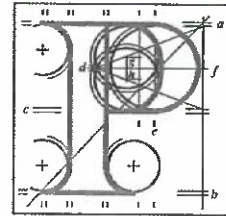


Our Case Number: ABP-314724-22

Planning Authority Reference Number:

Your Reference: Tesco Ireland



**An
Bord
Pleanála**

RMLA Limited
Unit 3B
Santry Avenue Industrial Estate
Santry Avenue
Santry
Dublin 9
D09 PH04

Date: 07 December 2022

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 refund of €50 will be made to the credit/debit card used to make the online observation.

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.

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Yours faithfully,



Niamh Thornton
Executive Officer
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RA05

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Planning Consultants

An Bord Pleanála,
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RMLA Limited,
Unit 3B,
Santry Avenue Industrial Estate,
Santry Avenue,
Santry,
Dublin 9,
D09 PH04

Email: admin@rmla.ie
Date: 25th November 2022

Dear Sir/Madam,

Re: Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022

An Bord Pleanála Ref. No. 314724

We, RMLA Limited, are acting for our Client, Tesco Ireland, Gresham House, Marine Road, Dun Laoghaire, County Dublin in relation to the lodgement of the Railway (Metrolink–Estuary to Charlemont via Dublin Airport) Order 2022 by Transport Infrastructure Ireland (hereafter 'TII').

The payment of €50, being the appropriate fee for making a submission, has been made online. Please note all correspondence in relation to this submission should be sent to the Agents, RMLA Limited, Unit 3B, Santry Avenue Industrial Estate, Santry Avenue, Santry, Dublin 9, D09 PH04. We request that An Bord Pleanála (hereafter 'ABP') keep us informed of any updates relating to this application.

The retail sector makes a major contribution to Dublin City and its suburbs, by increasing the vitality and viability of its urban settlements and villages, and acts as an economic anchor, creating significant employment and indirect economic and social activity. Having regard to this, we welcome this opportunity to engage with TII in respect of the preparation of the Railway Order 2022. As such, please see enclosed transport specific report prepared by SYSTRA in response to this application and setting out our client's position in relation to matters directly affecting their stores and distribution centres.

Tesco Ireland welcomes the proposed investment in public transport, active travel, and the urban environment of Dublin City. It is considered that the proposed Metrolink Scheme will greatly improve the way in which Dublin City functions from an economic, social, and environmental perspective. However, we would request the below issues highlighted are not overlooked and would welcome engagement at a later date.

We trust that the points raised in this submission will be considered by An Bord Pleanála as part of the assessment of this application. We are available for discussion on any of the matters referred to below and would also appreciate if you could confirm receipt of this submission by return.

Yours Faithfully,

Robert McLoughlin

Managing Director

For and on Behalf of RMLA Limited

Metrolink – Railway Order Process

Formal Submission in relation to Metrolink Railway Order Process

On Behalf of TESCO IRELAND

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Introduction

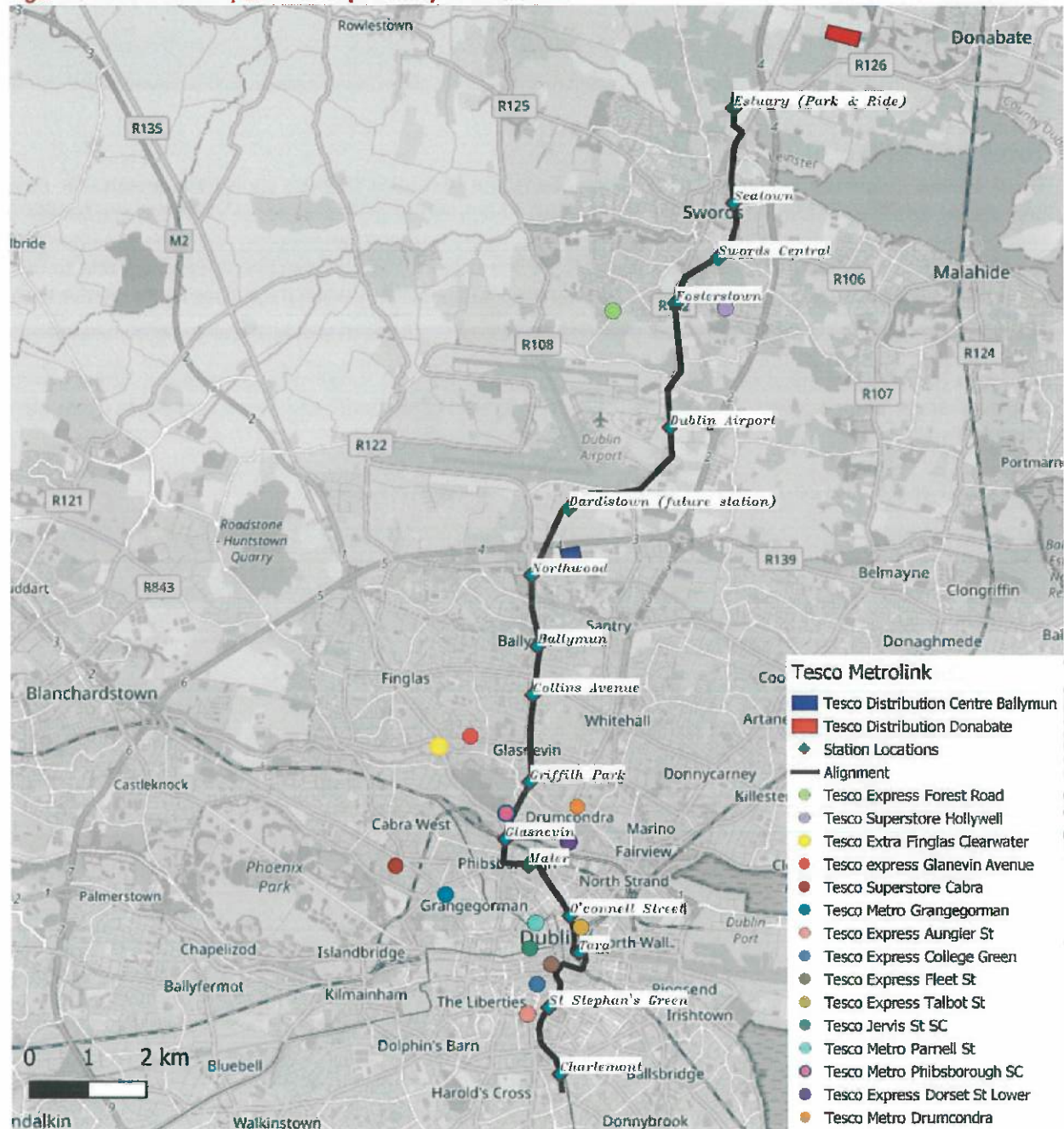
Tesco Ireland welcomes the opportunity to take part in the Railway Order process for Metrolink. Tesco Ireland has **162 stores across Ireland** which are supplied from two Distribution Centres in Ballymun and Donabate. We serve as a significant contributor to the national and local economies, **employing over 13,000 colleagues nationwide**.

The purpose of this submission is to positively engage on Metrolink, recognising the importance of the project to the future sustainability and vitality of the Greater Dublin Area, but not losing sight of potential transport issues that may need to be considered further through the Railway Order process and at later stages of the project.

Tesco Ireland operations in the vicinity of Metrolink

Tesco Ireland has a strong presence along the Metrolink Corridor. Its two Distribution Centres, which serve the 162 stores nationwide, are located at Ballymun and Donabate. There are also 15 Tesco stores located along the alignment. Figure 1 below shows Tesco Ireland operations relative to Metrolink alignment and its stations.

Figure 1 Tesco Ireland operations in proximity to Metrolink



Tesco Distribution Centres (DCs)

Deliveries are particularly important for convenience retailers given customers' demands for fresh produce on a daily basis. Larger stores typically require two deliveries per day to cater for chilled and ambient products and these deliveries require the use of delivery vehicles of varying scales. Tesco Ireland along with other large-scale convenience retailers currently operate a 'Central Distribution System' for deliveries. This involves the consolidation of individual supplier products at a central warehouse where they are organised and redistributed as part of a complete delivery. This system is an exemplar in terms of transportation management and environmental sustainability, as it allows one vehicle to deliver convenience goods to a number of stores. Importantly, it reduces the overall number of trips made by goods vehicles to each store and can be considered a demand management tool.

There is a range of logistical considerations that form part of this delivery system that makes it an efficient yet complex process, two of those considerations being timing and availability of space for deliveries at a store. The Distribution Centres operate on a 24-hour cycle to ensure sufficient levels of fresh produce are available and can be delivered to stores each day.

In the case of Ballymun Distribution Centre, a combined total of 1,200 vehicle movements in and out of the Centre are required each day to maintain successful operations including suppliers, staff and delivery vehicles.

