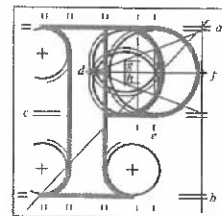


**Our Case Number:** ABP-314724-22

**Your Reference:** Woodies DIY c/o Grafton Group PLC



**An  
Bord  
Pleanála**

O'Connor Whelan Limited  
222-224 Harolds Cross Road  
Dublin 6W  
Dublin 6W

**Date:** 12 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, 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](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

**Teil**  
Glao Áitiúil  
**Facs**  
Láithreán Gréasáin  
Ríomhphost

**Tel** (01) 858 8100  
**LoCall** 1800 275 175  
**Fax** (01) 872 2684  
**Website** [www.pleanala.ie](http://www.pleanala.ie)  
**Email** [bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

## **MetroLink**

**Submission to An Bord Pleanála, 64  
Marlborough Street, Dublin 1, D01 V902 in  
relation to the Application for a Draft Railway  
Order for the Metrolink from Estuary to  
Charlemont, Dublin**

**An Bord Pleanála Reference NA/29N.314724**

**On Behalf of:**

**Woodies DIY  
c/o Grafton Group PLC  
Herron House  
Corrig Road  
Sandyford Industrial Estate  
Dublin 18**

**Date: January 2023**

PLANNING CONSULTANTS

222 - 224 Harold's Cross Road,  
Dublin 6W.

T : + 353 1 561 5000  
E : [info@oconnorwhelan.com](mailto:info@oconnorwhelan.com)  
W : [www.oconnorwhelan.com](http://www.oconnorwhelan.com)

## 1.0 Introduction

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We wish to make a submission in relation to the Public Consultation for the Application for a Draft Railway Order for the Metrolink from Estuary to Charlemont, Dublin (An Bord Pleanála Ref. NA/29N.314724), on behalf of Woodies DIY, c/o Grafton Group PLC., Herron House, Corrig Road, Sandyford Industrial Estate, Dublin 18.

The submission is made pursuant to the newspaper notice dated 17<sup>th</sup> September 2022 and a subsequent newspaper notice dated 25<sup>th</sup> November 2022, extending the consultation period until 16<sup>th</sup> January 2023.

The submission relates to the Woodies retail store, Seatown Road East, Swords, Co. Dublin, and the impacts that the proposed railway, and the CPO of lands, will have on the, heretofore, successful operation of the retail store.

The submission relates to the proposed CPO of the following plots of land:

### **Permanent Possession**

Ref. Number: ML1J-A4.  
Plan Number: ML-P 301 J-K

Ref. Number: ML1J-A8  
Plan Number: ML-P 301 J-K

Ref. Number: ML1J-A15.  
Plan Number: ML-P 301 J-K

### **Temporary Possession**

Ref. Number: ML1J-T1.  
Plan Number: ML-P 301 J-K

Ref. Number: ML1J-T2.  
Plan Number: ML-P 301 J-K

## 2.0 Context

Woodies DIY are the tenant / occupier of a retail warehouse adjoining the Seatown Roundabout in Swords. The site consists of a single warehouse building, an outdoor garden centre, a service yard and a surface car parking area consisting of 170 no. car parking spaces.

As illustrated in figures 1 and 2 below the site will be directly impacted by the proposed acquisition of part of the site for a cut and cover tunnel. Figure 3 shows the impact of the approved Railway Order for Metro North, which has no impact on the Woodies site or the access road (Estuary Road).

