

Submission No.			273		
Organisation Name or Name of Submitter			Sainfoin Property Company Limited		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Re: SUBMISSION ON THE METROLINK ON BEHLAF OF SAINFOIN PROPERTY COMPANY LIMITED REGARDING LANDS AT DARDISTOWN, CO. DUBLIN.					
1	Basis for Selection of Dardistown Metro North -ABP Ref: NA.0003	9	The Board’s reasoning for the location of the depot at Dardistown was primarily based on providing a combined facility for the Metro North and Metro West lines. However, as the Metro West scheme is no longer proposed by Government and is not included in the National Development Plan or the Draft Greater Dublin Area Transport Strategy 2022-2042, there is no longer a need for a depot at this location to serve both Metro lines. The rationale for a depot at Dardistown is therefore no longer applicable given the abandonment of the Metro West scheme and requires reconsideration. Additionally, in the eventuality of a future Metro West scheme being progressed, the benefits of co-location of a depot for both lines in a single location is questioned.	Options for the location of the depot and the associated access lines into the depot have been extensively and rigorously assessed as part of the development of the proposed Project. The proposals incorporated in the Railway Order application are considered to provide the best balance between operational requirements; compliance with planning designations (with the majority of the proposed site within 'General Employment' rather than 'High Technology' zoned land area); environmental impact; and retention of the ability for future adjacent land development as envisaged in local plans. Further details are provided in EIAR Chapter 7 (Consideration of Alternatives (Section 7.7.4.2 to 7.7.4.5) and EIAR Appendix A7.6 (Depot Location Options Report). The assessment between the two locations of Lissenhall and Dardistown for the MetroLink depot location was not influenced by any potential Metro West type project and did not incorporate any benefits at Dardistown that potentially could arise from a Metro West type project.	
2	Basis for Selection of Dardistown Metro North – ABP Ref.: NA.0007	9	A second application was submitted to An Bord Pleanála by The Railway Procurement Agency to provide for a depot to support the operation of the permitted Metro North railway. The application was in response to Condition No. 1 of Ref.: NA.0003 which required the depot for the Metro North project to be located at Dardistown in order for it to tie-in with the Metro West project. The Inspector’s report states: “Locating two separate depots on adjoining sites could produce modest synergies by reducing land take and, if access facilities can be shared, costs. Little or no operational benefits would arise from co-locating depots.” The Inspector states that synergies could be produced from co-locating the depot for the Metro North and Metro West, however, as stated previously, these “modest” synergies are not likely to be realised as the Metro West project is not being pursued by Government. Therefore, there would be no significant benefits from persisting with providing the depot for MetroLink at this location.	Please refer to response (1) above.	
3	Basis for Selection of Dardistown Impacts of the Current Proposal	10	The current proposal as identified in Figure 3 below involves a very extensive land take from our client’s property at Dardistown. It makes the potential development of the opportunity site to the southwest and the gateway site to the west significantly less viable. Indeed, the viability of the entire development of this prime land bank is severely compromised by the location of the proposed depot. It will create a high level of fragmentation of our client’s landholding, significantly diminishing the development potential of these lands. The two primary areas directly affected are intended to act as a gateway to develop to entirety of our client’s lands at Dardistown, however, given the reduced size and restricted nature of these sites, any significant development of these areas is less viable. The lines connecting the Dardistown station to the depot are not proposed to be covered and therefore development cannot take place. It is sought that these lines are cut and covered to allow for landscaping to be incorporated above these lines which would enable ground level connectivity between buildings across appropriately landscaped areas in future development of this key opportunity site and allow for placemaking as opposed to fragmentation.	Options for the location of the depot and the associated access lines into the depot have been extensively and rigorously assessed as part of the development of the proposed Project. The proposals incorporated in the Railway Order application are considered to provide the best balance between operational requirements; compliance with planning designations (with the majority of the proposed site within 'General Employment' rather than 'High Technology' zoned land area); environmental impact; and retention of the ability for future adjacent land development as envisaged in local plans. Further details are provided in EIAR Chapter 7 (Consideration of Alternatives (Section 7.7.4.2 to 7.7.4.5) and EIAR Appendix A7.6 (Depot Location Options Report). The lines connecting Dardistown Station to the depot entrance are cut and cover (see MetroLink Drawing ML-RO-303 E-F) and this will facilitate the provision of access across the depot access tracks and thus limit severance. The proposed replacement Sillogue Green road and junction with the R108 is included within the Railway Order application, and are on a cut and cover section of the depot access tracks, and has space adjacent which could subsequently be utilised to provide upgraded access to the wider development area if required, subject to any FCC highway requirements.	
4	Basis for Selection of Dardistown Impacts of the Current Proposal	11	Figure 6 above identifies the impact the depot and connecting lines will have on the site. The gateway site to the west is now significantly reduced and fragmented as a result of the railway lines connecting the depot with Dardistown station. As these lines are not proposed to be covered, it will result in significant barriers to movement, adverse impacts on future development, adverse noise impacts at operational stage resulting in significantly reduced potential for creating a coherent urban form and placemaking appropriate to an urban context and integration between blocks on the gateway site. The fragmentation has also resulted in significantly reduced plot sizes which will reduce their developable potential. This area of the LAP lands is intended to provide a gateway into the entire area, however, as a result of the MetroLink depot at this location, the site’s developability is significantly less viable and is less likely to act as a gateway to the entire lands, as provided for in the statutory Local Area Plan for Dardistown. The delivery of the gateway site would be a key consideration in the viability of a station at Dardistown.	Please see response (3) above.	



