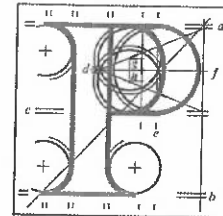


Our Case Number: ABP-317121-23

Planning Authority Reference Number:

Your Reference: O'Scanaill Veterinary Surgeons



An
Bord
Pleanála

Hughes Planning
85 Merrion Square South
Dublin 2
D02 FX60

Date: 20 September 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please be advised that landowners listed on the Compulsory Purchase Order schedule associated with this application are not required to pay the €50 fee associated with this case. As your client is listed as a landowner, a refund of €50 will issue under separate cover.

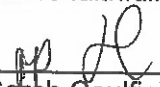
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

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Glao Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
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AN BORD PLEANÁLA
LDG- 066435-23
ABP- _____
12 SEP 2023
Fee: € 50 Type: CHA
Time: 17:14 By: Donnel

Swords to City Centre Core Bus Corridor Scheme Submission (Ref. No. 317121)

Submitted on Behalf of:
O'Scanail Veterinary Surgeons,
Milton Fields, Pinnockhill, Swords, Co. Dublin (Eircode Nos. K67 A4A8 & K67YX67)

12th September 2023

85 Merrion Square, Dublin 2, D02 FX60
+353 (0)1 539 0710
info@hpdc.ie
www.hpdc.ie

1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by our client, O'Scanaill Veterinary Surgeons, to make a submission in respect of the Swords to City Centre Core Bus Corridor Scheme currently being planned by the National Transport Authority (NTA).

This submission, which is accompanied by the relevant submission fee (€50), is made in response to a public notice, available at <https://swordsscheme.ie/>, inviting submissions, up until 12th September 2023, as part of a public consultation process on the route corridor (Ref. No. 317121). The purpose of this submission is to outline our client's concern to the intended route option.

We note the map which presents the location of the route corridor options as presented in Figure 1.0, below.

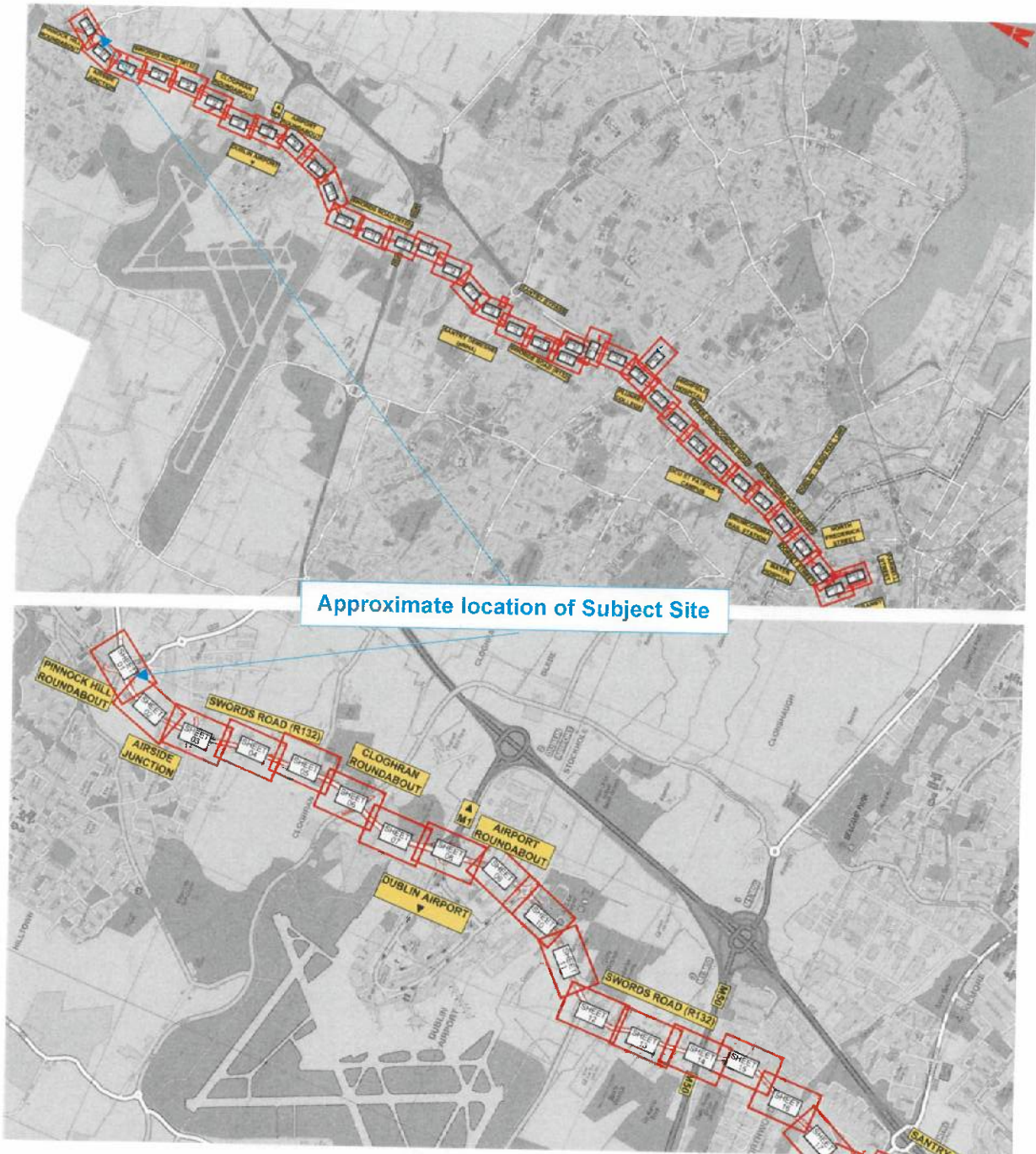


Figure 1.0 Extracts from the proposed scheme boundary illustrating the location of our client's site (blue outline) relative to the intended route option.

2.0 Subject Site

The site to which this submission pertains is located to the immediate south of the Pinnockhill Roundabout to which it is accessed from directly. The site also presents an extent of road frontage to the R125 along its eastern boundary.

The site's boundaries are comprised of dense vegetation behind a low-level wooden fence. Notwithstanding the dense nature of the vegetation which separates the site from the surrounding road network, the position of the site and the level of traffic utilising the roundabout results in near-constant background noise generated by vehicular traffic on this roadway.

The site is occupied by 2 no. buildings from which the O'Scanail Veterinary Hospital has operated from since 2001 whilst this family business has been located at this site for in excess of 70 no. years. It is noted that the number of registers clients from 2022-2023 amounts to 7,213.



Figure 2.0 Street-view image of the subject site illustrating the context of the site relative to the Pinnock Hill Roundabout.



Figure 3.0 Aerial image illustrating the immediate locational context of the subject site (indicative red outline).

3.0 Bus Connects Proposal Relative to Subject Site

As per the documentation available at <https://swordsscheme.ie/>, the Swords to City Centre Core Bus Corridor Scheme will have a significant impact upon our client's site as follows:

1. Significant extent of land acquisition for temporary use;
2. Significant extent of land acquisition (on permanent basis) for delivery of new slip road; and
3. Construction of new bus lane, cycle lane and bus stop to the immediate north of the site.

Further to the above, the scheme will also provide for a significant revision of existing boundary treatments/planting between the subject site and the adjoining road network along its northern and eastern boundaries.



Figure 4.0 Extracts from Sheet 01 of the General Arrangement drawing illustrating the proposed works relative to our client's site (purple fill).

4.0 Impact of Bus Connects Proposal on Subject Site

Having regard for the nature of the proposed works and the proximity of these works to our client's site, we would consider the Swords to City Centre Core Bus Corridor Scheme to present direct impacts to the commercial viability of our client's business through compromising the accessibility of the site and, given the sensitive nature of the commercial operation, compromising the standard of healthcare which can be offered by our client to the animals of their customers. The following sections of this report will expand upon the impacts which will occur as a result of the aforementioned scheme.

4.1 Revised Access

As detailed on the general arrangement drawings, the subject scheme will compromise the accessibility of the site through the omission of 1 no. of the 2 no. longstanding vehicular access points to the site. The removal of a vehicular access point to the site is considered a critical impact of the subject scheme given the fact that only a handful of local customers travel to the facility by foot with no customers travelling by public transport as can be expected given the nature of the facility. The subject facility has enjoyed access through these lands since the inception of the practice, and all investment and spatial planning of their facility to date have relied on this access.

The proposed revision to the existing access arrangement will compromise the ability of HGVs to enter the site and transport larger animals for veterinary care. Consequently, our client is deeply concerned about the future success of their business and the potential ripple effects it may have.

Completely removing one of the existing access points poses a significant threat to our client's business continuity. This action has the potential to "extinguish" their business altogether, making it an unacceptable situation which needs to be addressed at this stage.

4.2 Loss of Vehicular Parking

It is noted that the existing facility has only 23 no. vehicular parking spaces with these spaces routinely occupied at full capacity over the course of a typical working day. It is considered that the works illustrated on the general arrangement drawings will result in the loss of 6 no. vehicular parking spaces and, more importantly, it will require all vehicles to perform excessive reverse manoeuvres, creating a traffic hazard. Our client is deeply concerned about the safety of their clients and the potential knock-on effects it may have on their insurance premiums.

4.3 Construction Stage Impacts

The construction works described in the available documentation are projected to last for a duration of several years. These works are expected to generate significant noise, dust, and further restrictions on access. It is important to note that a large proportion of our client's customers rely on our support for their equine animals, and horses specifically require calm and tranquil environments.

5.0 Mitigation & Compensation

Having regard, for the identified issues which will compromise the accessibility of our client's property at Pinnockhill, it is considered reasonable that the National Transport Authority (NTA) engage directly with our client in relation to identifying appropriate mitigation measures to ensure the adequate protection of residential amenity at this location. In the absence of comprehensive mitigation measures to prevent undue visual, vibrations, lighting and noise impacts arising as a result of the subject scheme, our client would seek compensation to offset potential impacts to the monetary value of their property.