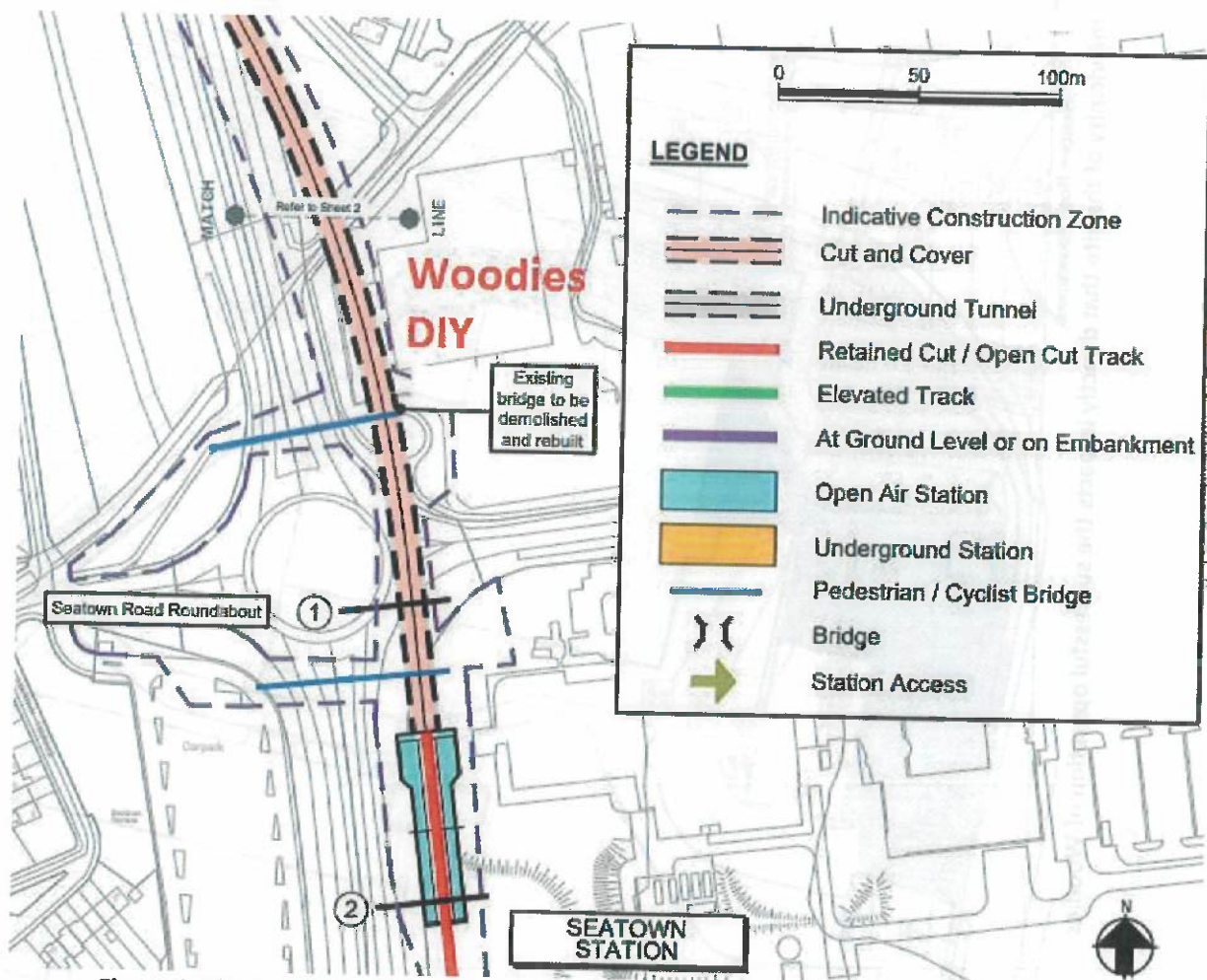


Figure 1: Site Location relative to MetroLink





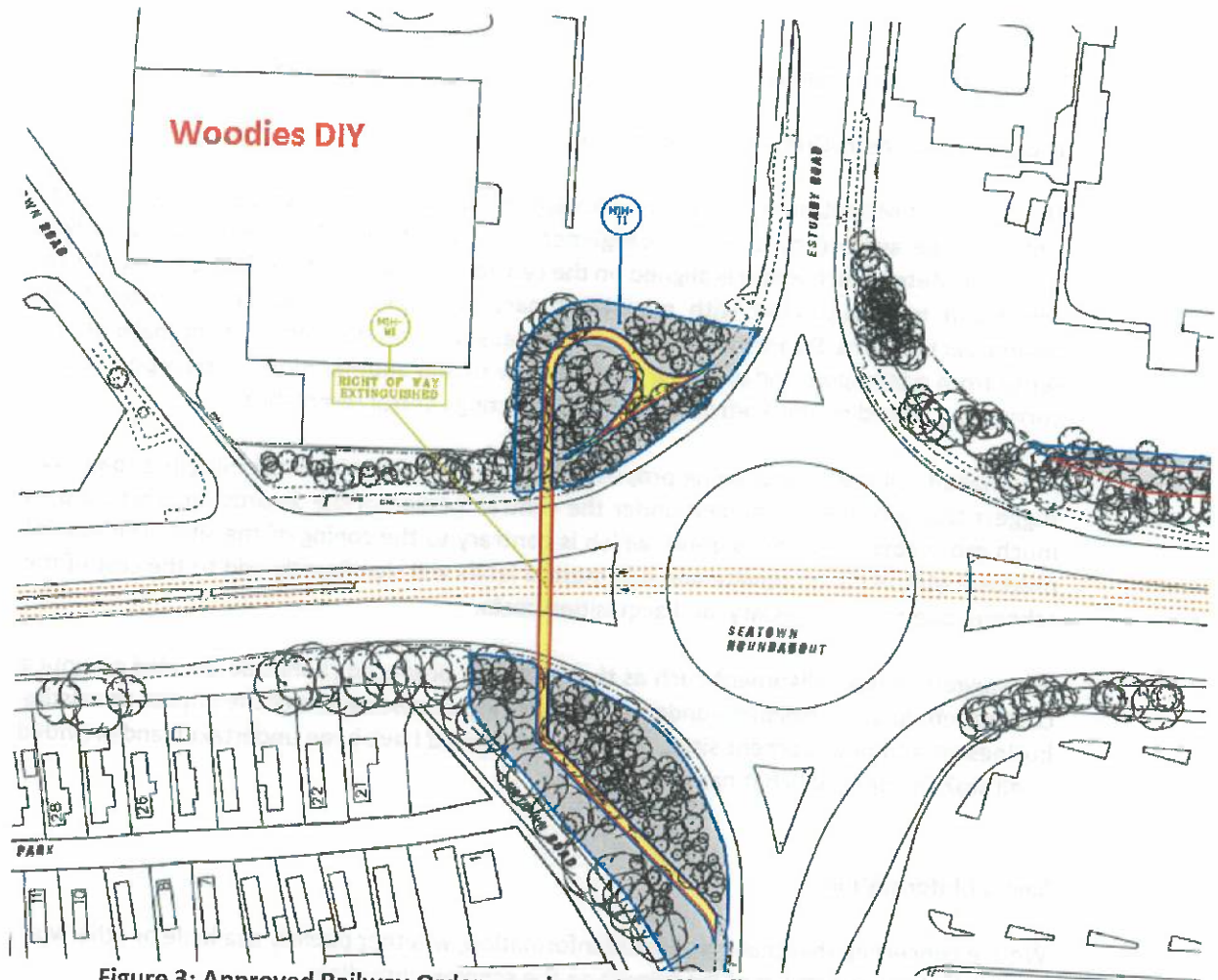


Figure 3: Approved Railway Order – no impact on Woodies or Estuary Road

## 2.0 Previous Public Consultation and Submission

We made an objection to the potential CPO of lands on and adjoining the Woodies site during the previous consultation period in May 2019. This public consultation was organised by TII in relation to the proposed "Preferred Route".