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5	Basis for Selection of Dardistown Impacts of the Current Proposal	12	<p>Figure 7: Potential Land Take (Source: TII) - Potential severance of the main access to the remaining development land – no allowance made in the application to facilitate development of the retained lands – potentially rendering them undevelopable.</p> <p>The proposal allows for permanent and temporary acquisition of lands at the interface of the lands with the Naul Road. This is the current access point for the lands and the location has been identified as the most appropriate for an appropriate access to facilitate the proposed large-scale development.</p> <p>The proposal is silent on this hugely important issue. There is no design or co-ordination allowed for between the route selection and access to the remaining lands.</p> <p>The proposal cannot proceed unless an appropriate access road is facilitated as part of the development.</p>	Please see response (3) above for access/severance issues.	
6	Temporary Land Take	13	<ul style="list-style-type: none">• The proposed scheme provides for a very substantial temporary land take at this location including an approx. 8-hectare site identified as “Opportunity site” within the LAP.• There is no defined timeframe for completion of the scheme - it could be up to 2034.• The temporary / permanent acquisitions effectively sterilize the entire lands for any development until such time as the Metro is completed. This uncertainty is at a huge cost both to the landowner and the taxpayer.• The sterilization of lands identified as “Opportunity site” is of particular concern. According to the Master Plan prepared by Foster and Partners these lands are capable of delivering 5m sq. ft and are identified in the initial phases of the masterplan.	<p>The temporary land take has been assessed as the desirable minimum area to provide for efficient and safe construction activities; reducing these construction areas would introduce constraints on progress, materials delivery/storage or increase site risks. Construction areas will be vacated as soon as practicable once no longer required and returned to the land owner to minimise impact.</p> <p>There is a defined timeframe for completion of the Project and TII will work closely with landowners to keep them appraised of timescales. Temporary land take for construction works for the Dardistown station, depot and adjacent M50 crossing is described in EIAR Chapter 5 MetroLink Construction Phase, Section 5.9. Lands required for construction purposes are also shown in EIAR Appendix A5.3 Construction Sequence Report, with lands required at Dardistown shown in Figures 6.1 and 7.1. Figure 7.1 indicates that part of the southern construction area shown as 'M50 crossing and compound No. 2', lies in the respondent's 'Opportunity Site', and is to be used for construction of the M50 viaduct and its northern approach. Appendix A5.2 Construction Programme indicates anticipated construction periods for different elements of the works. This indicates that whilst the main station and depot area works are expected to take 9 years, for the M50 viaduct and northern approach works, the forecast construction period and hence use of this part of the construction area is less at 4.5 years.</p> <p>EIAR Chapter 9 Traffic and Transport, Appendix A9.5 Scheme Traffic Management Plan provide details of Phase 1 and 2 of the proposed Temporary Traffic Management plans at Dardistown, see Section 6.5.6.2, Figures 6-13 and 6-14.</p> <p>Response (3) explains the sections of the depot track that will be contained in cut and cover to reduce the impact of severance. TII would also note that the LAP recognises the depot (although the LAP has now expired), but MetroLink’s presence at Dardistown will be pivotal and act as a catalyst for growth opportunities in line with Fingal County Councils Development Plan.</p>	
7	Temporary Land Take	13	<ul style="list-style-type: none">• Should the scheme proceed at this location as per the submission: 1) The temporary land take needs to be substantially reduced. 2) The opportunity site needs to be excluded and if temporary lands are required other lands are identified. 3) There is a longstop date on when these lands will be ceded back to the landowner.	<p>Please to response (1) that explains the background to why the proposed Dardistown depot option is preferred and response (6) that explains why the temporary land take cannot be reduced.</p> <p>TII will work closely with Sainfoin Property Company Limited to agree dates for the return of land.</p>	




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8	Relocation of the Depot Off Site	14	The Metrolink Promoters claim that the proposed scheme is modelled on similar schemes in similar cities and cites the example of Barcelona and Copenhagen as successful schemes. However, one glaring difference is the location of the depot. It is best international practice, for a variety of reasons, to located depots at the end of the Metros – in lands less viable and not capable of delivering development the scale of which could be accommodated at Dardistown. However, in this instance and bizarrely it is proposed to locate the depot in the middle of the route selection on Prime development lands.	<p>It is correct to state that MetroLink has considered other schemes such as Barcelona and Copenhagen, however it does not follow that because the depot is not located at the end of the line whereas for these schemes it is, that this means by default that MetroLink is proposing the wrong solution or that this is in contravention of best international practice. As explained by EIAR Chapter 7, Consideration of Alternatives, section 7.7.4.1, during the development of the Preferred Route the possibility of locating the depot mid-route was considered and a multi-criteria assessment (MCA) was carried out to determine the viability of locating the depot at Dardistown as an alternative to Estuary. It is this MCA, for which further details can be found in Chapter 7, section 7.7.4 that has been used to determine the proposed location of the depot.</p> <p>In summary, as noted by section 7.7.4.1.1, the main reasons that determined the proposed depot location at Dardistown is:</p> <ul style="list-style-type: none">• The operations of the system would be better served by a more centrally located depot site at Dardistown, which would mean that vehicles could come into service more quickly and efficiently with less empty running trains.• The section of the alignment from Dublin Airport to Charlemont will have the highest passenger demand with the requirement for more vehicles to operate on that section of the alignment. A depot location at Dardistown would ensure vehicles could enter services quickly and immediately service on the busiest section of the alignment.• If there are mechanical failure of vehicles, the location of a depot at Dardistown means that vehicles can be moved more easily to the depot site for maintenance when compared with a depot at the northern extent of the alignment.• Maintenance activity along the alignment can be more effectively managed as vehicles can commence maintenance activity more quickly from Dardistown compared to Estuary and• The location of a depot at Dardistown has potential for less significant environmental effects when compared to the proposed site at Estuary. It is also possible to mitigate the majority of the potential impacts identified utilising the proposed mitigation measures outlined in the relevant chapters of the EIAR. <p>Appendix A7.6 Dardistown Depot Options Report and the Preferred Route Design Development, Appendix C (https://www.metrolink.ie/en/consultations/preferred-route-2019/) provides further detail.</p>	
9	Relocation of the Depot Off Site	14	As stated previously, the location of the depot at Dardistown was originally intended to serve both the Metro North and Metro West lines. However, as the Metro West project is no longer progressing, the depot will only serve to MetroLink (formerly Metro North) and should therefore be situated at an alternative location.	Please refer to responses (1) and (8) above.	
10	Relocation of the Depot Off Site	14	The accompanying letter prepared by Tobin Consulting Engineers (Appendix 2) provides assessments of alternative locations for the depot and responds to the Railway order documentation with respect to the justification for the location of the depot on our clients’ lands, and the selected option within the lands. The letter appends a previous report undertaken with respect to the location of the depot on these lands, submitted to TII. Much of the points raised are still of particular relevance and briefly summarised in the following.	A response is provided against the related specific comments below.	
11	Relocation of the Depot Off Site Lissenhall / Estuary	14	The site at Lissenhall / Estuary was the original location proposed for the depot as part of the Metro North scheme. The Estuary stop is the most northerly on the MetroLink line and is located to the north of Swords town centre. The site is located adjacent to the M1 motorway and it is proposed to provide a park and ride facility at this location under the Proposed Material Alterations to the Draft Fingal County Development Plan 2023-2029 (PA SH 8.4). The previous depot with park and ride facility proposed for this site had the capacity to cater for 3,000 no. cars. It is considered that a park and ride facility at this location would remove significant traffic from the M1 and R132 through Swords as well as a reduction in traffic along the M50.	It is not clear the point that is being made noting that the proposed Estuary Station and adjacent Park and Ride site has been assessed and shows it will remove road traffic from the R132 and subsequent roads into the city centre. Modelled changes in Annual Average Daily Traffic (AADT) are provided in EIAR Appendix A9.2 Overall Project Traffic & Transportation Assessment, Section 6.2.2. As presented, with the increased use of public transport in the Operational Phase of the proposed Project, the strategic road network will experience an overall reduction in AADT and delays. The M50 Motorway, R132 Swords Bypass and M50 Port Tunnel see reductions in total traffic flow from the Do Minimum to the Do Something scenario.	

