

Submissions Received Issue 1
Park West Cherry Orchard
Draft Local Area Plan – June 2019

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Name:

Fr Michael

Organisation:

Comment:

Please widen road across from school especially if new shops are going there. It is chaotic at school run time presently. Be careful with open space. It draws antisocial gatherings.

Attachment:

Details as above from received written submission.

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Working in a Prison means you are constantly enclosed in four walls for the duration of your shift. Having access to an outdoor area where staff can relax or exercise would greatly increase staff moral and help with mental health. It would be greatly appreciated and highly beneficial to the organisation.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I would benefit immensely from an outdoor area for physical exercise. Currently officers can go 12 hours without having any natural light, detrimental to our health. An outdoor park for recreation would be a fantastic addition for the staff of the West Dublin Prison complex.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

The lands adjacent to Cloverhill Visitors Car Park provide a perfect amenity for Prison Staff whom serve the community daily here in West Dublin. Many of these staff seek various opportunities to exercise and regenerate during rest breaks etc and an appropriate development on these lands would create a more holistic environment for us to exercise/socialise/relax. As you can appreciate the role of a Prison Officer can be stressful at times and any opportunity for the community to recognise that would be most welcome.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a.”

Comment:

This could have a huge benefit for staff in a physical and mental capacity and give them a break away from the stressful conditions of the environment which they work in. A training and relax area could have huge benefits for all involved in the area.

Attachment:

Map of area

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

If we were given the area we could turn it into a running track/outdoor gym area which would be amazing for the Prisons beside it. Running and keeping fit is not just physically good for us but also mentally benefiting. Have an area to relax with benching etc. would also be benefit the prison with having an area to social/relax which we currently don't have in the prison. Plus having the ability to leave work during lunch time and not be behind the walls and having this area to relax/exercise/socialize in would be very benefiting for everyone in the prison.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports and Social, lands at 3a

Comment:

We have approximately 800 staff members, most of whom are physically active. The provision of nearby recreation facilities would greatly enhance the well being of these staff members. It would be of huge benefit, mentally and physically to staff members to have somewhere to congregate and partake of exercise, in a safe environment. At present a high percentage of our staff partake of physical activities, but time and travel constraints sometimes deter people. The nature of our work makes it difficult and uncomfortable to run, walk or jog in the public space outside our work place. This proposed development would be very welcome and be used by many of our members.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

potential benefits to your physical and mental health etc.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

potential benefits to physical and mental health. prisons are filthy and the air quality is shocking

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Sports & Social Club

Comment:

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Prison Officers are involved in the daily management of offenders, this can be a highly pressurised job, and for the staff to have a place that is secluded, secure and built for purpose. It will allow them the opportunity to go somewhere during their break periods to unwind, relax and maybe talk to others outside the confines of the prison walls, and in turn this could help their mental and physical wellbeing..

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

A prison staff recreational area / jogging area would be greatly appreciated to both prisons beside this land. It would benefit a huge number of people that need an open space to clear the heads and stay fit while working in a very enclosed environment. I

Comment:

a jogging area would be of great benefit / benches, trees.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I feel that the potential benefits of obtaining this land will be a great factor to maintain mine as well as all the other prison staffs physical and mental health.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service at land 3A.)

Comment:

I would love to see this area used for prison staff and a removal method from the pressures of our daily work. I feel it will bring enormous potential benefits to our physical and mental health etc.

has great potential to be used as a park area with exercise options and would be a great use of the high amount of tax we pay each year.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Please be advised that the prison service would benefit no end to this piece of ground.

At the moment work and rec in a concrete jungle and I think it would be very beneficial both mentally and physically to acquire this piece of land to encourage some ph

Comment:

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I think this would be of massive benefit for my physical and mental well-being. As a prison officer, I am always weary when going running publicly around the prison as my safety is always at risk. This area would greatly benefit my safety and the safety of other prison officers. I have been out running many times in the local area and on several occasions have been approached by former inmates knowing who I am. This development would address this problem.

Thank you,

Prison Staff – Name Redacted

Cloverhill Prison

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill prison sports and social club land at 3a

Comment:

working a daily 12 hour shift inside prison walls is tough both mentally and physically on a daily basis . there are times where you just feel drained as the nature of the job is very challenging. the best way I have found personally speaking to help with this is training at break it could be from something like a walk outside to going to the gym I find it is excellent for clearing my head and making me feel great. If we were to get this land I think I would reap huge benefits for all the staff here at the prison and I really hope you give it serious thought to granting it to us.

Thank You,

Prison Staff – Name Redacted.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Sports and Social Club Land at 3a

Comment:

The land here would be of huge benefit to the staff of both Cloverhill and Wheatfield Prisons. At the moment there is nowhere to go closeby over the lunch hour and to have this just outside the walls would be a massive advantage.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This would be a fantastic amenity to have for both Wheatfield and Cloverhill prisons. It would promote healthy living and allow a stress free break from a stressful job.

I would love to use this facility in the mornings and on my lunch breaks and I sincerely hope that you will consider this request.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I feel this would be a great amenity for use by both Prisons to promote a healthy lifestyle within a relaxed environment and would aid staff in escaping a stressful job for lunch.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This piece of land, with the right development , would be of great benefit to our physical and mental wellbeing especially given the nature of our shift pattern.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

This would really help all staff to have an area where they could exercise and meet for lunch etc. It would really help especially on stressful days to unwind and relax or exercise for an hour or so.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

It would be great to have somewhere to train and take a break from a stressful 12hr shift, in which we as prison officers do up to 5 times a week. It would be great to have an area to go to relieve the stress and take an hour out that is away on its own.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

This would be a great facility for staff to escape from the closed environment of their workplace and enjoy a healthy activity during their lunch break.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This piece of land would be hugely beneficial for the staff of both Wheatfield and Cloverhill Prison in both mental and physical capacities. From spending the majority of my time at work indoors breathing recycled dry air, I can personally attest to these benefits.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

