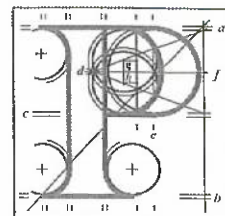


Our Case Number: ABP-314724-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Catherine Foley and Keith Madden
10 Saint Teresa Place
Glasnevin
Dublin 9
D09 C5X5

Date: 06 December 2022

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

From:

Catherine Foley & Keith Madden
10 Saint Teresa Place,
Glasnevin,
Dublin D09 C5X5

To:

An Bord Pleanála
64 Marlborough St
Rotunda
Dublin D01 V902

Date: 25/11/2022

Re: Observation Regarding Case reference: NA29N.314724:

314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin (Metrolink)

To whom it may concern,

My name is Catherine Foley and I wish to lodge an objection regarding the above referenced Metrolink Railway Order, on behalf of myself and my husband, Keith Madden, in relation to the potential risk to our property and surrounding Architectural Conservation Area.

Our home is at 10 Saint Teresa's Place, Glasnevin, which is within 30m of tunneling proposed between the Griffith Park and Glasnevin stations. Our home is part of the Prospect Square / De Courcy Square and Environs Architectural Conservation Area (ACA), and is a terraced two bay two-storey yellow brick-faced structure, built in c. 1905. Most relevantly to the tunneling proposed to take place nearby, the structure is built without foundations (when we lift a floorboard on the ground floor, there is nothing but earth beneath).

We wish to object to the the Metrolink Railway Order for the following reasons:

- **Structural Damage Risk:** We are greatly concerned about the potential for structural damage to our home, given the fact that the building has no foundations, is c.117 years old, and is less than 30m to the nearest tunnel. Fellow residents of the Prospect Square / De Courcy Square (ACA) have been engaging with the Independent Expert provided by TII, and the expert expressed concerns that not enough work has been done by TII to demonstrate that the tunneling will not cause structural damage to homes in the ACA, particularly as the type of boulder clay in the area may be particularly problematic for this type of project. More information on this is provided in the objection lodged on behalf of Prospect Square / De Courcy Square and Environs Architectural Conservation Area.

Significantly more work is required to ensure our home and others in the ACA will not experience structural damage, due to risks of vibration, impact of drilling on the water table, blasting at Glasnevin station, and potential settlement and subsidence. Detailed evaluations of the ACA (with a focus on the age and types of foundationless structures, the waterways beneath the ACA and the boulder clay beneath us) should be undertaken before the Railway Order is approved and in close consultation with residents.

- Lack of Engagement: There has been a distinct lack of engagement from TII with potentially affected homeowners and the ACA in general. Despite the fact that our home is within 28m of the tunnel, and therefore within the radius that is of enough concern for structural issues to qualify for surveys under the Metrolink POPS programme, we have received no direct engagement from TII on the matter. The only reason we even found out our home was that close to the tunnel was reaching out to TII repeatedly. We were told our home was not close enough to qualify for POPS in 2021, and only by chasing the matter up again recently were we finally advised that the tunnel is close enough that we qualify for POPS, with no further information supplied.
- Only Vague Information Provided on Structural Damage Risks and Mitigation Measures to Foundation-less Houses:
 - There has been only vague information provided about structural concerns for period houses without foundations. No evidence/ studies of other such tunneling projects where there was no damage to structures of the same age/ condition has been included in the Railway Order application. Applicable mitigation measures are not outlined in any detail.
 - No consideration is referenced in the Railway Order application to the additional implications of period structures in relation to either the higher risk to structural concerns due to the lack of foundations, or the the higher cost of repair to such buildings to the conservation standards expected in an ACA (tradition lime plasters/ mortars/ brick repair/ underpinning etc.).
 - Despite expressing our concerns by email to the TII team, and finding out that our home is within 28m to the tunnel, there has been no direct reassurance on the matter aside from a "it would be highly unlikely for any issues to occur" by return email. This is unacceptable, and much more detailed information is required both regarding our home and the ACA in general.
- Lack of Consideration given to the tunnel's proximity to the Prospect Square / De Courcy Square ACA:
 - Despite noting ACA's as being of a "High" Evaluation Level/Sensitivity in the [Environmental Impact Assessment Report](#), minimal consideration seems to have been given to the Prospect/ De Courcy ACA in the planning of the Metrolink Route. Section 10.18 on Architectural Heritage in the [EIAR MetroLink Non-Technical Summary](#) doesn't even list the Prospect/ DeCourcy ACA in its list of important sites, despite purporting to have examined areas within 50m of the tunnel in urban areas (begging the question why only structures within 30m will be surveyed). In the [Architectural Heritage](#) document, the ACA is only listed in passing and is not looked at in the same detail as other examples.