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12	Relocation of the Depot Off Site Lissenhall / Estuary	14	As set out in the accompanying engineering observations: “Document Appendix A7.6, Dardistown Depot location Options Report by Jacobs Idom, from the Environment Impact Assessment report volume 5; has been provided to Tobin for review. The executive study in Appendix A7.6 references a letter received from Comer Group Ireland which expressed an opinion that the Lissenhall area would have been a better location for the depot. The Jacobs Idom response to that was ‘this is not supported by earlier JI studies because it does not deliver efficient train operations and for this reason it is not considered further in this review’. Appendix A7.6 does not expand on the why it does not deliver efficient train operations, nor does it reference or provide a location where those earlier studies can be found for review and consideration as part of a robust and comparable multi criteria analysis.	The primary purpose of Dardistown Depot location Options Report contained in Appendix A7.6 was to consider and evaluate the alternative Dardistown depot location proposed by Comer Group Ireland. Response (8) explains where the information can be found that explains why a depot at Dardistown is preferred to Estuary.	
13	Relocation of the Depot Off Site Lissenhall / Estuary	14	In addition to considering the operational aspects of the depot location at Lissenhall, the other criteria of the Multi Criteria Analysis carried out for Dardistown, does not seem to have been considered for Lissenhall. The Dardistown location was previously selected assuming that there would be a link to Metro West which is no longer planned to progress.	Please refer to response (1) regards Metro West and response (8) that explains where the information can be found that explains why a depot at Dardistown is preferred to Estuary.	
14	Relocation of the Depot Off Site Lissenhall / Estuary	14	To provide a fair and informed review of the TII documentation relating to the location of the depot, Tobin will require the following be provided for review: • A copy of the ‘earlier JI studies’ referenced above. • A multi-criteria analysis (MCA) for the option at Lissenhall for the other aspects of the MCA applied to the Dardistown option.”	Please refer to response (8) above that explains where the information can be found that explains why a depot at Dardistown is preferred to Estuary. The initial comparison of the Lissenhall and Dardistown sites was to identify the preferred general location for the depot, which was assessed as Dardistown. The subsequent assessment of potential depot sites within the Dardistown area itself was subsequently undertaken to ensure the most appropriate location was identified through a Multi Criteria Appraisal.	
15	Relocation of the Depot Off Site Lissenhall / Estuary	15	A supporting document prepared by CPMS is included in Appendix 2 of this submission. In relation to the location of a depot at Dardistown, the report states that “With the removal of the link to Metro West and the fact this is no longer planned to be progressed in the foreseeable future, the argument for an end of line depot is strengthened. The previous Estuary site has no obvious characteristics from a rail perspective that make a depot location there unfeasible.”	Please refer to response (1) regards Metro West and response (8) that explains where the information can be found that explains why a depot at Dardistown is preferred to Estuary.	
16	Relocation of the Depot Off Site Lissenhall / Estuary	15	<p>The report also analyses the difficulties in providing the depot at Dardistown as opposed to Estuary, and the cost and resource implications:</p> <p>“The Dardistown location, proposed flyover of the M50 and proximity of Dublin Airport all present technical compliance and construction challenges that will result in additional costs. The operational disadvantages further support the case to avoid such a location for the main train depot for the route. The proposed service pattern and frequency also mean a loop/turnback facility will be required at each end of the line and this could potentially be incorporated into the depot footprint at Estuary in a more efficient manner than a separate depot at Dardistown. Major disruption to the M50 would also be avoided due to the removal of the requirement for a flyover structure south of Dardistown.</p> <p>A depot at Estuary would reduce the number of tunnel portals (estimated to cost €25-70m each) from four to two. Economies of scale would also be facilitated due to the single tunnel approach as opposed to the two-tunnel approach which is unavoidable if the depot is at Dardistown. There is a strong case that Estuary also provides a more accessible, more demographical suitable location for a base of operations, particularly when considering the planned development of the Dardistown site.”</p> <p>The overwhelming reason for relocating the depot site to Lissenhall is the lost opportunity on the Dardistown LAP area. These lands are potentially one of the most strategic sites in Europe with then potential to deliver €bn’s of euro per annum to the taxpayer through a best-in-class development commensurate with the some of the most successful developments on a global scale.</p> <p>Finally, there does not appear to be a transparent or clear rationale included within the application as to the selection of Dardistown over Lissenhall/Estuary; and on this basis it is respectfully submitted that the location of the depot at Dardistown should be reconsidered.</p>	<p>TII are not aware of the technical compliance issues to which this observation refers. The rationale for the selection of Dardistown is provided by the EIAR as explained by responses (1) and (8) above, that includes noting TII consider a Dardistown depot option performs better operationally than a depot located at Estuary. TII would also note that the Project includes for a turn-back facility at Estuary, a loop is not required. The proposed bridge form and construction proposals for the M50 viaduct are not assessed to have a significant impact on the operation of the M50; these are described in EIAR Chapter 5 MetroLink Construction, Section 5.9.2 with further details in EIAR Appendix 5.3 Construction Sequence, Section 7.</p> <p>The proposed Project has 3 tunnel portals - Dublin Airport North and South; and Northwood. Alteration of the project to a long single tunnel would thus remove one portal but would introduce a more costly deep underground station at Dardistown and would still require two Tunnel Boring Machines to maintain the construction programme. It is also noted that the quoted construction cost of tunnel portals is made in reference to HS2 in Appendix 1. This is not correct, portals for high-speed trains are not comparable to portals required for a metro project. Response (8) above explains where the information can be found that explains why a depot at Dardistown is preferred to Estuary.</p> <p>TII recognise that the site at Dardistown will impact on more valuable land due to its proximity to the M50 and the designation under the Fingal Development Plan as “High Technology”, but this needs to be considered balancing operational requirements; compliance with planning designations (with the majority of the proposed site within 'General Employment' rather than 'High Technology' zoned land area); environmental impact; and retention of the ability for future adjacent land development as envisaged in local plans. Reference by the observation to the Dardistown LAP is noted, and TII would note that the LAP recognises the depot and also that the LAP has now expired. MetroLink’s presence at Dardistown will be pivotal and act as a catalyst for growth opportunities in line with Fingal County Councils Development Plan, whilst also noting that the lands in their current state have insufficient infrastructure or utility provision and therefore MetroLink will potentially generate development rather than constrain it.</p>	

