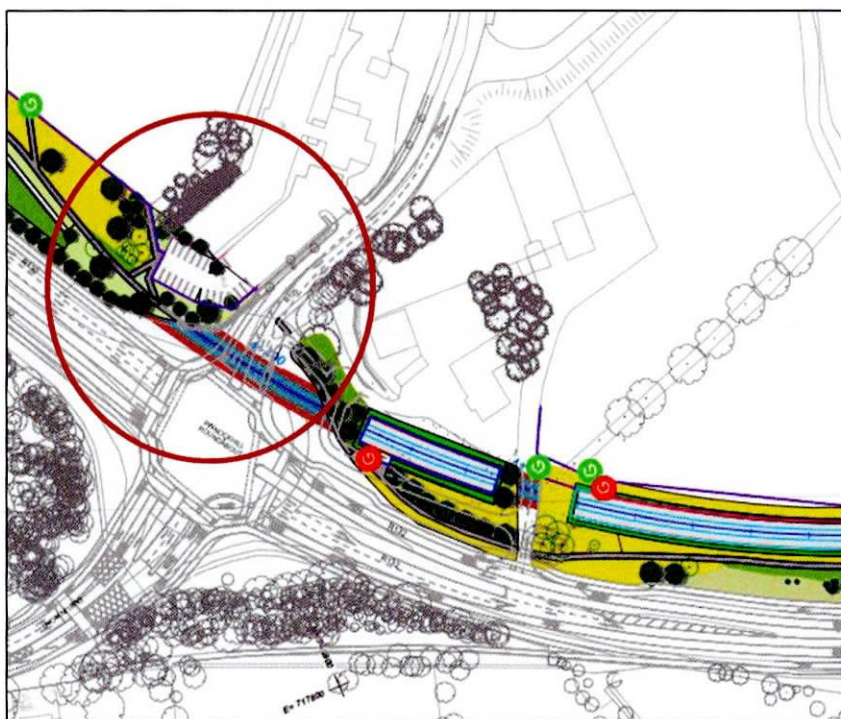


### ***Proposed Landscaping***

We understand that post-construction, the proposal includes a landscaping scheme which aligns with the landscape alterations proposed under BusConnects.

Having regard to the subject site, we note that the landscape proposals include the reinstatement of the Travelodge Hotel car parking spaces which are proposed to be taken under landtake ref. ML1S-A3.

<b>Drawing Book</b>	Landscaping Details Fingal County and Dublin City Council
<b>Drawing Title</b>	Swords Central – Fosterstown, Landscape Layout – Preliminary Design Issue
<b>Drawing Number</b>	ML1-JAI-ARL-SC03_XX-DR-Y-00006



**Figure 2.3:** Extract from Dwg. No. ML1-JAI-ARL-SC03\_XX-DR-Y-00006 showing the proposed landscape layout for the subject site and surrounding area.



### **3.0 GROUNDS OF SUBMISSION**

From the outset, we welcome the delivery of the Metrolink project and acknowledge that it will result in a significant improvement to the public transport accessibility and connectivity of the site and the surrounding area, including direct access to/from Dublin Airport and the City Centre.

In summary, our submission seeks to ensure that the Travelodge Hotel is safeguarded during the construction and operational stages of the Metrolink Project. This is further detailed below.

#### **3.1 Hotel as a Sensitive Land Use**

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.

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.

As a hotel, the Travelodge is reliant upon being an attractive and comfortable place to stay, in addition to being accessible to guests from key locations. 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.

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.

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.

#### **3.2 Loss of Car Parking**

As detailed above, it is proposed that land is acquired at the subject site (land take ref. ML1S-A3) which would result in the loss of a section of the Travelodge car park, comprising 24 no. spaces.

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.

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.

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.

### **3.3 Diversions and Traffic Disruption**

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.

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.

### **3.4 Future Growth of the Hotel**

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.

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.



### **3.5 Restaurant Tenant (Smokin Bones)**

As noted in the introduction, the subject site also accommodates our client's tenant, Smokin' 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.

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.

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.

### **3.6 Delays and Uncertainty**

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.

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.

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.

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.





#### **4.0 CONCLUSION**

We confirm that Devonmill Limited welcomes the implementation of the Metrolink and is supportive of the delivery of this nationally and strategically important infrastructure project.

However, as identified above, the Travelodge Hotel (and associated restaurant unit) is located immediately adjacent to major construction locations for the project, including a construction and logistics compound, linear construction areas and associated road closures and diversions. It is also proposed that part of Devonmill Limited land will be acquired to provide for the construction of the scheme, resulting in the loss of car parking spaces.

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.

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.

Our client welcomes the opportunity for further engagement with TII to ensure that the hotel operation is safeguarded at each stage of the application process and construction process thereafter.

We trust that the above is in order.