6.0 Conclusion

In conclusion, the undue visual impact, the vibrations, the significant increase in noise pollution and light pollution when combined all clearly render the Swords to City Centre Core Bus Corridor Scheme as incompliant with the proper planning and sustainable development of the area as it relates to our client's commercial business at Pinnockhill. It is considered, for the above reasoning, that the subject scheme will be detrimental to the accessibility of our client's commercial premises, will unduly compromise the standard of healthcare which can be provided to the animals of our client's customers and will directly affect the value and viability of the extant and longstanding family business on site.

In this regard, we would herein confirm our client's willingness to engage with the National Transport Authority (NTA) to identify suitable mitigation measures to ensure the adequate protection of residential amenity at this location. In the absence of comprehensive mitigation measures, it is considered reasonable that appropriate compensation be afforded to our client. It is requested that the NTA have due regard for the Impact Report prepared by TENT Engineering which is contained within Appendix A of this report in its assessment of this submission.

We trust that the Board will have regard to the contents of this submission in relation to the wider public consultation process on the Swords to City Centre Core Bus Corridor Scheme.



Kevin Hughes MIPI MRTPI
Director for HPDC Ltd.

Appendix A Impact Report prepared by TENT Engineering

MetroLink Dublin

Swords to City Centre

Impact on O'Scanaill Veterinary
Surgeons

20.07.2023

23060-TMT-XX-XX-RP-T-00002



TENT ENGINEERING

Site Address:
O' Scanaill Veterinary Surgeons,
Miltown Fields,
Swords, Co Dublin

Client:
O' Scanaill Veterinary Surgeons,
Miltown Fields,
Swords, Co Dublin

Office Address:
Tent Engineering Ltd.
32 Francis Street
Dublin, D08 NN96, IE

Revision and Review

This report has been prepared for the sole benefit, use and information of the client. The liability of Tent Engineering with respect to the information contained in this report will not extend to any third party.

REVISION(S)

Rev.	Description	Date
P01	1st issue	20.07.2023

AUTHOR(S)

Name and qualifications

Abel Toaci
Engineer



REVIEWER(S)

Name

Diarmuid Healy
Co-founder, Director



BEEng (Hons) MIEI CEEng MStructE FStructE

MetroLink Dublin - Impact on O'Scanail Veterinary Surgeons

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Office Address
Tent Engineering Ltd
32 Francis Street
Dublin 8, D08 NN96, IE

1 Executive Summary

We, Tent Engineering, have been appointed by O'Scanail Veterinary Surgeons, a well-established and highly successful business located adjacent to the Pinhook Hill Roundabout, which is undergoing significant upgrade works as part of the proposed MetroLinks - Swords to City Centre project.

In this report, we have conducted a thorough assessment of the impact that the alterations to facilitate the Metro Link will have on the existing operations of O'Scanail Veterinary Surgeons. Our analysis aims to identify the current functioning of the Veterinary facility and its interactions with the surrounding road network. Additionally, we highlight the anticipated negative effects of the planned improvement works, emphasizing that without fundamental changes to accommodate the veterinary surgeons' on-site operations, the business will suffer a severe disruption in its successful operation.

Given the highly sensitive nature of the equine-related activities conducted at this facility, we present evidence in this report indicating a high probability of a sudden decrease in customer numbers during the construction phase.

This decline is expected due to the potential disturbances caused by the upgrade works.

Furthermore, this report acknowledges that lands controlled by O'Scanail Veterinary Surgeons are subject to both temporary and permanent acquisition. We have determined that the impact on the business resulting from these acquisitions will be significant.

In summary, our study demonstrates that the proposed MetroLinks project will severely impact the existing facility, leading to a decrease in customer numbers. Therefore, it is crucial to address these issues and make necessary adjustments to mitigate the adverse effects on O'Scanail Veterinary Surgeons.

Fig 1.0 - Site location in relation with the existing road network



2 Description of the O'Scannail Veterinary Surgeon Lands

The veterinary services offered from this location have been continuously provided for over seventy years since the establishment of the practice in 1949. Currently, the hospital employs a total of over 20 staff members, including 8 vets. The number of registered clients from 2022 to 2023 amounts to 7,213. It is important to note that the primary mode of transportation for all clients is by car, SUV, or LGV.

While we acknowledge that the proposed schemes will improve transportation options for businesses along the route, it is essential to consider the unique nature of this veterinary business. Our client is not aware of a single client who transports their sick or injured animals via public transport to the facility. Access through public transport is highly unusual in this case.

The facility currently has 23 designated number of parking spaces available to accommodate its clients. This number can decrease depending on the type of vehicles entering the property. The existing parking facility is already at capacity, leaving no room for a reduction in parking facilities. To better understand the parking arrangement and its significance, please refer to Figure 2, which illustrates the parking layout, access arrangements, and the crucial role the surrounding roads play in the successful operation of the existing facility.

Additionally, it is important to note that the lands immediately adjacent to the practice are owned by the immediate family of O'Scannail Veterinary Surgeons. The veterinary surgeon has enjoyed access through these lands since the inception of the practice, and all investment and spatial planning of their facility to date have relied on this access. Thus any works on these adjacent land should carefully consider the impacts on the Veterinary Hospital.

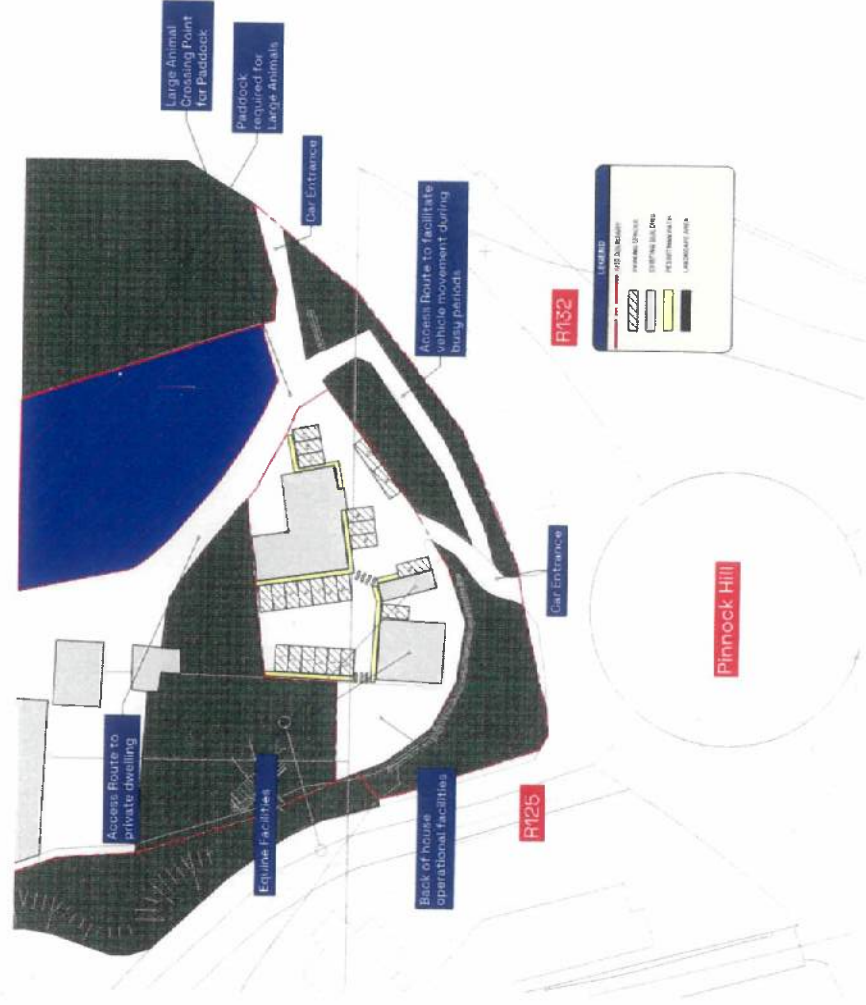
The paddock, highlighted in Figure 2.0 with blue hatching, is an integral and necessary part of the veterinary hospital. It serves as a recuperation facility for sick and recovering large animals such as horses, cattle, goats, and sheep. The paddock is utilized on a daily basis and is accessed through the internal roadway that connects it to the veterinary hospital premises. Any interference with or loss of use of this connecting roadway or the paddock itself would render the operation of the veterinary hospital impossible. This would not only question the viability of the business but also jeopardize the livelihoods of the skilled employees working there.

Over the years, with the population growth in the surrounding areas and the expansion of local infrastructure, the Pinnock Hill Roundabout has undergone significant augmentations.

During each upgrade, careful consideration was given to ensure that the successful operation of the facility was not negatively impacted.

Our client seeks to ensure that their business is afforded the same level of respect and consideration during this round of upgrade works. They believe it is essential that the impact on their operations is thoroughly assessed and appropriate measures are taken to mitigate any potential negative effects on their business.

