

**IN THE MATTER OF AN APPLICATION TO
AN BORD PLEANALA**

**For Approval of the Railway (Metrolink – Estuary to Charlemont via
Dublin Airport) Order [2022]**

ABP-314724-22

ORAL HEARING

STATEMENT OF EVIDENCE

on

Impact assessment of Santry Lodge

By

Rob Goodbody

19 February 2024

**MetroLink Oral Hearing
Brief of Evidence of Rob Goodbody
Impact assessment of Santry Lodge**

1 Qualifications and Role on the MetroLink Project

- 1.1 My name is Rob Goodbody. I am employed by Irish Archaeological Consultancy Limited as a Historic Building Consultant. I hold an Honours Degree in Geography from the University of Dublin, Trinity College, a Postgraduate Diploma in Environmental Planning from the Chelmer Institute, Essex, and an MA in Local History from the National University of Ireland, Maynooth. I have a master's degree in Urban and Building Conservation from the National University of Ireland, University College Dublin and a Postgraduate Diploma in Applied Building Repair and Conservation from Trinity College, Dublin.
- 1.2 I have over 40 years of professional experience in planning, built heritage and conservation. In this role I have worked on many motorway and other national road projects, smaller road projects and on railways, including the DART+West project. I have also been involved in works involving many houses of heritage significance throughout the country.
- 1.3 My role within the Metrolink project is as the expert Architectural Heritage Consultant and I was responsible for the preparation of the Architectural Heritage assessment in Chapter 26 of the EIAR in this capacity.
- 1.4 The purpose of this witness statement is to provide an updated character appraisal and impact assessment of Santry Lodge and its curtilage. This reassessment is necessary in circumstances where Santry Lodge was added to the record of protected structures by Fingal County Council on 22nd February 2023, after the EIAR was prepared.
- 1.5 I have prepared a report which contains a character appraisal and impact assessment of Santry Lodge and its curtilage, as requested by the Inspector in Appendix 1 to the Agenda for the Oral Hearing, which is appended to this witness statement.

2 Addition of Santry Lodge to the Register of Protected Structures

- 2.1 Santry Lodge is a house on the western side of Old Ballymun Road to the north of Ballymun and to the south of the M50 motorway. The property was used as a charter school from the 1740s to the 1890s and subsequently converted to two private houses, Santry Lodge and Tower House, though the latter was demolished in the 1980s. Santry Lodge was listed for protection in various development plans in the late twentieth century but was not included as such in the Fingal County Development Plan 1999.
- 2.2 At the time that the EIAR for Metrolink was prepared and the Railway Order application was submitted to An Bord Pleanála, the Draft Fingal Development Plan 2023-2029 had been published. This did not include Santry Lodge as a proposed protected structure.
- 2.3 Subsequent to the lodgement of the Railway Order application Santry Lodge became a proposed protected structure and its inclusion in the record of protected structures was confirmed with the adoption of the Fingal Development Plan early in 2023. The record of protected structures now includes the following in relation to Santry Lodge:

RPS ID: 0953

Structure name: Santry Lodge (Former Charter School)

Street address: Old Ballymun Road, Santry, Dublin 9, D09X4E8

Description: Mid-18th century, two-storey, eight-bay former royal charter school. Within the grounds are former outbuildings, gate lodges and entrance gates. Currently in use as homeless hostel.

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- 2.4 The relevant extract from the Record of Protected Structures is contained in **Appendix 2** to this witness statement.

3 Impact of Metrolink on Santry Lodge

- 3.1 It is proposed that Metrolink will cross over the M50 motorway and run down to ground level before entering a portal to a tunnel that will then continue southward beneath Dublin city to the terminus at Charlemont. The proposal is for the portal to be located at the site of the gate lodge to Santry Lodge, with the embankment approaching the portal blocking the present line of Old Ballymun Road. In order to ensure continued access to properties on Old Ballymun Road, the proposal includes the slight diversion of Old Ballymun Road on the eastern side of the alignment of the Metrolink to ensure continued access to the Tesco distribution centre nearby. Access to the lands on the western side of Old Ballymun Road is to be facilitated by means of a new road to run at grade through the grounds to the front of Santry Lodge and northward to link up with the northern end of Old Ballymun Road.
- 3.2 This will involve the demolition of the gate lodge to Santry Lodge, a former gate lodge that is now derelict and the front boundary wall in addition to the alignment of a new roadway through the grounds. This will affect the curtilage of Santry Lodge as has now been defined in the record of protected structures.
- 3.3 In Chapter 26 of the EIAR, a significance level is assigned to each architectural heritage structure within the study area according to Table 26.4, System of Evaluation. On the basis of this system of evaluation, Santry Lodge could have been included under level 4, but it is more likely that it would have been considered category 3 in view of the early period of the property and its history as a charter school. However, in view of its status as a former protected structure and in the light of consultations with the Architectural Conservation Officer in Fingal County Council, Santry Lodge was assigned the higher level 2 and it was assessed on that basis.
- 3.4 In circumstances, however, it was not anticipated that the gate lodge at Santry Lodge and the derelict former gate lodge of Tower House would be included in the record of protected structures, and they were considered to have a lower significance, they were accorded a level 4 significance. The gate lodge and walls of Santry Lodge and the derelict former gate lodge of Tower House are now protected by virtue of their being in the curtilage of the protected structure at Santry Lodge.
- 3.5 Having regard to the foregoing, it is necessary to carry out a reassessment of the impacts of the works on Santry Lodge and its curtilage. I propose to set out, first, a summary of the character appraisal of Santry Lodge contained in my report and, second, a summary of the impact assessment of Santry Lodge and its curtilage.

