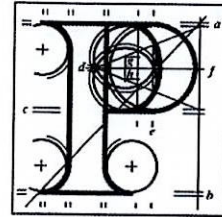


Our Case Number: ABP-314724-22

Your Reference: Gerard Gannon Properties



**An
Bord
Pleanála**

Downey Chartered Town Planners
29 Merrion Square
Dublin 2
D02 RW64

Date: 26 January 2023

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

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

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D01 V902	D01 V902

DOWNEY

29 Merrion Square, D02RW64

SUBMISSION TO THE DRAFT RAILWAY ORDER 2022

(MetroLink - Estuary to Charlemont via Dublin Airport)

Client: Gerard Gannon Properties

January 2023

AN BORD PLEANÁLA	
LDG-	<u>060538-23</u>
ABP-	
16 JAN 2023	
Fee: €	<u>50</u> Type: <u>duge</u>
Time: <u>17.13</u>	By: <u>hand</u>



Draft Railway Order
Metrolink
Estuary to Charlemont
via Dublin Airport

EXECUTIVE SUMMARY

This submission is being made to An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902, by DOWNEY, Chartered Town Planners, on behalf of our client, Gerard Gannon Properties, Kinvara House, 52 Northumberland Road, Ballsbridge, Dublin, D04 A665, within the context of the Draft Railway Order 2022 (MetroLink - Estuary to Charlemont via Dublin Airport), which is currently on public call for submissions.

The proposed development of the MetroLink is 'to provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre', with four proposed stations to be developed in the wider area of Swords, Estuary, Seatown, Swords Central, and Fosterstown Stations.

This submission is being made within the context of our client's lands in the wider Swords area. Our client is a leading developer in Ireland and has procured and delivered considerable residential and mixed-use developments within Swords, with hundreds of units also currently in the live planning application stage of the planning process.

Our client requires clarity that the construction and overall delivery of the MetroLink does not impact on our client's ongoing projects in the Swords area and as such would be willing to engage with TII on this matter.

Swords has developed and grown significantly in recent years; however, the development of public transport has not progressed in tandem with the town's population growth. Whilst it is recognised that some forms of public transport are available within the town, there still remains a high dependency on private car use within Swords and its environs.

In light of this, our client welcomes this strategic project and recognises the significance of its delivery to provide for a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre.

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DOWNEY

This submission is made in response to the statutory review of the Draft Railway Order. Accordingly, this submission has been prepared in the context of "Draft Railway Order 2022; MetroLink - Estuary to Charlemont via Dublin Airport", which seeks to deliver the construction of a fully segregated and automated railway and metro mostly underground c. 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. The Draft Order is currently on public display. We would respectfully request the An Bord Pleanála consider the content of this submission. DOWNEY would like to thank the Board for the opportunity to make this submission, on behalf of our client.

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Downey Planning Document Control			
	Name	Date	Version
Prepared by	S.M.	23 rd November 2022	V_01_DRAFT
	S.M.	4 th January 2023	V_02_DRAFT
Approved by	E.B. MIPI	13 th January 2023	V_02_FINAL

1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Draft Railway Order 2022 for the proposed MetroLink Project - Estuary to Charlemont via Dublin Airport. This submission is being made to An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902, on behalf of our client, Gerard Gannon Properties, Kinvara House, 52 Northumberland Road, Ballsbridge, Dublin, D04 A665, and relates to the MetroLink route and its relationship with our client's lands within the wider area of Swords.

Our client is a leading developer in Ireland and has procured and delivered considerable residential and mixed-use developments within Swords, with hundreds of units also currently in the live application stage of the planning process.

With reference to the Draft Railway Order 2022 (MetroLink - Estuary to Charlemont via Dublin Airport), our client welcomes this strategic project and recognises the significance of its delivery to provide for a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre.

2.0 OVERVIEW OF THE DRAFT RAILWAY ORDER

On 30th September 2022, governed by Section 37 of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted) ("the 2001 Act" hereinafter) and proposed within the definition of Strategic Infrastructure Development (SID) under Section 2 of the Planning and Development Act 2000 (as amended) ("the 2000 Act" hereinafter), the National Roads Authority (operating as TII) submitted the Draft Railway Order for the MetroLink Project - Estuary to Charlemont via Dublin Airport [2022] ("the proposed Project" hereinafter) to An Bord Pleanála.