As a prison officer in the wheatfield/cloverhil campus, I feel that it would be invaluable if a portion of the lands available were allocated to prison staff for use as an area of recreation. This job can be very mentally challenging at times and an area

Comment:

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I feel that the proposed development of this area by the Irish Prison Service would be of huge benefit to the staff of Cloverhill Prison both physically and mentally. This would be a fantastic area for staff to unwind during a stressful shift.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

To Whom it may concern,

I whole-heartedly support the plan put forward by the Cloverhill social club regarding the use of this piece of land. I currently work in Wheatfield prison which borders Cloverhill so this recreation area would greatly benefit the Wheatfield prison staff as well. To be able to leave the prison on our breaks but remain nearby would be massively beneficial to my physical and mental health. A prison is a very enclosed environment by necessity but this can have a very negative impact on the mental health of staff so to have a secure area close by that is not surrounded by massive concrete walls would give the staff a great boost. We would all appreciate if this area was developed in such a way as to benefit the hundreds of staff from the prison service who everyday enter the prisons to provide a service to our country.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison sports and social club (Irish Prison Service) land at 3A

Comment:

Unfortunately the staff in Cloverhill Prison have had little or no facilities for outdoor exercise or recreational purposes. This land would make for a perfect amenity for the staff of Cloverhill and Wheatfield Prison. It would be an ideal facility for removing staff from the stressful environment they have to work in.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Sports and Social Club (Irish Prison Service) land at 3a

Comment:

If we were to receive this land, I think it would give huge potential for officers both in Cloverhill and Wheatfield to develop the area for staff amenities. Currently, we have a lack of facilities and area's were staff can relax and potentially exercise which, if required, will benefit both our physical and mental wellbeing.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

cloverhill prison spors and social club, land at 3a

Comment:

We as serving prison officers servicing the government and the people of Ireland , would dearly love to acquire this piece of land which we can utilise to promote our health and mental well being in a very trying and stressful occupation .

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Being a Prison Officer it would be great to have an area outside of work that might have a measured walking / jogging track on it, along with some park benches, outdoor gym equipment etc. where staff could exercise or relax. An area that you could sit around and talk with your colleagues and feel like you have left the enclosures of the Prison environment. This in turn would have massive benefits to our physical and mental health.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I work in Wheatfield prison and have worked in Cloverhill also where the facilities in the local area are limited. I run most lunch hours on the roads surrounding the local area and would prefer a safe environment local to do this activity. The area would be a great benefit to the staff and families of both prisons and the wider community which could also use the facility to promote healthy and active lifestyles in a safe environment for young and old.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Comment:

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This land would be of untold benefit to the health and well being of people working in the closed environment of a prison. We work 12 hour shifts in an environment with little natural light and having a secluded place like this to relax and unwind during our breaks before returning to the sometimes hostile and stressful environment that we have to work in would be a God send. This would be a huge addition to both the physical and mental well being of all involved, as having a place to go for a walk or jog or even just to sit and read outside the confines of the prison walls would represent a little oasis for those of us that work in the prison environment.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Comment:

As a prison officer in Cloverhill prison, I feel it would be very beneficial for the staff to have an outdoor amenity area to relax, unwind or exercise ,as there is practically no outdoor areas within the confines of the prison this would be ideal.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

This would be an ideal location for prison officers to get out for some fresh air either before or after work. We work 12 hour shifts and whatever commutes people have so it would be an ideal place that we could really make our own and maintain it too.

The physical and mental well being of civil servants directly affects how we deliver our service to the state and an outdoor place for exercise would greatly enhance this and how we engage with the park west area as well.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

I work in this area on average 13 hours a day, this proposal would provide over one thousand staff in both prisons a safe area to spend some of their day away from the stress and confinement of the prison walls. We work in a high risk environment to both our mental and physical well being and currently have no area in which to relax or safely walk or exercise with out the risk of being identified on the outside by people who would wish us harm.

This incentive is vital to the wellbeing of the staff that work in these prisons in your community and I urge you to look at the statistics of stress among staff in this line of work and the high level of suicide before you make your judgement.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Clover Hill Sports and Leisure Club

Comment:

As an active member of the Irish Prison Service, I believe that if this piece of land was made available to the hard working officers in the local prisons, it would have a very positive impact on the health and wellbeing of the people doing a very difficult job in an effort to making the community at large a better/safer place to live.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

I would like to see the Cloverhill Prison Sports and Social Club be given the opportunity to develop the land at 3a so staff at the West Dublin Prison Campus could avail of it on their lunch break by exercising, eating outdoors on sunny days or just get a break away from work, which at times every staff needs to clear their heads. Working in the prison environment can be very stressful and can take its toll and there is no better way to clear your head and maintain a good state of mental health than exercise. A lot of staff would avail of this area either running or jogging on their lunch break and this facility, if it was given to the Sports and Social Club would be just what staff in the Prison Service need badly.

Comment:

Attachment:

Not Answered

Name:
Not Answered

Organisation:
Comment:
Attachment:
Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This land can be turned into a great space for us to relax and unwind and the benefit to all in the prison service outside the gates . a lot of officers use the roads for running during break time .

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This development would be a huge asset for the staff of Cloverhill prison, if this land could be turned into a recreational area for staff it would encourage and enable staff to get out on their breaks and exercise, get some fresh air or just get out of the prison environment for an hour out of a long 12 hour day in the prison. This facility would be beneficial for staffs mental and physical health.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

this would be perfect area for staff from both prisons to unwind relax and have our own running track.. Also it would be the perfect location to create family days and make a more out going feeling to staff to release the stress of everyday working life. Most important tree,s and plants, lighting around the track would enhance the look of the area .

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This would be very beneficial as we currently lack a lot of facilities at present.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I believe this are will be beneficial to the staff as it will allow staff to use an outdoor area away from the prison to exercise and relax during rest periods outside of the work environment. This would be very positive for mental health and general health of staff working in such a confined unnatural environment.

Attachment:

Not Answered

Name:

Siobhan Palmer

Organisation:

Comment:

While we welcome development in the area, I am concerned that too much residential units will be built with no services provision shops, supermarkets etc.