- Ideally, the tunnel should be rerouted to mitigate potential settlement in the ACA (for example, the original route with a station at Drumcondra).
- Otherwise, the 30m radius applying to POPS surveys should be extended, due to historic significance of ACA, and the fact that all of the buildings in the area have either no foundations whatsoever, or very shallow foundations.
- A Steering and Monitoring group should be put in place so that there will be engagement and transparency between the ACA and project managers.
- The entire ACA should be designated as a group of “Special” Buildings for monitoring purposes, as per EIAR Chapter 2 (5.4.11 Ground Settlement Monitoring and Mitigation Works), as these are similar to the cited listed buildings due to their ACA status, and are “Buildings with historical and cultural relevance.” The ACA should be monitored throughout the process (not just at beginning and end).
- Insufficient Property Owners Protection Scheme (POPS): The Property Owners Protection Scheme is not sufficient to protect period properties from potential structural damage, for the following reasons:
 - The documentation about the scheme demonstrates no understanding or consideration for the different structural considerations and repair requirements of Protected or ACA period properties. There are very few Conservation accredited structural engineers in Ireland who are properly qualified to survey period properties such as those in a conservation area (see Conservation Register for Engineers (CARE)). Only CARE qualified Conservation Engineers should be undertaking POPS surveys of Protected and ACA buildings, and there is no reference to the surveyors being provided under the POPS scheme having these specialities. Additionally, the cost of repairs in a period house are generally much higher due to the requirement to use appropriate materials and specialist skills to apply them (lime plasters and renders, matching cracked period bricks). There is no indication that these requirements have been considered and will be respected in instances where repairs are to be funded by TII.
 - The cost covered by the scheme is insufficient for the currently very high cost of construction, which is particularly high for period properties, and especially so for significant works like underpinning. Specifically, page 5 of the [MetroLink Property Owners' Protection Scheme, October 2022](#) document states that repairs recommended by the appointed surveyor will only be covered up to the cost of €45,000. It also states “If you do not agree with this recommendation you are free to pursue the matter through normal legal procedures.”
 - The potential repair costs covered should be increased to reflect current construction costs for specialist work on period houses, and to reflect worst case scenarios for structural damage caused by settlement. Assurances should also be made that the repair funds will cover repairs done to the conservation standards expected in an ACA.
 - Additional avenues to contesting survey findings should be put in place other than legal proceedings.

- The scheme only applies to properties which are 30m from the tunnel. My neighbour's house in the same terrace does not qualify, while ours does, which seems preposterous, given that they are attached (and indeed structural damage to one building in the terrace could have a knock on effect across the terrace). The 30m rule is insufficient given the architectural significance of the Prospect Square / De Courcy Square ACA and the fact that most structures in it do not have foundations.
- The scheme should apply to the entire ACA, or at the very least, structures within a much greater distance to the tunnel.
- Glasnevin Station Not In Keeping with Local Aesthetic: The station design at Glasnevin completely out of character with the historic neighborhood of Hart's corner with its late 19th C and early 20th C structures. The design should be revised to blend with the existing architecture of Hart's Corner.
- Length of Construction Period and Associated Disturbances: Up to a 10 year construction period will have a massive impact on the quality of life of those living along the proposed line. This in addition to the risk to homes and businesses along the route is not in any way worth the enhanced transport links.

We thank the team at An Bord Pleanála for reviewing our submission, and hope that the Railway Order will not be approved, to protect residents along the route from damage to homes, to preserve north Dublin city's architectural heritage, and to prevent the chaos of a 10 year construction period.

Many Thanks,
Catherine Foley and Keith Madden