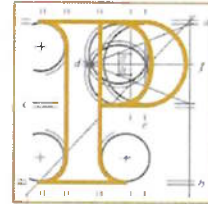


Our Case Number: ABP-317679-23



**An
Bord
Pleanála**

Mary O'Neill
RITE Committee
49 St. Patrick Villas
Ringsend

Date: 04 October 2023

Re: Ringsend to City Centre Core Bus Corridor Scheme.
Ringsend to City Centre, Co. Dublin.

Dear Sir / Madam,

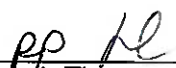
An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the mean time, please contact the undersigned officer of the Board at laps@pleanala.ie

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

HA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



3rd October 2023

Ringsend to City Centre Core Bus Corridor Scheme. SID Case Ref. 317679.

Dear Sir/Madam,

We wish to make the following observation regarding the proposed cycle route through Strand Street, Irishtown, outlined in the '*Ringsend to City Centre Core Bus Corridor Scheme*' and ask that you take all our points into consideration, before reaching your decision on the proposed Scheme.

As detailed in the Scheme, the proposed cycle route is planned to run parallel with the old granite sea wall through Bayview/Pembroke Street and into Strand Street where it then loops down through the middle of the green on Strand Street, proceeds around the end of the green and back towards the Strasburg Terrace car park and into Ringsend Park, effectively cutting off the green from residents.

Many of our group members are active cyclists and while acknowledging the importance of enhanced cycling infrastructure, we firmly believe there are alternatives which would by-pass Strand Street entirely or cause less substantial disruption to Strand Street itself, especially the green.

A. The likely effects on the environment of the Proposed Scheme:

1. Point 8.6 Human Health - Environmental Impact Assessment Report (EIAR) (page 33) states "*There is widespread exposure in the study area to noise levels which exceed the levels set by the World Health Organisation to prevent adverse health outcomes. However, the noise levels experienced are typical of an urban environment.*"

Strand Street is a quiet place, with minimal traffic; the noise levels will likely increase if permission is granted to the proposal as currently presented. We submit that including Strand Street as part of the cycle route will increase noise and disturbance and thus would have a **negative** impact on the health and well-being of residents there. For this reason, we ask that consideration be given to cutting out the part of the proposed cycle route that includes Strand Street, and instead, submit that the route take that as set at options 1, 2, 3 or 4 below, if permission is to be granted at all.

2. Point 8.6 (page 34 EIAR) states that *“The Proposed Scheme will create opportunities for building in regular physical activity into daily life through the improved pedestrian and cycling facilities, as well as through walking to and from bus stops. It is predicted that this will result in positive health outcomes as some people will change their travel behaviours and benefit from increased regular physical activity as a result.”*

We submit that taking Strand Street into the scheme by removing/reducing the green open space, which residents use as their garden (none of the homes on Strand Street or adjoining streets have front or rear gardens) will lead to a negative health outcome for people who live along this street. We use the green space for enhancing and protecting biodiversity. We plant herbs, pollinator plants and flowers, and we hugely value what we grow to be our healthy space in the community. It is for this reason, we ask you to consider imposing a condition that Strand Street, be cut out of the route for the proposed cycleway scheme, if the scheme is to be granted permission at all and that you consider the route take that as set at options 1, 2, 3 or 4 below.

3. Point 8.6 (page 30) states that *“Reductions in general through-traffic, improved pedestrian infrastructure and improvements to the streetscape are likely to encourage more social interaction along the Proposed Scheme, resulting in positive health outcomes such as good mental wellbeing.”*

We submit that the proposed changes to our community green space (residents' front garden) will have a negative impact and reduce our social interaction, resulting in a negative health outcome and diminished mental well-being of residents along this stretch of road. It is for these reasons, that we ask you to consider imposing a condition that cuts Strand Street out of the route for the proposed scheme, if permission is to be granted at all, and that you consider the route take that as set at options 1, 2, 3 or 4 below.

4. Point 8.7 Biodiversity (page 36 EIAR) states that *“Potential impacts on biodiversity for the Operational Phase may relate to the presence and operation of traffic on roads within the Proposed Scheme, the introduction of new lighting in previously unlit areas, routine maintenance works, and an overall increase in impermeable surfaces. The measures proposed to avoid or reduce negative impacts on biodiversity during the Operational Phase will include:*

- *Light spill will be minimised through lighting design around Ringsend Park and the DPTOB;*
- *New planting within the Proposed Scheme, as outlined in the design; and*
- *The implementation of sustainable drainage measures will help prevent habitat degradation.*

The assessment concluded that with the application of the proposed mitigation measures, the impact on biodiversity during the Operational Phase will be not significant beyond the local level however the habitat loss during the Construction Phase remains a permanent impact.”

Because of the negative impact the proposal to remove part of the green space on Strand Street will have on residents, we submit that as the green on Strand Street is a quiet, peaceful, biodiverse place, (morning and night) and, in the context of the 1.1 km of cycle route from York Road to Sean Moore Road, this street could be cut out of the scheme because of the very small section it involves. The proposed cycle route is planned to run parallel with the sea wall, then loop down through the middle of the green on Strand Street, back up across the top of the carpark at Strasburg Terrace and then into Ringsend Park. Alternatively, we submit that the route could run on any one of the following four options, removing any need to destroy the green space on Strand Street.

