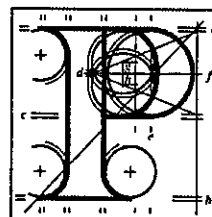


Our Case Number: ABP-314724-22



An
Bord
Pleanála

Lorraine Rooney
8 Saint Teresa's Place
Glasnevin
Dublin 9

Date: 06 January 2023

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.

I can confirm if you have made a submission within the original observation time period then you may make another observation without a fee during the extension period.

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

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Glaó Áitiúil	LoCall	1800 275 175
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64 Sráid Macilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

A Bord Pleanála, 54 Marlborough Street Rotunda, Dublin 1.

As the date has been extended for observations until the 16th January 2023 I would like confirmation that I can add to this observation due to APB decision linked to information that was not included in the Railway Order documentation filed on 30/09/2022.

Re Metrolink – Reference 314724

Ref: Intended application by the NRA (Operating as TII Ireland) for the Railway (Metrolink – Estuary to Charlemont via Dublin Airport) order (2022).

Date: 22/11/2022

RE: Lorraine Rooney – 8 St. Teresa's Place, Glasnevin, Dublin 9.

To whom it may concern.

AN BORD PLEANÁLA	
LDG-	059496-22
ABP-	ok
25 NOV 2022	
Fee: €	50
Type:	card
Time:	
By:	hand

My submission is relating to the above project and the impact it may potentially have on my property and the surrounding prospect ACA.

I do not feel that this €50.00 fee should apply on a local level due to the nature and extent of the build. TII, Bord Pleanála and the stakeholders are not taking into account that local residents are giving over the land in question without any meaningful exchange from any parties involved, including local representatives with regard to the extent, size and duration of this project. As per an entry of in the Law Society Gazette 31/01/2022 the total spend on this project is 88.1m since 2016. In this instance giving the fact that this amount of money can be spent on a project that has not even begun this fee should have been waived.

Communication from TII to local residents.

TII have **not** been transparent throughout the planning process of this proposed project. There has been no effort to bring communities on board since the consultations held in March 2019. These were a PR exercise that failed to meet the needs of the areas that will be subjected to huge disruption caused by this mega construction project. The stakeholders do not seem to have any interest in consenting local communities to have any input into the process, addressing genuine concerns about the route, the loss of green spaces, closing off sections of local amenities, and design of stations. There should have been meetings specific to each area, like the Prospect ACA, GADRA, IDRA, D7 Allianz to name but a few.

As a result of the change of the date for submission this shows that there is ineptitude within TII as how a large tract of documentation for a railway order of this size was omitted is beyond belief.

Provision of Detail

Provision of detail in lay terms is non-existent, it is scant to say the least. There is a wealth of technical detail in the various on-line reports. This involved many hours of trawling through different reports which is arduous and time consuming especially when there was such a tight deadline for the railway order. The stakeholders had all this knowledge well in advance of the deadline, giving them the advantage. And from meeting with the various groups the prospect ACA have liaised with this was the general consensus. That the stakeholders held the advantage and local representatives were not dealing with constituents concerns. I also believe that RINA are only

completing their independent report so this railway order should not be going through until this report has been looked at in greater detail.

Monitoring of Foundations

The properties along this section of the route have the standard foundations which would attributed to a property build over 100 years ago. The house is sitting on boulder clay and monitoring must be carried out to the highest standard. This ACA area is referenced in the documentation but no studies appear to have been completed. Foundations under these homes, would realistically be effected by vibration and changes to the water table.

"Areas of Architectural Conservation (ACAs) like Prospect Square, De Courcey Square and environs must be treated with great care and sensitivity and the residents and the Local Authority consulted at every stage of development"

Above is has been taken from a TII report.

An in-depth ground movement study must take place, and residents need to be involved throughout this process. There is a query over the 30M zone, which has been moved down from 50M. There is no way of predicting a zone for any property, as properties with varying ages, size, builds will all react differently to vibration. The distance of the zone may need be irregular depending on the settlement calculations done for each building. International standards must be adhered to and be contractually imposed to the contractor.