Yours faithfully,

---

**John Gannon**  
**Director**  
**Tom Phillips + Associates**

## APPENDIX A

### Copy of the Public Notice in respect of the Draft Railway Order Application.

 <div> <p>Riadas na hÉireann Government of Ireland</p> <p>Tionscadal Éireann Project Ireland</p> <p>2040</p> </div>	 <p>TII Transport Infrastructure Ireland</p>	<p><b>METROLINK</b></p>
<p><b>AN BORD PLEANÁLA</b> <b>AN TACHT IOMPAIR (BONNEAGAR IARNRÓID) 2001</b> <b>(ARNA LEASÚ AGUS ARNA FHIONRAÍODH)</b></p>	<p><b>AN BORD PLEANÁLA</b> <b>TRANSPORT (RAILWAY INFRASTRUCTURE) ACT 2001</b> <b>(AS AMENDED AND SUBSTITUTED)</b></p>	
<p>Iarratas ón Udarás um Bóithre Náisiúnta (a fheidhmíonn mar Bhonneagar Iompair Éireann) ar an Ordú Iarnróid (Metrolink - Inbhear go Charlemont trí Aerfort Bhaile Átha Cliath) [2022].</p>	<p>Application by the National Roads Authority (operating as Transport Infrastructure Ireland) for the Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order [2022].</p>	
<p>I bhfeidhmíu na cumhachtaí a thugtar dó le hAcht 37 den Acht Iompair (Bonneagar Iarnróid) 2001 (arna leasú agus arna ionadú), beidh feidhm ag an Udarás um Bóithre Náisiúnta (ag feidhmíu mar Bhonneagar Iompair Éireann) ("an Tacht") ar an 30 Meán Fómhair 2022 nó dá éis chuig an mBord Pleanála ar Ordú Iarnróid don Iarnróid (Metrolink - Inbhear go dtí Charlemont trí Aerfort Bhaile Átha Cliath) [2022] de bhun forálacha an Achtá sin.</p>	<p>The National Roads Authority (operating as Transport Infrastructure Ireland) in exercise of the powers conferred upon it by Section 37 of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted) ("the Act") will apply on or after the 30th September 2022 to An Bord Pleanála for a Railway Order for the Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order [2022] pursuant to the provisions of the said Act.</p>	
<p>Udarás leis an Ordú Iarnróid, má dheonaítear é, don Udarás um Bóithre Náisiúnta (a oibríonn mar Bhonneagar Iompair Éireann) oibreacha iarnróid a dhéanamh agus na hoibreacha go léir a gá chun tógáil, oibriú, cothabháil agus feabhsú iarnróid arna ainmíú mar mhétreo a chumas lena n-áirítear, i measc rudaí eile, tógáil iarnróid agus métreo leithreacha go hiomlán agus uathobraithe den chuid is mó faoi thalamh thart ar 18.8km ar fad le 16 stáisiún ag nith é thuaidh de Shíoré ag Inbhear trí Sord, Aerfort Bhaile Átha Cliath, Baile Múna, Glas Naíon, agus Lar na Cathrach go dtí Charlemont i ndeisceartiar na cathrach Bhaile Átha Cliath.</p>	<p>The Railway Order, if granted, will authorise the National Roads Authority (operating as Transport Infrastructure Ireland) to carry out railway works and all works necessary to enable the construction, operation, maintenance and improvement of a railway designated as a metro including inter alia the construction of a fully segregated and automated railway and metro mostly underground approximately 18.8km in length with 16 stations running from north of Swords at Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and the City Centre to Charlemont in the south of Dublin City Centre.</p>	
<p>Beidh na hoibreacha comhdhéanta go ginearálta ach ní siad teoranta do thógáil iarnróid thart ar 18.8km ar fad atá faoi thalamh den chuid is mó. Ainmíonn sé cuid 9.4km de thollán toilte singil a nithéann faoi Lar na Cathrach Bhaile Átha Cliath a nithéann go dtí Aerfort Bhaile Átha Cliath. I measc na gceadúnna toilte na saoráidí rochtana iomghabhála le haghaidh seirbhíse eigeandála ag Aerfort Bhaile Átha Cliath, Páirc Chialáiste Aillbe agus díreach ó dheas de Stáisiún Charlemont, cuirfeadh struchtúir thairneach an toilte ar fáil sa Chóil Thuaidh. I measc an Dairdeigh agus in Aerfort Bhaile Átha Cliath, O thuaidh ó Aerfort Bhaile Átha Cliath toiscfaidh an iarnróid amach ar an toilte agus nithfidh sé ag Inbhear an dromchla agus i struchtúir ghearrtha agus chloaigh go Stáisiún an Inbhair. Áirítear tréir, uaid struchtúir gearrtha agus chloaigh coinnithe, codanna andaithe dromh maith le hoibreacha dromhla agus corlochaigh lighéidheacha i gceadúnna reatha dromhla agus gearrtha agus chloaigh. Tógfaidh droichead nua 93m thar an MSO agus tairnealach líne 261m ar fad thar an Abhainn Ghaohra agus Abhainn an Bharda.</p>	<p>The works will generally comprise but are not limited to the construction of a Railway approximately 18.8km in length which is mostly underground. It includes a 9.4km section of single bore tunnel running beneath Dublin City Centre running from Charlemont to Northwood Station and a 2.3km section of single bore tunnel running beneath Dublin Airport. Tunnel sections include intervention access facilities for emergency services at Dublin Airport, Albert College Park and just south of Charlemont Station, tunnel Portal structures will be provided at Northwood, Dardinstown and Dublin Airport. North of Dublin Airport the railway will emerge from tunnel and will run at surface level and in cut and cover structure to Estuary Station. Surface running sections and cut and cover sections will include earthworks, the use of retained cut and cover structures, elevated sections plus miscellaneous drainage and accommodation works. A new 93m bridge will be constructed over the MSO and a 261m long multi-span viaduct over the Broadmeadow and Ward River.</p>	
<p>Beidh 16 stáisiún san iomlán ann, lena n-áirítear 11 stáisiún faoi thalamh ag Aerfort Bhaile Átha Cliath, An Chóil Thuaidh, Baile Múna, Axcall Uí Chollaín, Páirc Uí Chollaín, Glas Naíon, an Mater, Sráid Uí Chollaín, Sráid na Teamhrach, Faiche Stiabhna agus Charlemont; 4 stáisiún gearrtha coinnithe ag Baile na Mara, Baile Shíoré, Baile an Fhoráisteirigh agus Baile an Dairdeigh agus 1 ag Stáisiún grád san Inbhear. Soláthrfaidh spás páirceála agus taistil ilroin 3000 gar go Mhótarbhealach an M1 ag Stáisiún an Inbhair. Tá loista cothabhála suite in aice le Stáisiún Bhaile an Dairdeigh ina mbelldh na háiseanna go léir a theastáil chun an Metrolink agus ar a rothstoc agus ar an Lárnaidh Rialaithe Oibríocháin cothabhála a dhéanamh agus a oibriú.</p>	<p>There will be a total of 16 stations, including 11 underground stations at Dublin Airport, Northwood, Ballymun, Collins Avenue, Griffin Park, Glasnevin, Mater, O'Connell Street, Tara, St. Stephen's Green and Charlemont. 4 retained cut stations at Seaview, Swords Central, Fosterstown and Dardinstown and 1 at grade station at Estuary. A multi-storey 3000 space park and ride close to the M1 Motorway will be provided at Estuary station. A maintenance depot is located near Dardinstown Station which will house all the facilities required for the maintenance and operation of the Metrolink and its rolling stock and the Operational Control Centre.</p>	
<p>Áiríteadh na hoibreacha freisin comharthaíocht iarnróid, córais cheannasacha, rialaithe agus cumarsáide, volatáir foistúil leictreacha, bunú comhdháile seiladach tógáil, bunú bainistíochta trácha seiladach agus atreallaithe bóitire, bealaí rochtana nua agus leasaithe agus feabhsúcháin ar aomhail bóitire, atreorú na bhfoinnte atá ann cheana, bonneagar draenála nua a sholáthar, volatáir bearta masolaithe comhuaidi, agus modhnaíthe bonneagair eile chun an tionscadal iomlán a éascú.</p>	<p>The works will also include railway signalling, command and control and communications systems, provision of electrical substations, establishment of temporary construction compounds, establishment of temporary traffic management and road diversions, new and realigned access routes and road junction improvements, diversion of existing utilities, provision of new drainage infrastructure, provision of environmental mitigation measures; and other infrastructural modifications to facilitate the overall project.</p>	
<p>Ainmíonn an tOrdú Iarnróid, má dheonaítear é, cumhachtaí freisin don Udarás um Bóithre Náisiúnta (a oibríonn mar Bhonneagar Iompair Éireann) talamh nó cearta a fháil go heigeantach i dtalamh, faoi thalamh nó os a chionn nó ar aon thoshraith talún a shonraítear san ordú, chun talamh a shonraítear san ordú a fháil agus a áitiú go seiladach, chun éasainti agus cearta eile ar thalamh a shonraítear san ordú a fháil; cearta pobail agus nó próibhídeacha lena n-áirítear cearta sli atá sonraithe san ordú a mhúchadh; agus forálann sé do chearta eile ar thalamh.</p>	<p>The Railway Order, if granted, also includes powers for the National Roads Authority (operating as Transport Infrastructure Ireland) to acquire compulsorily land or rights in, under or over land or any substratum of land specified in the order; to temporarily acquire and occupy land specified in the order; to acquire easements and other rights over land specified in the order; to extinguish public and/or private rights including rights of way specified in the order; and provides for other rights over land.</p>	
<p>Tá na hoibreacha iarnróid atá beartaíte a chumhdáil leis an Ordú Iarnróid beartaíte faoi réir nith méachta measúnaithe tionchair timpeallachta de bhun an Achtá agus cuirfeadh iteach Ráiteas Tionchair Natura freisin.</p>	<p>The proposed railway works covered by the proposed Railway Order are subject to an environmental impact assessment procedure pursuant to the Act and a Natura Impact Statement will also be submitted.</p>	
<p><b>Cinní fheidhreacha ar an Ordú Iarnróid oscailte don Bhard Pleanála</b></p>	<p><b>Potential decisions on the Railway Order open to An Bord Pleanála</b></p>	
<p>Tar éis preitinn a dhéanamh ar an iarratas ar Ordú Iarnróid tá roinnt roghanna cinnti ar fáil don Bhard Pleanála:</p>	<p>Further to consideration of the application for a Railway Order there are a number of decision options available to An Bord Pleanála:</p>	
<ul style="list-style-type: none"> <li>• Feadfar an tOrdú Iarnróid a cheadú agus a dhéanamh;</li> <li>• Feadfar an tOrdú Iarnróid a dhíolú; nó</li> <li>• Feadfar an tOrdú Iarnróid a cheadú agus a dhéanamh faoi réir cibe coinníolacha, modhnaíthe, srianta agus ceanglaí (agus ar cibe téarmaí eile) as An Bord Pleanála agus a shonrúidh sé san ordú.</li> </ul>	<ul style="list-style-type: none"> <li>• The Railway Order may be approved and made;</li> <li>• The Railway Order may be refused; or</li> <li>• The Railway Order may be approved and made subject to such conditions, modifications, restrictions and requirements (and on such other terms) as An Bord Pleanála thinks proper and specifies in the order.</li> </ul>	
<p><b>Áirítear na nith seo a leanas sna doiciméid tacaíochta a ghabhann leis an iarratas ar Ordú Iarnróid:</b></p>	<p><b>The supporting documentation accompanying the Railway Order application will include the following:</b></p>	
<ol style="list-style-type: none"> <li>1. Driacht den Ordú Iarnróid beartaíte, dar teideal "Ordú Iarnróid (Metrolink-Inbhear go Charlemont trí Aerfort Bhaile Átha Cliath) [2022]";</li> <li>2. Plean de na hoibreacha iarnróid atá beartaíte agus na riachtanais talún le haghaidh na n-oibreacha iarnróid;</li> <li>3. Leabhar tagartha don phlean, ag cur in iúl céannacht úinéir agus áitiúcháin na dtailte a bhfuil tuairisc orthu sa phlean;</li> <li>4. Tuairisc ar Mheasúnú Tionchair Timpeallachta (TMIT), a sholáthraíonn anailís agus measúnú corasach ar éifeachtaí suntasacha tionchair beartaíte ar an gcomhshuí glactha;</li> <li>5. Ráiteas Tionchair Natura.</li> </ol>	<ol style="list-style-type: none"> <li>1. A draft of the proposed Railway Order, entitled "Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order [2022]";</li> <li>2. A plan of the proposed railway works and the land requirements for the railway works;</li> <li>3. A book of reference to the plan, indicating the identity of the owners and occupiers of the lands described in the plan;</li> <li>4. An Environmental Impact Assessment Report (EIAR), providing a systematic analysis and assessment of the significant effects of a proposed project on the receiving environment;</li> <li>5. A Natura Impact Statement.</li> </ol>	