Figure 1: The Proposed Project Roadmap (extracted from Chapter 8 of EIAR enclosed with the proposed Project application)

With an objective to "provide a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre", the proposed Project seeks to deliver the construction of a fully segregated, high-capacity, and high-frequency automated railway and metro between Estuary Station and the Park and Ride facility, north of Swords via Dublin Airport to Charlemont Station, with approximately 18.8km length, which is mostly underground. The proposed Project comprises 16 new stations along the alignment, comprising of Estuary Station at surface level,

four stations at Seatown, Swords Central, Fosterstown and Dardistown in retained cut, and Dublin Airport Station along with the remaining ten stations, which will be underground.

Other principal project elements include a multi-storey 3,000-space Park & Ride facility at Estuary, two viaducts, one over the Broadmeadow and Ward Rivers, and one over the M50 Motorway, an Operational Control Centre and Maintenance Depot at Dardistown, and intervention tunnels and shafts associated with Dublin Airport South Portal (DASP), located on the City Tunnel at Albert College Park, and south of Charlemont station.

The proposed Project has been designed to interchange with existing and future elements of the transport network. The key interchanges are as follows:

- Dublin Airport.
- The Western Commuter Line also known as the Maynooth Line (formerly the Midland Great Western Railway) and the South-Western Commuter Line also known as the Kildare Line (formerly Great Southern and Western Railway) at Glasnevin Station.
- The DART at Tara Station.
- Luas Lines (at O'Connell Street, St. Stephen's Green and Charlemont Stations).
- The Dublin Bus network and the future BusConnects network.

Temporary elements to the proposed Project, will comprise of Construction Compounds, Logistics Sites, and Tunnel Boring Machine Launch Sites, which are essentially to facilitate the construction phase of the development. This encompasses 34 construction compounds, including 20 main Construction Compounds at each of the proposed station locations, the portal locations, and the Dardistown Depot Location, as well as 14 Satellite Construction Compounds located at other locations along the alignment. Main logistics sites will be located at Estuary, near Pinnock Hill east of the R132 Swords Bypass and north of Saint Margaret's Road at the Northwood Compound. There will be two main tunnel boring machine (TBM) launch sites, with one located at DASP, which will serve the TBM boring the Airport Tunnel and the second located at the Northwood Construction Compound, which will serve the TBM boring the City Tunnel.

The statutory consultation period commenced on the 7th of October 2022, with an initial 6-week timeframe for submissions, i.e., the closing date for submissions was the 25th of November 2022 at 5.30pm. Pursuant to Section 40(1)(b) of the Act and as stated in the public notice published on the 25th of November 2022, this consultation period was further extended to the 16th of January 2023.

2.1 Specific Works in Swords

The MetroLink project is to develop a total of 4 no. stations in the wider area of Swords, all as part of the AZ1 Northern Section of the route:

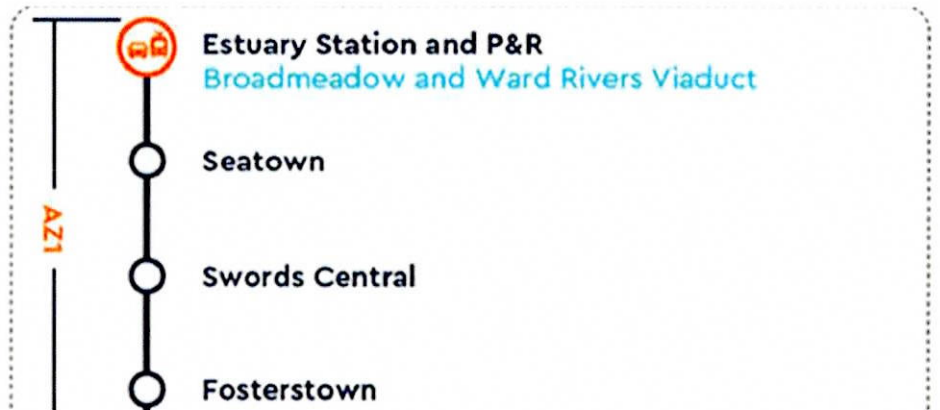


Figure 2: AZ1 Northern Section of the Draft MetroLink Route

The figure below illustrates the context of these stations in relation to Swords. All 4 no. MetroLink stations within the area of Swords will be connected by a surface linear park. This will make it possible to walk or cycle along its route between these stations, approximately 5 kilometres, adding to the sustainability of the proposed development.