Despite concerns raised in the written submission and, directly, in meetings with TII, little changes have been made to the draft Railway Order and therefore there will be major impacts on the successful operation of the retail store.

A copy of this submission is appended as Appendix 1, and we wish An Bord Pleanála to include this submission as part of our overall objection to the draft Railway Order.

The grounds of our objection at that time were, in summary, as follows:

#### **The proposed MetroLink is in the wrong location**

The proposed MetroLink will have an unacceptable impact on businesses such as Woodies, which can be avoided by a simple realignment of the scheme. There already is a Railway Order for Metro North which is aligned on the central reservation of the Swords Road (R132), which can be constructed with minimal impact on adjoining lands in commercial and residential use. The Swords Road is already a transport corridor and it would make perfect sense from a transport and planning point of view to add another mode of transport to that corridor by providing the MetroLink along the existing central reservation.

A tunnelled rail line is now being proposed on valuable zoned land adjoining the road. We suggest that a tunnelled rail line under the central median of the Swords Road would be a much more cost effective solution, which is contrary to the zoning of the site. The current proposal MetroLink on private and commercial lands will significantly add to the cost of the scheme, due to un-necessary land acquisition costs.

We suggest that an alignment such as that currently proposed cannot be decided on until a cost benefit analysis has been undertaken, including an assessment of the impact on existing businesses and development sites. This analysis should have been undertaken and provided to all stakeholders, which it has not.

#### **Lack of Information**

We are concerned that there is a lack of information, whether publicly available or otherwise, to allow a full assessment of the impact on the scheme, including:

- The timescale involved in the construction of the proposal. We were informed that total construction period is estimated at 6 years. Construction on the section of the route directly affecting the Woodies site will be "at least" 2 years, however, this could be longer based on ground conditions, construction methods, existing services etc.
- It is unclear when construction on the section of the route directly affecting the Woodies site will commence and end during the envisaged overall 6 year construction period.
- There is no information on the envisaged "notice to treat" CPO period, which has implications for both the operational and development potential of the site.
- Proposals for the potential future use of the permanent CPO lands have not been articulated.

#### **Unacceptable Impact on Woodies Retail Unit**

We believe that the proposed alignment of MetroLink will have an unacceptable impact on the operation of the Woodies store, so much so that it may unnecessarily affect the viability and practical use of retail at this location, due to the following:

- The works proposed are for an unreasonably long and uncertain period of time and will permanently damage trade. The proposal to occupy the Woodies car park in this manner is predicated not on the time it will take to install the cut and cover tunnel & line across their demise, but to facilitate other works relating to the Metro and the realignment of the adjacent junction. There is no precedent or right (temporary or permanent) to acquire lands by CPO to facilitate third party works.
- The proposal will effectively close off the access to site for prolonged periods of time.
- The permanent loss of the footbridge over the Swords Road which provides a vital connection to the store for customers on foot / bicycle.
- The loss of car parking for at least a 2 year period. No alternative scenario has been considered and Woodies may be forced to consider a complete closure of the store for trading as it will be logistically impossible to operate the business at any level if the current development proposals are carried through
- Woodies will lose 50% of its garden centre space for a period of 2 years.
- The works proposed are unreasonably and unnecessarily close to Woodies retail (2.4m at its nearest point).
- There will be severe noise, vibration and dust impacts over an extended time period which will place an unreasonable burden on Woodies and its ability to trade.

Given that more information is available than was the case in May 2019, some of the points above are expanded upon in this submission.

### 3.0 Current Objection

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We do not believe that these previous objections have not been addressed at all and wish for these concerns to form part of this current objection. Only small changes have been made to the proposed extent of CPO lands, and no changes or consideration lent to amelioration have been made to the alignment of the route.

We believe that the railway corridor approved on the central median of the R132, under the previous Railway Order for Metro North, should be implemented at this location.

The basis of the current augmented objection is as follows:

- The length of the construction period.
- The negative impact on access to the Woodies store, including safety and the mixing of customer traffic with construction traffic.
- The negative impact on car parking associated with the Woodies store.
- The negative impact on the external garden centre.



- The negative impacts on customer experience
- The need for permanent land take.

### 3.1 Length of Construction Period

The length of the construction period adjoining and on the Woodies site is of major concern.

Whilst the EIAR describes the construction works as temporary works, table 5.12, page 69, Volume 2 indicates that the duration of works at the "Woodie's Satellite Site" will be 54 months i.e. 4 years and a half years.

This length of construction is considerable. The impacts including traffic management, hoarding, visual impact, noise, dust, vibration etc., over a lengthy time period will have a considerable impact on the trading of the existing store.