Rialtas na hÉireann  
Government of Ireland

Yonascadál Éireann  
Project Ireland  
**2040**

Transport Infrastructure Ireland

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**Iniúchadh ar an dteacht-Ordú Iarnróid agus ar na doiciméid a ghabhann leis**

Feadar cop den dteacht-Ordú Iarnróid agus den doiciméadacht a ghabhann leis an iarratas a iniúchadh saor in aisce le linn gnáthuaireanta oifige nó oisailte ón 7 Deireadh Fómhair 2022 go dtí an 25 Samhain 2022 ag:

1. Oifigí An Bhoird Pleanála offices ag 64 Sráid Mhaolbhríde, Baile Átha Cliath 1, D01 V902;
2. Oifigí Chomhairle Cathrach Bhaile Átha Cliath ag Oifigí na Cathrach, Cé an Adhmaid, Baile Átha Cliath 8, D08 R13F;
3. Oifigí Chomhairle Contae Rhine Gail ag Halla an Chontae, An Phlómhárd, Sord, Contae Bhaile Átha Cliath K67 XRY2;
4. Oifigí Bonneagar Iompair Éireann (BIE) Ionad Gnó Gheata na Páirce, Sráid Gheata na Páirce, Baile Átha Cliath 8, D08 DK10;
5. Oifigí an tÚdaráis Náisiúnta Iompair (DNI) ag an Dún Scéine, Lána Fhearsaile, Baile Átha Cliath 2, D02 W120 (9.15am - 4pm de Luan go hAoine).

Is féidir an dteacht-Ordú Iarnróid agus na doiciméid a ghabhann leis an iarratas a theicéil ar <https://www.metrolink.ie> ó 29 Meán Fómhair 2022.

**Doiciméidúcháin a cheannach**

Feadar cóipeanna nó sleachta as na doiciméid a ghabhann leis an iarratas ar an Ordú Iarnróid a cheannach ar fháil le linn gnáthuaireanta oifige nó oisailte ar an costas réasúnach a bhaineann leis an gceip sin a cheannach nó le sliocht as:

- Bonneagar Iompair Éireann, (BIE), Ionad Gnó Gheata na Páirce, Sráid Gheata na Páirce, Baile Átha Cliath 8, D08 DK10, Éire

Feadar iarratas cheannach den seirbhís a sheoladh chuig Bonneagar Iompair Éireann, Ionad Gnó Gheata na Páirce, Sráid Gheata na Páirce, Baile Átha Cliath 8, D08 DK10 nó ar [info@metrolink.ie](mailto:info@metrolink.ie) nó trí ghlaic a chur ar 1800 333 777.

