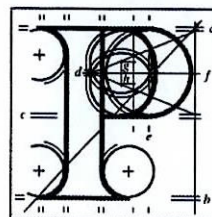


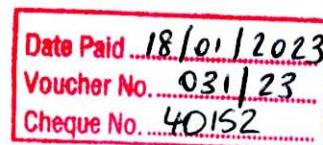
**Our Case Number:** ABP-314724-22

**Your Reference:** Rohan Holdings Limited



**An  
Bord  
Pleanála**

John Spain Associates  
39 Fitzwilliam Place  
Dublin 2  
D02 ND61



**Date:** 18 JAN 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.

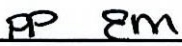
Please be advised, there is no fee for an affected landowner, listed on the schedule, to make an observation on this case, therefore, a cheque refund of €50 is enclosed.

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

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

  
Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

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

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



**John Spain Associates**

Planning & Development Consultants  
Chartered Town Planners & Chartered Surveyors

39 Fitzwilliam Place,  
Dublin 2  
D02 ND61

www.jsapanning.ie

Tel 01 662 5803  
info@johnspainassociates.com

The Secretary  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

<b>AN BORD PLEANÁLA</b>	
LDG-	059445-22
ABP-	
23 NOV 2022	
Fee: €	50
Type:	cheque
Time:	15.50
By:	hand

Date: 23/11/2022  
Our Ref: KK JN 22055

Dear Sir / Madam,

**RE: METROLINK RAILWAY ORDER – ESTUARY THROUGH SWORDS, DUBLIN AIRPORT, BALLYMUN, GLASNEVIN AND CITY CENTRE TO CHARLEMONT, CO. DUBLIN**

**AN BORD PLEANÁLA REF.: NA29N.314724**

### ***Introduction***

On behalf of our client, Rohan Holdings Limited, 4<sup>th</sup> Floor, Block 2, Harcourt Centre, Harcourt Street, Dublin 2, we wish to make a submission on the Railway Order application submitted to An Bord Pleanála by the NTA in relation to the Metrolink project (ABP Ref.: NA29N.314724) from Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin. The observation fee of €50 is enclosed.

### ***Relevant Context***

Rohan Holdings is a long established Irish property development and management company specialising in the logistic, office and residential sectors. Over the past 45 years they have continually reinvested in Fingal, with more recent developments including Dublin Airport Logistics Park, North City Business Park and North Dublin Corporate Park. These high quality commercial environments in Fingal have attracted many leading local and global operators (e.g. DHL, Thermo Fisher, Gilead, Eason, Holland & Barrett) delivering significant employment and rates for the County.

### ***Introduction to the Subject Lands***

This submission relates to the undeveloped lands owned by our client located at North Dublin Corporate Park, split into two parcels (Site A and B), comprising of approximately 4 acres in total (outlined in red in Figure 1 below). The lands form part of the wider North Dublin Corporate Park (outlined in blue in Figure 1 below) that our client developed, comprising of four warehouse units. The lands have an existing access and prominent frontage directly to the R132. The subject lands are strategically located to the east of Swords town centre, in close proximity to Dublin Airport, the strategic road network and the future MetroLink corridor, with Seatown station planned to the north.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPI

Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MScERM MAT&CP Dip ELA Mgmt. MIPI  
Stephen Blair BA (Mod) MRUP MIPI MRTPI Blaine Cregan B Eng BSc MSc

Senior Associate Directors: Luke Wymer BA MRUP Dip Plg & Env Law Dip PM Prof Cert Env Mgmt MIPI

Meadhbh Nolan BA MRUP MRTPI Kate Kerrigan BA MSc MRTPI

Associate Director: Ian Livingstone MA (Hons) Town & Regional Planning, MSc. Spatial Regeneration, MRTPI

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.  
Registered in Ireland No. 396306. Registered Office: 39, Fitzwilliam Place, Dublin 2 D02 ND61. VAT No. IE 6416306U



**Figure 1: Lands at North Dublin Corporate Park**

Source: Draft Sheet 8 – Draft Fingal Development Plan 2023-2029

The lands are zoned 'ME - Metro Economic Corridor' within the Fingal Development Plan 2017-2023 with the objective to '*Facilitate opportunities for high-density mixed-use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor*'. There is no change proposed to the zoning objective in the Draft Fingal Development Plan 2023-2029.