No explanation is given in the EIAR as to how this time period was calculated, and why it is such a lengthy period. It has been indicated in direct consultations with TII, and in other sections of the EIAR, that the time period for construction works at this location would be 18-24 months. However, this directly contradicts table 5.12 which provides the duration of works at each construction compound.

Indeed, very little information is provided in the EIAR. Section merely 5.7.10.1 states:

*"The Woodie's satellite construction site will be established in line with the construction programme. The site will span Seatown Road, between Woodie's superstore and Sword Business Park, occupying a portion of the park area adjacent to the superstore. Prior to establishing the construction site, Seatown Road will be temporarily diverted. An additional small construction site will be required west of the R132 Swords Bypass and north of Seatown Road, at Mantua Park, to aid the demolition of the existing footbridge just north of Seatown Roundabout."*

### 3.2 Impact on Access

The existing retail store has a straightforward access from the Seatown Roundabout (the former N1) and is visible from the roundabout. The proposal for a construction compound to the side and front of the store, including the proposed construction access will severely affect ease of access, and visibility of the store. The extent of disruption will affect the successful operation of the store.

It is unclear why this compound is required as there is a large construction compound on the south of the Woodies site adjoining the proposed new station.

Of further concern is that it appears the proposal is to use the existing store access as a shared access for Woodies customers and construction vehicles. Woodies have a number of issues with this proposal:

- It is an unsafe solution as it will result in customers' cars mixing with HGVs.

- No information has been provided as to the number of construction vehicles accessing and egressing the site on a daily basis during the 4.5 year construction period.
- No information has been provided as to who will control the entrance. Presumably as it is subject to a CPO, it will be controlled by the contractor. This may result in customers having to queue to enter and leave the Woodies site, as construction traffic will be given priority.

In addition, no information has been provided as to what other options has been considered to access the construction compound. Would it be possible to access the construction compound to the east of the Woodies entrance, for example, thereby negating the need to CPO the existing entrance and separate construction and customer traffic to some degree? Woodies cannot provide alternative access to their site. The location of the construction compound will impede any potential alternative access points.

The EIAR (volume 3, Chapter 9) states the following in relation to construction traffic impacts:

*"The TTM in place at Seatown junction results in a Moderate impact in the local area in general according to STMP ratings, however there are some severe levels of traffic flow redistribution."*

And

*"The restricted movements to and from the Seatown Road East arm on Seatown Junction will result in an approximate 1-2km diversion via the U-turn facilities on the R132 to the south of Malahide Junction and north of Estuary Junction."*

The Scheme Traffic Management Plan in the EIAR (Appendix A9.5) shows restricted access and road closures both north and south of the south along the R132 (Swords Bypass).

There is no assessment as to how the restricted traffic flow and diversions will affect the Woodies access. There is no map showing where the restricted movements to and from the Seatown Road East arm on Seatown Junction are located. No information is provided as to the duration of such restrictions.

### 3.3 Impact on Car Parking

Car parking is an essential component of a retail store selling bulky goods. The nature of the products sold is that the vast majority of customers use vehicular transport to access the site. Such stores are almost exclusively located in suburban locations with good road transport and larger car parking, which would not be feasible in town centre locations.

The proposed draft Railway Order will result in the loss of approximately 70 no. car parking spaces (42% of the number of car parking spaces) because of the temporary (up to 4.5 years) and permanent CPO of lands. It is difficult to quantify the exact amount of car parking spaces that will be lost, as the CPO maps, for some inexplicable reason, have failed to delineate the number of car parking spaces within the acquired lands.

In discussion with TII's design team, there was some mention of replacing lost parking spaces by acquiring lands from Fingal County Council following the removal of the pedestrian overbridge. General Arrangement plan drawing no. ML-RO 301 J-K shows that 29 no. car parking spaces, can be provided on these lands. However, as these lands will be owned by the state through the CPO process, there is no firm commitment or plan to ensure Woodies will have access to these lands, or indeed that these car parking spaces will be provided.

Even if these car parking spaces did become available, there would be a permanent loss of 24% of the car parking spaces available to Woodies. However, the loss of car parking spaces is accentuated by the permanent loss of the 50% of the garden centre space rendering the remaining 50% unusable, requiring an alternative garden centre in the main car park, which will require a further 600 sq m, or an estimated 30 spaces.

The total loss permanent loss of car parking spaces will be 56 or 33%, even if the spaces proposed on the FCC grounds materialise.

A further concern is the proximity of the Seatown train station to the car park. There is likely to be some unofficial park and ride by rail passengers in the Woodies car park, creating additional pressure on customer spaces for the retail store.

### 3.4 Impact on the Garden Centre

Whilst the location of the store per se will not be affected by the acquisition of lands, the location and extent of the external garden centre of the store will be severely curtailed to such an degree that it will have to be relocated on the site. As stated above, ca. 50% of the external garden centre will be permanently acquired. This will affect the entire garden centre, meaning that a new location will have to be found on the remaining Woodies site, meaning the loss of additional car parking spaces, disruption to the business as part of relocation and construction process and impact on the customer experience.

The garden centre is an important aspect of the overall business. The impact of its loss and relocation has not been assessed as part of the EIAR accompanying the application.

### 3.5 Impact on Customer Experience

The customer experience of the current store will be severely impacted by the lengthy construction. The impacts including traffic management, conflict with construction traffic hoarding, visual impact, noise, dust, vibration etc., over a lengthy time period will have considerable negative affects on the existing store.