Figure 3: MetroLink stations in the Context of Swords (our client's ongoing projects in Swords West are circled in dashed red)

2.1.1 Estuary Station

Estuary Station will be a surface station, with a Park and Ride facility, accommodating 3,000 car parking spaces, located adjacent to the station. As per the Planner's Report, the *'alignment between Estuary and Seatown Stations comprises a combination of at surface, open cut and cut and cover sections, crossing the Broadmeadow and Ward Rivers by way of a viaduct built up on embankments.'*



Figure 4: Proposed Estuary Station Platform

2.1.2 Seatown Station

This station will be located on the southeast side of Seatown roundabout, to the immediate west of Swords Business Park. As stated within the Planner's Report *'Seatown Station will be in retained cut, aligned north-south parallel with the R132, with a single entrance to the station at the northern end.'*

2.1.3 Swords Central Station

This station will be located within a retained cut and will be located on the eastern side of the R132 Swords Bypass. Swords Central Station has been designed to link with the Pavilions Shopping Centre by way of a pedestrian crossing of the R132. There will also be a total of 942 no. bicycle parking spaces provided at this station.



Figure 5: Proposed Swords Central Station Plaza

2.1.4 Fosterstown Station

This is the southern-most MetroLink Station in the wider area of Swords and it is located on the eastern side of R132 Swords Bypass, immediately to the west of the Airside Shopping Centre. There will also be a total of 432 no. bicycle parking spaces at this station with a new pedestrian crossing at the R132 Swords Bypass. After Fosterstown Station, the MetroLink will then run to Dublin Airport.

3.0 EMERGING CONTEXT OF THE WIDER AREA OF SWORDS

Swords is the county town of Fingal and has experienced considerable growth and development in recent years. Our client is currently constructing large residential and mixed-use developments in the townlands of Mooretown and Oldtown, which are located on the western fringe of the town. There have also been several planning applications made for further development in the town, including two large Strategic Housing Development (SHD) applications made by our client for over 1,000 residential units. These applications are currently under review by An Bord Pleanála, awaiting a decision (Reg. Ref ABP-313302-22 (Oldtown SHD), and ABP-313362-22 (Mooretown SHD)).

3.1 Demographic of Swords

Census 2016 results shows that Swords population stood at 39,248 in April 2016, which brought Fingal's county town to the second in the country, only after Drogheda. This also indicates an increase of 2,324 (6.3%) since the last Census in 2011. With an average household size of 3, there were 12,896 private households in Swords in 2016. As shown in Table 1 below, more than 60% of the households residing in Swords in 2016 were small sized households (8,021 households).

Table 1: Private Households in Swords by Household Size, 2016

Size of Household	Households	%
1-person Household	1,876	14.5
2-person Household	3,428	26.6
3-person Household	2,717	21.1
4-person Household	2,948	22.9
5-person and over Household	1,927	14.9
Total	12,896	-

Source: CSO StatBank

Investigating the age profile of the town over the Census 2011-2016 indicates that the younger age cohorts still form the greatest share of the population residing in Swords, however, there was a notable drop in cohort aged 20-29, which can partially be an outcome of housing market failing to meet the growing demand. The greatest share of the population growth however, occurred in 50-59 age cohort followed by 40-49 years old.