Fig 2.0 - MetroLink Scheme



3 MetroLink & Impact on O'Scanail Veterinary Surgeons

3.1 Background

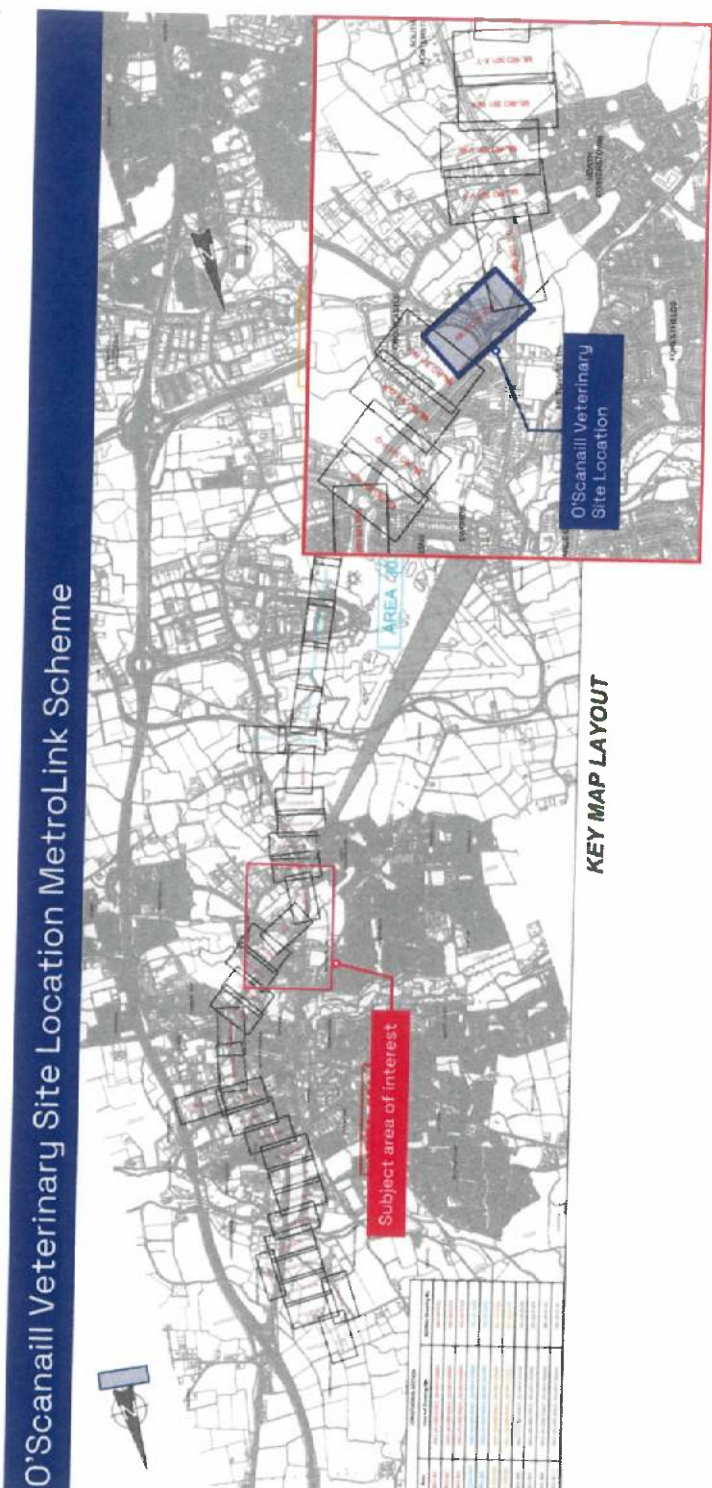
In September 2019 the National Transport Authority (NTA) published the Alignment Details Book. The report was a discussion document outlining proposals for the delivery of a core metro network across Dublin. It set out the vision for the provision of 19kms of dedicated metro lines with 18 stations in total.

3.2 MetroLink Scheme

Our site location was identified along this scheme at the beginning of the route, as shown in Fig. 3.0.

For the purpose of assessing the impact on our site location, the highlighted area in red was investigated.

Fig 3.0 - MetroLink Scheme 2022



[illegible]

3.3 Description of Proposed Changes on MetroLink to the O'Scanail Veterinary Surgeons

Figure 3.2 provides a visual representation of the proposed changes to the access for our client, which will result in a significant modification, reducing the facility's access points from two to a single access point. This change is a departure from the access configuration that has been in place for over 70 years since the facility's inception.

It is imperative to recognize the heavy reliance of the facility on the existing dual access and the current arrangements to ensure the smooth functioning of the parking arrangement, which is already operating at full capacity. Any alteration to these access points could have severe implications for the facility's ability to maintain its parking operations effectively.

Figure 3.4 sets out the relationship between the existing roundabout and access as well as the lands which are within the control of our client to be acquired.

Figures 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, 3.11, 3.12 & 3.13 illustrate how the existing facility operates from a parking and vehicles manoeuvrability perspective. It is evident that both entrance and exit points play a vital role in the facility's successful operations. Any disruption to the roundabout, entrance point, or exit point has the potential to cause significant disruption to the facility operational system.

Furthermore, Figure 3.14 clearly illustrates the limitations of accessing the property by a HGV due to the absence of a secondary exit route. This issue not only impedes our clients' ability to bring in larger animals, such as horses, but also affects their potential to attract more customers. Consequently, our client is deeply concerned about the future success of their business and the potential ripple effects it may have.

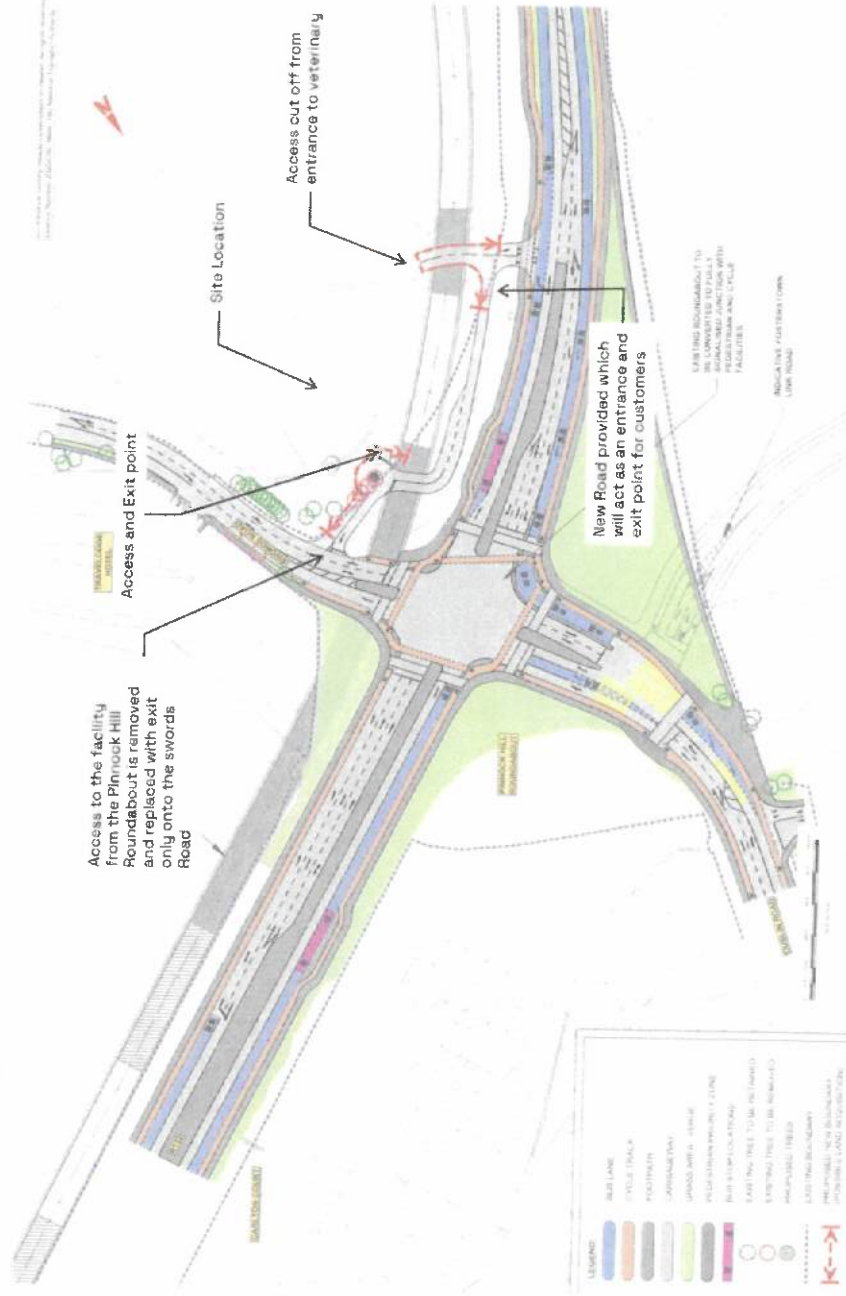
This change is predicted to result in the loss of six valuable parking spaces. More importantly, it will require all vehicles to perform excessive reverse manoeuvres, creating a traffic hazard.

Our client is deeply concerned about the safety of their clients and the potential knock-on effects it may have on their insurance premiums. Given the potential risks and disruptions posed by these proposed changes, it is of utmost importance to conduct a comprehensive evaluation of alternative solutions. This

evaluation should aim to address the concerns raised and safeguard our client's business, allowing it a reasonable prospect of survival despite the negative impacts of construction works and the proposed augmentation.

Completely removing one of the existing access points poses a significant threat to our client's business continuity. This action has the potential to "extinguish" their business altogether, making it an unacceptable situation which needs to be addressed as this stage.

Fig 3.2 - Description of changes to the existing junction



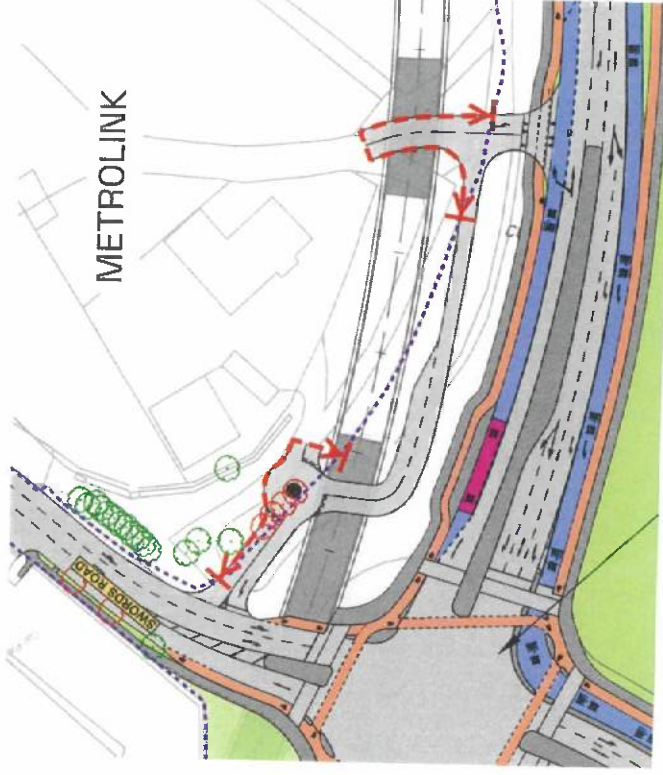
3.4 Conflicting Information

In Fig 3.3, a visual depiction reveals a significant discrepancy between the published documents of Metrolink and Bus Connects. Upon an in-depth analysis of the Metrolink plans, it is evident that they have made provisions for a two-way entrance and exit from Swords Road into the property. Contrarily, in a subsequent document published by Bus Connects, this junction to the property becomes exit only.