No consultation has taken place with prospect ACA as a group to alleviate concerns about the close proximity of properties to the tunnel, or properties directly over the bore.

Blast Risk Management

Risk management in blasting work is increasingly becoming more challenging as work inevitably occurs in more populated areas. Not only is the work closer to people and structures, but concern about blasting effects on utilities are also increasing. Sometimes it is possible to use mechanical methods to excavate rock, but these are slower, costly, and may still have vibration issues. Regardless of the scale of the blasting work, sometimes engineers and contractors underestimate the importance of preparing blasting controls and public relations programs. The consequences of this are often severe. There is limited information of the duration of blasting that will be required for the station area, will this be a duration of days, weeks. Advice we have been given that there could possibly be one blast per day going on for several weeks. Can information be provided in depth on the possible vibration effects of such a procedure? How will the buildings that are protected structures dotted around this section be managed during this work.

All blasting projects—large or small—occurring near any concerned neighbours, require some level of public relations work. The level of this public relations (PR) work is a function of the blasting duration, timing, and the level of concern by the neighbours. The public should not be ignored and should be allowed a meeting to discuss their concerns over blasting close to their homes and the canal.

Subsidence

As this is a terraced street, where there is the potential for movement of the boulder clay. It is very possible one weaker structure on the terrace could negatively impact all the properties and cause issues with subsidence/cracking/issues with doors windows/roof/drains, or more serious damage there does not appear to have been any impact study done in this instance. There seems to be discrepancies regarding the zone of inclusion, some residents received information that the zone was 50m, TII reports now have a 30M zone, another householder has been advised that if one of the properties on a terrace falls into zone of inclusion should a property become effected as a result of ground movement the whole terrace/street will be covered. This zone should be extended much further due to the building layout of the area and the interconnection of many of the properties. There is one property in particular on the junction of DeCourcey Square and Prospect road that is noticeably subsiding which gives a clear indication that there is movement in the ground below this area. This happens to be close to an underground source of water which would indicate a full investigation of the quality of the boulder clay/substrata is required.

Insurance

If this type of damage occurs what is the plan if the property has to be vacated for a period of time if remedial work needs to be carried out. As with the current situation and the housing shortage there would not be a viable alternative to house people. Also there would need to be an assurance that all contents in the house needed to be adequately insured in the event the damage necessitates the vacation of the home.

There is no clarity as to how private Home Insurance Policies will operate, how do TII/stakeholders propose indemnifying the house and contents for this period of time.

Speed of Remedial Work

How quickly would TII address the issues, in the event of damage would this immediately be assessed and repaired.

Timeframe

The timeframe of the tunnelling close this particular street and how far the vibration is expected to radiate from the bore sight.

Depth of Tunnel

The tunnel from ground to top level will be 15 metres. This is just short of 50ft which is not deep. The average depth of the underground in London is 24 metres, which would equate to 78ft.

Drains & Water Table

There are several underground drains/culverts one that appears to run down the centre of St. Teresa's Place as on occasion the small drains have discharged water when there is excessive rain and the manhole cover at junction of Prospect Road and St. Teresa's place has lifted on occasion. In exceptionally heavy rain there is a channel of water running down each side of the street as there in an incline heading towards Botanic Road.

Drains need adequate monitoring to ensure that no effluent is running into the surrounding ground.

Station Building

The building in the drawings does not enhance this area rather it detracts from what has the potential to be developed into a thriving business area, it is not in keeping with any of the local architecture. A building should grab people's attention, and become something that the community are proud of, are able to use as more than a station. This needs much more development as the Brian Boru is a landmark for anyone visiting the area with links to James Joyce's Ulysses, the mural on the side alone is something particular to the area. The station name is also very generic, and if historic building are proposed for demolition there should be something kept in the memory banks, name the station the Brian Boru or similar. No one refers to this part of the city as Glasnevin it has been called Harts Corner since the 1920's when the Hearts Building was constructed. Is it the policy for large building projects to eliminate all connection with the previous history of an area?

There is the possibility of a James Joyce Museum to be integrated into this building.

This is a quote from document metrolink-concept-engineering-design-report.pdf I fail to see where any of this has been incorporated in the station proposal for Glasnevin North.