Attachment:

Details as above from received written submission.

Name:

Teresa Douglas

Organisation:

Comment:

Do not want shops across from school, will cause gangs of youths to hang around - not good idea.

More parking for school outside.

Attachment:

Details as above from received written submission.

Name:

Eimear Humphreys

Organisation:

Comment:

I'm concerned about the shops being built with old folks on top they will be tormented by youth. I'm also concerned that Ballyfermot will turn into a concrete jungle and will get worse. My other concern is that people like myself will be left homeless while houses are filled with people who never grew up here.

I grew up playing in these fields and now that opportunity is being taking from my child.

Ballyfermot needs more support not more house pilled on top of each other.

Attachment:

Details as above from received written submission.

Name:

Catherine Curran

Organisation:

Comment:

Play Ground Security

Railings around playground (12ft) cameras and maintance

Attachment:

Details as above from received written submission.

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

Hello,

I am a Prison Officer based in Cloverhill. The job comes with it's stresses this area would be fantastic for all of the prison staff's health and wellbeing.

Might I suggest an outdoor exercise area, primarily made of bars, chin up bars, dip bars, monkey bars etc. Dublin City Council have installed similar workout areas along the coast in Clontarf and St.Annes Park in Raheny recently.

I cannot stress how much an outdoor recreation area would do for all staff on campus here.

Thank you kindly for your time.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Comment:

My name is Prison Staff – Name Redacted and I am writing to you in relation to my submission for use of the land identified as 3a. My submission is on behalf of the Cloverhill Prison Sports and Social Club which was initially sent on my behalf by Prison Staff – Name Redacted of the Irish Prison Service. If successful in my application it will benefit the entire West Dublin Prison Campus which encompasses both Cloverhill and Wheatfield Prisons and would benefit approximately 700 staff members, the majority of which are living locally or have close ties to the local community.

As I'm sure you can appreciate, it is a very taxing and stressful environment in which we work and after spending 12 hours a day looking at concrete walls and working with some extremely dangerous people, the staff here could greatly benefit their physical and mental health with having a safe "green" space in which to unwind, relax and reflect, as well as to exercise. Staff have on occasions been assaulted while jogging outside the jail on their lunch breaks, which has in turn resulted in some staff being afraid to do so. Having a safe area would be invaluable to us.

I would like to use the land in 3a to provide such an area. I would envisage it as having a secured border with trees keeping the area private, while having a measured walking track on it, along with some park benches, outdoor gym equipment etc. where staff could exercise and relax. We have dedicated Gym Officers who are qualified to run yoga and exercise classes for staff; or staff could just have a well-needed time out in a secluded area which is of paramount importance when it comes to looking after our mental health.

As our car park is attached to the land at 3a, we will be able to access this land via the car park and as such will not require any access points from the already congested Cloverhill Road nor will it increase the traffic flow as it is benefitting a large number of people who are already here.

I have spoken at length with Mr David McGovern from Familibase who's representing the local group "Horsepower" who are also looking to use the land at 3a to provide a much needed requirement of stables to rent to local horse owners. We are very agreeable on sharing the land with each other and hopefully will be able to work together in developing same. Horsepower are

looking for the land down the end with the roundabout and we are looking to use the land by our car park and I am looking forward to working alongside Mr McGovern if our application is successful.

Providing us with this land will be cost free to Dublin City Council as we are not looking for any funding towards the development of the land. This will come from a combination of the Irish Prison Service, the Cloverhill and Wheatfield Sports and Social Clubs, and staff fundraising.

I hope you will look favourably on my application and please feel free to contact me at this address with any questions you may have in relation to my application.

Kind regards

Prison Staff – Name Redacted

Attachment:

Details as above from received written submission

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

This would have great benefits to officers mental health who deal with very challenging situations on a daily basis and I feel this would allow officers to unwind away from their work place.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I believe allowing the Cloverhill Prison Sports & Social Club to procure this piece of land will have massive benefits for the staff in both Cloverhill & Wheatfield Prisons. As we work in a closed environment the pressures and stresses of working in such an environment are amplified by the fact that we have no opportunity to "switch off" during our lunch hour. The proximity of this piece of land to the two jails is perfect & I believe it would have massive benefits for the staffs mental health & life/work balance.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a.

Comment:

As a serving prison in Cloverhill for the last twelve years I would consider an open green space to use during our breaks as a great resource. Sometimes working in the prison can be extremely challenging, and even a few minutes away from that environment can be very helpful in reducing stress and giving us a chance to reset before going back to work. Prisons are by their very nature often loud, crowded and can have a very intense atmosphere and having an alternative to sitting in the car at lunch-time to get away from it for a little while and out into the fresh air to my mind would be have value beyond measure for our mental health.

Attachment:

Not Answered

Name:

Roisin O'Callaghan

Organisation:

Inland Fisheries Board

Comment:

Inland Fisheries Ireland (IFI) is a Statutory Body whose principal function is the protection, management and conservation of the inland fisheries resource.

The Park West- Cherry Orchard and its environs is traversed by the Camac River. The Camac River is a recognised salmonid system, under significant ecological pressure as a result of its largely urban situation. Although considerable sections of main channel are culverted, lengths of this river that remain on the surface invariably support self-sustaining populations of brown trout (*Salmo trutta*).

The LAP in considering the protection of the quality of the aquatic environment must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity. Protection of the aquatic environment must imply a greater commitment than merely to prevent fish mortality or protect water quality. The insidious effects of creeping/chronic pollution are often more serious than dramatic discharges which result in instantaneous fish kills, because sub-lethal pollution may reduce growth, inhibit reproduction functions or so alter the habitat as to render it uninhabitable for certain more desirable species. Maintenance of habitat is a particularly important objective of environmental responses of aquatic life to pollution/environmental degradation and tends towards more stringent habitat and water quality objectives. An important aspect in the maintenance of habitat is the protection of the food chain. The protection of each stage of the food chain is the very basis of aquatic habitat protection. Destruction of habitat or contamination of the food chain at any level may eliminate any other form of life depending on it.

Sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants over the full duration of the plan in order that the ecological integrity of the ultimate receiving water are protected. IFI would highlight

the importance of building a comprehensive and robust assessment of both local infrastructural needs and Local Authority capacity to meet those needs into the plan. It is imperative that this LAP works in harmony with the Water Services Programme of Irish Water.

Development such as road and bypass development, urbanisation, flood relief, afforestation, river drainage have caused and are causing major disturbances to the physical habitat. "Development" can require that extensive sections of watercourses be drained, altered and diverted, flood plains may be modified to accommodate housing and industrial development, impermeable surface areas in towns and on motorways have increased giving rise to increased runoff, and smaller streams and rivers have been culverted to accommodate development. The Council under the terms of the EU Water Framework Directive (WFD) (2000/60/EC) is legally obliged to protect the ecological status of river catchments and channels. Therefore consideration has to be given to other factors including flow, drainage, dams, bank erosion, quality of instream vegetation and riparian habitat etc.

To ensure that impacts from development/change in land use practices (including flood plains development) do not interfere with the aquatic environment it is essential that those areas adjacent to waterways (riparian buffer zones) are managed in a manner which will lessen impacts to these habitats. River corridors and buffer zones are an ideal and natural way to link areas to attain a high quality Green Infrastructure network for Park West – Cherry Orchard. When structures are being designed for crossing fisheries waters, consideration must be given to the following biological criteria: species of fish required to safely pass; size of fish required to pass (life stage); time of year in which fish passage is required; and, high and low design passage flows etc. Bridges and bottomless culverts have the least impact on fish passage. IFI recommends that the LAP should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.

To insure that impacts from development/change in land use practices (including flood plain development) do not interfere with the aquatic environment it is essential that those area adjacent to waterways (riparian

buffer zones) are managed in a manner which will lessen impacts to these habitats. A riparian/buffer zone is a vegetated area near a stream, which helps shade and partially protect a stream from the impact of adjacent land uses. It is a discrete ecological and geographical entity. It is the point of contact between the land (i.e. the terrestrial ecosystem) and the freshwater body (i.e. the aquatic ecosystem). It plays a key role in the protecting/improving water quality in associated watercourses thus providing environmental benefits. With the decline of many aquatic ecosystems due to development (both urbanisation and agricultural production), riparian buffers have become a common conservation measure aimed at improving water quality and lessening pollution impacts. The riparian/buffer zone must be sufficiently wide to protect the watercourse. An undisturbed buffer zone between development area and river bank should be minimum 10m.

The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian habitats. IFI is opposed to any development on floodplain lands.

In conclusion, rivers and watercourses are assets which provide a basis for the development of visual and amenity features of the areas through which they flow. In housing and industrial site planning they provide a feature around which landscape design and development can be based. They can provide a focus for the involvement of the communities in the protection of water quality and the biological/wildlife diversity of aquatic habitats with these areas. The LAP should create the policy framework for sustainable development, be consistent with River Basin Management (s) and comply with the requirements of the EU Water Framework Directive, while promoting the integration and improvement of natural watercourses in urban renewal and development proposals.

I trust you will take our observations on board when compiling the LAP.

Regards

Roisin O'Callaghan

Attachment:

Details as above from received written submission

Name:

Stefka Stoyanova

Organisation:

Comment:

Attachment: Please see following documents.

To: Avril Feeney, Administrative Officer,
Dublin City Council,
Planning & Property Development Department,
Block 4, Floor 3, Civic Offices,
Wood Quay, Dublin 8

21st June 2019

Dear Avril Feeney,

I am writing in regards to the new Park West-Cherry Orchard Local Area Plan.

I would like to express my concerns about the success of this plan and propose suggestions on how the area could be improve instead and made a better and safer place to live in.

I live on [REDACTED] facing the beautiful green land, full of wild life and separating the estate from the M50. In the past years, I have seen people walking their dogs there, having picnics or just having a nice walk. In the contrary, some youngsters have been riding squad bikes in the little hours, or even burned a car few years ago, which still haven't been removed from the field. Despite that, I do enjoy looking at the green field and you might agree that nowadays a few European cities have green areas like that. Not by chance Ireland has the name of the Emerald Ireland.

Please let me describe an ordinary day of my life.

I owe an [REDACTED] and I [REDACTED] I am lucky enough to have flexible work hours and am able to leave home late in the morning and come back after the rush hour traffic has calmed down.

Every morning from my window I look at the traffic on the avenue. It starts building up at about 7.45am and till about 9.00am there are cars, slowly advancing on the road, heading towards Parkwest Business / Industrial park. Heading towards the M50 in this hours, could easily take about 20 – 25 minutes to reach the Red Cow roundabout and merge onto the M50. Depending on traffic then, it could take another 45-50 minutes to reach the office where [REDACTED] Leaving after the rush hour, it takes me between 30 – 40 minutes to get to the office. On the way back is the same story. The old Nangor Road is very busy almost any time of the day, the M50 too. There is no direct access to the M50 from [REDACTED] between exit 9 (The Red Cow) and 7 (Liffey Valley).

Most probably, you are aware that there is no direct train or DART from Cherry Orchard to [REDACTED] The fastest way to reach it is to take the commuter train to [REDACTED] change to the [REDACTED] service and then walk to the office. The commuter train in the mornings is very crowded, so is the DART. It takes about one hour – one and a half to reach the office. It cost about €5 one way, which is about €50 per week. This is about double the time and cost compared to using my own car. Also, sometimes the public transport is late or happens that the station is closed.

Imagine I wanted to go to Liffey Valley Shopping centre or the new Tesco. I take my car and in 5 minutes I am there, provided there is no traffic. In rush hours 4-6.30pm it takes about 30 minutes to get from the Cloverhill roundabout to the traffic lights at the end of the road. This road is congested in the mornings too. Now, if I didn't have a car, the only way to go around is to walk for 30 minutes or get a taxi. There isn't any form of public transport linking Cherry Orchard and Liffey Valley. If I wanted to do my weekly shopping in Tesco and walk back, it won't be easy carrying the heavy bags on the long road home.