Tesco Ireland Stores

Tesco Ireland customers travel to the 15 stores along the Metrolink Corridor by various means. For many households, private vehicles are used for large weekly shops known as ‘trolley shops’. This has the benefit of reducing the overall number of trips made within a week. Public transport, walking and cycling is more often used for convenience trips or by smaller households where the volume of goods purchased is manageable to carry onwards. Colleagues use a variety of modes to travel to work depending on their place of residence relative to the store.

Deliveries to store are made by Heavy Goods Vehicles from our DCs. Larger stores operate a ‘grocery home shopping’ and click-and-collect facilities; namely Tesco Superstore Holywell and Tesco Superstore Cabra along Metrolink’s alignment.

Potential for impact on Tesco Ireland operations

Tesco Ireland recognises the extensive work undertaken by Metrolink’s Project Team to prepare and submit the Railway Order Application and has reviewed the documentation outlined in Table 1 to understand the potential impact on its operations during the construction and operational stages of Metrolink. This includes consideration of the future scenarios developed by Metrolink’s Team as part of the Environmental Impact Assessment Report:

- Construction Model 2024 for Enabling Works;
- Construction Model 2028 for Main Works;
- Operational Phase Opening Year: 2035;
- Operational Phase Design Year: 2050; and
- Operational Phase Forecast Year: 2065

Table 1 Railway Order Application documentation reviewed by Tesco Ireland

RAILWAY ORDER DOCUMENTS	CONSTRUCTION STAGE	OPERATIONAL STAGE
Alignment details Book 1 and 2	x	x
Planning Report	x	x
Property Details book 1 and 2	x	x
Permanent & Temporary Landtake	x	x
EIAR Chapter 9 Traffic and Transport	x	x
A5 Construction A5.1 Outline CEMP A5.2 Construction Programming A5.3 Construction Sequence A5.7 Construction Vehicles Fig 5.1 Construction Compounds Figure 5.2 Construction haul Routes Figure 9.9 HGV Routing Options	x	
A9 Traffic A9.1 Area of Influence Note A9.2 overall scheme traffic A9.3 – 9.4 Traffic and Transport Modelling Plan and Report	x	x

A9.5 – Scheme Traffic Management Plan

No temporary or permanent land take requirements which involve Tesco Ireland have been identified in the documentation provided. As a result, the review focused on construction and operational stage impacts using the processes set out below.

Construction stage review process

The review of Metrolink's construction impact on Tesco Ireland was undertaken in two stages:

- Stage 1: Initial review of Metrolink Enabling and Main Works proposals to identify potential for impact with consideration to:
 - temporary traffic management measures that materially reduce accessibility for Tesco deliveries, colleagues and customers to its Distribution Centres or Stores
 - Construction haulage volumes that materially affect capacity on the road network
- Stage 2: Where the potential for material impact was identified then Works proposals relative to Tesco were considered in further detail

Key assumptions underpinning the construction stage review are outlined in Table 2 below.

Table 2 Key assumptions for the construction stage review

KEY REVIEW ASSUMPTIONS
<p>A9.5 – Scheme Traffic Management Plan is a standalone document within the EIAR which consider traffic impacts during the construction stage. Works are split into Advance Enabling Works (utilities) and Main Works with different assessment periods modelled as follows:</p> <ul style="list-style-type: none"> - A 2024 scenario for Advanced Enabling Works - A 2028 scenario for Main Works
<p>The 2024 scenario assumes R132 Connectivity Project in Swords has been delivered. This includes (1) conversion of roundabouts at Northern Swords R125-R132 (Estuary), Seatown-R132, Malahide R106-R132 and Pinnockhill R125-R132 to traffic signals and (2) reduction of general traffic capacity to facilitate enhanced bus priority and active travel measures along the corridor.</p>
<p>The 2028 scenario is based on an NTA forecast for traffic schemes delivered by 2028 and includes the R132 Connectivity Project listed above and two elements of BusConnects Ballymun Finglas to City Centre – Bus Gate on St. Mobhi Road and operational changes around Blackhall Palace.</p>
<p>This review looks at the outcome of the Stage 2 Assessment process and considers residual impacts following mitigation measures. It considers the following Key Performance Indicators developed by the Metrolink Team to assess the construction impact on general traffic:</p> <ul style="list-style-type: none"> - Increase in traffic flow (PCUs) - Increase in driver delay (seconds) - Length of diversion
<p>Existing service delivery routes from Donabate and Ballymun Distribution Centre remain in place as they have been identified by Tesco Ireland as the most effective way of delivering to stores both economically and sustainably</p>

Operational stage review process

The review of Metrolink's operational impact on Tesco Ireland was undertaken in a single stage:

- Review of Metrolink Design Phase proposals to identify potential for impact with consideration to:
 - Permanent alterations to the transport network that materially reduce accessibility for Tesco deliveries, colleagues and customers to its Distribution Centres or Stores

This approach acknowledges the proposed segregation of network Metrolink services by cut-and-cover and tunnel along the corridor. The key assumption underpinning the operational stage review is that Fingal County Council R132 Connectivity and NTA BusConnects proposals will be fully delivered by the time Metrolink becomes operational which will transform the at-grade transport network. Fingal County Council R132 Connectivity Project received planning permission under ABP Reference JP06F.310145 whilst NTA BusConnects proposals are yet to receive permission.

Construction Stage Assessment

Construction is anticipated to last up to 10 years and is programmed as four main works packages:

- Enabling Works Central and South
- Enabling Works North
- Main Works Central and South
- Main Works North

The review of Metrolink's construction impact on Tesco Ireland is undertaken in two stages:

- Stage 1: Initial review of Metrolink Enabling and Main Works proposals to identify potential for impact with consideration to:
 - temporary traffic management measures that materially reduce accessibility for Tesco deliveries, colleagues and customers to its Distribution Centres or Stores
 - Construction haulage volumes that materially affect capacity on the road network
- Stage 2: Where the potential for material impact was identified then Works proposals relative to Tesco were considered in further detail

Table 3 below lists the Main Works activities associated with Metrolink and their potential to impact on Tesco.

Table 3 – Stage 1: Review of Metrolink construction proposals on Tesco

METROLINK CONSTRUCTION	TTM ON TESCO ACCESS ROUTE	METROLINK HAULAGE	REVIEW	FURTHER ASSESSMENT REQUIRED
R132 Corridor: Estuary P&R Seatown Swords Central Fostertown Cut & Cover	Yes	Varies across the corridor. Routes typically run from R132 to nearest M1 interchange	Traffic restrictions along R132 Corridor for the duration of Works. In particular, the R125 closure at Pinnockhill Roundabout for 6-9 months in Year 4. Access for Holywell Store materially affected.	Yes
Dublin Airport & Tunnel Portals	No	20 to 40 for DATPN 75 to 150 for DATPS Via Dublin Airport	The review identified no impact on access to and from Tesco Ireland Distribution Centres or Stores.	No
Dardistown	No	100 – 300 per day on R108 north of M50 and old airport road	Minor temporary traffic management on R108 north of M50 – along delivery route for Tesco Swords Express. Access not materially affected.	No
Northwood Station M50 Crossing South Dublin Tunnel Portal	Yes	100 to 250 vehicles per day via R108	On R108 major temporary traffic management measures at Northwood Avenue. Works also proposed on Old Ballymun Road. Access from Ballymun Distribution Centre to all stores nationwide materially affected.	Yes

METROLINK CONSTRUCTION	TTM ON TESCO ACCESS ROUTE	METROLINK HAULAGE	REVIEW	FURTHER ASSESSMENT REQUIRED
Ballymun	Yes	40 to 60 vehicles per day via R108	On R108 general traffic lanes in both directions are being reduced from two lanes to one lane for a period of ~8 years. Access from Ballymun Distribution Centre to City Centre Stores materially affected.	Yes
Collins Avenue Station	Yes	40 to 80 vehicles per day via R108	On R108 general traffic lanes in both directions are being reduced from two lanes to one lane for a period of ~8 years. Access from Ballymun Distribution Centre to City Centre Stores materially affected.	Yes
Griffith Park Station	Yes	40 to 80 vehicles per day via R108	On R108 general traffic lanes are retained with bus lane closures and bus priority signal used. Access not materially affected.	No
Glasnevin Station	No	50 to 100 vehicles per day via R135	On R108 general traffic lane restrictions during Enabling Works with limited traffic restrictions during Main Works. Access not materially affected.	No
Mater Station	No	40 to 70 vehicles per day. Inbound R135, outbound via N1	The review identified no impact on access to and from Tesco Ireland Distribution Centres or Stores.	No
O'Connell Street Station	No	50 to 100 vehicles per day via N1	The review identified no impact on access to and from Tesco Ireland Distribution Centres or Stores.	No
Tara Station	No	30 to 60 vehicles per day via Port Tunnel	The review identified no impact on access to and from Tesco Ireland Distribution Centres or Stores.	No
Stephen's Green Station	No	20 to 60 vehicles per day via RedCow	The review identified no impact on access to and from Tesco Ireland Distribution Centres or Stores.	No