**Aighneachtal Scríofa**

Is é an Bord Pleanála an t-údarás inniúil atá freagrach as an gcinneadh an ndéanfar nó nach ndéanfar an t-Ordú, ónár féidir faisnéis zóhartha a fháil agus ónár féidir tuairimí nó ceisteanna a chur isteach. Breithneoidh an Bord Pleanála son aighneachtal ó aon daoine, a dheanfar i scríbhinn ó 7 Deireadh Fómhair 2022 go dtí 5.30in ar an 25 Samhain 2022 agus beidh fáille €50 ag gabháil leo i ndáil leis an dteacht-Ordú Iarnróid, nó i ndáil leis na heifeachtaí dóchúlacha an gcomhiachail agus ar an bionchar suntasach dóchúlacha a bheidh ag na hoibreacha iarnróid atá beartaithe sa limistéir lena mbeannann le Láithreán Eorpacha, más ann dóibh. Níl an fáille seo infoctha ag comhiachail forordaithe áirithe nó ag daoine a bhfeidh ar a goid fáille a fháil faoin dteacht-Ordú Iarnróid.

**Ní mór aighneachtal a chur isteach trásh nach deanaí ná 5.30in ar an 25 Samhain 2022** agus ní mór iad a sheoladh chuig an mBord Pleanála, 64 Sráid Mhaolbhríde, Baile Átha Cliath 1, D01 V902 agus marcáilte "Ordú Iarnróid (Metrolink-Inbhear go Charlemont trí Aerfort Bhaile Átha Cliath) 2022". Is féidir aighneachtal a chur faoi shuíomh greasáin an Bhoird Pleanála freisin ag an seoladh seo a leanas: <https://www.pleanala.ie/en/observations>

**Eisteacht Ó Bhéal**

Feadarh an Bord Pleanála, dá iarragha féin, eisteacht ó bhéal a thionól maidir leis an iarratas ar Ordú Iarnróid, faoi ailt 42 den Acht.

**Athbhreithniú Breithneach**

Feadarh duine bailiocht chinneadh an Bhoird Pleanála a cheistiú trí iarratas ar athbhreithniú breithneach de réir ailt 47 agus 47A den Acht Iompair (Bonneagar Iarnróid) 2001 (ama leasú agus ama leasú) agus faoi Ordú 84 de na Rialacha na hAischiúiteanna, 1986 (ama leasú) (S.I. Uimh. 15 de 1986 ama leasú) agus is féidir teacht ar thaisníis phraiticiúil faoin meicniocht athbhreithnithe faoin gceanncheadail "Fogair DII" - "Fogair Athbhreithnithe Bhreithneacha" ar shuíomh greasáin an Bhoird [www.pleanala.ie](https://www.pleanala.ie) nó ar an shuíomh greasáin um Fhaisnéis do Shaoirnaigh [www.citizeninformation.ie](http://www.citizeninformation.ie)

**Sinthe: Edel McCormack**

**Rúnai don Udarás**

An tÚdarás um Ráthre Náisiúnta (ag feidhmú mar Bonneagar Iompair Éireann), Bonneagar Iompair Éireann, Ionad Gnó Gheata na Páirce, Sráid Gheata na Páirce, Baile Átha Cliath 8, D08 DK10, Éire

16 Meán Fómhair 2022

**Tá tuilleadh eolais le fáil ar:**

Teileafón: 1800 333 777

Ar post: [info@metrolink.ie](mailto:info@metrolink.ie), Bonneagar Iompair Éireann, Ionad Gnó Gheata na Páirce, Sráid Gheata na Páirce, Baile Átha Cliath 8, D08 DK10.

Riennphost: [info@metrolink.ie](mailto:info@metrolink.ie)

Suíomh greasáin: [www.metrolink.ie](https://www.metrolink.ie)

**Inspection of the draft Railway Order and accompanying documentation**

A copy of the draft Railway Order and the documentation accompanying the application may be inspected free of charge during normal office or opening hours from 7th October 2022 until the 25th November 2022 at:

1. An Bord Pleanála offices at 64 Marlborough Street, Dublin 1, D01 V902;
2. Dublin City Council offices at Civic Offices, Wood Quay, Dublin 8, D08 R13F;
3. Fingal County Council offices at County Hall, Main Street, Swords, County Dublin, K67 XRY2;
4. Transport Infrastructure Ireland (TII) offices at Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10;
5. National Transport Authority (NTA) offices at Dún Scéine, Harcourt Lane, Dublin 2, D02 W120 (9.15am - 4pm Monday to Friday)

The draft Railway Order and the documentation accompanying the application may also be viewed at: <https://www.metrolink.ie> from the 29th September 2022.

**Purchase of Documentation**

Copies or extracts from the documentation accompanying the application for the Railway Order may be purchased on payment of a fee not exceeding the reasonable cost of making such copy or extract from:

- Transport Infrastructure Ireland (TII), Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10, Ireland

Such purchase requests may be sent to Transport Infrastructure Ireland, Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10 or [info@metrolink.ie](mailto:info@metrolink.ie) or by calling 1800 333 777.

**Written Submissions**

An Bord Pleanála is the competent authority responsible for making the decision whether or not to grant the order, from which relevant information can be obtained and to which comments or questions can be submitted. An Bord Pleanála will consider any submissions by any persons, made in writing from 7th October 2022 to 5.30pm on 25th November 2022 and accompanied by a fee of €50 in relation to the draft Railway Order, or in relation to the likely effects on the environment and the likely significant effects in the area concerned with European Sites if any, of the proposed railway works. This fee is not payable by certain prescribed bodies or by persons whose lands may be acquired under the draft Railway Order.

**Submissions must be lodged no later than 5.30pm on 25th November 2022** and must be addressed to An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902 and marked "Railway (Metrolink-Estuary to Charlemont via Dublin Airport) Order 2022". Submissions can also be made on the An Bord Pleanála website at the following address: <https://www.pleanala.ie/en/observations>

**Oral Hearing**

An Bord Pleanála may, at its absolute discretion, hold an oral hearing into the application for a Railway Order, under section 42 of the Act.

