

Submission No.			077, 177, 206	
Organisation Name or Name of Submitter			Various submitters covering the above submission No's - Refer to Index	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Corr Property Consultants on behalf of Eanna Coffey, Apartment 21, College Gate, Townsend Street. Ref No: ML60-A10				
1	General Objection	Please note page numbers not included as these vary between the three submission although the technical content is the same.	We act on behalf of the above clients who have been served with notice of the making of the above Railway Order Application. Having reviewed the drawings and documentation accompanying same, our clients have instructed us to object to the confirmation of the Metrolink Railway Order Application and all of the supporting documentation to include the proposal Railway Works and Land Requirements, the Book of Reference, the EIAR and the Natura Impact Statement on the following grounds:	TII wish to thank you for your submission and provide the following comments in response to the matters raised.
2	1. Project Need		1. Project Need As currently designed, this project is excessive and is leading to a significant overspending versus alternatives. The requirement in relation to increased use of public transport could be met in alternatives ways that would have been much less costly and at the end of the day, would have been better than the Metrolink as it is currently proposed.	 <

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3	2. Economic Analysis of Metrolink Versus Alternatives		2. Economic Analysis of Metrolink Versus Alternatives The projected total budget cost of the Metrolink Project is extremely high versus other infrastructure capital projects. Analysis is showing that alternatives would have been able to deliver a similar or higher overall benefit and at a lower cost. Therefore, the economic cost benefit analysis on the Metrolink Project should mean that the project should not be progressed in its current form.	Please refer to response (2) above in relation to the consideration of alternatives, the reasons that the Proposed Project was selected as the preferred option, and the economic assessments undertaken. The observation notes that "the cost of the Metrolink project is extremely high by comparison to other infrastructure projects". It is not clear which projects the observation is comparing MetroLink with. It is also unclear what analysis the observation is referring to in its statement that "Analysis is showing that alternatives would have been able to deliver a similar or higher overall benefit and at a lower cost". In July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a railway order application by TII to An Bord Pleanála in respect of the MetroLink project (Decision Gate 1). This approval was granted after the Preliminary Business Case (PBC) had undergone significant scrutiny and challenge by bodies that are independent of TII, including DoT and DPER review (including independent review by JASPERS and the Major Projects Advisory Group (MPAG)) of the PBC around timeline, costs and benefits that were updated to inform the Government decision.
4	3. Route Selection		3. Route Selection Even if one assumed that the Metrolink project was needed and it did stand up to economic analysis, the route chosen is flawed. Better alternative routes were available to the Designers.	<p>Chapter 07 (Consideration of Alternatives) presents the decision-making process that has led to the development of the proposed Project, including the route selection process. The NTA and TII commissioned an Alignment Options Study to determine the Emerging Preferred Route (EPR) for New Metro North proposed in the Transport Strategy for the GDA. The New Metro North Alignment Options Report (TII, 2018), and all relevant appendices can be reviewed at www.metrolink.ie.</p> <p>The study area was based around a corridor from Swords to Dublin City Centre via Dublin Airport, in line with the Project's objective as identified in the Transport Strategy for the GDA. The overall study area was broken into three sections, with a number of station location options proposed within. Based on the conclusions of the MCA, Option 9 was recommended as the EPR for NMN for the following primary reasons:</p> <ul style="list-style-type: none">* In terms of Economy, it delivers substantially more benefits than most of the options resulting in the joint highest BCR;* It performs among the best in terms of public transport usage i.e. boardings over 24 hours;* It integrates better with the wider transport network with better potential for seamless interchange with other modes, particularly heavy rail in the city centre and bus in Swords, than other options considered;* It integrates better with current Land Use Policy particularly in Ballymun and Swords; and* In terms of Environment, while there are some impacts in terms of Landscape and Visual and Archaeology, Architecture and Cultural Heritage, these impacts can largely be mitigated (EIAR Chapter 7, Table 7-14). <p>Submissions made by stakeholders and the public during the Public Consultation in 2018 on the EPR were carefully analysed. Taken together with other proposed route alignment and design improvements, design responses to consultation submissions have resulted in a number of changes to the EPR leading to a Preferred Route, including alterations to the alignment which led to alternative station locations:</p> <ul style="list-style-type: none">* Realignment of the EPR at Lissenhall;* Realignment of the EPR along the R132 Swords Bypass through Swords;* Realignment of the EPR over the M50 Motorway and to Ballymun;* Realignment of the EPR at O'Connell Street Station; and,* Alignment under Trinity College Dublin (TCD). <p>Chapter 07 also provides an outline on a station-by-station basis of alternative station locations, layout or design changes. For full details of the analysis undertaken, please refer to the MetroLink Preferred Route Design Development Report (TII, 2019), available at www.metrolink.ie.</p>