- R132 Corridor Works
- M50 Crossing South
- Dublin Tunnel Portal
- Northwood Station
- Ballymun Station
- Collinstown Station

Stage 2 Assessment - North Section

- Estuary P&R and Station
- Seatown Station
- Swords Central
- Fostertown Station
- Cut & Cover at junctions including the crossing of Estuary Roundabout, R106 Malahide Road, Pinnock Hill Roundabout and Nevinstown Lane

Estuary Junction left in/left out

Seatown Junction left in/left out

R132 reduced general traffic lanes from 2 to 1 between Estuary Roundabout and Pinnock Hill Roundabout (permanent R132 Connectivity)

Pinnock Hill R125 Arm closed for 6-9 months (end of 2027 – mid 2028)

Airside Junction Nevinstown Lane – one-way westbound for two 2 years (end of 2025 – end of 2027)

Donabate

R126

Estuary (Park & Ride)

Leinster

Seatown

Swords

Swords Central

Fosterstown

R108

R124

Tesco Metrolink

- Tesco Distribution Centre Ballymur
- Tesco Distribution Donabate
- Station Locations
- Alignment
- Tesco Express Forest Road
- Tesco Superstore Hallywell

8

construction sequencing is replicated in Figure 3 below. Construction Works expected to affect Tesco Ireland are outlined in Figures 4-7 below.

- Figure 3 - Metrolink construction sequencing for the North Section
- Figure 4 – Metrolink Construction Stage impact associated with Pinnock Hill Roundabout – R125 Closure
- Figure 5 – Metrolink Construction Stage impact associated with Nevinstown Lane Closure – one-way wb
- Figure 6 – Metrolink Construction Stage impact associated with Estuary Junction left in left out
- Figure 7 – Metrolink Construction Stage impact associated with Seatown Junction left in left out

The proposals are typically described as having a Stage 2 impact assessment rating of ‘severe’ on general traffic in Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. This is of significant concerns to Tesco given the location of Tesco Holywell Store in relation to its customers, colleagues, home delivery routes and Donabate Distribution Centre delivery route.

Figure 3 Metrolink construction sequencing for the North Section

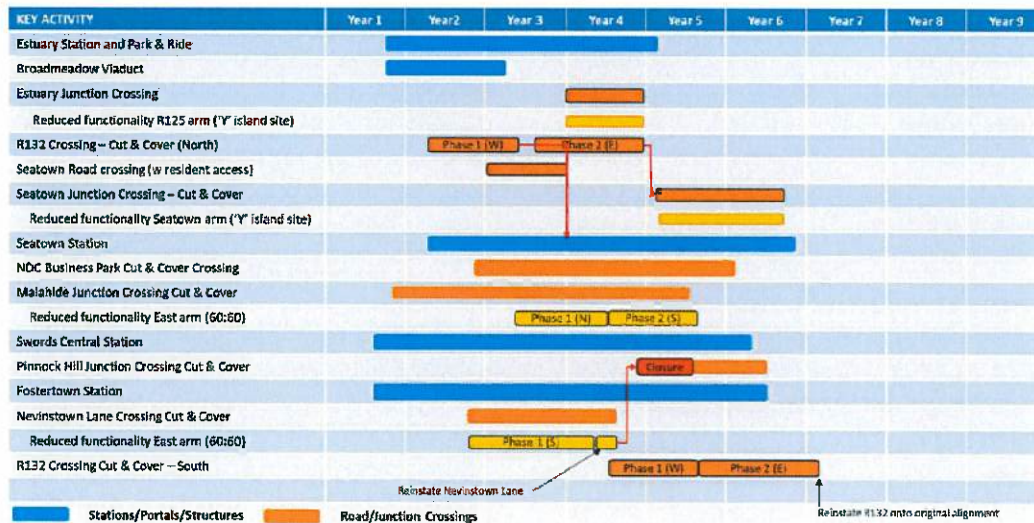


Figure 5-3: Construction Sequencing in the North section

Figure 4 – Metrolink Construction Stage impact associated with Pinnock Hill Roundabout – R125 Closure

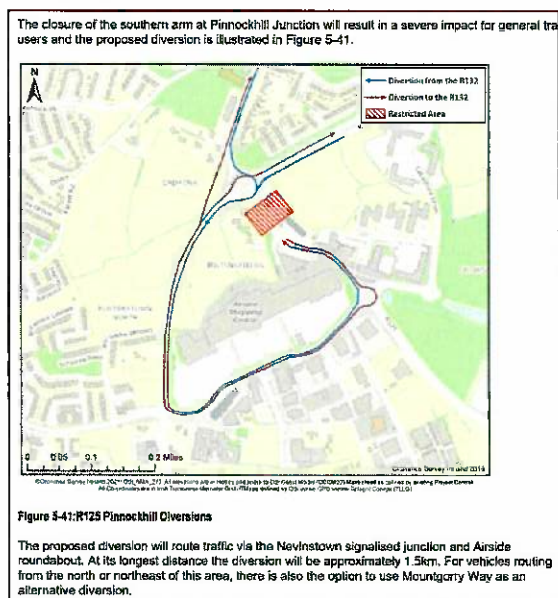


Table 5-78: Pinnockhill Signalised Junction Stage 2 Assessment General Traffic and HGV Summary

Road User	Criteria	TTM Design	Stage 2 Impact Assessment Rating	Residual / Comment
General Traffic	Increase in traffic flow (PCUs)	Full closure of the R125 south arm during main works. Reduced general traffic lane on R132 southbound on approach to junction and R132 northbound on approach to junction.	Severe	Residual Impact
	Increase in Driver Delay (seconds)		Severe	Residual Impact
HGV	Increase in HGV flows	No proposed TTM	Moderate	Residual Impact

Table 5-79: Pinnockhill Signalised Junction Stage 2 Assessment Local Access Summary

Road User	Criteria	TTM Design	Stage 2 Impact Assessment Rating	Residual / Comment
General Traffic	Diversion for local access	Diversions, of approx. 1.5km due to R125 south closure	Severe	Residual impact

Figure 5 – Metrolink Construction Stage impact for Nevinstown Lane Closure – one-way westbound only

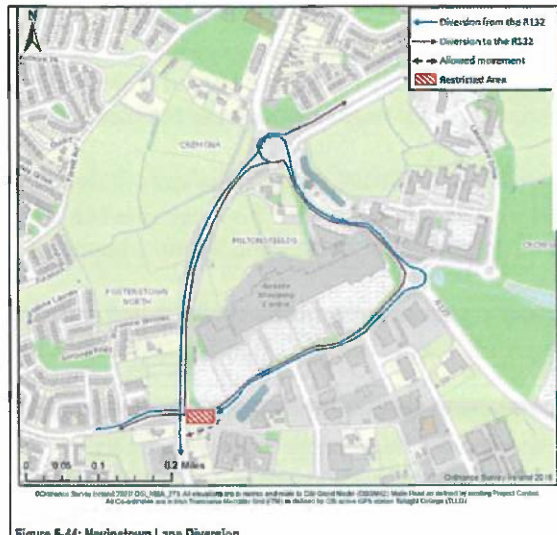


Figure 5-44: Nevinstown Lane Diversion

Table 5-84: Nevinstown Signalled Junction Stage 2 Assessment General Traffic and HGV Summary

Road User	Criteria	TTM Design	Stage 2 Impact Assessment Rating	Residual / Comment
General Traffic	Increase in traffic flow (PCUs)	Closure of L2305 arm. Existing 4 arm junction reduced to a 3-arm junction with a left out slip onto R132 southbound, south of the junction.	Severe	Residual Impact
	Increase in Driver Delay (seconds)		Slight	
HGV	Increase in HGV flows	No proposed TTM	Moderate	Residual Impact

5.5.6.2.3.2 Impact on Local Access

The Stage 2 impact assessment result for local access is detailed in Table 5-85.

Table 5-85: Nevinstown Signalled Junction Stage 2 Assessment Local Access Summary

Road User	Criteria	TTM Design	Stage 2 Impact Assessment Rating	Residual / Comment
General Traffic	Diversion for local access	Closure of L2305 causing approx. 1.4 km diversion to Pinnockhill Junction/Airside Roundabout.	Severe	Residual impact

The closure of the eastern arm at Nevinstown Junction will result in a severe impact for general traffic users and the proposed diversion is illustrated in Figure 5-44. The proposed diversion will route traffic via Pinnockhill Junction and Airside roundabout. At its longest distance the diversion will be approximately 1.5km.

Figure 6 – Metrolink Construction Stage impact associated with Estuary Junction left in left out



Table 5-16: Estuary Signalled Junction Stage 2 Assessment Local Access Summary

Road User	Criteria	TTM Design	Stage 2 Impact Assessment Rating	Residual / Comment
General Traffic	Diversion for local access	Loss of turning movements to and from the R125 (west) junction arm.	Severe	Residual impact and mitigation required

The restricted movements to and from the R125 arm of Estuary Junction will result in an approximate 1km diversion for southbound movements and 2km diversion for westbound movements. The proposed diversion is illustrated in Figure 5-17.