**Judicial Review**

A person may question the validity of the decision of An Bord Pleanála by way of an application for judicial review in accordance with section 47 and 47A of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted) and under Order 84 of the Rules of the Superior Courts, 1986 (as amended) (S.I. No. 15 of 1986 as amended) and practical information on the review mechanism can be accessed under the heading "Legal Notices" - "Judicial Review Notice" on the Board's website [www.pleanala.ie](https://www.pleanala.ie) or on the Citizen's Information website [www.citizeninformation.ie](http://www.citizeninformation.ie)

**Signed: Edel McCormack**

**Secretary to the Authority**

National Roads Authority (operating as Transport Infrastructure Ireland), Transport Infrastructure Ireland, Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10, Ireland

16th September 2022

Further information is available from:

Telephone: 1800 333 777

Postal: Metrolink, Transport Infrastructure Ireland, Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10

Email: [info@metrolink.ie](mailto:info@metrolink.ie)

Website: [www.metrolink.ie](https://www.metrolink.ie)



## APPENDIX B

Extract from the Draft Railway Order Application showing the proposed landtake at Devonmill Limited's lands (Ref. no. ML15-A3).

METROLINK - BOOK OF REFERENCE - SECOND SCHEDULE Land which may be acquired		Ref. No:	ML15-A3
		Plan No:	ML-P 301 S-T
Quantity, description and situation of Land	Owners or Reputed Owners and Occupiers or Reputed Occupiers		
<b>Quantity</b> 849 sq.metres  <b>Description</b> Car park (part of)  <b>Situation</b> Adjacent to Pinnock Hill Roundabout	Devonmill Limited 31 Northwood Court Northwood Park Santry Dublin 9  TIFCO Limited 31 Northwood Court Northwood Park Santry Dublin 9  Travelodge (Dublin Airport North) Pinnockhill Swords County Dublin		
<b>Observations:</b>			
Page 1 of 1		Referred By: L&PS	Date: August 2022      Ref. No: ML15-A3





## **APPENDIX C**

**Transport and traffic related observations, prepared by Transport Insights, Transport Consultants.**

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

25 November 2022

**Our Ref: P916 2022 Devonmill Limited – MetroLink Transport Observation, Travelodge Dublin Airport North ‘Swords’ Hotel**

**Your Ref: MetroLink Railway Order 2022 – Travelodge Dublin Airport North Swords Hotel**

Dear Sir or Madam,

On behalf of our Client, Devonmill Limited, Transport Insights welcomes the opportunity to provide An Bord Pleanála with a Transport Observation in respect of the Draft Railway Order for the proposed MetroLink project. The Observation has been prepared in parallel with an overarching Planning Submission in relation to the proposed project, prepared by Tom Phillips + Associates.

MetroLink construction phase traffic impacts at and in the vicinity of the Travelodge Hotel, located adjacent to the Pinnock Hill Roundabout, Swords, Co Dublin, are the specific focus of this Observation. In light of the essential service provided by the Travelodge Hotel, and the severe impact of the current MetroLink construction phase proposals on accessibility to and the operation of the hotel, our Client trusts you will give detailed consideration to the contents of this letter.

#### **Travelodge Dublin Airport North ‘Swords’ Hotel**

The Travelodge Hotel is located adjacent to the R132 Pinnock Hill Roundabout, Swords, 3.5 kilometres to the north of Dublin Airport, with the hotel also accommodating a dine-in restaurant. The two-storey hotel is located on a ca. 9.3 ha. site, and has 130 no. bedrooms. It employs 38 no. staff in a variety of roles. Due to the hotel’s location with respect to Dublin Airport, a significant proportion of the hotel’s guests are transiting through the Airport. Access to the hotel, both for guests and servicing activities (e.g. deliveries, supplies, refuse collection), is exclusively via the adjoining R125 regional road. 116 no. car parking spaces are located within the site, which are critical to the hotel’s operations as in excess of 60% of hotel guests arrive by car (as car drivers or car passengers), with additional parking demand generated by the on-site restaurant.

The hotel site is in a prominent location with respect to the R132 Swords Bypass (and former N1 Dublin to Belfast road), and there are two main approaches. The primary approach to the hotel is from the R132 Swords Bypass Pinnock Hill Roundabout immediately to the west, with the secondary access from the southeast via the adjoining R125, from where access to the hotel site is provided. The R125 also provides a direct link between the hotel and the national road network, at M1 Junction 3. Quality bus corridor infrastructure is provided along the R132 Swords Bypass to the west, with bus services operating therein linking the site to Dublin Airport and Dublin City

+353 1 9639691  
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cmckeon@transportinsights.com  
www.transportinsights.com



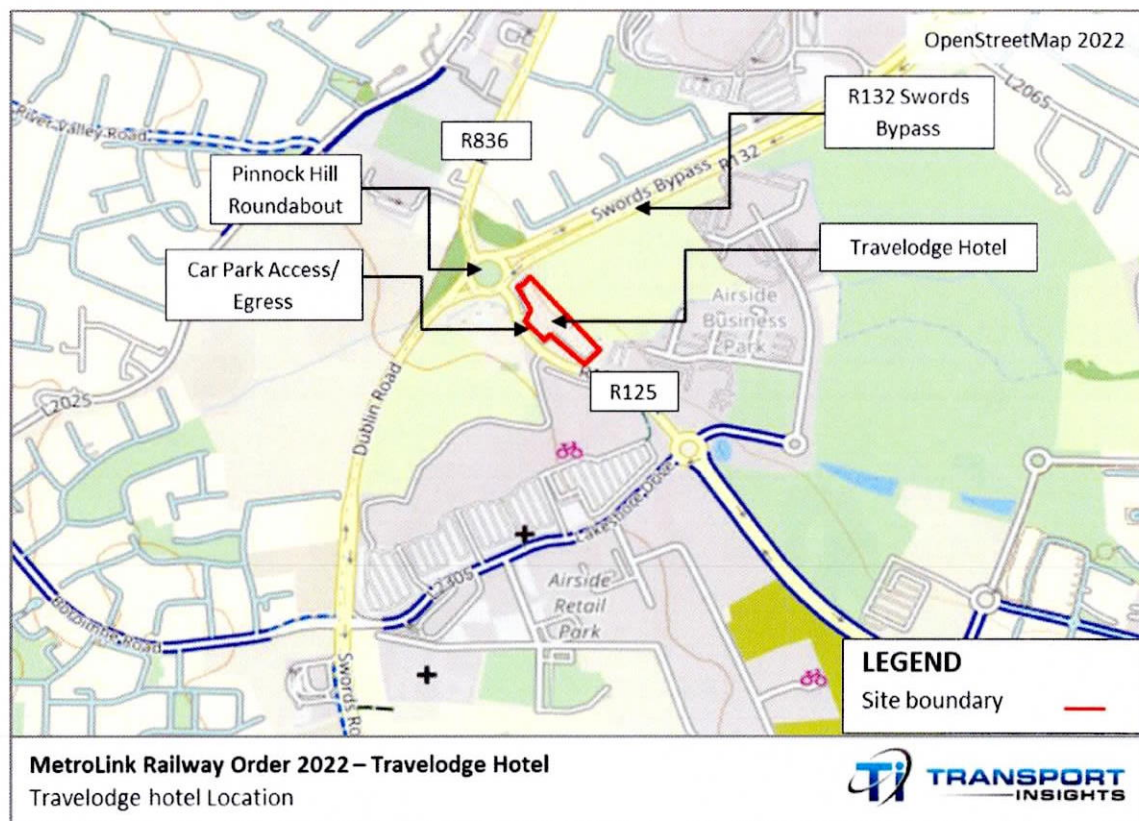


Centre (Abbey Street and Eden Quay). Due to the site's location with respect to the R132 and R125, it is most conveniently accessed by car or public transport (bus).