In relation to *“The measures proposed to avoid or reduce negative impacts on biodiversity during the Operational Phase”*

It is submitted that the work we in Ringsend & Irishtown Tidy Towns & Environment “RITE” and Dublin City Council Parks Department have invested in the protection of our biodiversity, that the green open space on Strand Street and the fourteen trees need to be left in place in order to protect the ecosystem and the health and well-being of residents, and for this reason, we ask that you condition-in that Strand Street, be cut out of the route for the proposed scheme, if permission is to be granted at all.

B. The implications of the Proposed Scheme for proper planning and sustainable development in the area in which it is proposed to situate the Proposed Scheme:

1. The Eastern Midlands Regional Assembly’s (EMRA) Regional Spatial and Economic Strategy (RSES) at page 77 (<https://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html>) states:-

“The following Guiding Principles for SuDs shall be incorporated into development plans and LAPs:

- *Seek to reduce the extent of hard surfacing and paving as well as requiring the use of sustainable drainage techniques. Where possible, consideration should be given to measures that have benefits for both WFD and flood risk management objectives, such as natural water retention measures, and also for biodiversity and potentially other objectives.”*

The introduction of a hard surface cycle route in place of the open green space on Strand Street is a direct contradiction of regional policy as stated in the EMRA RSES, hence does not make for proper planning and sustainable development in our area of Irishtown. As well as trying to protect the green space for reasons of biodiversity, health and well-being, there is also concern locally about possible future flooding in the area. The green open space provides natural absorption/water retention during heavy rainfall. We submit that the route could run on any of the below options, removing any need to encroach the open green space on Strand Street.

2. The EMRA RSES - Chapter 7.7 Green Infrastructure (page 164) states:-

“Placemaking and Green Infrastructure GI serves a wide variety of important functions including but not limited to; provision of habitat, increased biodiversity, ecological corridors, climate change adaptation and mitigation, water treatment, water retention, local amenity provision, air quality improvement, cultural and heritage preservation, a mentally restorative environment and flood mitigation. At the local authority scale, GI offers an opportunity to develop integrated strategies around economic development, urban placemaking and rural policy. Linking strategic natural assets with cultural and heritage assets further enhances the opportunities for GI strategies to drive recreation and tourism benefits. Table 7.1 identifies the strategic GI and cultural heritage assets in the Region.”

The open green space on Strand Street serves a wide variety of important functions including -

- a) provision of habitat for birds and foxes (which keep the rodent population at bay);
- b) increased biodiversity with a number of varieties of maple and fir trees, pollinator plants, water stations for birdlife and bug hotels for the protection and encouragement of solitary bees and bugs;
- c) acting as a flood water retention area, which is vital to adjacent homes, particularly during heavy rainfall as predicted into the future with July 2023 being the wettest July on record according to provisional records of Met Éireann;
- d) the presence of mature trees that absorb carbon dioxide, thus being a vital contribution to our air quality, and
- e) provision of a local amenity which we tend to and on which we grow pollinator plants and herbs for the use of residents.

All the above contribute to the preservation of our local ecosystem and for these reasons we submit that Strand Street be either cut out of the proposed cycle route or that consideration be given to running the cycle route along any of the four other options below, removing any need to encroach upon the open green space on Strand Street.

Alternative Options:

Option 1:

Extend the existing standalone cycle path on Sean Moore Road onto Pigeon House Road and Cambridge Road, creating a 'quiet way' to Thorncastle Street. This option allows for potential future connectivity to the Dodder Greenway.

Option 2:

Along Pigeon House Road, establish a cycle path on the existing greenway between the road and the East Link Wall. While unsuitable to vehicular traffic, this stretch is suitable for a cycle path and would run parallel to the proposed LUAS link to Glass Bottle.

Option 3:

Install the cycle path behind the old sea wall at the Sean Moore junction and continue it in a straight line into Ringsend Park, thereby avoiding any encroachment on the green and street.

Option 4

Slightly increase the width of the existing footpath which runs parallel to the old granite sea wall and allow it to become a combined pedestrian/cycleway. If the combined route (*as proposed on p.14 Appendix A, General Arrangement Drawings, from Marker F50700*) can accommodate all anticipated users, there is no reason for a separate cycleway. This would avoid cutting the green off from residents, would be far more cost effective and could be extended to the Sean Moore Road junction.

The Strand Street green holds significance as more than just a green space - it serves as a cherished garden for the residents of Strand Street, Chapel Avenue, Pembroke Street and the surrounding streets where homes do not have front or rear gardens; it functions as a quiet biodiverse haven where nature is nurtured, providing habitat for birds and foxes; it contributes to the health and well-being of the community; and it actively supports environmental sustainability through various initiatives undertaken by the local residents and by we the members of *Ringsend & Irishtown Tidy Towns & Environment* group as well as Dublin City Council.

The proposed severance of the green and the loss of trees would be deeply distressing and would adversely impact the health and well-being of residents and would disrupt the natural habitat of wildlife, actively encouraged in the area.

We are very concerned at the lack of attention to detail in the Scheme concerning Irishtown and Strand Street in particular, which by all reports, was similarly evident during the Public Consultation with the NTA in 2019. We believe that this element requires far more careful consideration if it is to be included in the Scheme.

While we actively support measures that address climate change, including improved cycling facilities and public transport, we emphasise the importance of community engagement, and respect for residents' concerns. The residents of Irishtown have a strong sense of community and a commitment to preserving the area's heritage and natural environment. We request that these voices be heard, and that our concerns and recommendations be given full and proper consideration.

Yours sincerely,

MARY O'NEILL

Secretary,
RITE Committee,
49 St. Patrick's Villas,
Ringsend,
Dublin 4.