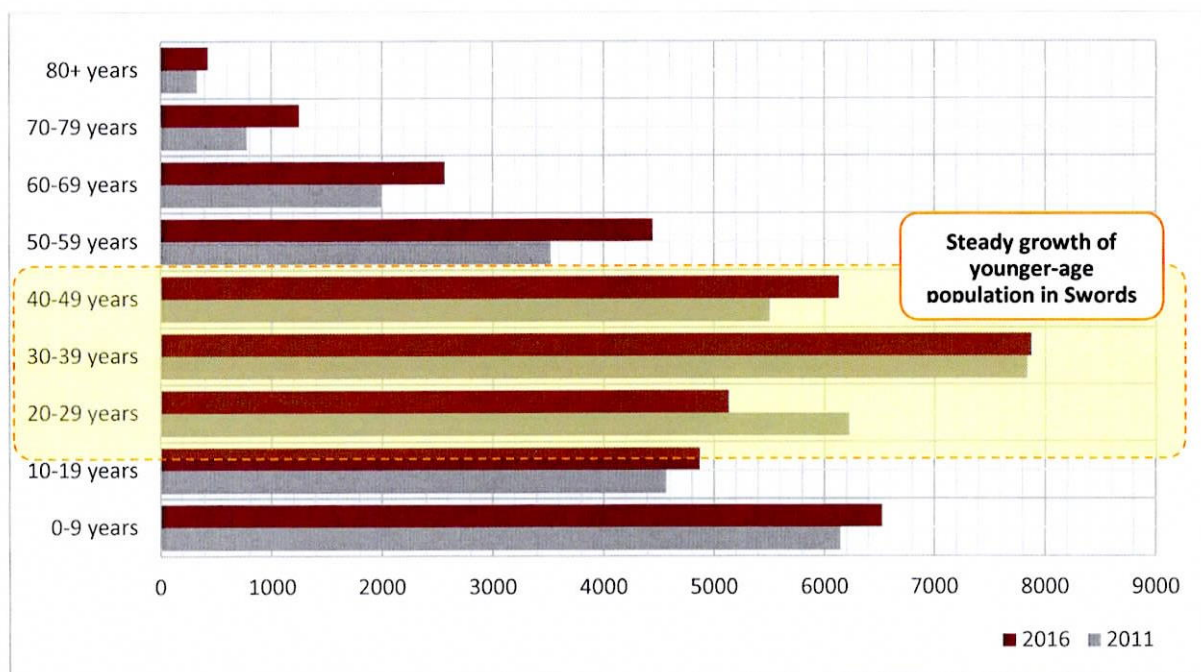


Figure 6: Population Change by Age Cohort in Swords over 2011-2016

The population pyramid below shows the town age distribution in more detail. A peak of births in 1980's shows up in the 30-39 age category, and another peak in the number of births occurred in 2010's and shows up in the 0-9 age category. Overall, the age pyramid indicates a young population residing in the town, which is expected to grow in the coming years.

Based on the aforementioned results, Swords is expected to have a steady population growth with the greatest share of the population residing in the western side of the town. This population is characterised with young age profile and smaller sized households and the area demonstrates potential for accommodating a notable share of Swords growing population.