What if I was heading on holidays and had an early flight at 6am? Again, the only alternative is taking my own car or getting a taxi. Both ways, are very expensive. Parking cost about €4.50/day at the long term airport parking and taxi is a minimum of €35 one way. There isn't Aircoach or Airlink serving the area, neither there is a bus operating so early in the morning, connecting through the city centre. The Airhopper is not at a walking distance neither, as it stops at the Clayton Hotel, which is about 40 minutes away on foot.

All of the above demonstrates the congestion, caused by the current inhabitants of Cherry Orchard and Parkwest areas. In [REDACTED] there are about 250 units. Parkwest has hardly 20% of the offices rented, all the rest have been empty for years, reason being high rent, lack of public transport and good connections and very high traffic, especially in the rush hours. It is normal that many businesses left the business park in Parkwest, as unsuitable location and lack of main facilities. In the Crescent building in Parkwest there have been empty commercial spaces on the ground floor, left empty for years, and now, there have been announcement that they will be converted into apartments.

In my opinion, building additional 2,000 homes, as per the local development plan for Parkwest / Cherry Orchard will only force the small amount of businesses left in Parkwest to leave. It will cause disruptions and increase even further the traffic in the area. The roads can barely manage the traffic with the current density of the population. On another note, pollution will go up, caused by additional cars brought by the new home owners. This is currently about 3,000 – 4,000 additional vehicles, as some families have at least two cars, if both parents are working. There isn't even enough car parking spaces for the current residents. Only one slot is allowed per apartment and many are forced to park on the cycling lanes, outside on the main road.

Instead of making the area nice to live in, it will be turned into a huge cement jungle and highly polluted industrial area. It will be accommodating social and affordable housing, therefore increasing by default the crime and antisocial behaviour in the area. That will inevitably confirm the bad reputation Ballyfermot / Cherry Orchard have already, which will not help attract middle class working people to invest in a home here. Businesses will be also reluctant to consider opening an office in the area.

On a daily bases, a crime happens in the [REDACTED] know of a person, to whom a gun was pointed at in the park on front of the equine centre. A robbery happened on the street on the [REDACTED]. A car was broken into twice, with an attempt to be stolen. Another car was burned down in the field across the road. A commercial vehicle was also broken into and a stock for thousands has been stolen or thrown in the [REDACTED] in the field behind the Creche. All that happened to people I know – friends or neighbours.

According to a Garda report, I've got from a public meeting with the Inspectors last month, there is only one patrol car serving the areas of Ballyfermot, Cherry Orchard, Chapelizod and Palmerstown. CCTV cameras are not under the surveillance of the DCC. There isn't enough of them and the Garda cannot do anything against that to prevent crime and anti-social behaviour. If the DCC/Garda cannot handle the situation right now, with the current amount of people leaving in the neighbourhood, how are they going to do it with a growing amount of inhabitants?

Kids and recreational areas are also an issue. Right now, kids are playing in the car parks, climbing bin cages, playing with hazardous waste, constantly being in the danger of been hit by a fast moving car, pulling into the car park. The kids are not allowed to go in the park nearby, as it is not safe. There young gangsters, coming from the nearby travellers mobile home site, near the prison on the Cloverhill Road, messing around and bullying the kids of the residents. Believe me, this is not a pleasant experience for anyone.

We often see horses crossing the estate, people illegally dumping their rubbish in the bins, provided for residents only. In other countries, there are depots where this could be done, and also a free collection day is organised by the city council to resolve the issues with illegal dumping. In some countries, like the Netherlands and Spain, for example, the containers are underground and are collected daily. No big bags or disposal could go into them. On the other hand, the smell from the nearby Thornton's rubbish depot is unbearable on warm days or when the wind blows from that direction.

As you could see there is a lot more to be done, before start building and over populating an area, which have been really badly managed. A solution to the housing problem is to find less dense areas, such as outside Dublin and build social or affordable housing, thus solving issues with traffic jams and pollution in the city.

Instead of the current project, which will take even the little green areas away from the residents, and turn the place into a ghetto, my suggestion is that a nice natural park is been created on the land across the [REDACTED]. There is a natural pond, which forms every winter with the heavy rains in the field, which could be turned into a nice recreation area, various fish, birds and animals could be invited into the park. Oak trees, which have been reduced to a stage, in which they are listed as endangered species could be planted in the field. In that way the CO2 emissions issue, coming from the nearby M50 can be resolved. Planting trees, rather than removing green areas and building more apartments, will help to stop the global warming trend, created by producing more heat from people's houses and cars. Adding outdoor fitness facilities and places where people can walk their dogs or enjoy a nice day out with their families will make the area a desirable place to live in.

Thank you for reading so far.

Below is a summary of the main points of this letter.

Objections against the building of new 2,000 homes in the Cherry Orchard area

- Social/affordable housing
 - will bring more crime and anti-social behaviour to the area
 - will increase the already bad reputation of Cherry Orchard / Ballyfermot area

- will continue the trend of businesses leaving Parkwest Business Park
- will push away potential investors and businesses from the area
- Tall buildings and more houses – will cause:
 - over-crowding an area, which is already dense in population
 - bring more traffic, which is heavy as it is
 - create more CO2 emissions from new owners' cars
 - less car parking spaces, which are not enough even now
- Environmental issues, such as:
 - destroying wild life and natural inhabitants
 - smog / pollution from cars and people's homes
 - no green areas with trees, to produce more oxygen and absorb CO2 emissions
 - large parks and recreational area will lack and kids will be forced to play on the streets