The nature and scale of these impacts have not been assessed, or even acknowledged, in the EIAR, other than to state:

*"Construction works will give rise to local disturbance during the construction phase in the vicinity of the R132 and Seatown Station...."* [EIAR, Book 3, Chapter 11, page 82.]

### 3.6 The Need for Permanent Land Take

There are three areas of Woodies land that are subject to permanent CPO as illustrated on Plan Number: ML-P 301 J-K:

- Ref. Number: ML1J-A4.
- Ref. Number: ML1J-A8.
- Ref. Number: ML1J-A15.

It is not clear why the permanent acquisition of these lands is required. Land parcels A4 and A15 are external to the proposed Metrolink tunnel corridor and are not even immediately adjoining the corridor. A15 is due to become car parking, which as discussed above, technically Woodies will not own, and will not have any control over the use of the car parking.

Plot A8 is directly over the tunnel corridor. It is unclear why there is a need to permanently own these lands. Metrolink could instead require a wayleave over these lands and a legal agreement banning construction on these lands. This would enable Woodies to continue the use of these lands for car parking and the external garden centre, enabling Metrolink easy access to the tunnel corridor if, and when necessary. Instead, the CPO will result in an open area of lands directly adjoining the Woodies site, over which Woodies will have no control. There does not appear to be any intention to fence off or delineate these lands. The lands will not be overlooked and will result in increased security risks for the Woodies site, particularly its external garden centre.

## 5.0 Conclusions

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We made an objection to the proposed CPO of lands on and adjoining the Woodies site during the previous consultation period in May 2019. This public consultation was organised by TII in relation to the proposed "Preferred Route".

Despite concerns raised in the written submission and, directly, in meetings with TII, little changes have been made to the draft Railway Order and therefore there will be major impacts on the successful operation of the retail store due to the fact the alignment is in the wrong location, lack of information and the overall impact on the operation of the Woodies store.

We request that An Bord Pleanála include the previous submission as part of our overall objection to the draft Railway Order.

The basis of the current augmented objection is as follows:

- The length of the construction period.
- The negative impact on access to the Woodies store.
- The negative impact on car parking associated with the Woodies store.
- The negative impact on the external garden centre.
- The negative impacts on customer experience

- The need for permanent land take.

We believe that the current proposal will have an unacceptable and unnecessary impact on the Woodies retail store, to the extent that the practicality of running a business at this location will be compromised for a number of years, or indeed permanently.

Signed



**Alan Whelan**  
**Director**  
**O'Connor Whelan Limited**



**Appendix 1: Woodies DIY submission to the Metrolink "Preferred Route", May 2019**

## MetroLink

### Submission to TII in relation to the Public Consultation for the Preferred Route

#### On Behalf of:

Woodies DIY  
c/o Grafton Group PLC  
Herron House  
Corrig Road  
Sandyford Industrial Estate  
Dublin 18

Date: May 2019

PLANNING CONSULTANTS

222 - 224 Harold's Cross Road,  
Dublin 6W.

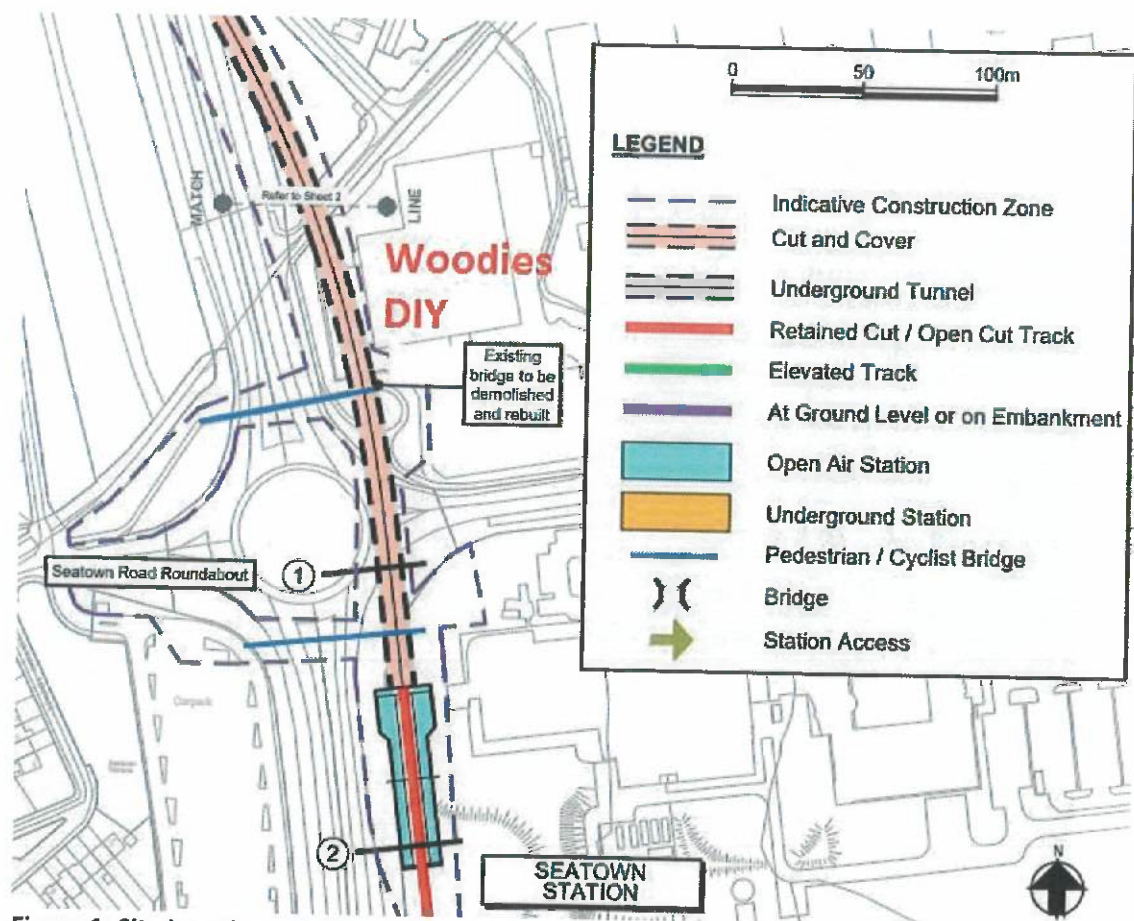
T : + 353 1 561 5000  
E : [info@oconnorwhelan.com](mailto:info@oconnorwhelan.com)  
W: [www.oconnorwhelan.com](http://www.oconnorwhelan.com)