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17	Alternative Location within the Site	16	<p>As part of the extensive engagement set out with TII, the following alternative location (referenced by TII as Option 10) has previously been put forward to TII prior to the submission of the Railway Order.</p> <p>Such is the destruction of the proposed Depot location our client is proposed this alternative location for the MetroLink depot at Dardistown in order to reduce the impact on the gateway site and opportunity site to the west and southwest of the area. The depot can be accommodated in the ‘GE – General Employment’ zoned area and in the ‘HT – High Technology’ zoned area of the site in the southeast corner of the site. This area of our client’s lands also has good access to the M50 and is also located in close proximity to the M1 to the east.</p> <p>Our client has offered the land for our clients preferred option if the depot is to be located on their landholding without cost to the Metrolink proposal; however, this offer was rejected. This letter of offer is dated 17th January 2021 and is included in Appendix 3.</p> <p>This site is considered more appropriate for the depot as it will have a reduced impact on the economic viability of the site as a whole and will result in less fragmentation of the site. The gateway and opportunity sites can be developed to their full potential which will have positive impacts for the rest of the lands. These lands are currently occupied by a go-kart track and a car dealership.</p> <p>Whilst it is noted in the Railway Order documentation that the alternative option put forward by our client shown on the drawing was not of the scale now required for the depot, the option would easily be extended to ensure it is of the scale now required.</p> <p>The rationale in the submitted documentation for not progressing our clients preferred option within the lands also include reference to the Dublin Airport outer Public Safety Zone. We would note the draft Fingal Development Plan 2023-2029 includes for a review of the public safety zones, as per Objective DA020: “Support the review of Public Safety Zones associated with Dublin Airport and implement the policies to be determined by the Government in relation to these Public Safety Zones.”</p> <p>Therefore, the consideration of the development of low intensity uses within a public safety zone may change.</p>	<p>There is no “destruction” as stated by the observation, this is currently an area of undeveloped land. It is also noted that the observer accepts that their proposal put forward would need to be developed further to provide an equivalent level of service to that provided by the MetroLink proposal, increasing it's size and land take.</p> <p>The option proposed has been subject to the same rigorous assessment as all other depot options and does not outperform the proposed location on any of the environmental, planning, operational or economic criteria examined by TII. Appendix A7.6 Depot Location Options Report provides the full details of this assessment, noting that it was necessary for the assessment to modify the Sainfoin proposal to accommodate the necessary depot functional requirements resulting in an increased site area.</p> <p>While the observation notes that the Sainfoin proposal can be accommodated in the ‘GE – General Employment’ zoned area and in the ‘HT – High Technology’ zoned area of the site in the southeast corner of the site, TII’s assessment shows that the Sainfoin proposal lies c.50% in the ‘High Technology’ zone compared to the MetroLink proposal that has c.70% of the depot in the ‘General Employment’ zone and thus is less impactful on the potential development of the lands.</p> <p>The Sainfoin proposal compromises TII's aim of facilitating the best possible passenger experience at a future passenger station integrated into the surrounding area. A depot in the CGI Proposed Location will be so far from the MetroLink main line that it will require the large looping structures shown by Figure 9, drawing 10806-1003 D which will restrict the efficient operation of the depot. Those structures will separate passengers from the future urban realm and passengers will have to traverse them by way of long bridge or underpass structures. In contrast, the Preferred Location has the potential for passengers to exit the station directly into future urban realm.</p> <p>It is also noted that this Sainfoin proposal encroached into the Inner Public Safety Zone of Dublin Airport, meaning that a depot cannot be built there without materially contravening the Fingal County Development Plan and Government guidance in relation to safety in proximity to the Airport. The proposed depot location included in the Railway Order application avoids the Inner Public Safety Zone entirely. TII would further note that in respect of Public Safety Zones, it is not appropriate to anticipate possible undefined future changes in policy. The current guidance on appropriate uses within Public Safety Zones continues to apply.</p> <p>It is further noted that the Sainfoin proposal is also on the route of the proposed orbital sewer forming part of the Greater Dublin Drainage (GDD) project, while the Railway Order proposal avoids the sewer route entirely and will necessitate the demolition of an existing wastewater treatment plan based on the arrangement presented by Figure 9. TII do not consider there is any material difference in terms of access to the M50 and M1 between the options.</p> <p>Response (3) above explains how the concerns about fragmentation of the land will be managed so that development of the gateway and opportunity sites remains possible. As previously noted, MetroLink’s presence at Dardistown will be pivotal and act as a catalyst for growth opportunities in line with Fingal County Councils Development Plan, whilst also noting that the lands in their current state have insufficient infrastructure or utility provision and therefore MetroLink will potentially generate development rather than constrain it.</p> <p>While the offer of land for free is noted, the offer is contingent on TII building a fully operational passenger station, and operating and maintaining it from the outset, entailing additional works and cost that is not justified by TII's passenger demand modelling.</p>	
18	Alternative Location within the Site	17	Additionally, please refer to Appendix 2 for commentary from Tobin Consulting Engineers with respect to the comparison between Option 8A (which forms the Railway Order proposal) and Option 10 (put forward by our client) undertaken by TII. In summary it is set out that Option 10 is a feasible option.	TII note the comments in the Tobin Consulting Engineers report. However, we consider that the assessments undertaken on the selection of the depot location as set out in EIAR Chapter 7 (Consideration of Alternatives) and EIAR Appendix A7.6 (Depot Location Options Report) provide justification for the depot site selected at Dardistown. Please also refer to response (1) above.	