6.1.2 Urban Integration and Place Making.

metrolink-concept-engineering-design-report.pdf

"A station in an urban location transforms its surroundings dramatically. The approach to design for the New Metro North line is urban integration focused. Careful incorporation of the stations into urban districts can act as a catalyst for economic growth, social mobility, regeneration and place-making. Various aspects including station location, public realm, over-site-development (OSD) potential and its impacts on existing urban infrastructure such as roads and services need to be carefully evaluated. A station also creates a space around it; for meeting, gathering, waiting, and embarking on journeys. Stations are often also urban land-marks and points of references. Their visual identity and the potential for transforming the public realm requires that its urban context is understood and analysed thoroughly. The New Metro North system will span across diverse districts of a city with distinctive urban characters. The attention to the local context creates an opportunity also to develop a unique identity for each station whilst enabling relationship between the urban context, station and the metro line.

The station as a catalyst for enhancing heritage. • The station as a threshold to green spaces"

Steering and Monitoring Group

A steering group needs to be set up; as there has to be a direct connection between the project developers with the local community and the residents, this has not been discussed. There needs to be full accountability and transparency. As we are to have to deal with a huge building project both underneath our homes and at a section of the community where our GP practice is and our chemists, what is the proposal if in the event of the station build these services have to be relocated.

Community Fund

A fund needs to be set up for the local community as this area has no community hall, no facilities for residents to have community groups/functions/meetings and this should be incorporated into the new station. The proposed station building can easily accommodate commuters and residents. It is important that something is given back to the community as we are giving a huge amount, from having the potential of property damage, to the problems that may be caused commuting to the city centre and the effect it will have on local amenities/services especially for the elderly person.

Employment Prospects

6.15 Functional and efficient.

metrolink-concept-engineering-design-report.pdf

"It is also envisaged that there will be minimal, if any, passenger facing permanent staff in the stations, and that New Metro North will work on the very latest digital infrastructure available for station and system operation to service and run a metro system that is truly looking to the future."

How many employees do the shareholders envisage in this large station, what way will security be monitored throughout the station and the large plaza planned for this tract of land. Unmanned zones like this are a mecca for anti-social behaviour especially at night. How safe would people feel in an unmanned station and if there is an incident how quickly can this be addressed, as in a medical emergency, assault, train incident as you have in London with people stepping/falling out on front of trains. People like to feel safe in stations, especially at night so I do not envisage any station in Dublin feeling safe without a security service/garda presence.

Summary

I have lived in this area all my life, and feel that much more work needs to be done to allay any fears people have with regard their property and the area in general. It is all well and good for people to comment and say that it is only a few old houses, and they will be repaired if there is damage. I have spent years paying a mortgage, taxes, and numerous other bills. I have invested in my property and have done work that should ensure it lasts for another 100 years. So it is not just some old house to me, this street has witnessed the history of the area and has serviced many families since it was first built. It is not acceptable to put people in a situation that the house was so badly damaged it is deemed not fit for purpose what is the alternative proposed by the stakeholders in such a situation.

Areas like this should be given proper recognition and enjoy protection that other European cities provide for the preservation of older architecture. There is not enough safeguarding given to neighbourhoods that actually enhance a city, and provide fantastic living spaces. If we are to have a thriving area that people want to live in and visit we need to start to respect and appreciate our architecture which is considerably better and more durable than buildings that are going up today. They have a character that is an essential part of Dublin as a city and to allow a project to go ahead that may allow the demolition of some protected buildings and damage others is total lack of foresight on behalf of TII/Dublin City Council/other bodies involved with this project.

I do not believe that this metro will provide the income to cover the cost of building for decades to come and is another wasteful project that will take years to pay dividends. There is also a total lack of communication from TII, a refusal to engage with the residents who are actually granting them permission to proceed, there is a huge displeasure within the area with the way TII/stakeholders and local representatives did not engage with residents. But this seems to be a standard procedure with these large construction projects which is a sad indictment for both our large infrastructure agencies and our local elected representatives.

Yours sincerely



Lorraine Rooney