4 Executive Summary of Character Appraisal of Santry Lodge

- 4.1 In summary, Santry Lodge is a house that formerly was part of a range of buildings used as a charter school. Following the closure of the school in the 1890s the front section of the school was demolished and the rear section converted to use as two houses known as Tower House and Santry Lodge. Tower House was demolished in the 1980s and its gate lodge, built in about the 1890s, is now derelict. Santry Lodge has a gate lodge that was built in the mid-19th century. The lands associated with Santry Lodge include a small area to the front of the house, a driveway connecting between the gates and gate lodge and the main house, a small area to the north, including some derelict outbuildings and a large tract of land to the rear. The grounds of the former Tower House run across much of the front of Santry Lodge and are largely overgrown with brambles and self-seeded trees, except for some areas kept clear by grazing horses.
- 4.2 The alignment of Metrolink will run through the gate lodges to Santry Lodge and Tower House, necessitating their demolition and will also result in the removal of the front boundary wall. In addition, a new access road will be required to gain access to the lands of Tower House and Santry Lodge and the properties to the north and this is to run through the land to the front of Santry Lodge.

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5 Executive summary of impact assessment of Santry Lodge and its curtilage

- 5.1 The addition of Santry Lodge to the record of protected structures has implications for the assignment of the nature of the impact on the property arising from the MetroLink project. The curtilage of Santry Lodge has been defined by Fingal County Council as including the lands of Tower House, though these are not in the same ownership and hence the proposed access road will be routed through the curtilage of the protected structure. The revised status of Santry Lodge does not change the impacts on the house or the gate lodges, but these impacts will now be assessed as having a different level of significance.

5.1.1 Santry Lodge

The house at Santry Lodge will not be directly affected by the proposed works. However, there will be an effect on the setting. In Chapter 26 of the EIAR Santry Lodge was given a Medium baseline rating and the magnitude of the impacts on the setting of the house arising from the works was assessed as Significant in accordance with the criteria set down in Table 26.5 in Chapter 26 of the EIAR. In the light of its present status the baseline rating would be increased to High and as a result, in accordance with the criteria set down in Table 26.5, the effect on the setting of the house could now be deemed to be Profound. However, the definition of Profound as set down in Table 26.6 is "An effect which obliterates sensitive characteristics" and this would be an over-statement of the impact. A Very significant impact would be more appropriate, defined in Table 26.6 as "An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment". The mitigation measures proposed are to relocate the existing gateway and surviving gate at the new entrance to the property from the proposed access road and to provide a new boundary along the access road, with a screen planting scheme to be agreed with the planning authority. Following mitigation, the impact will still be Very significant.

5.1.2 The gate lodge of Santry Lodge and the walls

As it was not anticipated that the gate lodge would become a protected structure it was given a baseline rating of Very low in Chapter 26 of the EIAR. As the lodge is now in the curtilage of a protected structure the baseline rating will increase to High and the architectural heritage impact, in accordance with the criteria in Table 26.5, will increase from Slight to Profound. The mitigation proposed is to record the gate lodge through measured drawings, photographs and written description and the impact following mitigation will remain Profound. This is the same mitigation as was proposed in Chapter 26. Following discussions with Fingal County Council it is not likely that the front boundary wall will be reconstructed as such reconstruction rarely results in a satisfactory solution. The treatment of the front boundary will be agreed with Fingal County Council prior to construction.

5.1.3 The gate lodge of Tower House

The case of the derelict gate lodge of Tower House is similar to that of the lodge of Santry Lodge, having been assigned a Very low baseline rating the rating now becomes High and the architectural heritage impact increases from Slight to Profound. The mitigation proposed is to record the gate lodge through measured drawings, photographs and written description and the impact following mitigation will remain Profound. This is a more detailed level of recording of the building than was put forward in Chapter 26.

6 Conclusion

The addition of Santry Lodge to the record of protected structures has resulted in a greater significance of the effects on the house, the two gate lodges and the boundary wall. The mitigation measures remain similar to those originally proposed, except for minor modifications.

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APPENDIX 1

Architectural Heritage Impact Assessment Santry Lodge Old Ballymun Road

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APPENDIX 2

Extract from Appendix 5 of the Fingal County Development Plan 2023-2029: record of protected structures.

| RPS ID | STRUCTURE NAME | STREET NUMBER | STREET ADDRESS | DESCRIPTION |
|-------------------|--|--------------------------|--|---|
| 0953 | Santry Lodge (Former Charter School) | | Old Ballymun Road., Santry, Dublin 9, D09X4E8 | Mid-18 th century, two-storey, eight-bay former royal charter school. Within the grounds are former outbuildings, gate lodges and entrance gates. Currently in use as homeless hostel. |