### **Grounds of Submission**

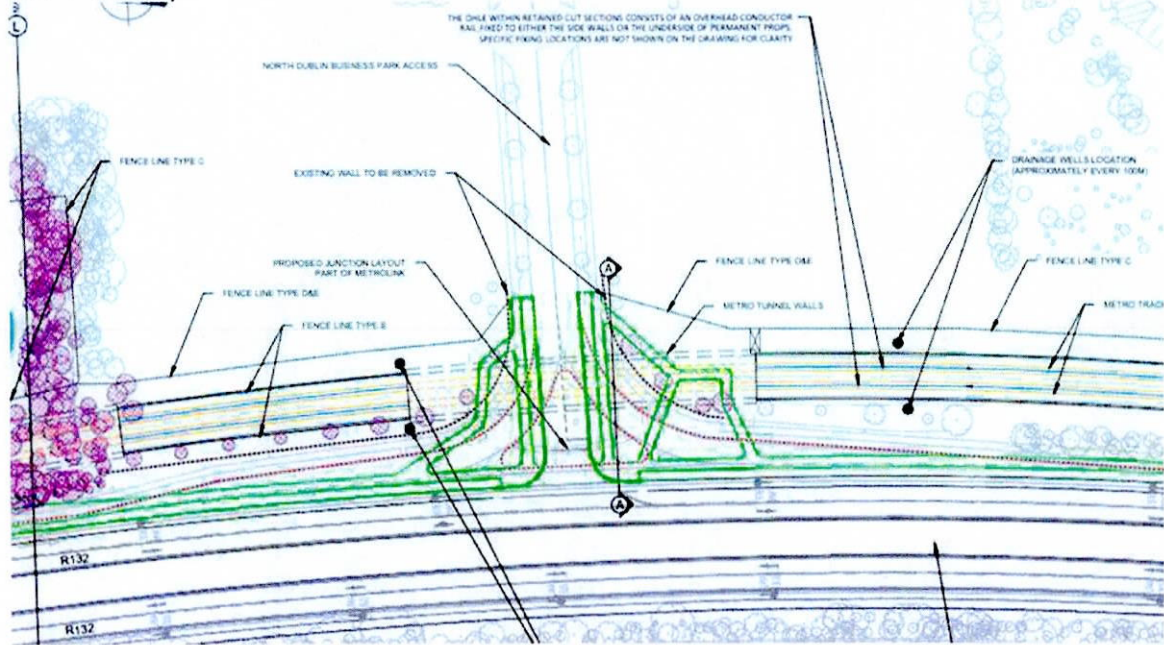
Due to the delays in bringing forward the route and plan for delivery of the previous Metro North proposals and the current MetroLink proposals, our client's lands have been sterilised for the past 15 years.

Despite our client's previous submissions highlighting the impact of the project on the strip of land fronting onto the R132, our client is concerned that the balance of the lands have now been identified for temporary land take for the provision of construction compounds (See Figure 3) thus further sterilising the lands from development until MetroLink is delivered as opposed to identifying less valuable lands for such purpose