Suggested improvements for the Parkwest / Cherry Orchard area

- Public Transport – should improve by introducing
 - 24/7 Airport connection from the area
 - NightLink bus
 - More regular train services to town, including weekends and late evenings
 - Connection routes to the nearby Liffey Valley Shopping Centre, Clondalkin Shopping Centre, The New Nangor Road
- Public Parks
 - Creating a new Natural park in the area between the M50 and Cherry Orchard and inviting wild life to it
 - Building outdoor fitness facilities and places for outdoor recreation activities for families
 - Oak tree and other endangered species planted in the area to tackle the CO2 emissions from the M50
- Security – should be increased in the area by:
 - Introducing more CCTV cameras, monitored by the Garda
 - Garda presence in the area to prevent anti-social behaviour
 - Educational programmes for kids with difficult behaviour and their parents
- Car Parking Spaces – should be increased, as they are insufficient currently
- Local Shops – spaces already exist in the Crescent building and have been left empty for years. A motivation for shop owners should be introduced to attract them to open up new stores
- Gym – a few have closed down already. An investment in advertising the area to attract businesses into it should be done

Thank you again and I hope the points from my letter will be taken into consideration, so we all create a good living environment together.

Enclosed are also some copies of submissions from the Dublin Chamber of Commerce, I am a member of, highlighting the same issue around public transport, traffic congestions and environmental issues.

Warm regards,

Stefka Stoyanova

Mobile: [REDACTED]

Address:
[REDACTED]

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**Submission to the National Transport Authority re
BusConnects Phase 3 Corridors
May 2019**

Dublin Chamber, on behalf of our 1,300 member companies, welcomes the opportunity to offer feedback regarding BusConnects and the redesign of the Dublin Area Bus Network.

Dublin Chamber commends the National Transport Authority (NTA) on its decision to consider a new and improved bus network for the Dublin region. We also recognise the substantial amount of work that has been carried out by the NTA to examine the suitability and functioning of the current network and to utilise both the feedback of users and evidence of international best practice.

Dublin Chamber recognises the importance of public transport, with the bus network at its heart, to the success of Dublin. We share the NTA's ambition to have more people using public transport and for Dublin to have a public transport network that rivals those in the best cities in the world.

The delivery of a much-improved public transport system will require a significant increase in the level of investment in public transport services by Government. Higher levels of investment will be required over a concerted period of time in order to address the shortfall of the past decade. This is particularly true in the case of the bus network, where the amount of money available is limiting the ability of the NTA and transport providers to deliver a reliable, consistent, efficient and – importantly – sustainable service.

Overview of Dublin Chamber Position

Dublin Chamber is broadly supportive of the BusConnects proposal. The proposed redesign comes at a crucial time for the Dublin region, given the current growth and economic prosperity being experienced, and in light of the growth and opportunities that are forecast over the coming years and decades.

In particular, we welcome the ambition put forward in the BusConnects plan to:

- Increase bus priority throughout the city, particularly in the core city centre
- Improve and simplify the fare structure and ticketing options
- Reduce the quantity of routes and buses travelling through the city centre while increasing the frequency of city centre services.
- Improve walking and cycling infrastructure alongside (and in coordination with) the bus network changes.

We would like to see each of these aims remain at the forefront of any future iterations of the BusConnects plan. Dublin Chamber accepts that a considerable amount of revision and changes will be required to ensure that any final plan is workable. We also accept that a certain amount of refinement is required to the local routes which will feed the core spines of BusConnects.

A more detailed outline of the Chamber's views is included in the remainder of this document. We look forward to working further with the NTA on the BusConnects proposal over the coming months.

The Need for a Network Rethink

Dublin Chamber believes that the current bus network in Dublin is no longer fit for purpose and we support the decision to revise the network.

Dublin Chamber supports the aim of encouraging more people to use public transport. However, there are a number of flaws with the current network which are acting as a barrier to achieving this aim.

An efficient and reliable public transport system is a requirement for a successful Dublin – and will be central to achieving a high quality of life in the city. In that regard, Dublin is currently significantly behind where it needs to be. It is a fact that too many people in the city still do not have the standard of bus service that they require and deserve. This is due to poor forward planning and a 'disconnect' between land use and transport planning over many years.

In particular, the failure to deliver underground mass transit solutions over the past several decades has left Dublin's transport system in a far from desirable state. Dublin Chamber has recently welcomed the publication of the emerging preferred route for the MetroLink and is anxious that after many years of discussion that the urgently needed infrastructure project gets approval. Contrastingly, it is disappointing to see the Dart Underground is once again

not on the list of priorities for Irish Rail as they focus on increasing their fleet. For Dublin to effectively manage its transport system and reduce its congestion it needs all of these large infrastructure projects to be implemented, including BusConnects.

The continued prosperity of Dublin is dependent on an improvement in the city's public transport network. Dublin Chamber's Vision for Dublin 2050, recognises the importance of a world-class public transport to a high quality of life being available in the city. The people of Dublin desire a city that is easy to move around, where public transport is reliable, sustainable and efficient. Dublin Chamber believes that a desired commute time of no more than 30 minutes should be achievable from anywhere within the M50 to the city centre by the year 2050.

There is an urgent need for better integration of the various public transport modes in Dublin. Currently, there is an inadequate level of synchronisation across the various modes. This situation has unfortunately not improved as frequencies were increased on the DART and commuter rail lines over the last few months. Particularly during peak commuter times, trains become increasingly crowded as you move closer to the core of the city and there are significant capacity issues making transferring from one service to another undesirable, and in some cases, impossible.

Radial Spines

Dublin Chamber supports the idea of creating spines along the main arterial roads in Dublin. This is reminiscent of the hugely successful 'Finger Plan' in Copenhagen, albeit the Dublin version will run over-ground as opposed to underground.

The creation of these spines will require more dedicated road space for buses. Increased bus priority will be essential to achieving a frequent and reliable service. Dublin Chamber notes the NTA's intention to run buses on these routes at a frequency of between 4 and 8 minutes.