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19	Dardistown Depot Location Options	17	<p>In the submission document TII referenced 9 other potential locations in Dardistown using a multi criteria analysis, however, and most significant no regard was had to</p> <p>1. Destruction in value of this prime development site 2. The residual site developability</p> <p>In development and planning terms, the depot is cited in the 2nd worst possible location in the site identified as a “gateway” site in the LAP. This site is capable of facilitating the development of a large-scale campus – akin to the Apple Campus in the US with potential for over 10,000 high value jobs.</p> <p>For reference attached please find an in depth multi criteria analysis of each site – incorporating their development capacity, value and the true lost opportunity to the taxpayer.</p>	<p>It is not correct to say no regard has been taken of the potential development of the site. The report contained in Appendix 7.6 Depot Location Options Report makes considerable effort to explore the development objectives of the receiving environment and does not as suggested ignore this as part of the assessment. TII would further note that the EIAR section 7.7.4 takes account of this consideration both when considering a depot at Dardistown or Estuary, and individual depot options located at Dardistown. Responses (1) and (8) above have explained where the information can be found that explains the rationale for locating the proposed depot at Dardistown.</p> <p>MetroLink’s presence at Dardistown will be pivotal and act as a catalyst for growth opportunities in line with Fingal County Council’s Development Plan rather than as a destruction in value. The MetroLink project is an essential part of enabling the development of those lands. With a presently limited planning context, and no or insufficient existing infrastructure and utility provision, bringing forward development in this location will likely be costly and protracted over a long-term horizon. TII is of the view that as referenced in the Fingal Development Plan, the assumed development of large-scale commercial opportunities in this area would follow the construction of the MetroLink depot and tracks. Thereafter, the commercial potential of the lands may be realised on a phased basis.</p> <p>TII note that the observer's comparative analysis of the potential alternative depot sites at Dardistown focuses on development issues and potential economic benefits foregone and would therefore not be considered an in depth multi criteria analysis of each site as stated. As explained by response (1) above TII have undertaken a rigorous analysis of possible depot options on the Dardistown lands that has considered operational requirements; compliance with planning designations (with the majority of the proposed site within 'General Employment' rather than 'High Technology' zoned land area); environmental impact; and retention of the ability for future adjacent land development as envisaged in local plans to achieve the optimal balance across these assessment criteria. Further details are provided in EIAR Chapter 7 (Consideration of Alternatives (Section 7.7.4.2 to 7.7.4.5) and EIAR Appendix A7.6 (Depot Location Options Report).</p> <p>It is further noted, as explained by response (16) above that TII recognise that the site at Dardistown will impact on more valuable land due to its proximity to the M50 and the designation under the Fingal Development Plan as “High Technology”, but this needs to be considered balancing the assessment criteria noted above. MetroLink’s presence at Dardistown, as noted above, will be pivotal and act as a catalyst for growth opportunities in line with Fingal County Councils Development Plan, whilst also noting that the lands in their current state have insufficient infrastructure or utility provision and therefore it could be argued that MetroLink will generate development rather than constrain it.</p> <p>As the analysis is not considered to be multi-criteria, TII relies on the EIAR analysis. Any losses to the landowner will either be compensated as part of early legal agreement or may be claimed by way of the CPO compensation code. The onus of providing all loss lies with the developer and TII reserves its rights to dispute all and any heads of loss.</p>	
20	Amendments to Current Proposal	17	<p>Whilst it is submitted that the depot should be located in an alternative location outside our client’s landholding, or in an alternative location to the south east area of our clients land for the reasons outlined above; should the Board nonetheless consider that Dardistown is the most suitable location for the depot, our client would like to propose the following amendments to the scheme to reduce the impact on the viability of the subject lands delivering on their planning objectives, without prejudice to our client’s preferred location.</p> <p>1. A proposal on a development access is designed and built as part of the scheme so as not to landlock this important development opportunity</p> <p>2. That there is a change to the temporary land take acquisition as per Figure 7 above i.e. that lesser lands are included in the temporary land take and that the lands zoned “opportunity” are removed.</p> <p>3. It is requested that the portion of the tracks which connects the depot to Dardistown station are cut and covered sufficiently to allow for landscaping to take place above. This will allow development between the lines to feel more connected and ensure the economic viability of the gateway and opportunity sites. Alternatively, it I requested that the track layout is amended in order to reduce the level of fragmentation to the gateway site. The current proposal breaks the gateway site into significantly smaller land holdings which will have a significant adverse impact on their developability. This will lead to a disconnect between the various buildings in this location and will have a negative impact on the functionality of a gateway site.</p>	<p>1 and 3. Please refer to response (3) access to the potential future development.</p> <p>2. Please refer to responses (6) above regarding lands proposed for construction purposes and the potential for earlier hand-back of construction areas.</p>	

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21	Concluding Comments	19	It is primarily considered that the MetroLink depot should be relocated from the proposed location at Dardistown given that this location was chosen to serve both the Metro North and Metro West lines. This is one of the most strategic sites left in Ireland and locating a low value use such as a depot is bad in planning particularly As the Metro West line is no longer being progressed. It is therefore obvious that the depot would better serve the MetroLink at Lissenhall/Estuary where the depot and park and ride facilities can be consolidated together and would be a more efficient use of land.	Please refer to responses (1) and (8) above that explains; the rationale for why a depot at Dardistown is preferred to Estuary, the rationale for selecting the proposed depot location at Dardistown, and confirmation that a Metro West type project has not influenced the assessment of options.	
22		19	Should the depot be provided for at the proposed location, it is requested It is relocated elsewhere within the lands – away from the two prime areas zoned Gateway and Opportunity sites to lesser value locations and salvage some of the better locations for long term sustainable development. However, if either of the suggestions above are needlessly resisted - then at a minimum the current proposal should be amended to cut and cover the tracks connecting the depot with Dardistown station. This will allow for landscaping to be incorporated in the gateway site above the tracks which would reduce the proposed disjointed nature of the site. Alternatively, a realignment of the tracks is requested in order to reduce the fragmentation of land at this location. The current proposal may prohibit the development of our client’s land.	TII do not agree that an option to relocate the Dardistown depot has been needlessly resisted. TII have undertaken a rigorous assessment of Sainfoin's proposed alternative, as documented by EIAR Appendix A7.6 and response (17) above. Response (3) explains how proposed cut and cover structures will limit the impact of land severance.	
The appendices of the submission have been reviewed and observations responded to that either expand on observations made by the core submission or highlight additional observations.					
23	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited <u>Environmental comments</u>	Page 2 of memo	 Appendix A7.6 table 6-3 : MCA assessment of options 8A and Option 10, does not include note 5 of section 6.2.1 – A burnt mound has been found within the area for option 8A. This will require careful excavation in this area and has the potential to cause delay.	TII are aware of the burnt mound and the observation is noted. TII do not expect this to have a material impact on the programme but agree that there is a risk of a small delay.	
24	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited <u>Environmental comments</u>	Page 2 of memo	 The colour coded table shows both options being amber concluding that both options are equal from an environmental perspective however, the TII Metrolink environmental impact assessment report volume 2 chapter 7, pg 55; says that 'option 10 is marginally better than option 8A when considering it from an environmental perspective'. Option 10 should therefore be shown in green indicating it has advantages over Option 8A.	The reasons for both options being assessed as amber is explained by section 6.2.3 of Appendix A7.6: "Overall, Option 10 would have a slight advantage over option 8A due to the fact that it is more removed from sensitive receptors, with less potential for impacts during both the construction and operational phases. Also, Option 10 does not have any direct impact on known archaeology, although it is acknowledged that this area in general does have a high potential for archaeology. It should be noted however that Option 10 would require the acquisition of two commercial properties, and demolition and replacement of the wastewater treatment plant, which would have a potentially negative impact on local business. Option 10 would also require the excavation of a significant volume of material to level the site, which would require disposal and significant transport impact. While Option 10 is marginally better than Option 8A when considering it from an environmental perspective, the impacts identified for both options could be mitigated during both the construction and operational phases."	