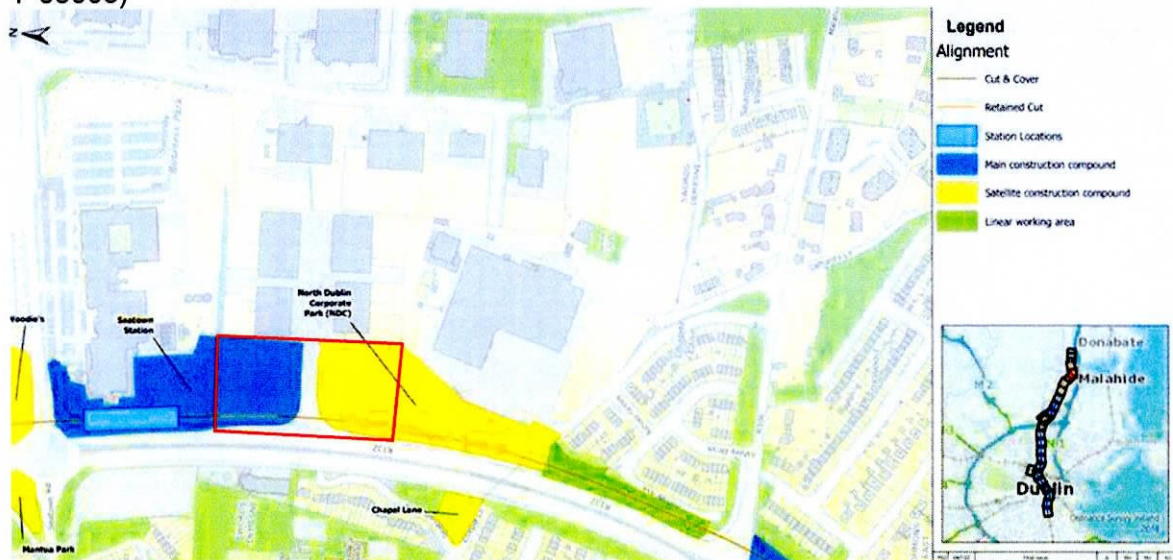
The construction compound figures as per the extract below (and included in Chapter 5 of the EIAR) illustrate it is proposed the lands will form part of the proposed main and satellite construction compounds for the Seatown Station. Chapter 21 of the EIAR states that the temporary land will be utilised for a period of time to facilitate the construction of the proposed project, but is then returned to its former use. However there are no timescales provided on when the additional lands required for the temporary compounds will be returned.



**Figure 2: Extract of Alignment Drawing (Source: Drawing no. ML1-JAI\_ARD\_ROUT\_XX-DR-Y-03016)**



**Figure 3: Extract Construction Compounds - Subject lands approximately outlined in red (Source: EIAR Chapter 5 Figure 5.1 Sheet 4 Drawing no. ML1-JAI\_EIA\_ROUT\_XX-DR-Y-05005)**



It is respectfully submitted that any sterilisation of lands adjacent to the MetroLink would be contrary to the zoning objective for the Metro Economic Corridor within the Fingal Development Plan 2017-2023 (and indeed the draft 2023 – 2029 plan) which seeks to facilitate opportunities for high-density, mixed-use employment generating activity and commercial development, and also the appropriate quantum of residential development.

The National Planning Framework (NPF) also supports the delivery of new homes at locations that can support sustainable development, and increasing residential density in settlements, including through infill development schemes. Both the NPF and the Eastern and Midlands Regional Assembly; Regional Spatial and Economic Strategy (RSES) supports the provision of flexible housing typologies.

In this regard and given the prominent frontage to the R132, proximity to Swords town centre and the lands being within walking distance of St Colmcille's Boys and Girls school, the subject lands have potential for a number of development options in the short term. **In particular, the subject lands have the potential to deliver urgently needed housing, including potentially significant social housing.** A feasibility assessment for the subject lands has been undertaken by O'Mahony Pike Architects on behalf our client (See Appendix 1 for the feasibility assessment Site Layout Plan) and identified the potential to deliver 2 no. residential blocks (c. 120 no. units each block), supporting uses and all associated infrastructure.

### **Conclusions**

While our client is supportive of the MetroLink project in general, given the uncertainty in timescales of delivery of the MetroLink, it would be unreasonable to safeguard the subject lands for temporary construction compounds, particularly given the development potential of the lands to deliver urgently needed housing in the short term to assist the current housing crisis. Therefore, it is respectfully submitted that our client's lands outside the MetroLink corridor should be omitted from the temporary land take, and the construction compounds relocated to another site.

If you have any queries, please do not hesitate to contact us.

Yours sincerely,



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**John Spain**

*Managing Director John Spain Associates Ltd.*



**APPENDIX 1 - FEASIBILITY ASSESSMENT SITE LAYOUT PLAN**