Travelodge hotel receives ca. 20 deliveries per week via a variety of van and truck types including refuse collection vehicles.

The following Figure 1 illustrates the hotel's location and layout.

**Figure 1 Travelodge Hotel Site Location Plan**



### Receiving Environment

As illustrated in the preceding Figure 1, the hotel is located at the junction between the R125 and the R132, ca. 3.5 kilometres to the north of Dublin Airport and ca. 14 kilometres to the north of Dublin City Centre. It is bounded to the north by an open field, to the east by Holywell Commercial Centre, to the south by the R125 and to the west by Pinnock Hill Roundabout and R132. Airside Retail Park is located to the southern side of the R125, directly across from the southeast corner of the hotel site.

### MetroLink Proposal and Construction Phase Plans

As part of *Project Ireland 2040*, the *National Development Plan (NDP) 2021-2030* sets out the Government's overarching investment strategy and budget for the period from 2021-2030. The current *NDP* contains a range of planned investments to be implemented over the coming years to facilitate the transition to a low carbon economy, of which sustainable mobility is a key component. These measures include significant expansions to

public transport infrastructure and services, including capacity enhancements and the delivery of new public transport infrastructure through projects such as MetroLink.

The MetroLink project involves the construction of a metropolitan railway between the Estuary, north of Swords and Charlemont in Dublin City Centre South via Dublin Airport. The overall alignment of the scheme is ca. 18.8 kilometres long, whereas the alignment between the two end stations (Estuary to Charlemont) is ca. 18.1 kilometres long. The estimated construction phase of this project is currently 8 years, commencing in 2027, with the scheme scheduled to be operational by 2035.

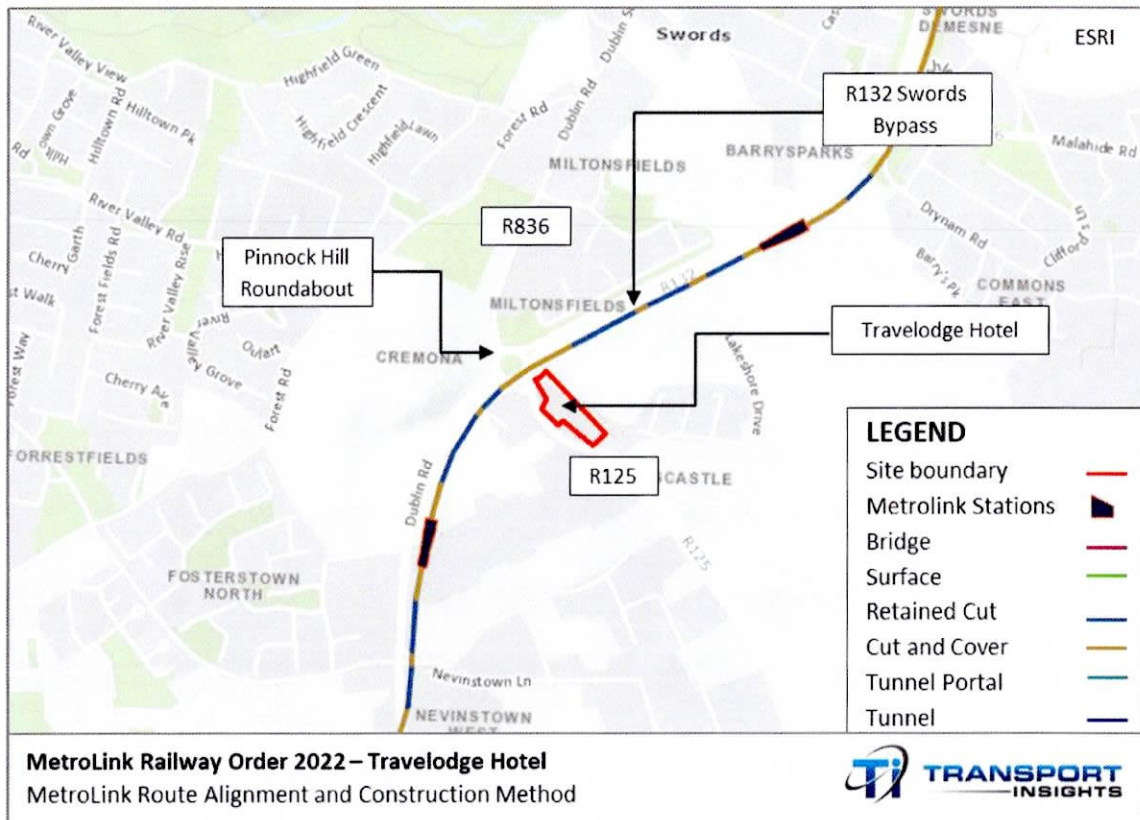
The Travelodge Hotel is located within the catchment of two metro stations – Fostertown and Swords Central. The Fosterstown Station will be located ca. 500 metres to the southwest of the hotel, adjacent to the R132 and just north of Airside Retail Park while the Swords Central Station will be located ca. 650 metres to the northeast of the hotel, adjacent to the R132. The Swords Central Station will be an integral part of the proposed R132 Connectivity Project, which also includes upgrade works along the R132 between north of Pinnock Hill Roundabout and north of Estuary Roundabout, to facilitate installation of new protected cycle and pedestrian facilities, comprising 2 metres wide cycle lanes and 2 metres wide footpaths on both sides of the carriageway, retention of one bus and one general traffic lane in each direction, removal of hard shoulders and/ or general traffic lanes, and a reduction in the speed limit to 50 km/ h.

Figure 2 (overleaf) illustrates the MetroLink route alignment and construction method in the vicinity of the hotel. The northern section of the proposed project, between Estuary and Northwood, will be largely on surface, in retained cut, cut and cover, or embankment, with a short section of tunnel under Dublin Airport. In particular, the alignment between Fosterstown Station and Swords Central Station will consist of sections of retained cut, with cut and cover sections, and will pass under Pinnock Hill Roundabout as a cut and cover tunnel. It will then cross to the western side of the R132 Swords Bypass just south of the existing junction of the R132 Swords Bypass, Nevinstown Lane and Boraimhe Road.