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25	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited <u>Roads & Utilities</u>	Page 2 of memo	 The Greater Dublin Drainage Scheme is currently still in the planning process and a slight diversion on the site could still be agreed at this point, which would avoid any conflict with the depot as proposed in option 10. Alternatively, an engineered solution is feasible to work around the GDD.	Option 8A has no interface with the GDD and therefore no impact on the current GDD planning application or introduces unnecessary risks to the application, as well as no subsequent design or construction interface risks that could result in additional cost and delay.	
26	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited <u>Roads & Utilities</u>	Page 2 of memo	 Keeping the depot further away from the station may be safer for pedestrians and vulnerable road users (VRU).	There will be no conflict between depot operations and the public and therefore TII do not consider there is an increased safety risk.	
27	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited <u>Roads & Utilities</u>	Page 2 of memo	 Since depot staff and drivers will start / stop working at unsociable hours, parking facilities should be provided for them. Plant and deliveries would be required to and from the depot. This would be better provided away from the station to avoid congestion.	Parking facilities are provided for depot staff. Plant and deliveries are not predicted to be of a level to cause congestion. Dardistown Station itself is designed not to encourage private car use when it is operational, with minimum private car pick-up / drop-off provided and therefore congestion is not anticipated.	

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28	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited <u>Functionality</u>	Page 2 of memo	Appendix A7.6 highlights that option 8A has already progressed to preliminary stage. This is used in the MCA as an advantage over option 10 in terms of functionality. The functional layout of the depot should be assessed on the potential for the proposed site and not the design progress for one option over another.	As set out by Appendix A7.6, TII have increased the size of the Sainfoin proposal to ensure it achieves like-for-like operational requirements provided by the option proposed by the Railway Order application. TII could have rejected the Sainfoin proposal on the basis it did not provide the required operational requirements, however TII considered it was not fair to do so and instead made allowances for the Sainfoin submitted proposal so that it could be fairly evaluated against TII's option proposed by the Railway Order application. However, it is a fact that the TII depot proposal has the advantage of being developed to Preliminary Design level which delivers all the necessary facilities for efficient MetroLink operations, compared to the Sainfoin proposal and its low design maturity that presents an increased risk of subsequent schedule and cost increases as its design is developed.	
29	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited <u>Functionality</u>	Page 3 of memo	<ul style="list-style-type: none">• Mainline Connections - Option 10 offers enhanced connectivity to the mainline vs Option 8A that serves Up service only.• Planned Movements – Option 10 provides comparable Up entry distances to Option 8A but offers potential advantages for Down mainline connections as this is not offered by Option 8A.• Emergency Movements – Option 10 Up and Down movements to the depot offer a potential advantage over Option 8A.	Option 8A does serve both Up and Down services with crossings provided to facilitate this.	
30	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT RE: Metrolink Depot Location Dardistown - Submission, Sainfoin Property Company Limited Concluding statements	Page 3 of memo	<p>In respect of the various options on the Dardistown site, the current preferred option of Option 8A requires a comprehensive assessment review and to that end, we will require a full suite of drawings, calculations and provisions of operational modelling information.</p> <p>To provide a comprehensive locational analysis, Tobin would recommend that Lissenhall be compared to Dardistown assessing all the criteria used in the Multi Criteria Analysis for the different options on the Dardistown site.</p> <p>If after the Multi Criteria Analysis, Dardistown is deemed the preferred site; it is Tobin Consulting Engineer’s opinion that option 10 is a feasible location for the depot.</p>	TII have already carried out a comprehensive and rigorous assessment as explained by responses (1) and (8) above for both a depot located at Estuary compared to Dardistown, and the consideration of 9 Dardistown options plus Sainfoin's proposed option. These responses also explain where the information can be found that explains why it was concluded that the depot proposed by the Railway Order application is preferred.	

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31	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 4.3.3 Movement & Infrastructure	Page 15 of Appendix 1	Conversely and as indicated below, the provision of a maintenance depot on the Metroparks site would in our view go against or conflict with the core objectives of the plan.	As previously noted, TII is of the view that as referenced in the Fingal Development Plan, the assumed development of large-scale commercial opportunities in this area would follow the construction of the MetroLink depot and tracks. Thereafter, the commercial potential of the lands may be realised on a phased basis.	
32	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 5.2 Preferred Route Report - March 2019	Page 17 of Appendix 1	Whether or not the Dardistown site is a more efficient location for the siting of the Depot is questionable based on comparable metro schemes, upon which Metrolink is based. Indeed, it is considered that the location of the depot along the route rather than at the end point is far less efficient and results in the running of empty trains between terminus points and the depot location.	Please refer to response (8) above.	
33	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 5.3 Preferred Route Design Development Report - March 2019	Page 18 of Appendix 1	Overall, it is considered that the benefits identified for choosing Dardistown over Estuary as the proposed site for the Metrolink depot are at best marginal given the relative proximity of both sites to each other. Furthermore, when considered within the context of the potential for development at Dardistown as detailed throughout this report, and the wider implications of the impact on the developability of a highly strategic site, then it is questionable as to the extent of the benefits of choosing Dardistown. Indeed, this is notwithstanding the fact that in order to facilitate the depot at Dardistown, two sections of tunnel need to be constructed as opposed to the possibility of one tunnel section from north of the airport, south to Charlemont, in the event that the depot was located at Lissenhall.	Please refer to responses (1) and (8) above that explains the rationale for why a depot at Dardistown is preferred to Estuary, and the rationale for selecting the proposed depot location at Dardistown, while response (16) explains why one running tunnel section is not feasible.	