Increasing the amount of dedicated space for buses will ultimately mean less room for cars. While this may have the effect of slowing car journeys through the city, it is hoped that this will have the desired effect of encouraging more people towards taking public transport. According to the Canal Cordon Report since 2010, there has been a trend of increasing modal share for sustainable transport modes, walking, cycling and public transport, with consistent levels of increase each year. In 2018 this figure peaked at 70%, its highest level since 2006.¹ Correspondingly, there has been a year on year decline in car usage. Dublin Chamber welcomes this change but cautions that it will only continue if bus services are made as

¹ https://www.nationaltransport.ie/wp-content/uploads/2019/04/Canal_Cordon_Report_2018.pdf

attractive as possible. This will require frequent services (no greater than 5 minutes) at peak times. It will also require a high standard of facilities at bus stops, including shelters and reliable real-time information at all stops. Smart technologies should allow for considerable advances in these areas in the coming years. Dublin should look to become an early adopter and innovator of such technologies.

We would also encourage the NTA to consider piloting certain bus routes using more environmentally sustainable vehicles such as bio-methane, hydrogen and electric hybrid busses. The use of electric, hybrid and hydrogen-powered buses in London is expected to reduce emissions by 84%.² This ambition should be replicated in Dublin.

Feeder Services

The ultimate success of the radial spines will depend on how well they are fed by other services. Dublin Chamber recognises that considerable work needs to be done in terms of refining local services. We note considerable resistance to the proposed changes during the consultation phase. Dublin Chamber believes that local communities and users are best placed to offer feedback on how these local routes can be improved. We encourage the NTA to continue with the extensive levels of engagement that have already been carried out around the city.

In future iterations of the BusConnects plan, Dublin Chamber would like to see more attention given to other feeder possibilities, including cycling facilities (cycle lanes and parking facilities) and park and rides along the spines, particularly around the edge of the M50 and the canals. Dublin Chamber believes that improvements to the cycling network in Dublin, in line with the NTA's cycling strategy, which was published in 2013, can significantly complement the public transport network in Dublin.

Orbital Routes

The lack of good orbital routes is a major gap in Dublin's bus network. Too often, bus users are forced to come into the city centre in order to travel back out to another part of the city. For example, someone living in Lucan, who is looking to get to Dublin Airport by public transport, is currently required to take a bus into the centre of Dublin in order to catch another bus northwards. This type of journey is not compelling and leads to people opting to use a private vehicle to make the journey instead. Dublin Chamber welcomes the ambition to change this in BusConnects. There is also an opportunity to further exploit the potential of Dublin Airport as a public transport hub, particularly given plans for the emerging route for the MetroLink line.

² <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/cleaner-buses>

Dublin Chamber is disappointed by the lack of attention that has been given in the BusConnects plan to improve the current public transport deficit around the M50. There is very little proposed in the BusConnects plan that will help address the high level of congestion that are currently seen on the M50. We would like to see this addressed in the next iteration of the plan.

Changes to Ticketing

The current ticketing regime is a major barrier to people interchanging in Dublin. Dublin Chamber has long advocated for a fare system that allows the user to pay for where they are going as opposed to how they get there. Dublin Chamber would also welcome a flat fare structure.

Interchanging should be made as simple as possible for users, with short walks and clear and consistent signage and mapping between stops.

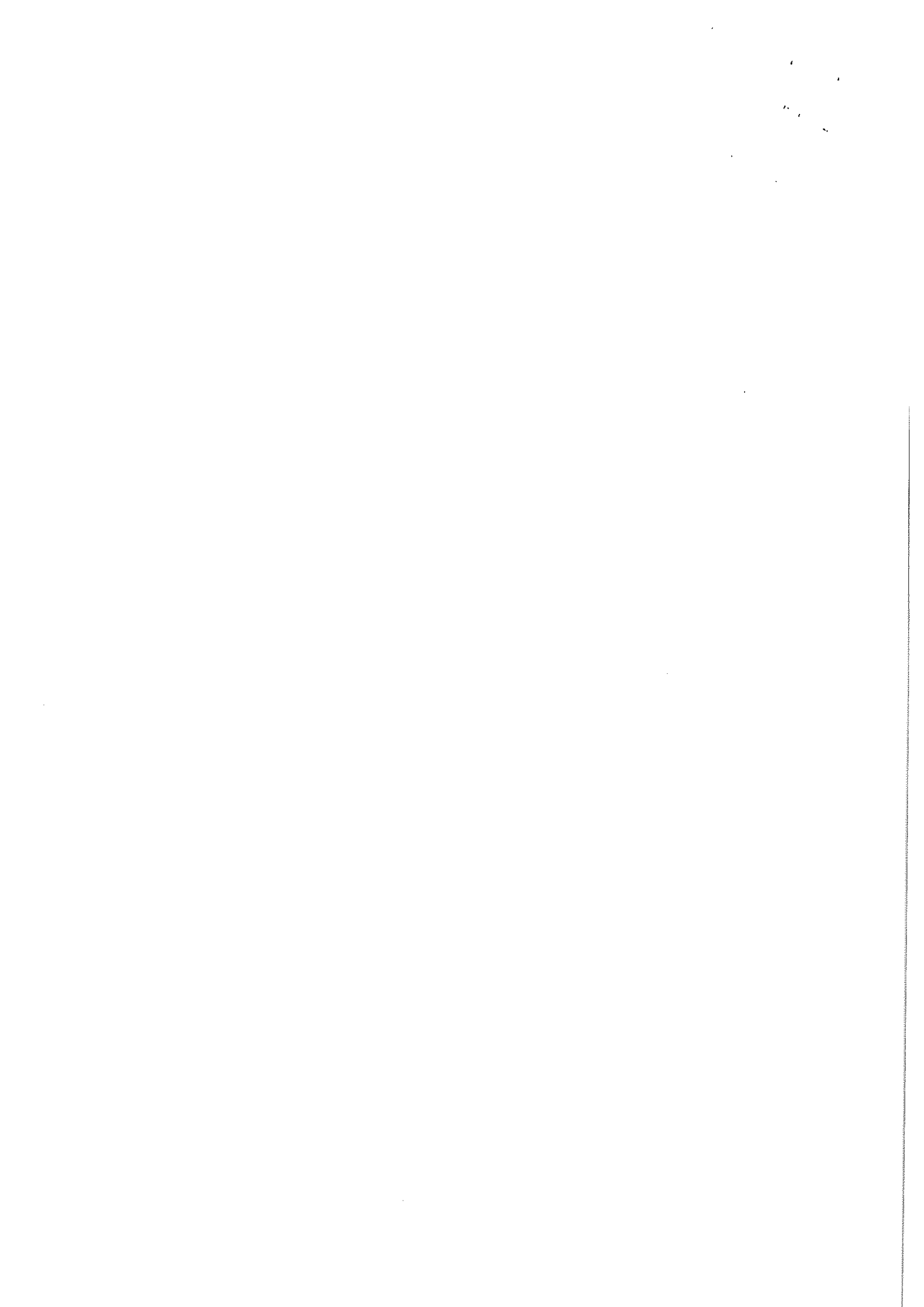
Dublin Chamber would like to see the use of cash on public transport phased out over the coming years. The increased use of Leap Cards and the acceptance of other payment options, including debit cards and via phone, will help reduce the frustratingly long dwell times that currently blight bus services in Dublin.