Figure 7 – Metrolink Construction Stage impact associated with Seatown Junction left in left out



North Section Impact Assessment on Tesco Ireland

Proposed Works along R132 Corridor adversely affect accessibility of Tesco Holywell Store for customers, colleagues, deliveries and home deliveries. The most significant impact is associated with proposed closure of R125 Arm of R132 Pinnock Hill Roundabout for 6-9 months and given its significance Tesco Ireland is focused on highlighting this concern. This is because a **high proportion of trips to Tesco Holywell Store use Pinnock Hill Roundabout to get to and from the store:**

- Deliveries from Donabate Distribution Centre travel along R132 and R125 to reach the store. There is no suitable alternative to this route without unsustainably extending trip lengths. This is because M1 Junction 3 at R125 does not contain an off-ramp for southbound traffic or on-ramp for northbound traffic
- Customers, colleagues and home deliveries travelling to and from Swords and its northern and western suburbs use this route. There is no suitable alternative without unsustainably extending trip lengths as Ward River Valley Park restricts possible movements
- Passing customers, use R125 as part of longer journeys involving M1 Junction 3 and R132. For example, evening commuters currently stop at Tesco Holywell Store on their way home to Swords and its northern and western suburbs. They are discommoded by this proposed closure and are therefore likely to seek an alternative route, i.e. using M1 Junction 2 Dublin Airport, resulting in a direct loss of trade.

As a result of impact on above trips to and from the store, the proposed closure is anticipated to directly affect Tesco Ireland's ability to trade under normal conditions. Tesco Ireland acknowledges some disruption is likely to occur given the scale and complexity of Metrolink's construction, however it is respectfully requested that further mitigation is sought to address impacts associated with Works at Pinnock Hill Roundabout.

Potential ways to further mitigate against impact on Tesco Ireland could include:

- Retain R125 access via Pinnock Hill Roundabout
- Reduce proposed closure period of R125 access via Pinnock Hill Roundabout
- Ensure junction capacity at Airside Junction / Nevinstown Lane is maximised to offset impact of closure and schedule wider Works so as to minimise overall impact on the transport network
- Provide for direct engagement between Metrolink's Traffic Management Co-ordinator and Tesco Ireland during Design and Build Stage of the project to ensure early warnings of upcoming traffic management proposals are in place such that impact on Tesco Ireland customers, colleagues, deliveries and home deliveries are mitigated insofar as practicable.

Tesco Ireland would appreciate the opportunity to engage with Metrolink's Design and Build Team as the construction programme is being developed to arrive at an optimal solution for all interested parties.

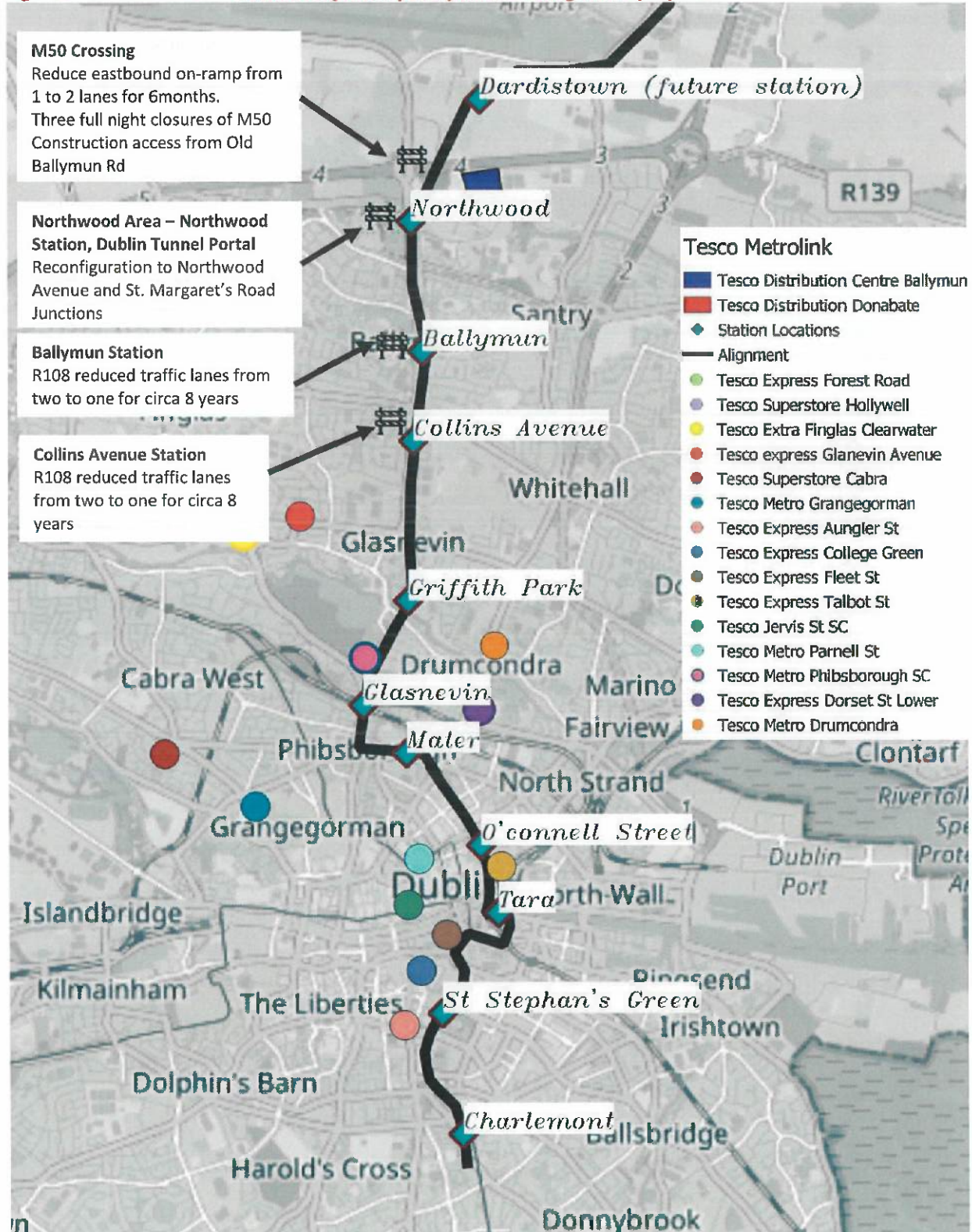
Central and South Sections

The Central and South Sections consists of Works between Dublin Airport Tunnel Portal and Charlemont Station.

Major works with the potential to impact Tesco Ireland are as follows:

- M50 Crossing
- Northwood Station
- Northwood Dublin Tunnel Portal
- Ballymun Station
- Collins Avenue Station

Figure 8 Central and South Section major temporary traffic management proposals



Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application provides details of the construction works and associated temporary traffic management measures. For Tesco Ireland there is significant concern around the ongoing operation of its Ballymun Distribution Centre. The Distribution Centre located off Old Ballymun Road is used to serve 162 stores nationwide with a focus on fresh goods deliveries.

The Ballymun Distribution Centre requires a combined total of 1,200 vehicle movements in and out of the Centre each day to maintain successful operations including suppliers, delivery vehicles and colleagues.

Metrolink Construction Stage impact associated with M50 Crossing

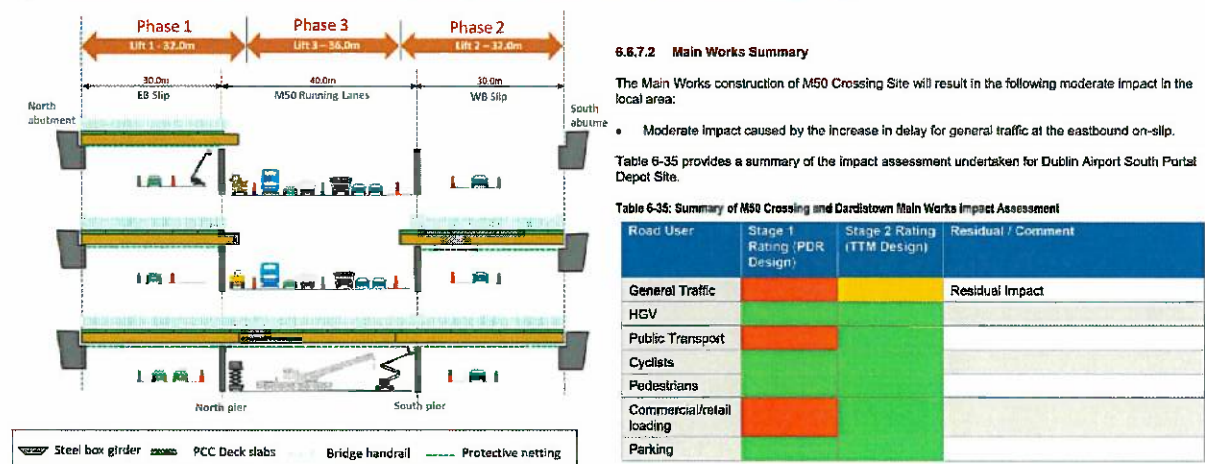
M50 J4 Ballymun is a key junction for access in and out of Tesco Ireland's Ballymun Distribution Centre. M50 Crossing Works involve four main phases described below and as shown in Figure 9.