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34	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 5.4 Metrolink - The Proposal	Page 24 of Appendix 1	<p>In summary, the study (attached as Appendix B) found that the following:</p> <ul style="list-style-type: none">• The site, adjacent to Dublin Airport can accommodate large building plots and has the capacity to provide a number of distinct interlinked zones, including a tech campus, cultural quarter, wellness quarter, a business park and an innovation hub.;• The development, if granted planning, would be the first view of Dublin/Ireland for arriving visitors and would make a strong impression;• Constraints on the site require further investigation, but; The site has the potential to provide 15,000,000 sq. ft of development, accommodate 4,400 people and provide employment space for 40,000. <p>A high-level indication of the potential breakdown of development on the site is included below and in summary at Appendix C.</p>	As noted above TII recognise that the site at Dardistown will impact on more valuable land due to its proximity to the M50 and the designation under the Fingal Development Plan as “High Technology”, but this needs to be considered balancing operational requirements; compliance with planning designations (with the majority of the proposed site within 'General Employment' rather than 'High Technology' zoned land area); environmental impact; and retention of the ability for future adjacent land development as envisaged in local plans. MetroLink’s presence at Dardistown will be pivotal and act as a catalyst for growth opportunities in line with Fingal County Councils Development Plan, whilst also noting that the lands in their current state have insufficient infrastructure or utility provision and therefore MetroLink will potentially generate development rather than constrain it.	
35	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 7.1.4 Flooding	Page 28 of Appendix 1	<p>There have been two flood events adjacent to the Dardistown site, as indicated in Figure 13 below. The incident at the Mayne M50 flyover, adjacent to the old Airport Road (R312), was low level flooding incident. Further North along the R312 a flooding incident occurred in November 2002, with localised flooding of the road. There is a residual risk of low-level flooding on the northern side of the M50 bordering the Dardistown site. There have been no recent recorded flood incidents at the alternative site locations, Site’s 1 –5.</p>	<p>Your reference to Figure 13 (which upon inspection appears to be Figure 16) referred to shows the two flood events referred to as adjacent to the Dardistown site at a considerable distance from the depot proposed by the Railway Order application. EIAR Appendix A18.5 documents the flood risk assessment undertaken for the proposed Project. Section 4.6.2 notes the proposed Dardistown Depot and Station will impact on the Turnapin Stream and a number of minor ditches and drains that form part of the Mayne River catchment. These watercourses will be diverted as part of the proposed Project. There is no published flood risk information for any of these ditches, and no historic records of flooding were identified for any of the ditches.</p> <p>TII would also note that the flood events shown by Figure 16 are of greater relevance the Sainfoin proposed alternative.</p>	
36	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 7.1.5 Rail	Page 30 of Appendix 1	<p>The route layout into the Dardistown also appears to narrow to a single track at one point which further constrains movements in and out of the depot (see Image 5). This also presents significant performance risk as there is no operational contingency measure/alternative should there be any issues with the infrastructure at this pinch point.</p>	<p>While this observation referred to 'Image 5', we note there is no 'Image 5' and believe this is in relation to Figure 21 which appears to be a "snip" from another depot option rather than the one proposed by the Railway Order application. The depot configuration proposed by the Railway Order application, Option 8A, does not have a single point of entry and is also provided with crossovers to ensure access is maintained to / from the depot at all times.</p>	

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37	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 7.1.5 Rail	Page 30 of Appendix 1	significant increase in track meterage may be required, which appears to be circa 500m according to the Emerging Preferred Route layout. Not only will there be the cost of the additional infrastructure, but also the cost of additional land acquisition to facilitate construction. The operational implications of the proposed depot location at Dardistown is likely to result in a net higher operational expenditure than an end of the line depot location. Lessons learned from elsewhere demonstrate the cost of the required ECS movements can contribute significantly to the average cost per journey and would be unavoidable with a centrally located depot. Considerations should also be made to both the local demographic of the area in Dardistown and transport links to ensure ease of access for future staff. Although difficult to quantify the additional costs without a full set of information to base estimates on, a number of key design principles aligned to minimising costs are contradicted or ignored with the proposal to construct a depot at Dardistown.	TII did not understand why the depot layout being referenced was in relation to the Emerging Preferred Route (EPR). In terms of track meterage, comparing the option proposed by the Railway Order application verses the option proposed by Sainfoin, by inspection given the increased distance from the mainline to the depot, and the provision of the 'loop track layout' to enable access to and from the depot, the Sainfoin proposal requires a greater length of track than the layout proposed by the Railway Order application. Response (8) above explains the operational rationale for the proposed depot location.	
38	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT Appendix 1 - MetroLink Depot Site High Level Assessment Report 7.6.5 Rail	Page 41 of Appendix 1	As detailed in historical documentation and prior to the publication of the Emerging Preferred Route, the location of the depot was detailed as Estuary – at the northern end of the Metrolink route. Using a simple comparison mechanism to summarise, it is clear that from a rail perspective, Estuary is a much more favourable location than Dardistown.	Please refer to response (8) above.	
39	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT MetroLink Depot Site High Level Assessment Report 8.0 CONCLUSION Depot Location – Lissenhall/Estuary	Page 43 of appended report	<ul style="list-style-type: none">Lissenhall was initially considered as the preferred location for the depot and ancillary services associated with Metro North. The ABP Inspector in his consideration of the application for Metro North (NA.0003) suggested as much and was of the view that the location finally proposed under that application (Belinstown) was done so for economic purposes and without a plan led approach. In his conclusions, the Inspector recommended that a revised Railway Order be submitted for a new depot location at Lissenhall and potentially Dardistown if the Board considered it appropriate.The Board in their Order on NA.0003, Condition 1 requested that a new Railway Order application be made for a revised depot and spoil scheme at Dardistown. However, this decision paid significant regard to the development of Metro West and the fact that it was proposed to tie in with Metro North at Dardistown.Metro West is no longer a live consideration, does not appear in the National Planning Framework: Ireland 2040, nor does it appear in the National Development Plan. As Metro West is no longer considered viable, the rationale that was applied to locating the Depot at Dardistown, which in effect was the overriding rationale, is consequently no longer viable.	Please refer to responses (1) and (8) above that explains; the rationale for why a depot at Dardistown is preferred to Estuary, the rationale for selecting the proposed depot location at Dardistown, and confirmation that a Metro West type project has not influenced the assessment of options.	

