



Mark Campbell and Aimee O'Farrell  
11 The Court  
Dalcassian Downs  
Glasnevin  
Dublin 11  
D11 FP77

**Date:** 16 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.

Please be advised, there is no fee for an affected landowner, listed on the schedule, to make an observation on this case, therefore, a refund of €50 will be made to the credit/debit card used to make the online observation.

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](http://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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12/01/2023

An Bord Pleanála  
64 Marlborough Street,  
Dublin 1,  
D01 V902.

Dear An Bord Pleanála,

**Re:** Metrolink Glasnevin Station, proximal to The Court Apartments, Dalcassian Downs

**Case reference:** NA29N.314724 Estuary through Swords, Dublin Airport, Ballymun,  
Glasnevin and City Centre to Charlemont, Co. Dublin (Metrolink)

There are significant public health risks associated with the proposed works which I do not feel have been adequately described in the Environmental Impact Assessment Report (EIAR).

### 1. Specific health risk to children

**Health risks described in the EIAR will be based on studies that explore adult health risk. There have not been adequate studies done to examine the specific risk to infants and children who have significantly different physiology and psychology.**

Long term disruption/ Long-term exposure to noise can cause a variety of health effects including annoyance, sleep disturbance, negative effects on the cardiovascular and metabolic system, immune system dysfunction, as well as cognitive impairment in children. Sleep disturbance has been shown to cause delay in reaching predicted growth centiles and developmental milestones and impair academic ability.

(<https://www.eea.europa.eu/articles/noise-pollution-is-a-major>)

Children have a higher respiratory rates, and smaller lungs, they are more susceptible to air pollutants. (<https://journals.sagepub.com/doi/pdf/10.1080/14034950600677311>)

Children are more susceptible to airborne and groundborne noise due to a number of factors including their range of hearing <https://pubmed.ncbi.nlm.nih.gov/15129589/>

**Any mitigation measures and modelling included in the EIAR are based on adult data, these studies don't include and cannot accurately predict risk to children, and therefore cannot be relied upon.**

Specifically, EIAR suggests 'Significant to Very Significant' Airbourne Noise and Vibration (NV4) for Dalcassian Downs Court post mitigation measures.

Whilst TII have documented 'Potential annoyance and disturbance of sleep for residents' this does not describe the potential risk to infants and small children, or night workers related to disturbance of daytime sleep patterns.

Construction traffic holds another risk for children in addition to the noise and dust and pollutants caused by construction traffic. As children are smaller, they may be more difficult to see from the cabin of large vehicles. Being less visible to these drivers puts them at increased risk of injury/serious incidents/near misses.

## **2. Quality of life**

These are very formative years for infants and children, their physical health, their growth potential, and their academic performance have been shown to be negatively impacted by disruption to their sleep, being exposed to prolonged periods of noise.

They will no longer be able to socialise in the common areas, speak to neighbours, invite friends over. This will hinder their emotional development.

## **3. Air Quality:**

Air quality in the area already exceeds the World health organisation air quality guideline levels. There is a direct correlation between elevated pollutants and mortality. This is more significant on those with smaller lungs and higher respiratory rates such as children.

(<https://www.who.int/publications/i/item/9789240034228>)

Building a station/ transport system to reduce pollution in the future should not be offset by increasing the risk to the local population now. The proposed development will undoubtedly reduce the quality of life, the air quality, and the ability to use green spaces locally due to invasive/intrusive noise, dust.

## **4. Air and noise pollution:**

There has been no sustained collection of air or noise quality readings at the site of the proposed station. This is already an area of elevated noise and poor air quality. There is no evidence that any mitigation measures would be capable of reducing the increased risk to human health.

EIAR Section 10.5.1.2 suggests that working at this site will be 24h per day, and that mitigation methods are predicted not to adversely affect human health.

As described above - These predictions cannot account for infant and child health. The impact on children is immeasurable

Noise control targets/Noise emission limits for drilling- (<50dB at The Court, <45dB vibration from Mechanical excavation). These limits should be reduced in evening and night-time by minimum 5-10 decibels).

## **Further questions that should be answered:**

- Who will be responsible for measuring noise levels during construction?
- How will the equipment and measurements be validated, and who is responsible for monitoring and reporting?
  - This telemetry should be publicly available on a hosted website for public access to records.



- Monitoring should be continuous. Monitoring equipment should be maintained/ inspected at regular intervals.
- Breaches should have swift and significant penalties, that should not be seen as merely an additional cost.
- Repeated or sustained breaches will require more severe penalties.

**Additional considerations:**

Given that many people are working from home, there are implications to our working day. As someone working in healthcare remotely, this presents a significant barrier to normal working conditions, and could cause undue levels of stress.

Control of noise at work regulation is relevant here, as not only peak noises, but sustained noise can interrupt video calls, telephone calls.

The current EIAR report does not examine the welfare of children and thus is inadequate. This group is physiologically different from adults and thus the same findings can't be universally applied to all ages. The health and welfare of children and infants in the area cannot be sacrificed nor should they be used as case studies in the future to highlight dangers that can be predicted.

As residents of The Court, Dalcassian Downs, this construction will be taking place outside our front door and our apartment window. We will be living on a building site, and do not feel that the plans that are suggested are safe or appropriate.

We look forward to hearing from you,

Dr. Mark Campbell &  
Dr. Aimee O'Farrell