- Phase 1 – 3 months – eastbound on-slip at M50 J4 reduced from two lanes to one lane
- Phase 2 – 3 months – eastbound on-slip at M50 J4 reduced from two lanes to one lane
- Phase 3 – night time possessions - Two full night time closures of main M50 carriageway
- Phase 4 – night time possession - One night time closure of main M50 carriageway

Access to the construction site for southern section of M50 Crossing Works is via a new roundabout on Old Ballymun Road. The construction haulage route to M50 is shared by vehicles to and from the Ballymun Distribution Centre.

The proposals are described as having a Stage 2 impact assessment rating of moderate in Table 6-35 of Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. This is of concern to Tesco Ireland because it's on the main access route for fresh goods delivery in and out of the Ballymun Distribution Centre to serve several stores across the country.

Figure 9 Metrolink Construction Stage impact associated with M50 Crossing



Northwood Station and Dublin Tunnel Portal

Northwood Station Works require significant alterations to R108 Ballymun Road at St. Margaret's Road and Northwood Avenue Junctions. Both junctions are critical for access in and out of Tesco Ireland's Ballymun Distribution Centre. Northwood Station Works involve five enabling phases and two main works phases requiring temporary traffic management at the junctions. Dublin Tunnel Portal Works use an access point off St. Margaret's Road. Works are described in further detail below.

Northwood Station Enabling Works

Enabling works are split into five phases as shown in Figure 10 below. The various phases are anticipated to last up to 6 months.

The proposals are described as having a Stage 2 impact assessment rating of 'severe' in Table 7.3 of Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. This is of significant concern to Tesco Ireland because it's on the main access route for fresh goods delivery in and out of the Ballymun Distribution Centre to serve stores nationwide.

Figure 10 Metrolink Construction Stage impact associated with Northwood Station Enabling Works

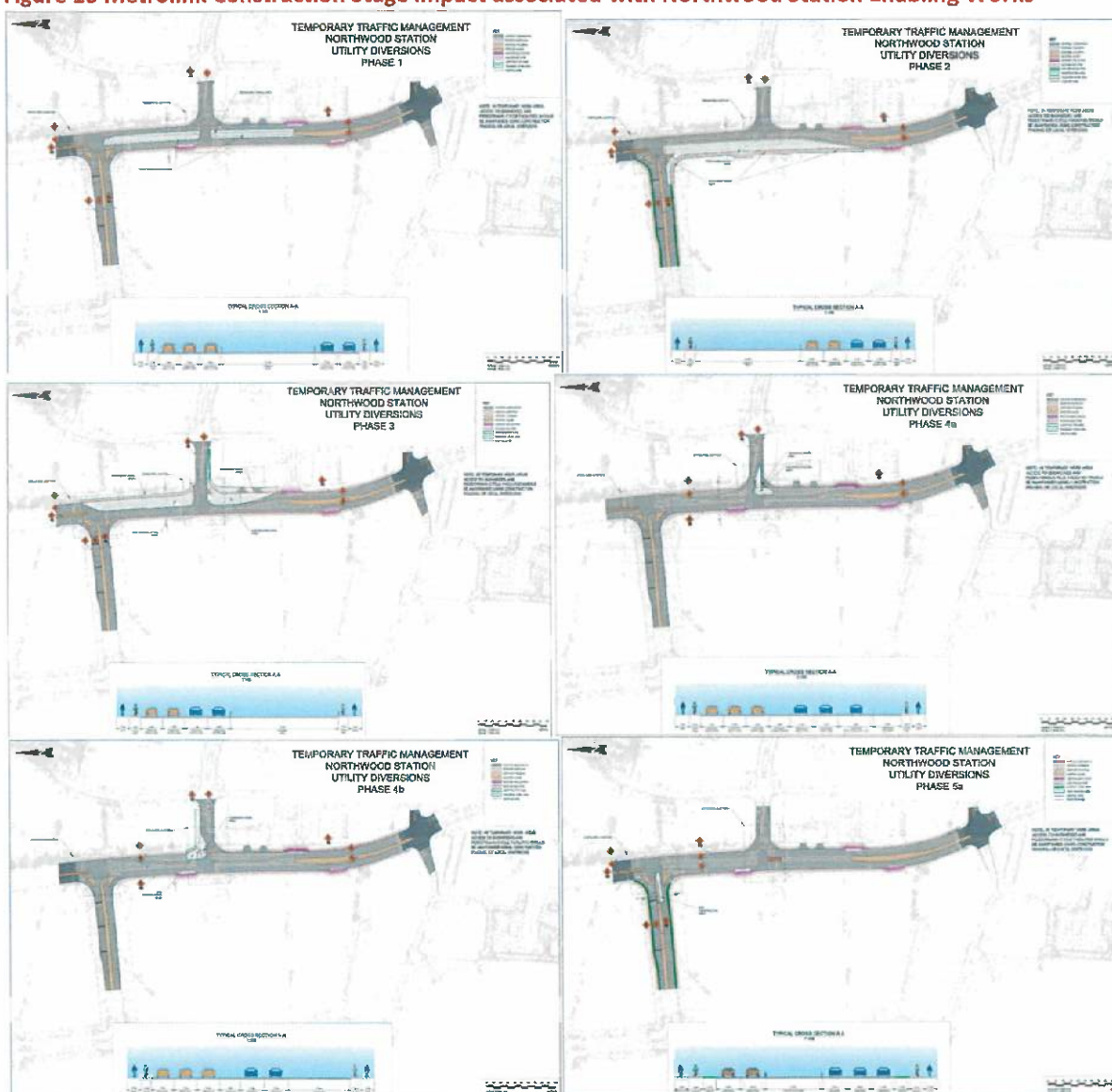


Figure 10 Metrolink Construction Stage impact associated with Northwood Station Enabling Works (continued)

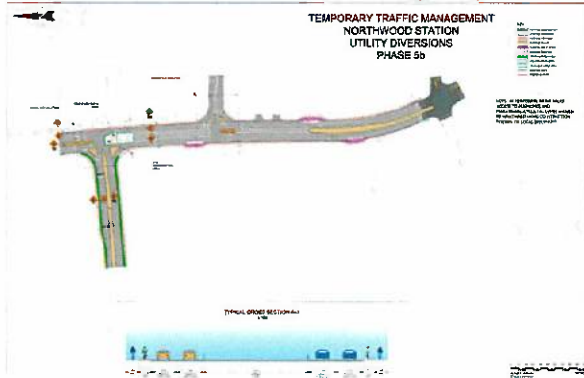


Table 7-2: Northwood Utilities Summary

Station	Phase Ref	Road Name/No	TTM Type	Duration (approx.)	Location of Works
Northwood	1	R108	Narrow lanes Lane closure	1 to 2 weeks	Southbound lane loss and northbound turning lane removed at Northwood Avenue junction
Northwood	2	R108 / St Margaret's Road	Footpath closure (nights only) Narrow lanes Traffic diversion to other side of the road	2 to 4 weeks	R108 northbound and southbound - 2 lanes in each direction. Filler lane removed on R108 northbound approach to St Margaret's junction
Northwood	3	R108	Footpath closure (nights only) Narrow lanes Traffic diversion to other side of the road	2 to 4 weeks	R108 northbound and southbound - 2 lanes in each direction. Capacity reduction on Northwood Avenue junction.
Northwood	4a 4b	R108, Northwood Ave junction	Lane closure Signalised traffic	2 to 4 weeks	Changes to signalised junction to accommodate progressive pipe installation
Northwood	5	St Margaret's Road	Narrow lanes 1 Lane closure	1 to 3 months	Lane loss on St Margaret's Road westbound and junction realignment.

Illustrations of the AEW Temporary Traffic Management are located in Appendix A.

7.2.5.3 AEW Stage 2 Impact Assessment

7.2.5.3.1 Impact on General Traffic

The stage 2 impact assessment for general traffic and HGVs are detailed in Table 7-3.