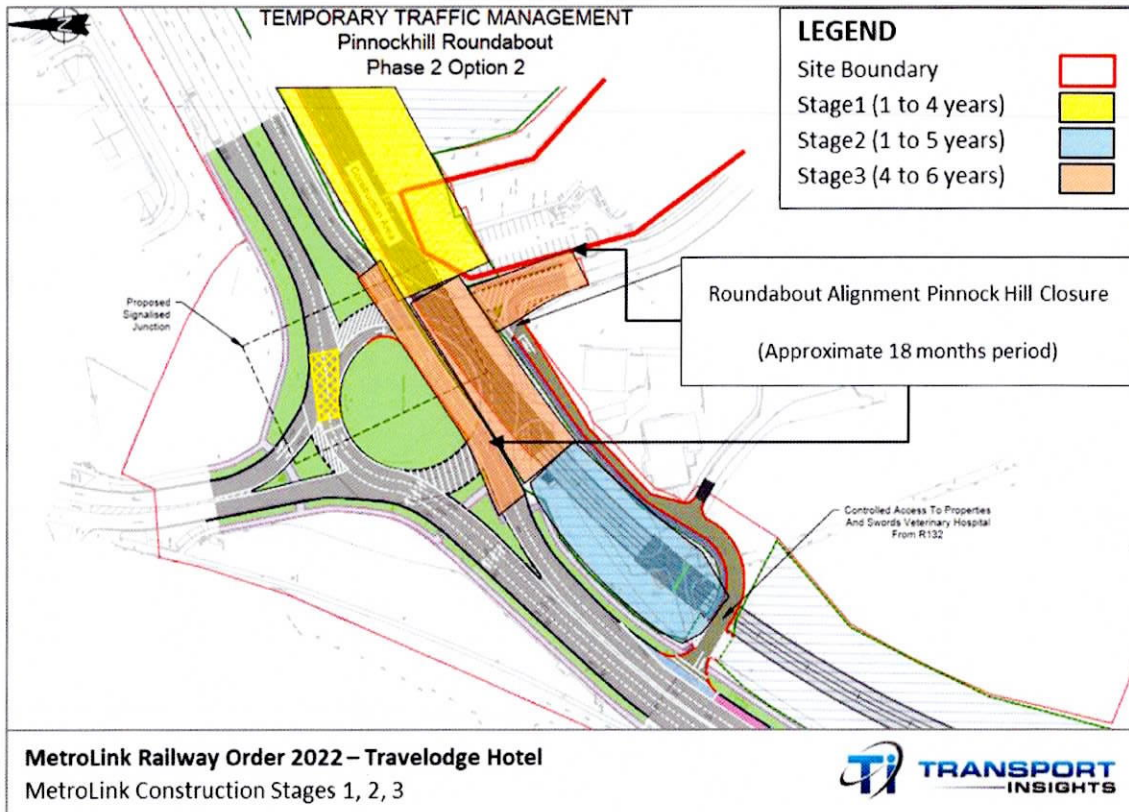
Figure 3 (also overleaf) presents the proposed construction stages in the vicinity of Pinnock Hill Roundabout. As a result of the MetroLink construction phase proposals, vehicular movement shall not be possible from Pinnock Hill Roundabout, which is one of the two hotel approaches, during year 4 to 6 of the construction programme. During this stage, it is currently proposed that all road users would only access the hotel via the R125 to the southeast (coming from the M1 and Airside Retail Park), resulting in a significant diversion (+1.7 kilometres) to those travelling from/ to the R132 to the west.



**Figure 2 MetroLink Route Alignment and Construction Method**



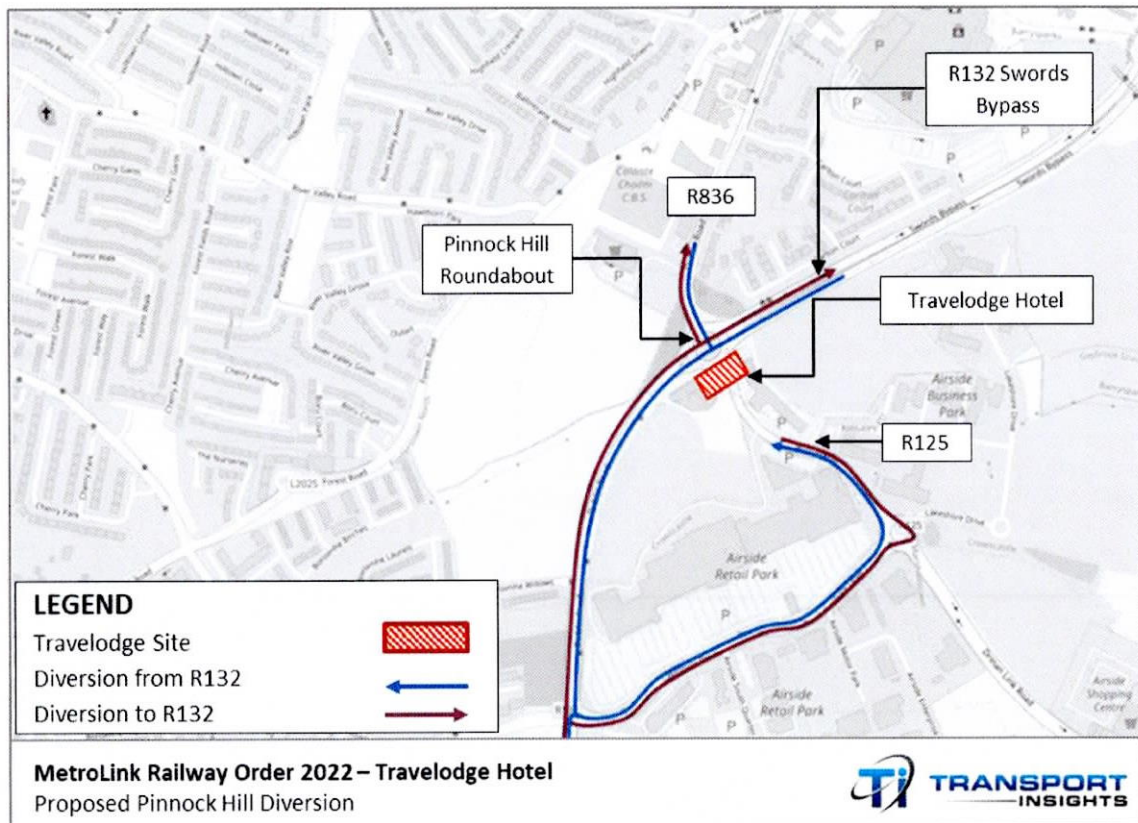
**Figure 3 MetroLink Construction Stages**





The following Figure 4 illustrates the proposed diversion for the 18-month period during which access to the hotel would exclusively be via the R125 to the southeast.