This contradictory information gives rise to significant concerns and necessitates urgent clarification. Resolving this inconsistency is paramount for our client to understand the extent of permanent impact his business may suffer. A comprehensive understanding of the access points is crucial for safeguarding the optimal functioning of the property and maintaining a smooth flow of traffic.

Fig 3.3 - Discrepancy between Metrolink and Bus Connects Scheme

Extract published by Metrolink on August 2022



Extract published by Bus Connects on April 2023



[illegible]

Fig 3.5 - Autotracking for existing situation

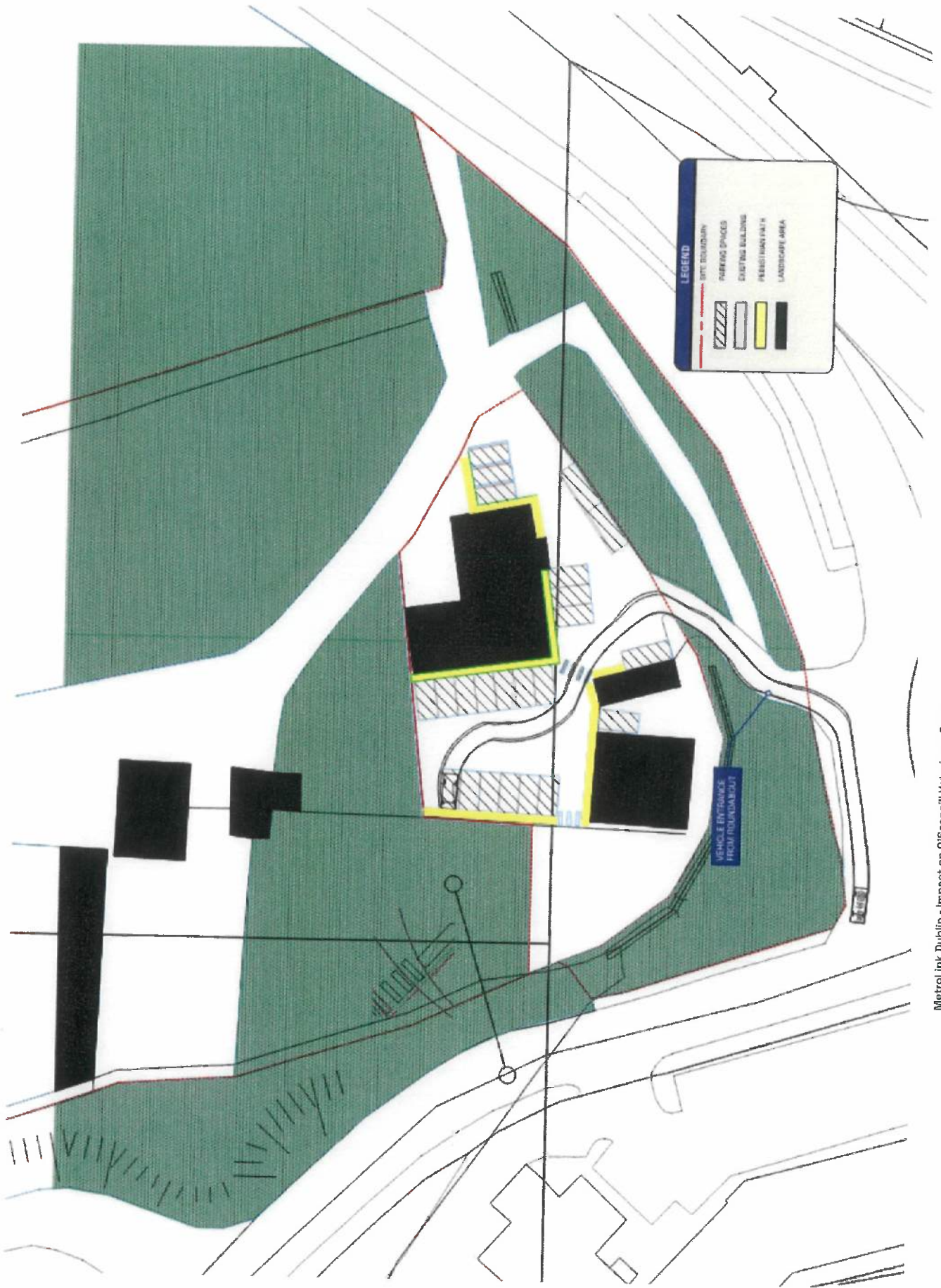


Fig 3.6 - Autotracking for existing situation

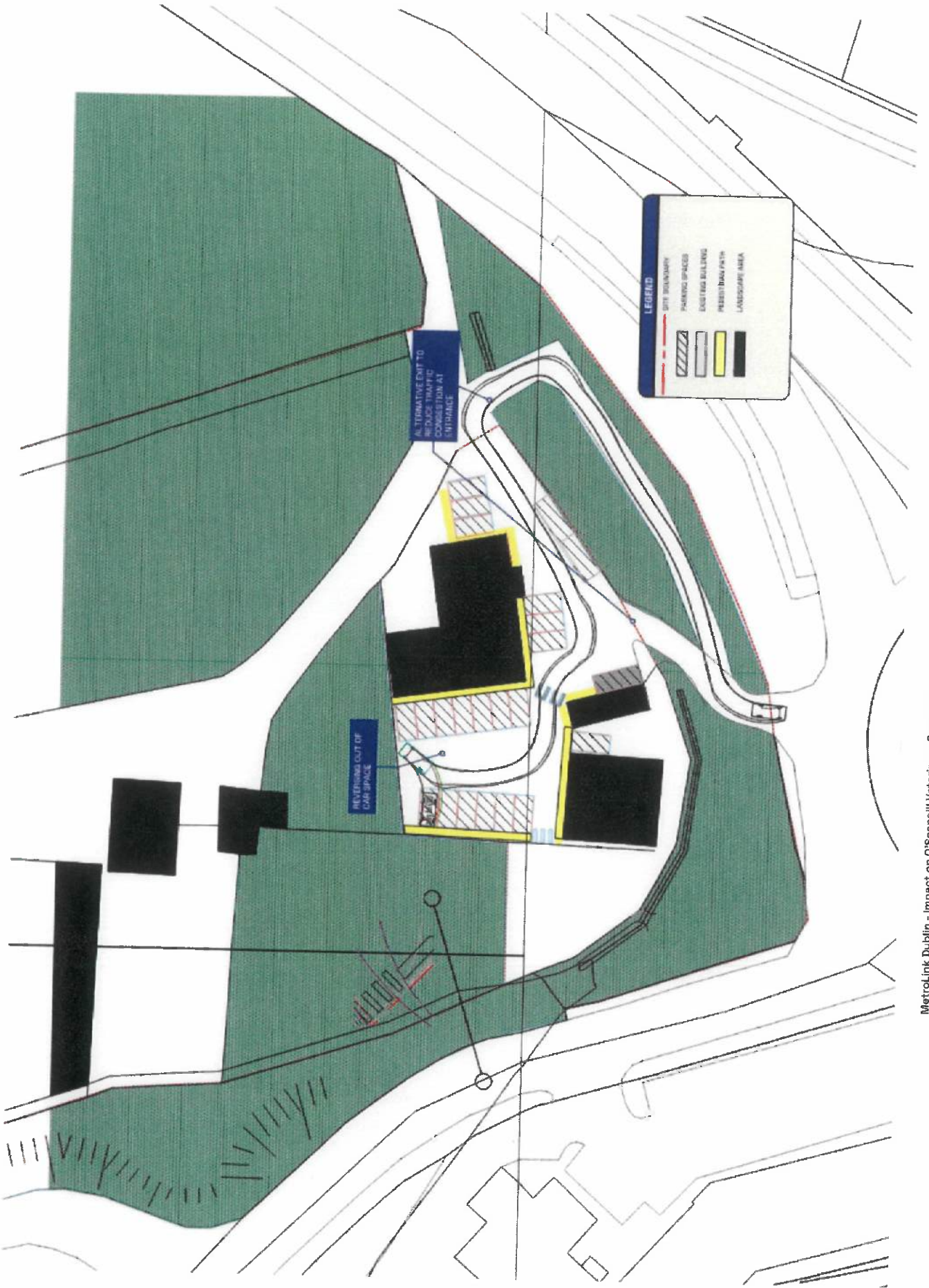


Fig 3.7 - Autotracking for existing situation

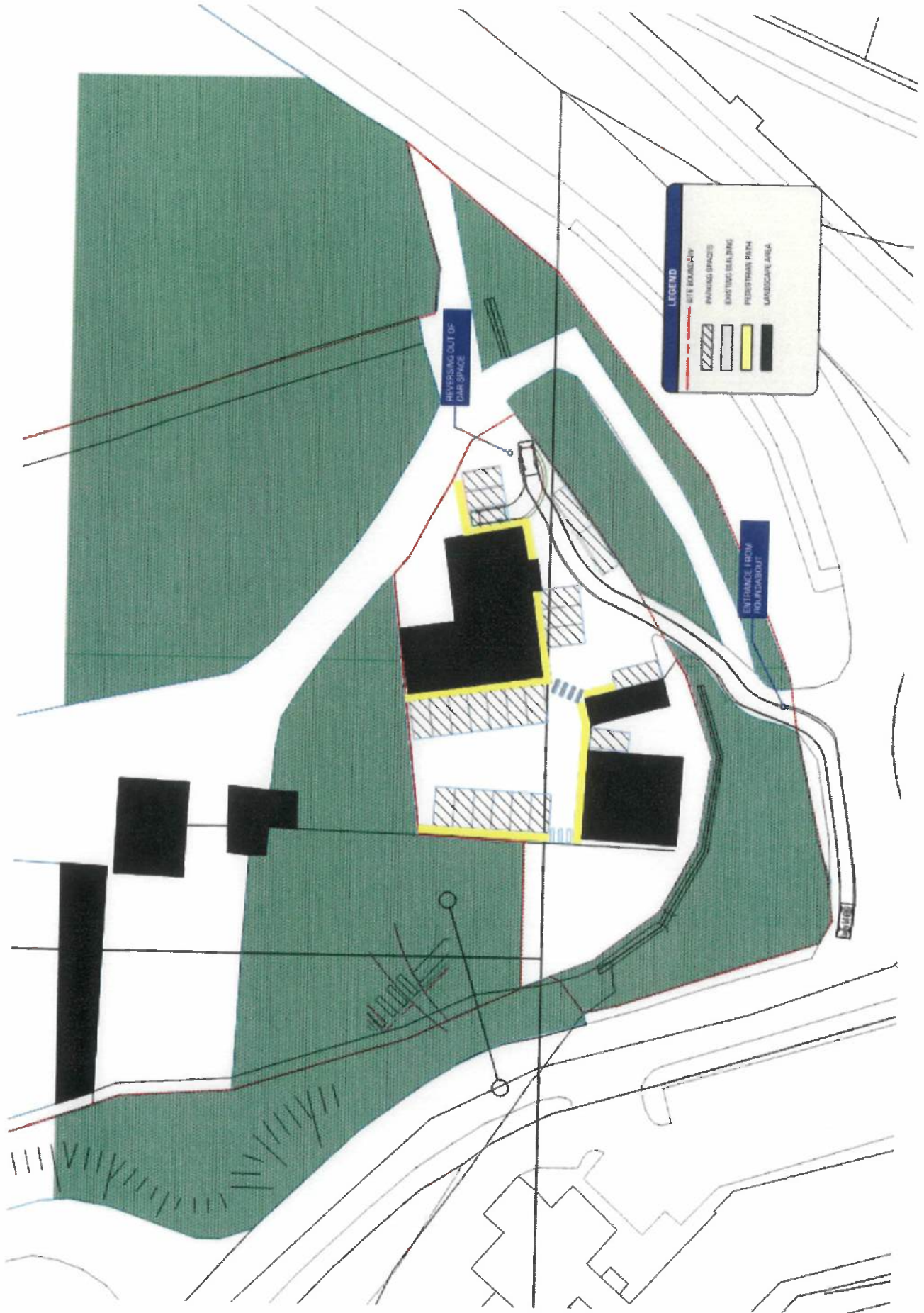


Fig 3.8 - Autotracking for existing situation

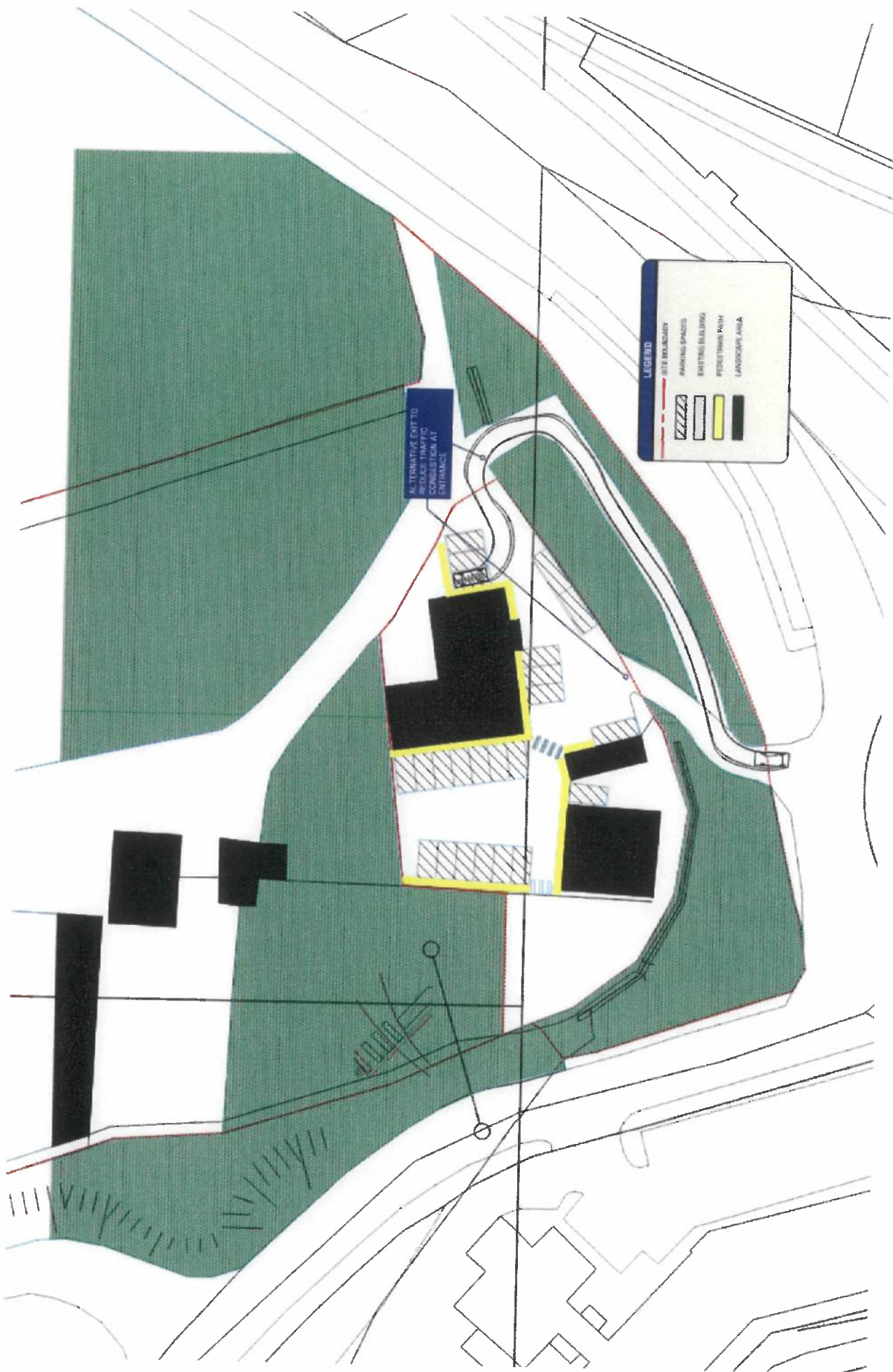


Fig 3.9 - Autotracking for existing situation



Fig 3.10 - Autotracking for existing situation

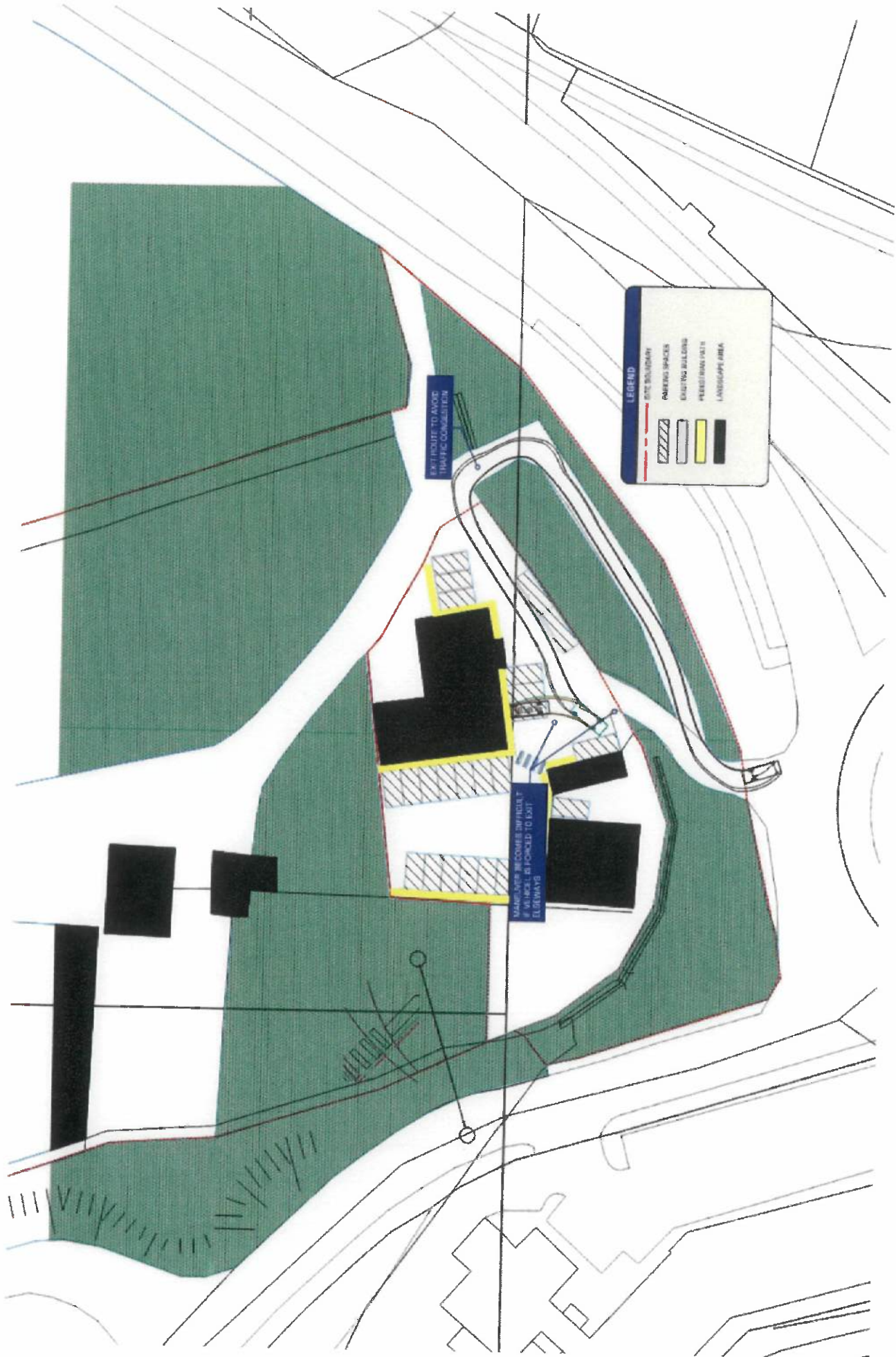
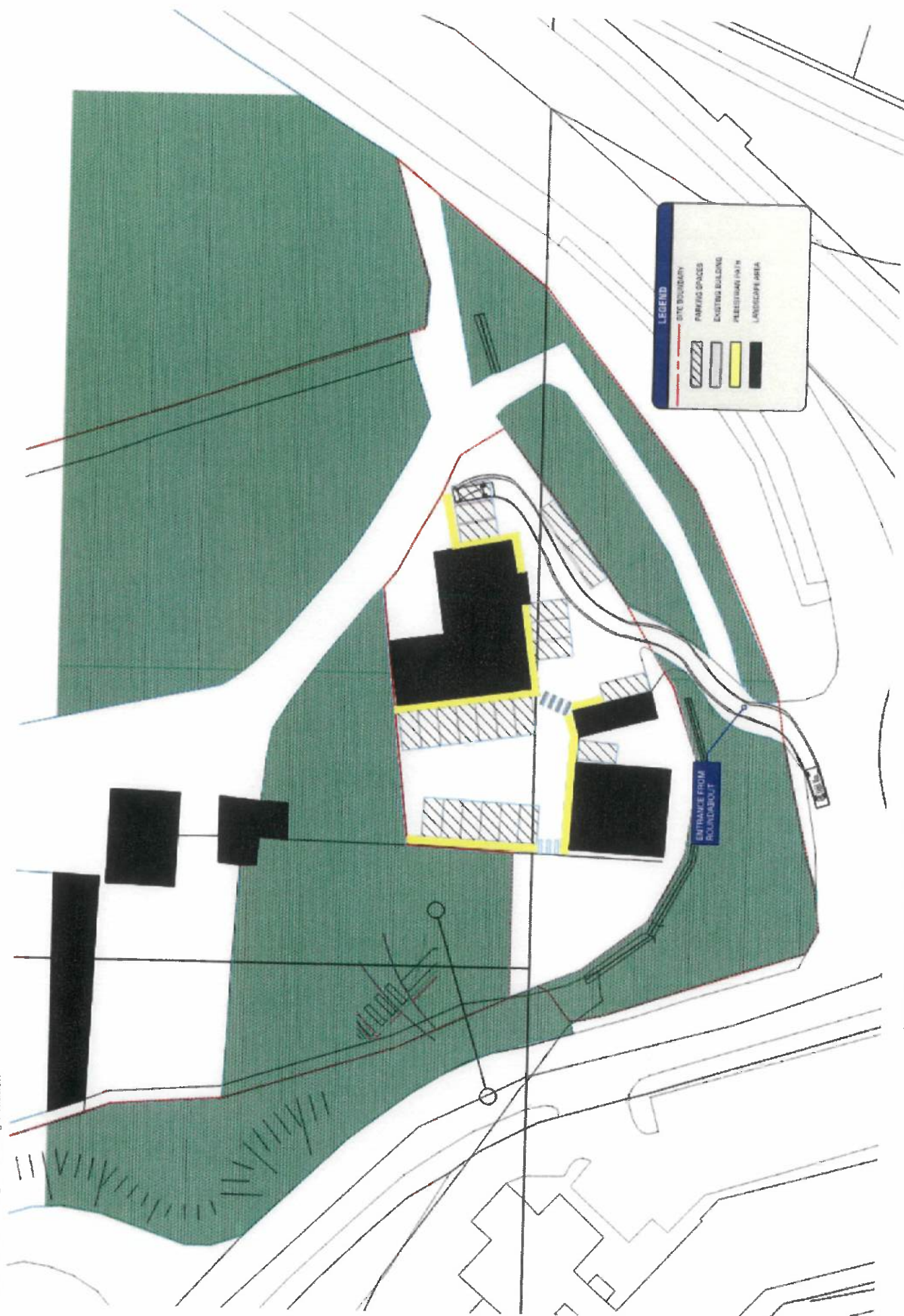


