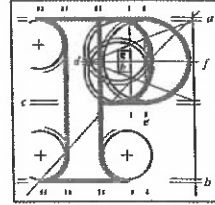


Our Case Number: ABP-314056-22



An
Bord
Pleanála

Lauren Tuite
122 Emmet Road
Inchicore
Dublin
Dublin 8

Date: 28 July 2023

Re: Liffey Valley to City Centre Core Bus Corridor Scheme.
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted.

If you have any queries in relation to the matter 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

CH08

Tel	Tel	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

AN BORD PLEANÁLA

LDG- _____
ABP- _____

05 JUL 2023

Fee: € _____ Type: _____
Time: _____ By: Hand

Lauren Tuite
D8 Development
122 Emmet Road
Dublin 8

Case ref: ABP-314056-22

D8 Development Response to NTA Observations on the Proposed Scheme Submissions

Introduction

D8 Development is a social enterprise that brings life back to empty buildings. In our research and practice, we see the detrimental impact of car prioritised design in Inchicore. As part of our work to tackle dereliction, we lobby for equitable use of public space and the prioritisation of vulnerable road users. We do this in collaboration with local residents, businesses, and other organisations. This observation will consider the specific design proposal for 120–124 Emmet Road, the location of our flagship project, and the broader failure to provide walking, cycling and public realm improvements for Emmet Road.

Response to 2.4.3.1 Cycle parking removal

With regards to the total number of bike parking spaces, the NTA's response states that:

With regards to cycle parking, 417 spaces are currently provided. The Proposed Scheme will increase provision by 148% to a total of 1,017 spaces across the entire corridor.

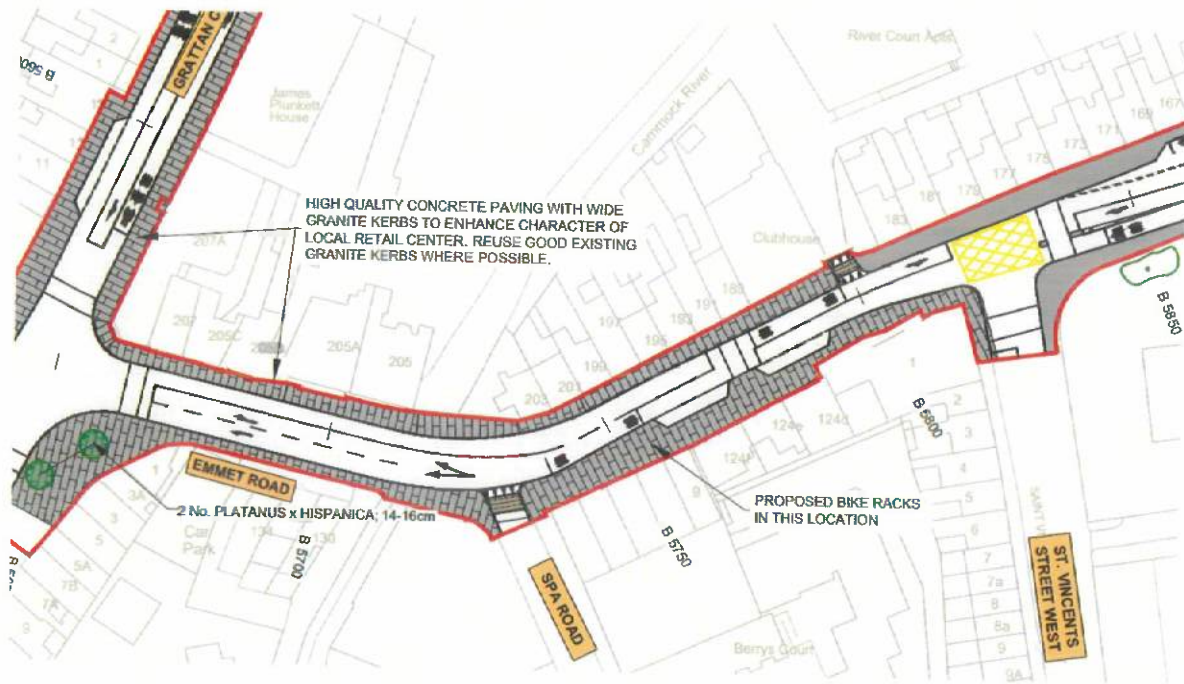
While we welcome the provision of 1,017 bike parking across the Proposed Scheme, there is very little detail about where they will be provided at a local level. At this stage of the statutory process, it's completely unacceptable that the NTA would withhold the precise location of these 1,107 spaces from the public.

With regards to bike parking provision in the Emmet Road area, the NTA's response states that:

As set out in Supplementary Information Preliminary Design Report Sections 4.11.6 and 4.13 bike racks will generally be provided, where practicable, at island bus stops and key additional locations. The island bus stop and key additional cycle parking locations are noted in the Landscape General Arrangement drawings in Volume 3, Chapter 4 Section 5 of the EIAR. As shown in the Landscape Arrangement drawings, new cycle parking is proposed along Emmet Road which will substantially increase the cycle parking along this section of the Proposed Scheme.

This response is highly misleading. Since there are no island bus stops proposed on Emmet Road due to the total omission of safe cycling infrastructure along this section, we can only conclude that there will be no further bike parking on Emmet Road beyond what's shown in the Landscape General Arrangement.