Table 7-3: Northwood AEW Stage 2 Assessment General Traffic and HGV Summary

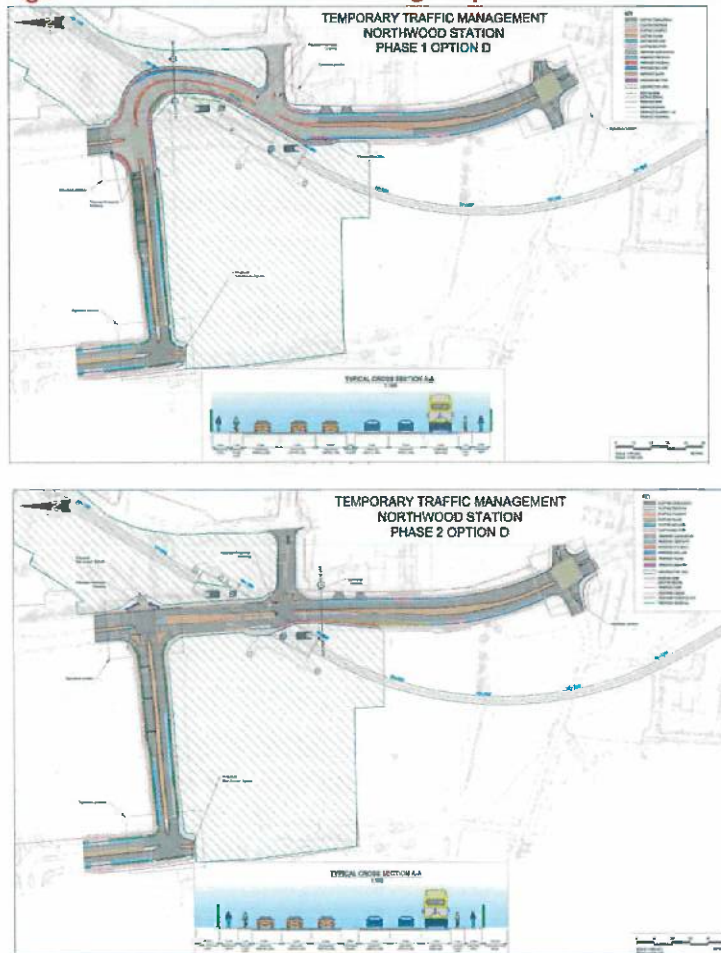
Road User	Criteria	TTM Design	Stage 2 Impact Assessment Rating	Residual / Comment
General Traffic	Increase in traffic flow (PCUs)	R108 partially reduced to 2 lanes in each direction during all phases.	Severe	Residual Impact
	Increase in Driver Delay (seconds)	Alterations to junction capacity during multiple phases.	Slight	N/A
HGV	Increase in HGV flows	No proposed TTM	No impact	N/A

Northwood Station Main Works

Northwood Station Main Works are split into two phases as shown in Figure 11 below. Phase 1 is expected to be in place for approximately 1.5 years while Phase 2 is expected to be in place for five years and nine months.

The proposals are described as having a Stage 2 impact assessment rating of 'moderate' for general traffic and 'severe' for HGV traffic in Table 7.15 of Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. This is of significant concern to Tesco Ireland because it's on the main access route for fresh goods delivery in and out of the Ballymun Distribution Centre to serve stores nationwide.

Figure 11 Metrolink Construction Stage impact associated with Northwood Station Main Works



7.2.7.2 Main Works Summary

The main works construction of Northwood Station will result in a range of impacts in the local area. A summary of the main impacts are outlined below:

- Moderate impact on traffic redistribution and volume in the local area
- Severe impact on HGV volume

Table 7-15 provides a summary of the impact assessment undertaken for Northwood station.

Table 7-15: Summary of Northwood Main Works Impact Assessment

Road User	Stage 1 Rating (PDR Design)	Stage 2 Rating (TTM Design)	Residual / Comment
General Traffic	Red	Orange	Residual
HGV	Red	Red	Residual
Public Transport	Orange	Green	
Cyclists	Red	Green	
Pedestrians	Red	Green	
Commercial/retail loading	Green	Green	
Parking	Green	Green	

Ballymun Station Works

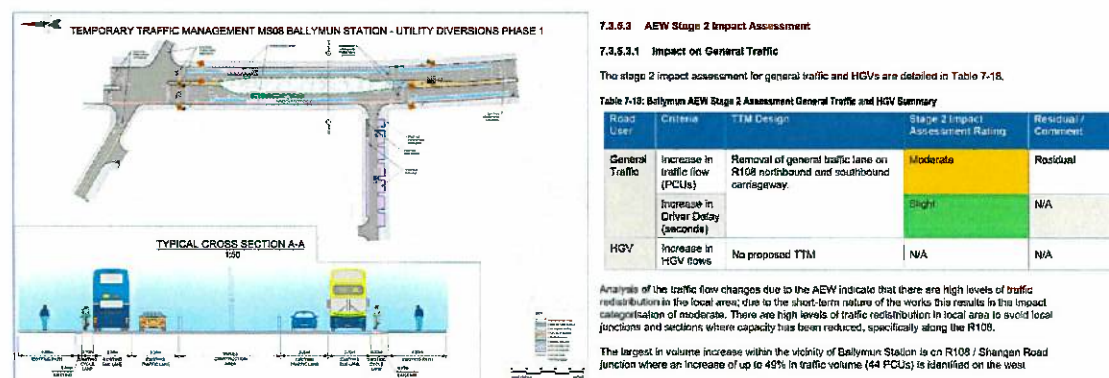
Ballymun Station Works consist of Enabling Works Phase and Main Works Phase. Both phases involve reduced lane capacity on R108 Ballymun Road. Capacity on this corridor is important for access between Tesco Ireland's Ballymun and Donabate Distribution Centres to stores in the North Inner City. Works are described in further detail below.

Ballymun Station Enabling Works

Enabling works involve a single phase with temporary traffic management proposals affecting R108 as shown in Figure 12. The phase is anticipated to last up to a few weeks.

The proposals are described as having a Stage 2 impact assessment rating of 'moderate' in Table 7.18 of Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. This is of significant concern to Tesco Ireland because it affects Tesco Ireland's ability to get goods from Ballymun and Donabate Distribution Centres into its stores in the North Inner City.

Figure 12 Metrolink Construction Stage impact associated with Ballymun Station Enabling Works

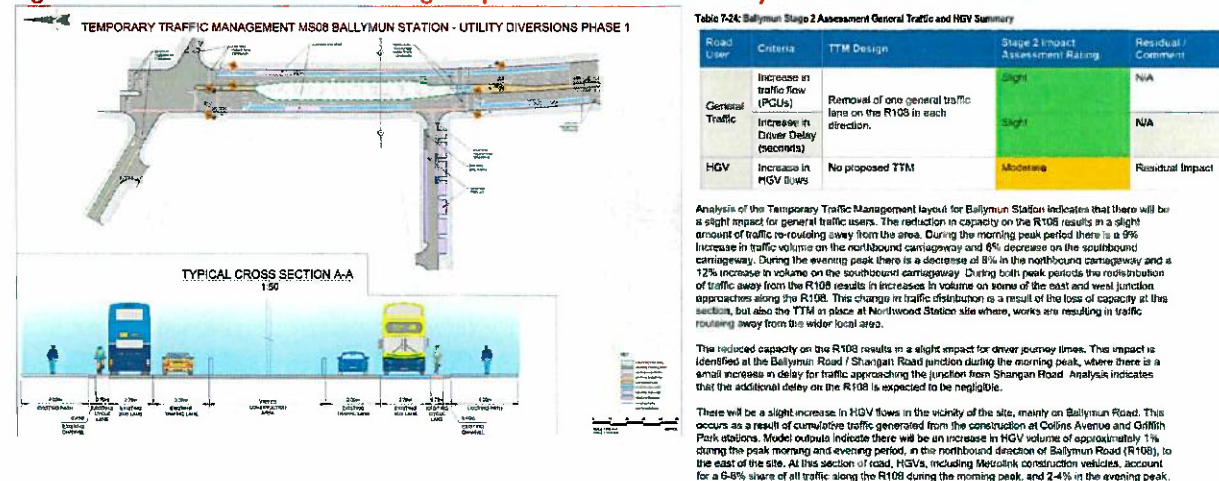


Ballymun Station Main Works

Main Works involve a primary phase with temporary traffic management proposals affecting R108 traffic as shown in Figure 13. The phase is anticipated to take place over a period of approximately 8 years and three months.

The proposals are described as having a Stage 2 impact assessment rating of 'slight' in Table 7.18 of Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. However, this is still of significant concern to Tesco Ireland because it affects Tesco Ireland's ability to get goods from Ballymun and Donabate Distribution Centres into its stores in the North Inner City. The origin, destination and nature of these trips means the re-routing of these deliveries isn't a sustainable alternative.

Figure 13 Metrolink Construction Stage impact associated with Ballymun Station Main Works



Collins Avenue Station

Ballymun Station Works consist of Enabling Works Phase and Main Works Phase. Both phases involve reduced lane capacity on R108 Ballymun Road. Capacity on this corridor is important for access between Tesco Ireland 's Ballymun and Donabate Distribution Centres to stores in the North Inner City. Works are described in further detail below.