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40	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT MetroLink Depot Site High Level Assessment Report 8.0 CONCLUSION Depot Location – Lissenhall/Estuary	Page 43 of appended report	<ul style="list-style-type: none">As late as June 2018, the Alignment Options Study Report considered that the best and most appropriate location for the depot on the new Metro North, now Metrolink, was Estuary/Lissenhall as the track was at grade at this location and there was adequate space to accommodate the facilities.	Noted, but since then further work, as one would normally expect as a scheme is developed, has been undertaken as explained by responses (1) and (8) that explains the rationale for why a depot at Dardistown is preferred to Estuary and the rationale for selecting the proposed depot location at Dardistown. Please see Appendix A7.6 Depot Locations Options Report and the Preferred Route Report as outlined in previous responses.	
41	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT MetroLink Depot Site High Level Assessment Report 8.0 CONCLUSION Depot Location – Lissenhall/Estuary	Page 43 of appended report	<ul style="list-style-type: none">The benefits outlined in the Preferred Route Design Development Report of March 2019 for choosing Dardistown as a location for the depot over Estuary are marginal and take no account of issues such as land value and development potential. In this light, it is considered that the benefits outlined should be reviewed further.	<p>Response (19) explains why TII do not consider it is correct to say no regard has been taken of the potential development of the site.</p> <p>It is further noted that while both the Dardistown and Lissenhall areas are intended for future development, Lissenhall has a more central role in the strategic development of Fingal and is identified as a strategic long-term reserve in the core strategy.</p> <p>By identifying Lissenhall as a key future development area, the Council is seeking to <i>maximise the opportunities created by the delivery of this key piece of strategic infrastructure in accordance with best planning practice and the principles of sustainable development. The development of the area following the sequential development of the existing Swords envelope, is also consistent with the Council’s long term strategic vision for Swords to develop as a sustainable city. It is envisaged that this area could accommodate the development of a significant mixed use urban district providing for a significant level of employment in addition to approximately 6,000–7,000 residential units. A statutory land use plan will be prepared for these lands to provide a framework for development.</i> (Fingal Development Plan 2023-2029, p44)</p>	

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42	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT MetroLink Depot Site High Level Assessment Report 8.0 CONCLUSION Metro park – A Highly Strategic Location	Page 43 of appended report	<ul style="list-style-type: none">• Metro park is considered to be one of the most strategic development sites within the greater Dublin region. It comprises 83ha (206 acres) of land in one ownership (the Comer Group) located in close proximity to Dublin City and immediately adjoins Dublin Airport.• The development of such a flagship project, akin to Cherrywood in south Dublin, but arguably in a more strategic location, provides an unrivalled opportunity to develop a high-quality mixed-use development incorporating residential, commercial, employment and recreational uses. Indeed, similar to other major airports around the world, the development has the potential to further enhance Dublin Airport as not just a commuter hub but to turn it into a major ‘Airport City Region’.• The location of a depot on the Metro park site will essentially sterilise what is a prime development site and as shown in Drawing 10806-008 or Figure 13 above. Of the total 83ha available, 34ha will become lost to development potential due to the location of the depot and ancillary services, access roads and the metro line itself.	Responses (1) and (8) explain where the information can be found that explains the rationale for the depot proposed by the Railway Order application, and response (3) explains the sections of track leading in to the depot that will be cut and cover to assist with limiting the impact of land severance.
43	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT MetroLink Depot Site High Level Assessment Report 8.0 CONCLUSION Metro park – A Highly Strategic Location	Page 44 of appended report	<ul style="list-style-type: none">• An initial Concept Masterplan prepared on behalf of Comer Group by Foster & Partners outlines the significant potential of Metro park. In total the site has the capability to provide circa 15,000,000 sq. ft of development including employment space for up to 40,000 people and residential accommodation for c.4,000 people, all on a highly accessible site and in close proximity to Dublin airport and the wider Dublin region. Locating the depot at the current location on the preferred route with the open above ground lines will result in the loss of approx. 6,000,000 sq. ft of this space which will be a significant loss to strategic land bank.	Please refer to response (34) above.

Submission No.			273	
Organisation Name or Name of Submitter			Sainfoin Property Company Limited	
Item No.	Section Ref.	Page No.	Observation Statement	TII Response
Re: SUBMISSION ON THE METROLINK ON BEHLAF OF SAINFOIN PROPERTY COMPANY LIMITED REGARDING LANDS AT DARDISTOWN, CO. DUBLIN.				
44	APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT MetroLink Depot Site High Level Assessment Report 8.0 CONCLUSION Rail Conclusions:	Page 44 of appended report	<ul style="list-style-type: none">• Without Metro West, the justification for the depot at Dardistown is significantly weakened and results in a disproportionate impact on the Metrolink scheme as a whole.• Based on the length of route, number of stations, linear nature and frequency of service, it is difficult to see why the depot is to be located at Dardistown, other than the potential link to the Metro West scheme (which is no longer a consideration). Various examples of comparable schemes have been provided that show an end of the line depot location.• Relocation elsewhere, namely Lissenhall/Estuary, brings numerous constructability and operational benefits which in turn enable significant potential financial efficiencies.• The Dardistown location, proposed flyover of the M50 and proximity of Dublin Airport all present technical compliance and construction challenges that will result in additional costs, social and environmental effects.• The operational disadvantages further support the case to avoid such a location for the main metro depot for the route. The proposed service pattern and frequency also mean a loop/turnback facility will be required at each end of the line and this could potentially be incorporated into the depot footprint at Estuary/Lissenhall in a more efficient manner than a separate depot at Dardistown.• Major disruption to the M50 would also be avoided due to the removal of the requirement for a flyover structure south of Dardistown.	<p>These summary points have been responded to as follows:</p> <ul style="list-style-type: none">• Metro West - Please refer to response (1)• Rationale for locating depot at Dardistown - Please refer to responses (1) and (8)• Construction and operational benefits and challenges are addressed by responses (8) and (16).
45	APPENDIX 4: DARDISTOWN DEPOT RAIL ANALYSIS	Appendix 4	The content of Appendix 4 is included within 'APPENDIX 2: TOBIN CONSULTING ENGINEERS LETTER INCLUDING METROLINK DEPOT SITE HIGH LEVEL ASSESSMENT REPORT' which has been responded to above.	
46	APPENDIX 5: COMPARATIVE ANALYSIS PREPARED BY MCGREEVY PROPERTY CONSULTANTS	Appendix 5	APPENDIX 5: COMPARATIVE ANALYSIS PREPARED BY MCGREEVY PROPERTY CONSULTANTS	Please refer to response (19) above.