Fig 3.11 - Autotracking for existing situation



LEGEND

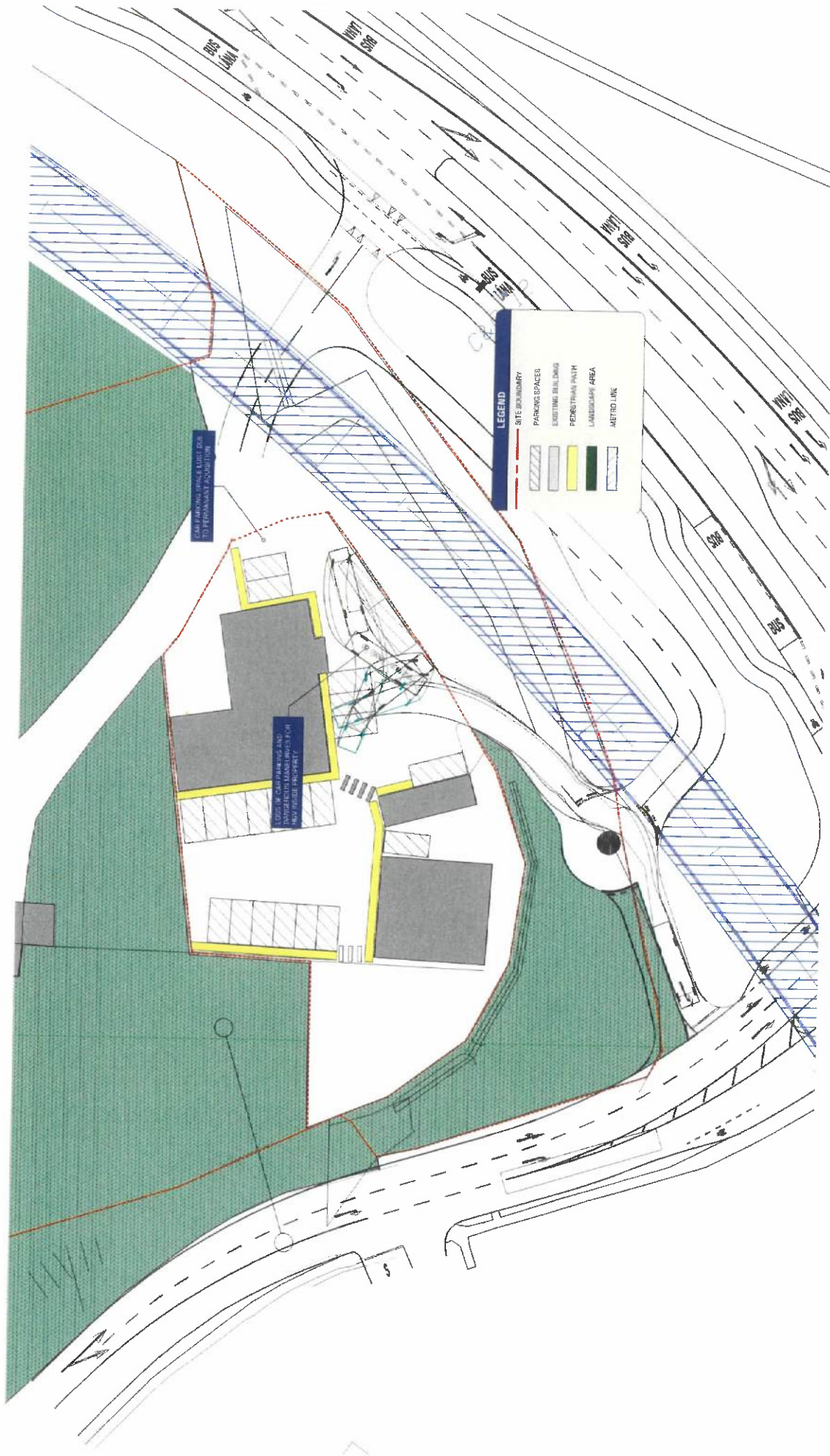
- SITE BOUNDARY
- PARKING SPACES
- EXISTING BUILDING
- PROPOSED BUILDING
- LANDSCAPE AREA

MARCEL VAN BROOM'S OFFICE & VEHICLE MAINT EXIT FROM FRONT ENTRANCE ONLY

Fig 3.13 - Autotracking for existing situation



Fig 3.14 - Autotracking showing the proposed situation and the impact on the car parking



4 Construction Related Impacts

Volume 3 – Book 3: Material Assets, Waste and Materials Management, Cultural Heritage, Landscape and Risk Chapter 23: Agronomy notes the following:

The veterinary hospital located just off Pinnock Hill Roundabout in Swords will be directly impacted during the Construction Phase. Direct impacts include disruption to access, noise, vibrations, dust. There is 0.89ha of grassland associated to the veterinary hospital, used as a recovery paddock for large animals. Disruption to access and land-take will affect the recovery paddock, during the Construction Phase it may not be possible to utilise the recovery facilities due to sporadic noise from construction which may cause stress or fright to the animal. The veterinary practice and its handling facilities for large animals are located <50m from the centre of the alignment of the proposed Project. Handling facilities for large animals are located outside. Large animals which use the recovery paddock consist of horses and young cattle. Stables are also present on-site and are available to horses in recovery. Animals may use the recovery paddock and/or stables for only a few hours, or up to a few days. Animals treated by the veterinary hospital are visiting and may be affected by construction noise which may cause them fright. In some cases, there may be a potential impact from dust nuisance e.g., where animals are confined to stables during recovery. Generally, animals in recovery, depending on the severity of the procedure, would be housed on-site for a short period (i.e., up to 24 hours or longer perhaps up to one week). A separate detailed assessment has been undertaken to assess the impacts the proposed Project will have on the veterinary hospital and associated grounds.