## 1.0 Introduction

We wish to make a submission in relation to the Public Consultation for the Preferred Route for the proposed MetroLink, on behalf of Woodies DIY, c/o Grafton Group PLC., Herron House, Corrig Road, Sandyford Industrial Estate, Dublin 18.

Woodies DIY are the tenant / occupier of a retail warehouse adjoining the Seatown Roundabout in Swords. The site consists of a single warehouse building, an outdoor garden centre, a service yard and a surface car parking area consisting of 170 no. car parking spaces.

As illustrated in figures 1 and 2 below the site will be directly impacted by the proposed acquisition of part of the site for a cut and cover tunnel. Figure 3 shows the impact of the approved Railway Order for Metro North, which has no impact on the Woodies site or the access road (Estuary Road).





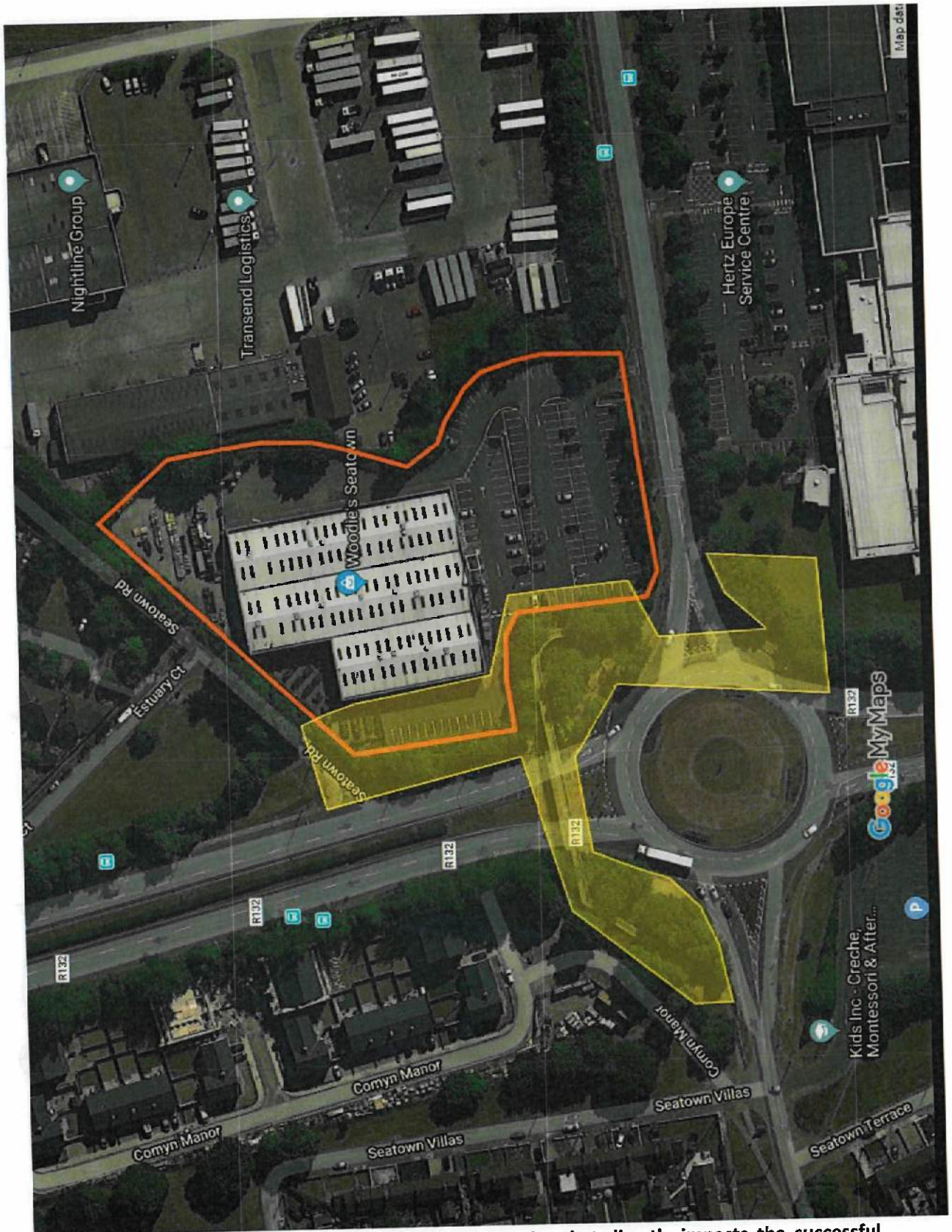
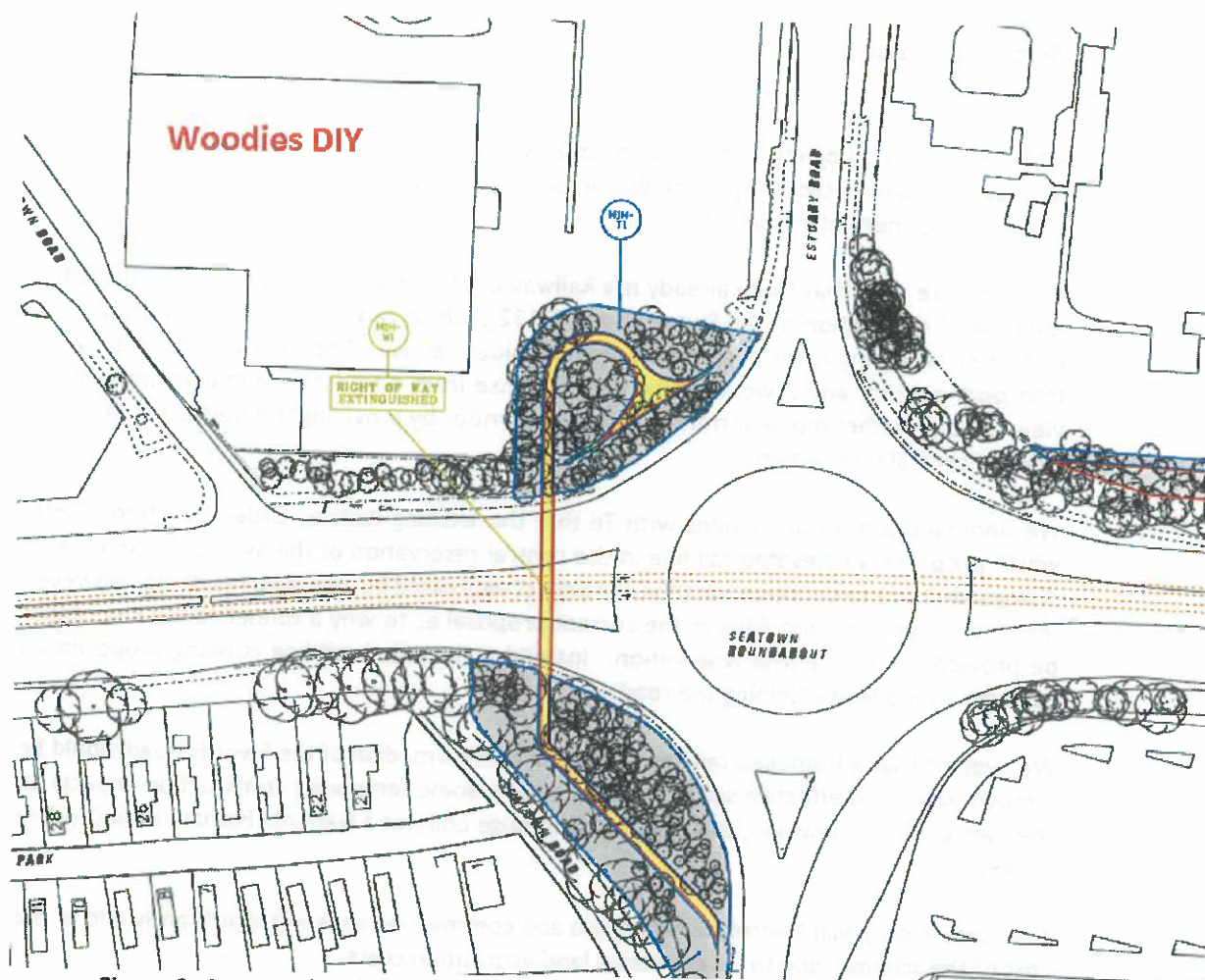


Figure 2: Proposed CPO in the vicinity of the site that directly impacts the successful operation of Woodies



**Figure 3: Approved Railway Order – no impact on Woodies or Estuary Road**

We wish to object to the proposed CPO of lands on and adjoining the Woodies site for a number of reasons:

- The proposed MetroLink is in the wrong location.
- A lack of information regarding the assessment of impacts with regard to the proposal.
- The proposal in its current guise will have an unacceptable impact on the operation of the Woodies retail unit.



## 2.0 Wrong Location

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Whilst we have no objection to the MetroLink, we believe that it is in the wrong location and will have an unacceptable impact on businesses such as Woodies, which can be avoided by a simple realignment of the scheme.

In regard, we note that there already is a Railway Order for Metro North which is aligned on the central reservation of the Swords Road (R132), which can be constructed with minimal impact on adjoining lands in commercial and residential use. The Swords Road is already a transport corridor and it would make perfect sense from a transport and planning point of view to add another mode of transport to that corridor by providing the MetroLink along the existing central reservation.