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5	4. Mitigation of Impacts on the Human Environment		<p>4. Mitigation of Impacts on the Human Environment</p> <p>In the case of the College Gate Apartment Complex the proposed impact mitigations put forward by the Acquiring Authority are seriously flawed and inadequate. The common areas of the complex and the overall College Gate property has been severely blighted since the route for the Metrolink project was decided and it was clear that the College Gate Complex was within the preferred route for the scheme and would have to be demolished should the scheme proceed on foot of a Railway Order as submitted. It was open to the Acquiring Authority to step forward at that stage and immediately offer to fully deal comprehensively with all of the individual owners in the complex and the Owners Management Company with a comprehensive suite of measures. These would include an offer of adequate full compensation to each owner and other measures such as immediate advance payments to the Owners Management Company to upkeep the common areas. It would have been open to owners to sell at that stage to the Acquiring Authority, if they so choose.</p> <p>This has not been forthcoming from the Acquiring Authority and the complex has remained blighted and the lives of the owners severely impacted since the route for the Metrolink was chosen. Contrary to what has been stated publicly, there is nothing in law to stop the Acquiring Authority in this case doing the right thing, that being to have stepped in immediately and dealt comprehensively with a suite of measures for the College Gate Complex including a full purchase offer for owners wishing to sell and move on with their lives.</p> <p>The early negotiations optional proposal put forward by the TII is a totally unsatisfactory proposal and is deeply flawed in many respects. It is not an adequate mitigation offer. Mitigation is critical in relation to all impacts of a scheme.</p>	<p>TII understand and acknowledges the importance of residential property owners being able to plan their affairs with as much notice and certainty as possible. As part of the Land Acquisition Strategy, TII has introduced a discretionary scheme to encourage early engagement. Our intention is to enter into a pre-agreement with residential property owners to agree a baseline apartment price and other matters of compensation, which will be payable under the compensation code. This will be determined at an early date and provides a commitment from TII to agree terms, ahead of the statutory process, locking in a baseline apartment price, with an agreement to apply indexation to reflect any future uplift. The scheme will accelerate the acquisition process following an enforceable Railway Order avoiding protracted negotiations. TII advocates that residential property owners are professionally advised and as part of the process have agreed to meet all reasonable professional fees and costs. The scheme does not prejudice property owners nor are they obligated to participate. TII have appointed external property consultants to assist them with the implementation of the discretionary scheme. This also ensures that engagement with residential property owners continues and concerns can be addressed where practicable. Further details on TII's Land Acquisition Strategy can be viewed https://www.metrolink.ie</p>
6	5. Time Frames and Funding		<p>5. Time Frames and Funding</p> <p>There is a lack of clarity with regard to time frames and funding for the Metrolink Project. There is no clarity with regard to the approval process and how long this will take. While this is ongoing, the severe blight on the College Gate Complex will continue and the hardship placed on the owners and the Owners Management Company will continue. This is wrong.</p>	<p>TII as the Government Agency responsible for delivering MetroLink, are committed to expediting the delivery of this transformative project on receipt of an Enforceable Railway Order. Upon approval, the construction phase is anticipated to last approximately 9 years, with the MetroLink planned to be operational in 2035.</p> <p>In July 2022, the Government granted Approval in Principle to the NTA to enable the submission of a railway order application by TII to An Bord Pleanála in respect of the MetroLink project (Decision Gate 1). This approval was granted after the Preliminary Business Case (PBC) had undergone significant scrutiny and challenge by bodies that are independent of TII, including DoT and DPER review (including independent review by JASPERS and the Major Projects Advisory Group (MPAG)) of the PBC around timeline, costs and benefits that were updated to inform the Government decision.</p> <p>The Non-Technical Summary (submitted as part of the Railway Order) outlines the Railway Order process, including how An Bord Pleanála will consider the feedback/submissions received during the statutory public consultation process. The Board has confirmed that it intends to hold an Oral Hearing for this project. The Oral Hearing is a process whereby TII and its specialists are given an opportunity to present evidence on the proposed Project and on submissions received. There is also an opportunity for The Board and parties who made submissions during the statutory consultation process to question TII and its specialists. Following this process, and based on information available to The Board, they will make a decision on the application.</p>
7	6. Oral Hearing		<p>6. Oral Hearing</p> <p>All of the points raised above can be fully addressed at an Oral Hearing which we request be held in relation to the Metrolink project. The above is only a basic outline of some of the points that are relevant to our clients and these points will be further elaborated on and additional points raised at the Oral Hearing, as more information becomes available.</p>	<p>Please refer to response item (6) above in relation to the Oral Hearing process. Further information is available at www.pleanala.ie/en-ie/oral-hearings</p>

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8	Closing Objection		7. Additional Grounds of Objection We reserve the right to include other grounds of objection and to elaborate on the above listed grounds of objection and to tender these at the An Board Pleanála Oral Hearing which we request be held.	Please refer to response item (6) and (7) above in relation to the Oral Hearing process.

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Other similar respondents list below:			
Response #	Respondent		
077	Eanna Coffey		
177	Maria Elena Garcia Valasco		
206	Nicola Brait and Greta Tumiatti		