While there has been some minor references noted to the impact on the hospital in the various publicly available information studied there appears to be no document available that matches the description of "detailed assessment"

The construction works described in the available documentation are projected to last for a duration of several years. These works are expected to generate significant noise, dust, and further restrictions on access. It is important to note that a large proportion of our clients' customers rely on our support for their equine animals, and horses specifically require calm and tranquil environments.

The equine facility is located in close proximity to the Pinnock Hill Roundabout, as depicted in Figure 5. Our client urgently requires detailed information regarding the construction management plan, which should outline the expected extent of noise and dust, as well as temporary access arrangements for customers.

Until this information is received, our client remains highly concerned about the severe impact the construction phase will have on their revenues and their ability to operate during this time. There is a significant risk of experiencing a substantial reduction in customers from the equine trade, as well as customers who may become frustrated with the difficulties of accessing the facility during the prolonged construction period.

In recent weeks, construction works have taken place in close proximity to our client's property. The noise associated with these works has resulted in the hospital's inability to treat horses in the core equine treatment area. This disruption severely impacted the smooth and successful operation of their facility.

Fig 4.1 demonstrates how the existing car parking arrangement is seriously impacted as a result of the proposed temporary land take. All spaces to the front of the hospital will be unworkable. The spaces to the main car park will need to be reconfigured and significantly reduced to accommodate an appropriate turning circle for a HGV.

Fig 4.0 - Change required to this scheme

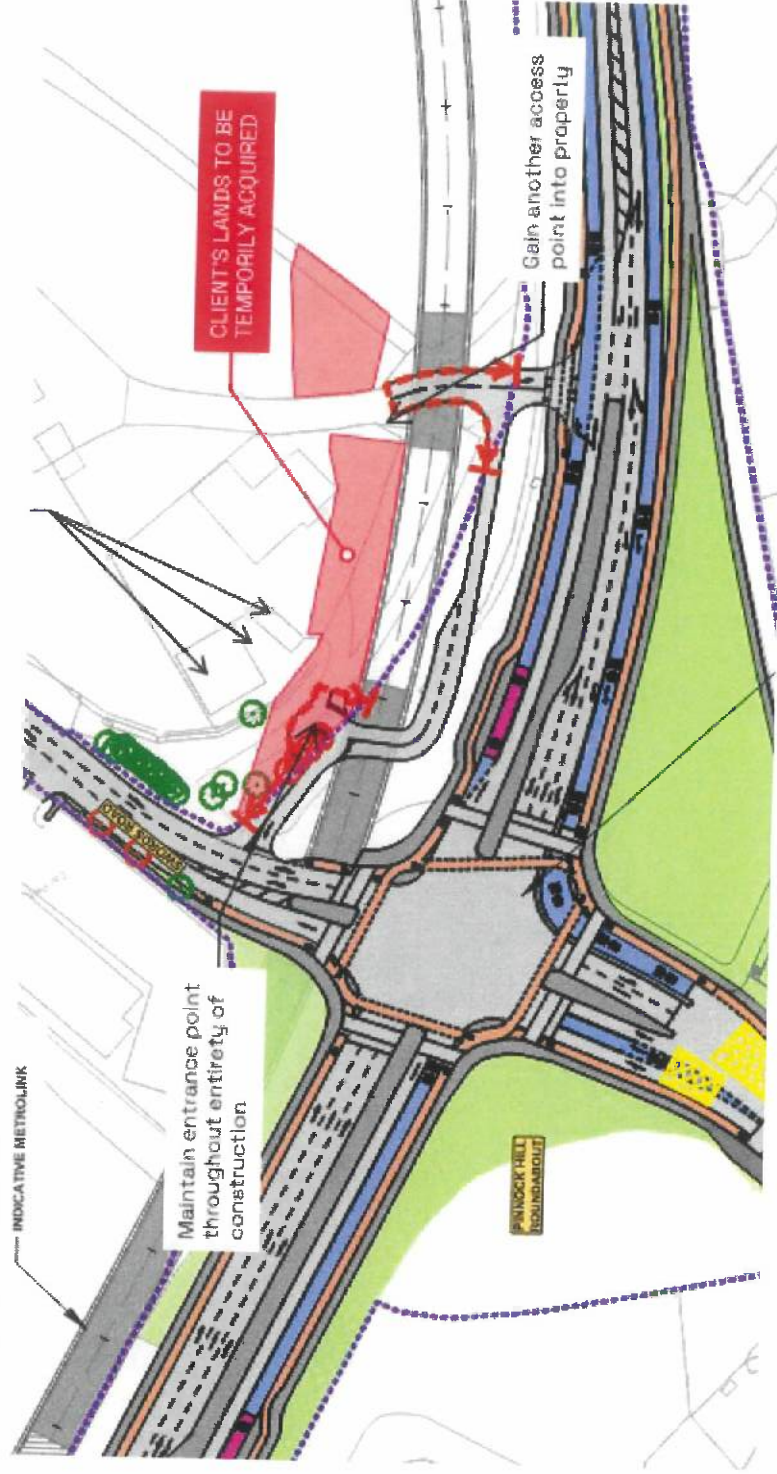
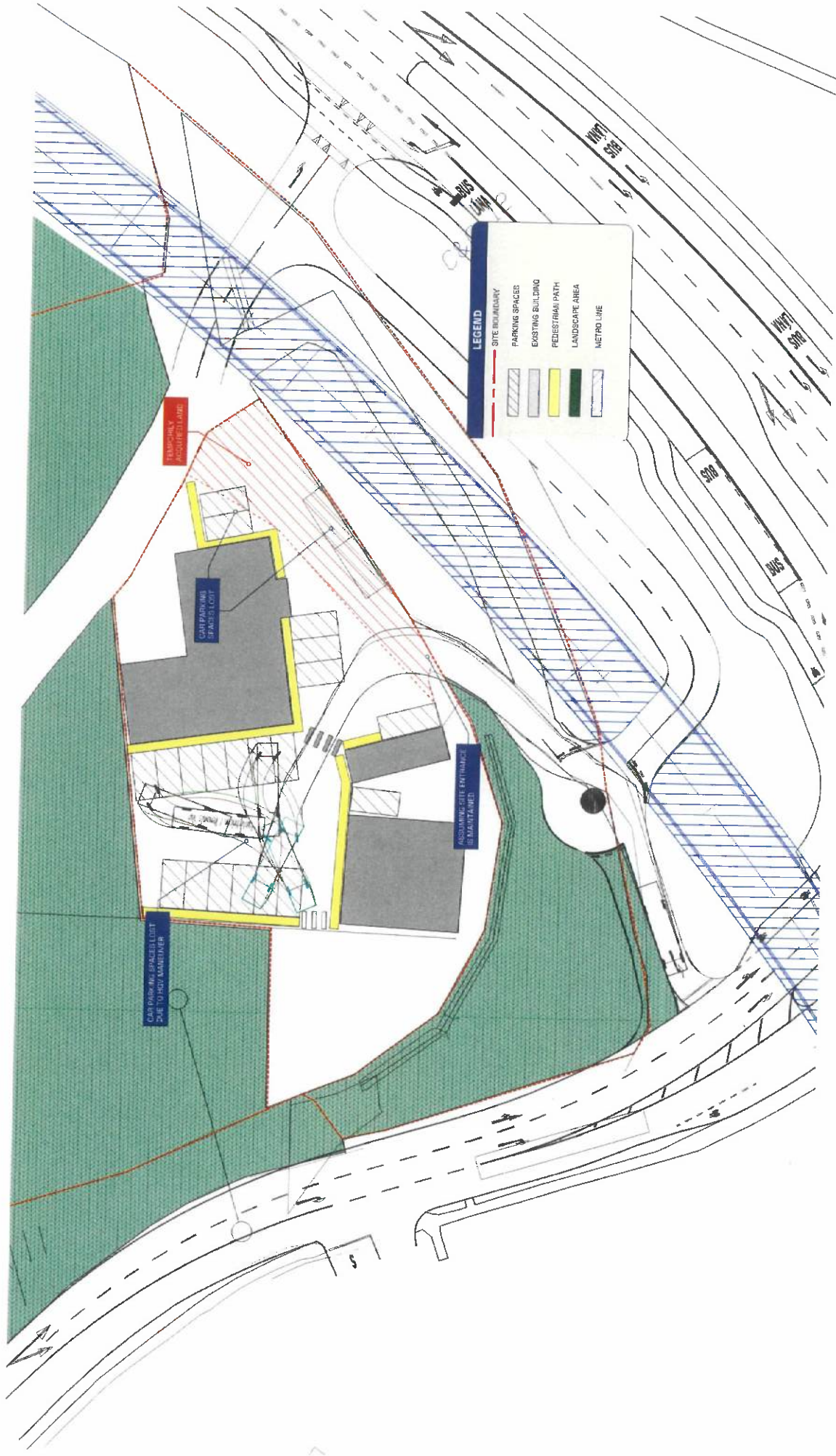


Fig 4.1 - Autotracking showing impact on the car parking during construction stage