Collins Avenue Station Enabling Works

Main Works involve 5 phases with temporary traffic management proposals affecting R108 traffic as described in Figure 13. The phases are anticipated to last up to 9 months.

The proposals are described as having a Stage 2 impact assessment rating of 'slight to moderate' in Table 7.32 of Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. However, this is still of significant concern to Tesco Ireland because it affects Tesco Ireland 's ability to get goods from Ballymun and Donabate Distribution Centres into its stores in the North Inner City. The origin, destination and nature of these trips means the re-routing of these deliveries isn't a sustainable alternative.

Figure 13 Metrolink Construction Stage impact associated with Collins Avenue Station Enabling Works

Table 7-31: Collins Avenue Utilities Summary

Station	Phase Ref	Road Name/No	TTM Type	Duration (approx.)	Location of Works
Collins Ave	1	R108	Narrow lanes 2 lanes closure	1 to 2 weeks	R108 both directions
Collins Ave	2	R108	Narrow lanes 2 lanes closure	1 to 3 months	R108 northbound
Collins Ave	3	R108	Narrow lanes 2 lanes closure	1 to 3 months	R108 northbound
Collins Ave	4	R108	Narrow lanes 2 lanes closure	2 to 4 weeks	R108 both directions
Collins Ave	5	R108	Narrow lanes 2 lanes closure	2 to 4 weeks	R108 southbound
Collins Ave	6, 7, 8	Incorporated in main works TTM			

Illustrations of the AEW temporary traffic management are located in Appendix A.

7.4.5.3 AEW Stage 2 Impact Assessment

7.4.5.3.1 Impact on General Traffic

The Stage 2 impact assessment results for general traffic and HGVs are detailed in Table 7-32.

Table 7-32: Collins Avenue AEW Stage 2 Assessment General Traffic and HGV Summary

Road User	Criteria	TTM Design	Stage 2 Impact Assessment Rating	Residual / Comment
General Traffic	Increase in traffic flow (PCUs)	Reduced capacity on R108 Ballymun Road during various phases. One lane for general traffic in each direction.	Slight	N/A
	Increase in Driver Delay (seconds)		Moderate	N/A
HGV	Increase in HGV flows	No proposed TTM	N/A	N/A

Impact analysis for the general traffic during the AEW phase was conducted using the SATURN model, as detailed in Section 3.2.

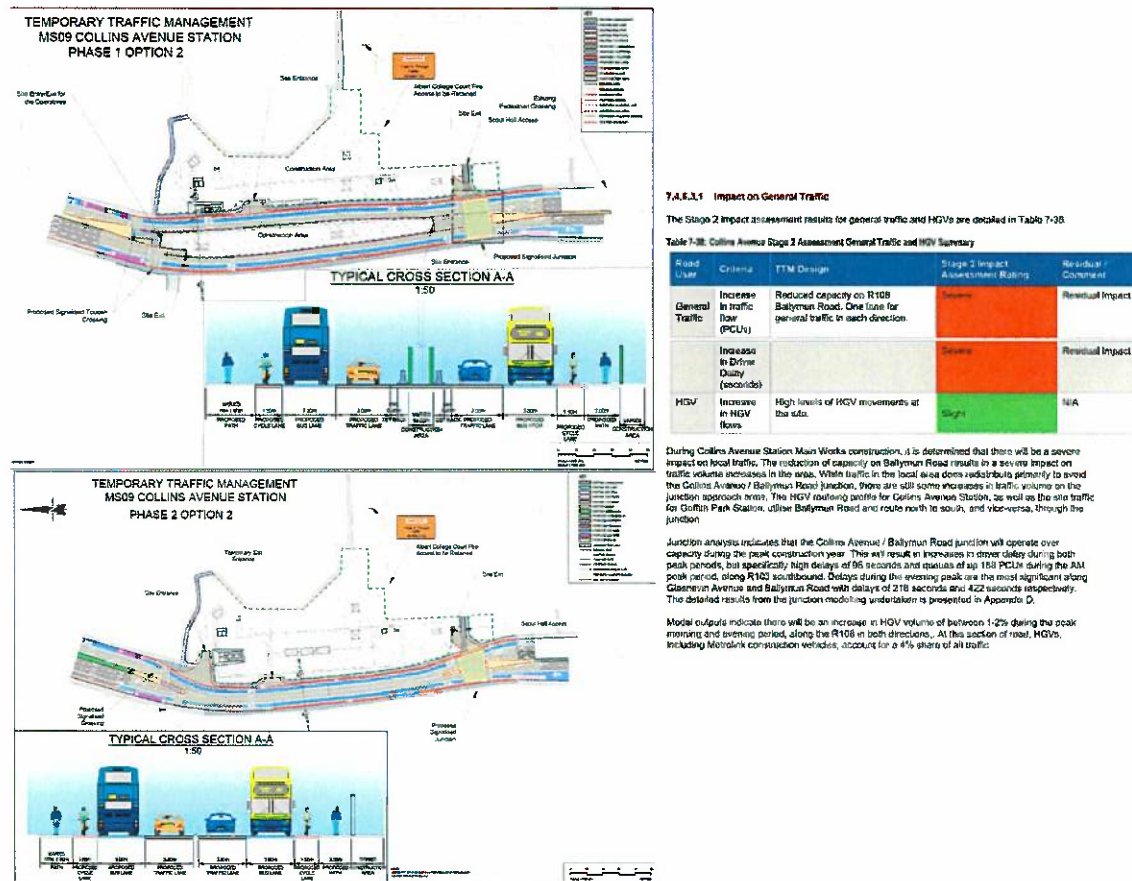
The temporary traffic management associated with the AEW will result in a slight impact on traffic volume and distribution of traffic on the local network. There is anticipated to be increases in traffic flow on local roads to west of the works location, mainly due to traffic routing to avoid the Collins Avenue / Ballymun Road signalised junction.

Collins Avenue Station Main Works

Main Works involve 2 phases with temporary traffic management proposals affecting R108 traffic as described in Figure 14. Phase 1 is anticipated to last up to 6 months and Phase 2 is anticipated to last up to 6 years.

The proposals are described as having a Stage 2 impact assessment rating of 'severe' for general traffic as described in Table 7.38 of Appendix 9.5. Scheme Traffic Management Plan of Metrolink Railway Order Application. This is of significant concern to Tesco Ireland because it affects Tesco Ireland's ability to get goods from Ballymun and Donabate Distribution Centres into its stores in the North Inner City. The origin, destination and nature of these trips means the re-routing of these deliveries isn't a sustainable alternative.

Figure 14 Metrolink Construction Stage impact associated with Collins Avenue Station Main Works



Central and South Section Impact Assessment on Tesco Ireland

Proposed Works at M50 Crossing, Northwood Station, Ballymun Station and Collins Avenue Station adversely affect accessibility for Tesco Ireland to deliver goods to its stores from Ballymun and Donabate Distribution Centres. The most significant impact is associated with Northwood Station Works where temporary traffic management arrangements directly affect access in and out of Tesco Ballymun Distribution Centre.

Tesco Distribution Centre located off Old Ballymun Road is used to serve 154/162??stores nationwide with a focus on fresh goods deliveries. The Ballymun Distribution Centre requires a combined total of 1,200 vehicle movements in and out of the Centre each day to maintain successful operations including suppliers, delivery vehicles and staff.

Works further south along the R108 Corridor at Ballymun Station and Collins Avenue Station affect Tesco's ability to get goods to store in Dublin's North Inner City from Ballymun and Donabate Distribution Centres:

- Tesco Express Glasnevin Ave
- Tesco Metro Drumcondra
- Tesco Metro Phibsborough SC
- Tesco Express Dorset St Lower
- Tesco Metro Jervis Street SC
- Tesco Express Temple Bar
- Tesco Express College Green
- Tesco Express Aungier Street

As a result of impact on above trips to and from Tesco Distribution Centres and stores in Dublin's North Inner City, the proposed works are anticipated to directly affect Tesco Ireland's ability to trade under normal conditions. Tesco Ireland acknowledges some disruption is likely to occur given the scale and complexity of Metrolink's construction, however it is respectfully requested that further mitigation is sought to address impacts associated with works at M50 Crossing, Northwood Station, Ballymun Station and Collins Avenue Station.

Potential ways to further mitigate against impact on Tesco Ireland could include:

- Retain general traffic lane capacity along R108 combined with bus gates for public transport priority
- Ensure north-south movements on R108 Ballymun Road are prioritised, particularly during Phase 1 of Northwood Station Main Works
- Ensure junction capacity at R108 / Northwood Avenue is maximised with specific consideration given to the volume of Heavy Goods Vehicles using Northwood Avenue which are not appropriate to re-route. This includes retention of dedicated turning lanes in and out of Northwood Avenue to safely cater for Heavy Goods Vehicle traffic
- Provide for direct engagement between Metrolink's Traffic Management Co-ordinator and Tesco Ireland during Design and Build Stage of the project to ensure early warnings of upcoming traffic management proposals are in place such that impact on Tesco Ireland customers, colleagues, deliveries and home deliveries are mitigated insofar as practicable.