We understand from discussions with TII that the existing Railway Order for Metro North, which proposes an elevated rail line in the central reservation of the Swords Road, is being disregarded due to concerns about visual impact expressed by adjoining residents. However, there is no rationale provided in the current proposal as to why a tunnelled rail line cannot be provided in the central reservation. Instead a tunnelled rail line is being proposed on valuable zoned land adjoining the road.

We suggest that a tunnelled rail line under the central median of the Swords Road would be a much more cost effective solution. There will be some temporary construction impacts on the Swords Road, however, this is a Regional route and not a National Primary or Secondary Route.

The current proposal MetroLink on private and commercial lands will significantly add to the cost of the scheme, due to un-necessary land acquisition costs.

We note that the consultation documents states the following with regard to the "business case" for the proposed development:

*"Major projects require comprehensive business cases to be developed and approved before the plans proceed to implementation. A business case is a detailed document that sets out a rationale for the proposal, the basis of selecting the intended scheme, the benefits that would arise from its implementation, cost details for its implementation, risks associated with the scheme and various other details. For a major project in Ireland, there are two significant milestones in the business case process.*

*The first is when we submit a Business Case to Government for its consideration, prior to making the application for a Railway Order. The second stage occurs subsequent to the planning process, when the final scheme details are fully known."*

We suggest that an alignment such as that currently proposed cannot be decided on until a cost benefit analysis has been undertaken, including an assessment of the impact on existing businesses and development sites. This analysis should be provided to all stakeholders.

We also believe that the proposed alignment is contrary to the zoning for the site - the Metro Economic Corridor, the objective of which is 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."*

The Vision for the zone is to:

*"Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the Metro within a setting of exemplary urban design, public realm streets and places, which are permeable, secure and within a high quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure."*

The zoning objective clearly envisages high density commercial and residential uses in order to generate economic activities. The loss of development land to provide for a metro, when permission already exists for a metro adjoining this site, does not comply with the spirit or the intent of the zoning objective and it's Vision.

### 3.0 Lack of Information

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Whilst we are aware that the design has yet to be finalised, we are concerned that there is a lack of information, whether publically available or otherwise, to allow a full assessment of the impact on the scheme, including:

- The timescale involved in the construction of the proposal. We were informed that total construction period is estimated at 6 years. Construction on the section of the route directly affecting the Woodies site will be "at least" 2 years, however, this could be longer based on ground conditions, construction methods, existing services etc.
- It is unclear when construction on the section of the route directly affecting the Woodies site will commence and end during the envisaged overall 6 year construction period.
- There is no information on the envisaged "notice to treat" CPO period, which has implications for both the operational and development potential of the site.
- The full extent of the permanent and temporary CPO areas have not been outlined.
- Proposals for the potential future use of the permanent CPO lands have not been articulated e.g. can Woodies use them for the garden centre and car parking in the future; and if so how can this be achieved? Will the lands have to be rented, used under licence etc.?

## 4.0 Unacceptable Impact on Woodies Retail Unit

---

We believe that the proposed alignment of MetroLink will have an unacceptable impact on the operation of the Woodies store, so much so that it may affect the viability of retail at this location, due to the following:

- As noted above the works proposed are for an unreasonably long and uncertain period of time and will permanently damage trade.
- The proposal will effectively close off the access to site for prolonged periods of time. Indeed it is not clear how the construction works can be carried out whilst maintaining access to the store from Estuary Road.
- The loss of the footbridge over the Swords Road for the duration of the construction period, which provides a vital connection to the store for customers on foot / bicycle.
- Woodies will lose ca. 48 no. car parking spaces<sup>1</sup> (ca. 28% of the total number of car parking spaces) for at least a 2 year period.
- Woodies will lose 50% of its garden centre space for a period of 2 years, rendering the remaining 50% unusable, requiring a temporary garden centre in the main car park, which will require a further 600 sq m, or an estimated further 30 spaces, bringing the loss of car park spaces to 46% for the entire construction period. This has an ability to cause traffic congestion and a lack of car parking for customers who could potentially be encouraged to shop elsewhere. Ease of access and adequate car parking facilities is essential for any retail warehouse business, as the majority of customers use their car to access the store.
- The works proposed are unreasonably and unnecessarily close to Woodies retail (2.4m at its nearest point). There are real concerns that vibration as a result of construction will have impacts on the structural integrity of the building.
- There will be noise and dust impacts over an extended time period which will place an unreasonable burden on Woodies and its ability to trade.

Even minor impacts on the turnover of the store will affect its economic viability. We are greatly concerned that the impacts outlined above will create significant impacts on turnover thereby effecting the viability of the store at this location.

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<sup>1</sup> 24 no. spaces to the side and 24 no. spaces to the front of the store (to include circulation aisles)

## 5.0 Conclusions

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In conclusion, we find the current proposal unacceptable due to the fact the alignment is in the wrong location, and that a far better solution would be to provide a tunnel under the central median of the Swords Road, an existing transport corridor. This would ensure that zoned lands are free for commercial and residential development adjoining the future MetroLink.

We are concerned about the lack of information currently available, and as such the true impacts of the proposal are impossible to quantify.

We are confident, however, that the current proposal will have unacceptable impacts on the Woodies retail store, so much so that the economic viability of future trade at this location may be compromised.

Signed



**Alan Whelan**  
**Director**  
**O'Connor Whelan Limited**