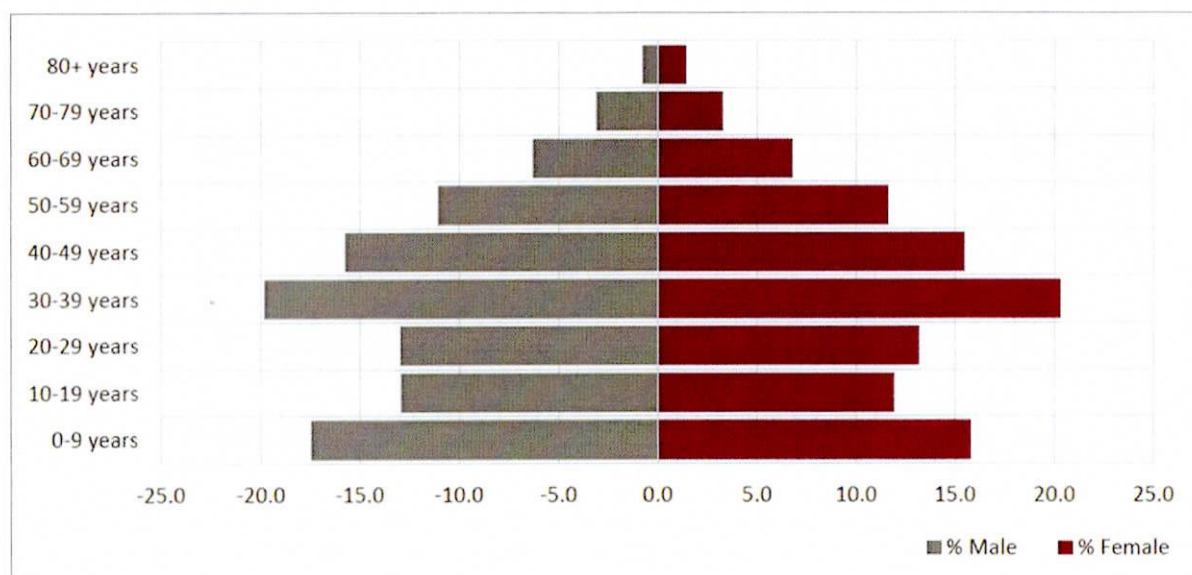


Figure 7: Population Age Pyramid of Swords, 2016

As it is mapped on the Figure below, the overall distribution of population in Census 2016 indicates that there are significant variances in population trends within ED's throughout the town. However,

the highest concentration of the total population in Swords is clearly to the western electoral division (ED's) and towards the lands at Oldtown-Mooretown.

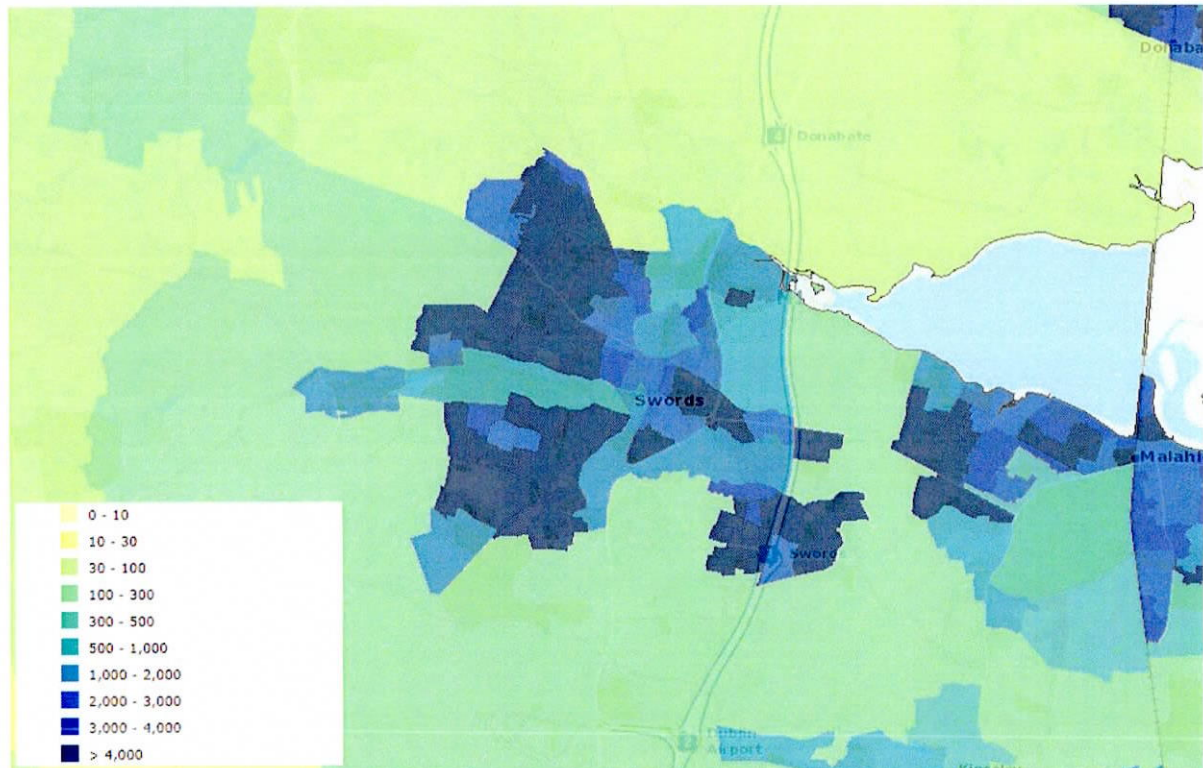


Figure 8: Spatial Distribution of Population Density per Km2 in Swords, 2016

3.2 Existing Public Transport in Swords

Swords currently offers various public bus services to cater for the existing population. These bus routes include the following:

Dublin Bus:

- 41 (from Swords Manor to Lower Abbey Street) which runs every 15-minutes.
- 41B (from Rowlestown to Talbot Street) which runs every 15-minutes.
- 41X Express Bus (from Knocksedan to University College Dublin) which runs twice in the morning peak, and twice in the evening peak.

Swords Express:

- Route 196 (from Knocksedan to Swords) which runs nine-times in the morning, and six-times in the evening.
- Route 500 (from Abbeyvale to Eden Quay) which runs once an hour between 8:40 and 18:50.
- Route 503 (from Abbeyvale to Merrion Square) which operate three-times in the morning peak, and twice in the evening peak.

Go-Ahead Bus 197 (from Swords Airside Industrial Estate to Ashbourne) which operates once an hour.

As can be seen, the majority of these bus routes are express routes and operate only during peak hours, making it difficult to use public transport during all other times of the day. It is noted however,

that as part of the Bus Connects project, it is proposed to introduce the A4 bus route (from Swords to Dundrum, via the City Centre), which will also operate once every 15 minutes.

3.3 Car Use and Ownership in Swords

During the 2016 Census survey, data was gathered on the commuting patterns in the area. Table 2 below gives an overview of the means of travel to work, school, or college in the settlement of Swords. It is noted that 'car driver' is the dominating means of travel with a total of 53.59% of commutes completed by car (driver and passenger combined). This is compared with 51.82% in Fingal County Council area, and 43.67% in County Dublin of commutes completed by car.

Table 2: Means of Travel in Swords, 2016

Means of Travel to work, school, or college	Population	%
On Foot	4,421	15.71
Bicycle	549	1.95
Bus, minibus, or coach	5,365	19.07
Train, DART, or LUAS	233	0.83
Motorcycle or scooter	110	0.39
Car Driver	11,163	39.67
Car Passenger	3,918	13.92
Van	736	2.62
Other (including lorry)	35	0.12
Work from Home	347	1.23
Not Stated	1,261	4.48
Total	28,138	-

Source: CSO StatBank

Furthermore, the latest data available on car ownership reveals that c. 80% of the households residing in Swords own 1-2 motor cars.

Table 3: Rate of Car Ownership in Swords, 2016

Number of Cars	Number of Households	Percentage of Households
No motor car	1375	11%
1 motor car	5639	44%
2 motor cars	4666	36%
3 motor cars	647	5%
4 or more motor cars	160	1%
Not stated	402	3%
Total	12889	100%

Source: CSO StatBank

With regards to the above, the dependency on the private car is evident within Swords. Therefore, the construction of the MetroLink will be integral to the sustainable development of the area. The MetroLink railway will provide for further sustainable, public transport options for this emerging area which has been the subject of extensive development in recent years, with our client, Gerard Gannon Properties, being a key developer and contributor to the overall delivery of this development.

4.0 CONCLUSION

This submission has been prepared by DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, on behalf of our client, Gerard Gannon Properties, Kinvara House, 52 Northumberland Road, Ballsbridge, Dublin, D04 A665, and relates to the MetroLink route and its relationship with our client's lands within the wider area of Swords.

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In light of this, our client welcomes this strategic project and recognises the significance of its delivery to provide for a sustainable, safe, efficient, integrated and accessible public transport service between Swords, Dublin Airport and Dublin City Centre. DOWNEY respectfully request that An Bord Pleanála take into consideration this submission when assessing the Draft Railway Order 2022 (MetroLink - Estuary to Charlemont via Dublin Airport).