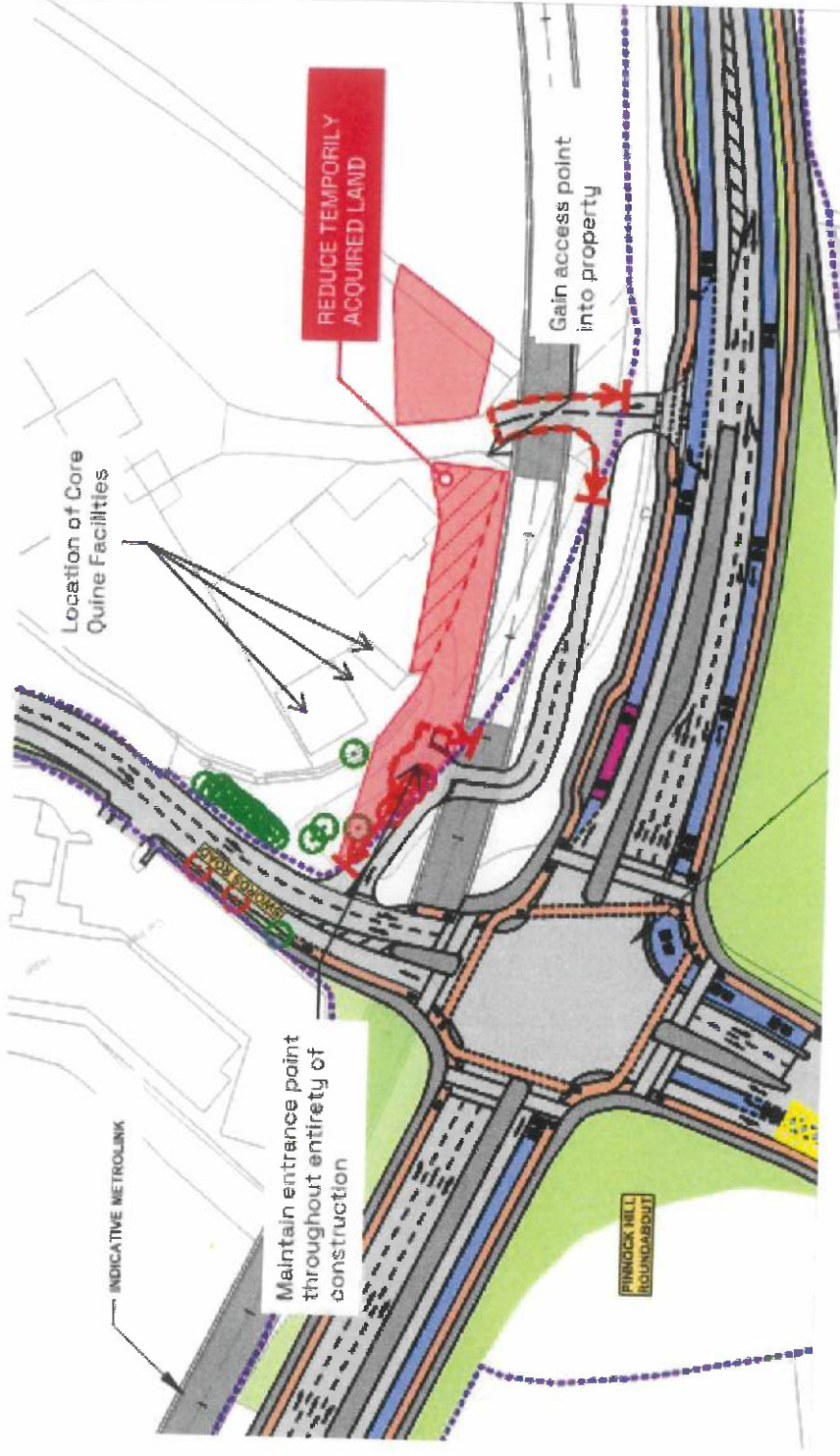


5 Changes required to the construction phase to facilitate ongoing successful operation

Figure 5.0 presents a visual representation of the necessary changes for the facility to operate. The temporary land acquisition should be limited to our property's boundary line. The temporary land take will paralyse the business by making parking near impossible as demonstrated in fig 4.1, as it affects a significant number of car parking spaces.

Our client stands to lose the majority of their essential parking spaces which is deemed unacceptable and could severely impede the operations of their business and in-turn significantly impact their revenues. Furthermore, the property must be accessed via the paddock to facilitate an efficient flow of traffic which is highly important for larger vehicles entering.

Fig 5.0 - Changes required to construction phase



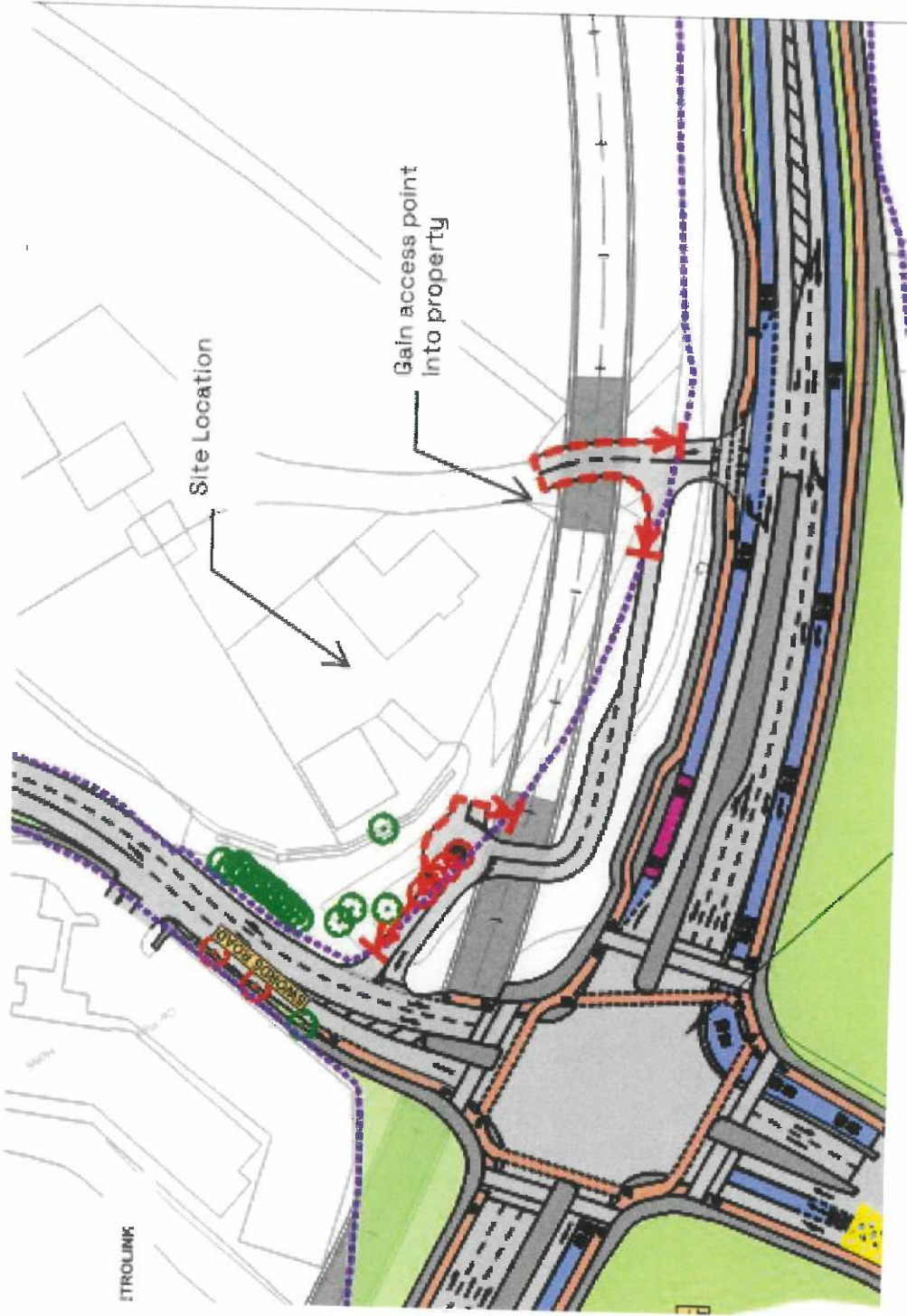
6 Changes required to the permanent scheme to facilitate ongoing successful operation

Figure 6.0 illustrates the necessary changes our client requires to ensure smooth operations. Failing to address these modifications may result in a highly negative visitor experiences which poses a real risk to a drop in customer numbers.

In summary all existing access points should be maintained for vehicles entry and exit points.

Any variation on this has a significant impact on the successful operation of the business.

Fig 6.0 - Changes required to permanent scheme



7 Conclusion

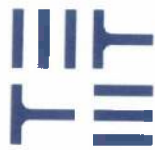
In this report, we have conducted a comprehensive assessment of the impact that the proposed alterations for Metro Link both during and after construction will have on the existing operations of O'Scanail Veterinary Surgeons. Our analysis thoroughly examined the current operations of the facility, emphasizing the importance of on-site parking and its interaction with the surrounding road network.

Furthermore, we have highlighted the anticipated negative effects of the planned improvement works, underscoring the need for fundamental changes to accommodate the veterinary surgeons' on-site operations and prevent severe disruptions to their successful functioning. Given the highly sensitive nature of the equine-related activities conducted at this facility, we have identified a high probability of a sudden decrease in customer numbers during the construction phase.

To adequately assess the potential disruptions faced during the scheduled construction phase, we have requested evidential construction management plans from the relevant authorities. These plans will enable our client to fully evaluate the extent of the disruption and devise strategies to mitigate its impact. These plans should take consideration of the highly sensitive nature of the facility and the importance of on-site parking for customers.

Additionally, we acknowledge that lands controlled by O'Scanail Veterinary Surgeons are subject to permanent and temporary acquisition. Our evaluation concludes that the impact on the business resulting from these acquisitions will be highly significant. As a result, we have highlighted the need for fundamental changes to the scheme to ensure the continued operation of the facility.

In summary, our study demonstrates that the proposed MetroLink project will severely impact the existing facility, leading to a decrease in customer numbers. It is therefore crucial to address these issues and make necessary adjustments to mitigate the adverse effects on O'Scanail Veterinary Surgeons



TENT ENGINEERING