**Figure 4 Proposed Pinnock Hill Diversion (Year 4 to 6: 18 Months Duration)**



In addition to impacts during years 4-6 set out above, it is noted that access to the hotel will also be affected by the proposed Nevinstown Lane diversion during years 2 to 4 (24 months), with access from the R132 exclusively via the Pinnock Hill Roundabout.

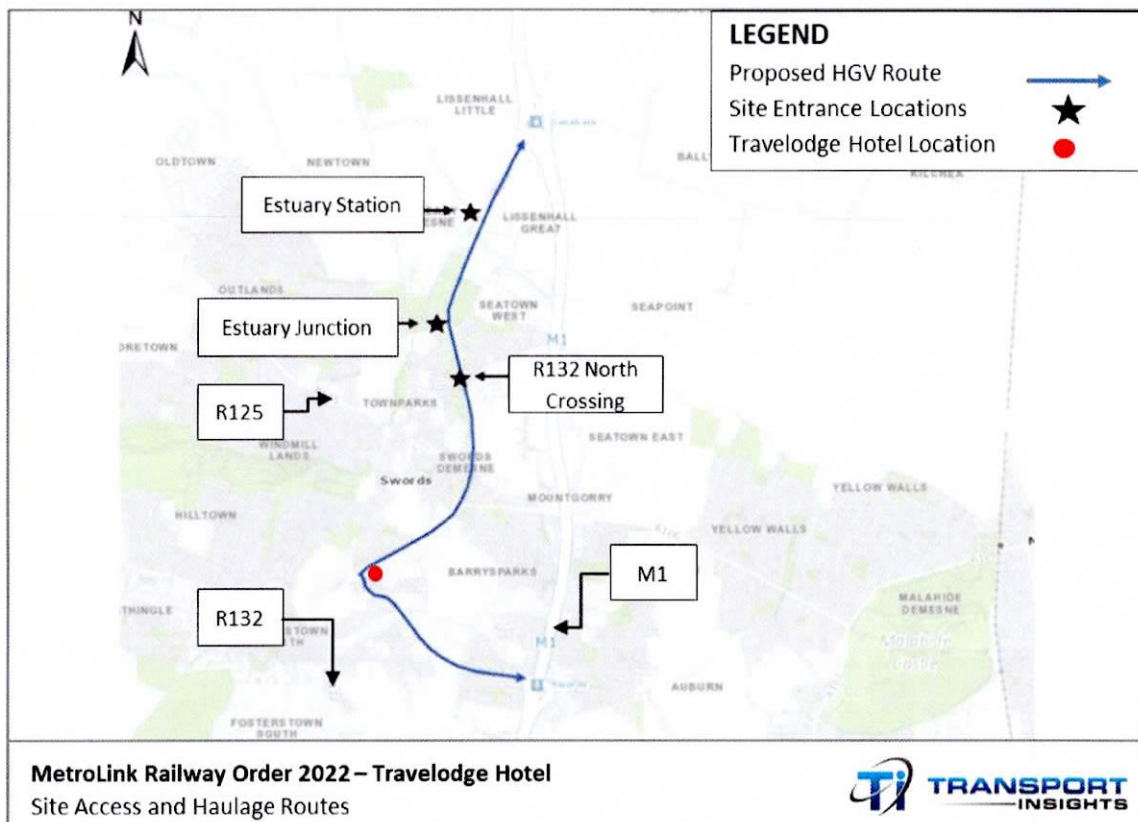
While construction works will give rise to a general loss of road network capacity due to temporary lane closures and other restrictions, the proposed route for construction related Heavy Good Vehicles (HGVs), as illustrated in Figure 5 (overleaf), is via the R125 and R132 (either from M1 Junction 3 or 4) adding significant construction traffic onto a localised network already impacted by diversions. The construction-related traffic is expected to be approximately 202,000 movements across the associated sites in this section with vehicle movements ranging from 100 to 400 per day<sup>1</sup>. There is a significant risk that the resulting additional HGV traffic will 'overload' the R125 which will be the only way to access the hotel during the closure of the access route from the west.

It should be noted that the additional HGV traffic will impact the specific haul route along the local network from year 1 to 6 of the construction programme.

<sup>1</sup> Scheme Traffic Management Plan, MetroLink project, Environmental Impact Assessment Report, Volume 5, Appendix A9.5.



**Figure 5 MetroLink Site Access and Haulage Routes**



In light of the considerable impacts of the MetroLink construction phase proposals, Transport Infrastructure Ireland has sought to engage with our Client, with the most recent such engagement at a meeting on 04 August 2022 during which the current construction phase proposals were presented. The outcome of such engagement has not resulted in a satisfactory outcome for our Client, with identified key concerns set out in the subsequent section of this Observation.

#### Railway Order Identified Concerns

Whilst our Client is supportive of the MetroLink project and the wider benefits it will bring during its operational phase, including substantially improved connectivity between Dublin Airport and the hotel, the following specific construction phase proposals contained within the Draft Railway Order are of deep concern:

- **Current Operational Concerns:** 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.
- **Car Parking:** 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).

- **Significant Risk of Programme Extension:** 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.

### Summary and Outcome Sought

This Transport Observation has been prepared by Transport Insights, on behalf of Devonmill Limited. Our Client recognises that prioritising investment in sustainable travel and associated infrastructure is essential to achieving stated national, regional and local planning policy objectives. This Observation details key points of consideration for An Bord Pleanála regarding the Railway Order application for the MetroLink project as they relate to the Travelodge Hotel, located at the Pinnock Hill Roundabout, Swords, Co Dublin. 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.

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:

- Further engagement with our Client in relation to construction and traffic management plans for the Swords area.
- 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.
- 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.
- 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.
- Consideration of expansion plans for the Travelodge Hotel to ensure such plans are not jeopardised by current MetroLink construction phase traffic management arrangements.

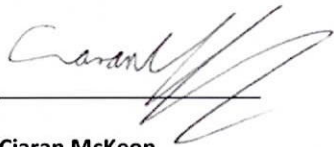
The above proposed suggestions demonstrate that our Client is willing and open to working with Transport Infrastructure Ireland and other relevant stakeholders to support the realisation of the MetroLink project, on the



presumption that the hotel's commercial and operational viability is not undermined, and as such that it can continue to provide a significant and notable contribution to the hospitality industry.

We trust you will give detailed consideration to the contents of this Observation. Our Client looks forward to further engaging with relevant stakeholders in the months ahead as the MetroLink scheme advances through the statutory planning process.

Yours sincerely,



**Ciaran McKeon**  
**Managing Director**