In the Landscape General Arrangement drawings, there is only one location on Emmet Road where the provision of bike parking is shown - an unspecified number of bicycle stands between St. Vincent's Street West and Spa Road on the southern side of Emmet Road. In return, the NTA proposes removing 14 bike parking spaces at the junction of Spa Road and Emmet Road, 8 bike parking spaces outside McDowell's pub and 10 bike parking spaces outside Flower Pop. The latter 18 spaces were installed in recent years due to increasing local demand. In addition, the 4 bike parking spaces due to be installed outside Flower Pop as part of the planning permission for 122/124 Emmet Road can no longer be installed.



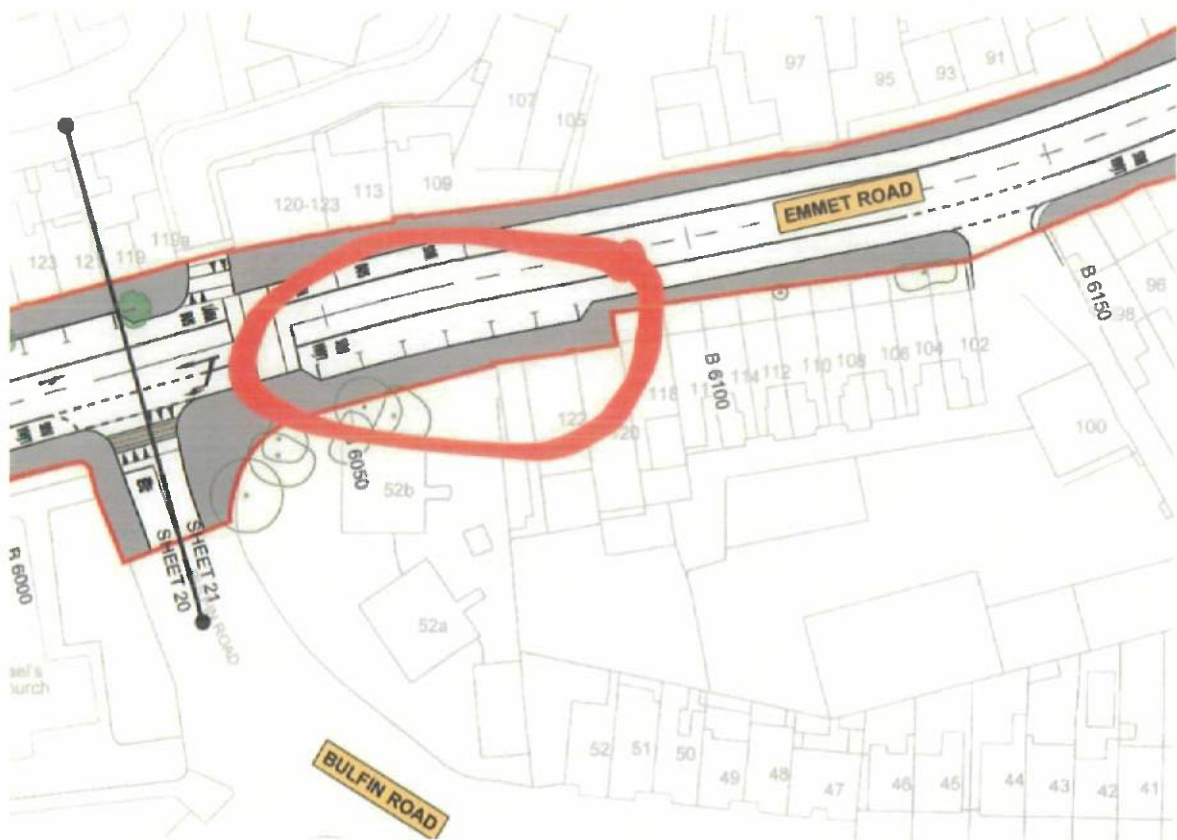
It's difficult to see this as anything but a significant loss of bike parking in the area. This is an urban village with busy commercial and high density residential units and any loss of bike parking at these locations would be detrimental to the village and for the objectives of the Proposed Scheme itself.

Response to 2.4.3.3 Footpath treatment

With regards to narrowing of the footpaths, the NTA's response states that:

It will be necessary to reduce footpath widths along Emmet Road in some locations. This is required to facilitate dedicated bus priority and, in some cases, to provide allocated residential parking that has been relocated or reduced.

However, at the location we highlighted outside 120-124 Emmet Road, the footpath is being narrowed and the private landing is being purchased to provide parking outside a commercial area. As stated previously, this would have a detrimental impact on the businesses operating at this location that rely on local people walking and cycling to the premises for the bulk of their trade. This location is also a stop on the historical walking tour from Richmond Barracks to Kilmainham Gaol, and large tour groups gather, several times a day, on the wide footpath outside 124 Emmet Road to hear the history of Emmet Hall and its role in the 1913 Lockout and the 1916 Rising. After many decades of lying idle, these buildings were redeveloped in 2020 and 2021 to provide much needed community facilities and employment including: a grocery store, bookshop and florist.



Once again, we believe that halving the number of parking spaces proposed at this location from 6 spaces to 3 spaces would be an acceptable compromise to avoid narrowing of the footpath at 120–124 Emmet Road. This would also allow for replacement of some of the bike parking spaces that are proposed to be removed by the NTA.