Tesco Ireland would appreciate the opportunity to engage with Metrolink's Design and Build Team as the construction programme is being developed to arrive at an optimal solution for all interested parties.

Operational Stage Assessment

The review of Metrolink's operational impact on Tesco Ireland was undertaken in a single stage:

- Review of Metrolink Design Phase proposals to identify potential for impact with consideration to:
 - Permanent alterations to the transport network that materially reduce accessibility for Tesco deliveries, colleagues and customers to its Distribution Centres or Stores

This approach acknowledges the proposed segregation of network Metrolink services by cut-and-cover and tunnel along the corridor. The key assumption underpinning the operational stage review is that Fingal County Council R132 Connectivity and NTA BusConnects proposals will be fully delivered by the time Metrolink becomes operational which will transform the at-grade transport network. Fingal County Council R132 Connectivity received planning permission under ABP Reference JP06F.310145 whilst NTA BusConnects proposals are yet to receive permission.

Table 4 – Review of Metrolink operational proposals on Tesco Ireland

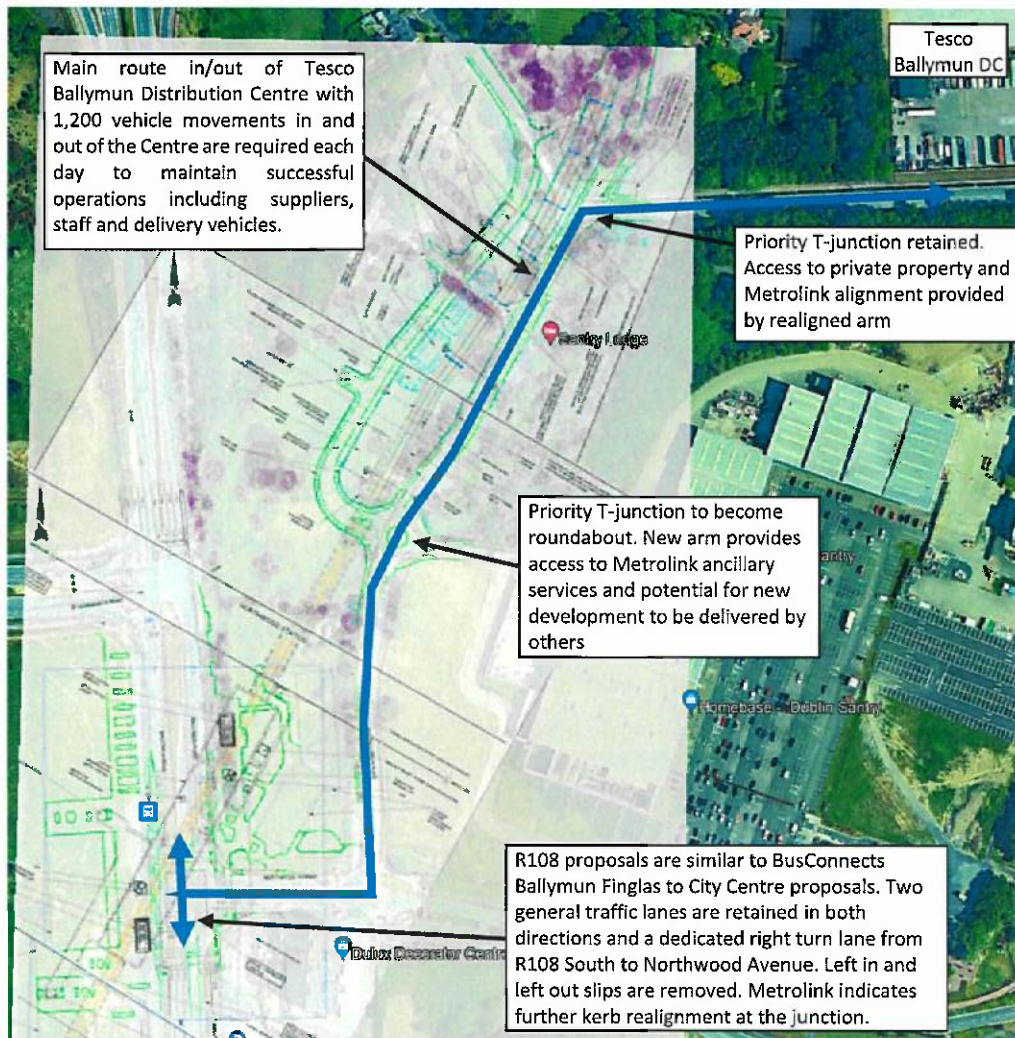
TESCO STORE / DISTRIBUTION	OPERATIONAL STAGE REVIEW	FURTHER ASSESSMENT
Donabate Distribution Centre	No permanent transport alterations materially affect access for Tesco Ireland.	No
Tesco Superstore Holywell	Changes proposed to R132 corridor affect access for Tesco Ireland, however, the relevant changes are proposed as part of FCC R132 Connectivity project and NTA BusConnects Swords to City Centre project which are considered separate to Metrolink	No
Tesco Swords Express	No permanent transport alterations materially affecting access for Tesco Ireland	No
Ballymun Distribution Centre	Changes proposed to the transport network as part of Northwood Station and Metrolink alignment works will directly affect access to and from the Distribution Centre	Yes
Tesco Express Glasnevin Ave	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Express Finglas Clearwater	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Metro Drumcondra	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Metro Phibsborough SC	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Superstore Cabra	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Express Dorset St Lower	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Metro Prussia Street	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Metro Parnell Street	No permanent transport alterations materially affecting access for Tesco Ireland	No

TESCO STORE / DISTRIBUTION	OPERATIONAL STAGE REVIEW	FURTHER ASSESSMENT
Tesco Express Talbot Street	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Metro Jervis Street SC	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Express Temple Bar	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Express College Green	No permanent transport alterations materially affecting access for Tesco Ireland	No
Tesco Express Aungier Street	No permanent transport alterations materially affecting access for Tesco Ireland	No

Further consideration for Tesco Ballymun Distribution Centre

Tesco Ballymun Distribution Centre is located off R108 via Northwood Avenue and Old Ballymun Road with 1,200 vehicle movements in and out of the Centre required each day to maintain successful operations including suppliers, colleagues and delivery vehicles. Metrolink's underground Northwood Station is to be located under the R108 / Northwood Avenue Junction. In addition, the Metrolink alignment will run parallel to Old Ballymun Road towards an M50 Bridge Crossing. Metrolink Proposals:

- Old Ballymun Road / Tesco Access Priority T-junction retained. Access to private property and Metrolink alignment provided by realigned arm
- Priority T-junction converted to a roundabout. New arm provides access to Metrolink ancillary services and potential for new development to be delivered by others
- R108 proposals are consistent and integrated with NTA BusConnects Ballymun Finglas to City Centre proposals. Two general traffic lanes are retained in both directions and a dedicated right turn lane from R108 South to Northwood Avenue. However, left in and left out slips are removed.



Impact Assessment on Tesco Ireland at Ballymun Distribution Centre

Tesco Ireland wishes to ensure the level of traffic, including a high proportion of Heavy Goods Vehicles, is safely accommodated at junctions along the route between Tesco Ballymun Distribution Centre and R108 Ballymun Road; recognising the route is equally important to other local parties and Metrolink operations. Of particular importance to Tesco Ireland is that junction alterations proposed to R108/Northwood Avenue junction and along Old Ballymun Road will successfully cater for the volume of HGV turning movements in the area.

Tesco Ireland would appreciate the opportunity to engage with Metrolink's Design and Build Team as the design progresses to achieve a positive design outcome for all parties which can include the sharing of data for movements in and out of its Distribution Centre.

Conclusion and Next Steps

Tesco Ireland reiterates its broad support of Metrolink notwithstanding the specific considerations and assessment outcomes identified in this submission. Tesco Ireland recognises the important role Metrolink plays in delivering greater accessibility and connectivity across the Greater Dublin Area. Tesco Ireland's colleagues and customers will benefit from attractive sustainable travel choices Metrolink provides.

In reviewing Metrolink's Railway Order Application, Tesco Ireland has assessed impacts which affect how it can serve goods to its customers during the Construction and Operational Stages of Metrolink. It is trusted that potential measures put forward to mitigate against these impacts are considered further and in turn help Metrolink's Project Team arrive at solutions which cater for the variety of stakeholder affected, thereby resulting in a successful outcome for all parties.

Tesco Ireland again thank you for the opportunity to engage on the project through the Railway Order process. In relation to the specific matters identified, we would welcome the opportunity to work closely with Metrolink's Project Team as the design and build progresses, to ensure the future success of Metrolink, and retain safe and efficient access to Tesco Ireland's Distribution Centres and Stores for its customers, colleagues and trading partners.