24-hour Bus Routes

Dublin Chamber welcomes the recent announcement by the NTA of the first 24-hour service for Dublin Bus. The 42 route, which runs from Swords serving Dublin Airport, is badly needed and will facilitate Dublin Airport workers who are in need of late night transport. Dublin Chamber would like to see an enhanced roll-out of 24-hour services across the city where appropriate. Late night workers such as those in the hospitality sector or healthcare sector need to have access to these services to commute to and from work. We would like to see more attention given to the possibility of more routes with 24 hour service and how they would be facilitated in the BusConnects plan.

Beyond BusConnects

Dublin Chamber ultimately views the BusConnects project as part of a larger plan to alleviate congestion and enhancing public transport infrastructure in the City. On its own, BusConnects presents only a short-term measure that will enable the existing transport network to function for as long as possible. In the medium-to-long term, much more ambitious investment is required in Dublin's transport infrastructure. The lack of a modern, reliable public transport system is already acting as a barrier to the city's ability to take up the investment and jobs opportunities that are coming its way. While we welcome the aims of BusConnects in providing a more efficient bus service, the reality is that projects such as MetroLink and Dart Underground must be progressed alongside it, without delay.





Dublin Chamber Submission to Dublin City Council on its Draft Climate Change Action Plan 2019-2024

March 2019

Dublin Chamber welcomes the Dublin City Council Draft Climate Change Action Plan, the partnership across all four Dublin local authorities, the foundation of the Dublin Metropolitan Climate Action Regional Office and the focus on city resilience. However, the Chamber is concerned at the lack of clear deadlines for implementation when considering the 5 year timeline of the Draft Plan, especially in relation to transport infrastructure projects. Also, the Draft Plan does not fully consider engagement or inclusion of the business community, or recognise the role that the business community can play in transitioning Dublin businesses and their employees to more environmentally sustainable practices.

Introduction

Dublin Chamber is the largest Chamber of Commerce in Ireland, representing 1,300 businesses from across the Greater Dublin Area.

Dublin Chamber broadly welcomes the publication of the Dublin City Council Draft Climate Change Action Plan and its holistic approach to sustainability and city resilience, and welcomes the foundation of the Dublin Metropolitan Climate Action Regional Office as a body charged with its implementation. We welcome the focus on public transport as an area where improvements can have an immediate impact on reducing harmful emissions in the City. We also commend the Council for its acknowledgement that climate change is an economic issue and the inclusion of overall city resilience as a theme. However, we are concerned at the apparent lack of definite timelines for actions, in relation to public transport and cycling infrastructure in particular. We also are concerned that there does not appear to be any clear plans to include and collaborate with Dublin's business community, despite references to an aim of engaging citizens in the process of becoming more environmentally sustainable, and to the economic importance of environmental sustainability and city resilience.

The Draft Plan does not state how it proposes to provide for meaningful interaction, buy-in or cooperation with the business community to make the city sustainable and resilient into the future. Considering that transition to more environmentally sustainable practices is proven to be most

successful in a 'top down', leader driven approach, this may be an oversight.¹ Dublin City Council is in a leadership role and could enable and encourage Dublin's business leadership to engage with environmental sustainability as a business priority, and not merely as an optional 'add-on' as has been the case in the past, for both the business community and for local and central Government.

Dublin Chamber has been at the forefront of driving the green agenda within the Dublin business community for many years. The 'green agenda' was something the organisation was heavily involved in and an area in which a knowledge and leadership role was being developed until the economy crashed. With the economy having recovered from the steep economic downturn, during which the focus on sustainability was placed on hold or dropped by many companies, Dublin Chamber is again focused on playing a leadership role within the Dublin business community when it comes to sustainability and reacting to climate change.

Dublin, its Local Government, business community and citizens, cannot afford to let environmental sustainability be dropped as a priority again.² It is vital, therefore, that all parties, including Government, both local and national, the business community and citizens, work cohesively together over the coming years.

Context

The National Planning Framework (NPF), Ireland 2040, launched in February 2018, outlines in its environmental and sustainability goals a focus on resource efficiency and a transition to a low carbon economy. The NPF sets targets out to 2050 that directly apply to Dublin as Ireland's capital and largest urban region. It is a national objective for Ireland to transition to a low carbon economy, and this includes *"an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors"*.³

The UN warned in October 2018 that we have just 12 years to make the changes necessary to keep climate change from rising 1.5C above pre-industrial levels, a level detrimental to the planet.⁴ It is clear from this warning that real action needs to be taken at all levels of Government as well as by the business community with a sense of urgency and with tangible deadlines. These need to extend beyond the five year electoral cycle in order for the city to play its part in the country's overall sustainability

¹ MIT Sloan Management Review – How to become a Sustainable Company. 2012.

https://www.hbs.edu/faculty/Publication%20Files/SMR_Article_EcclesMillerSerafeim_77d4247b-d715-447d-8e79-74a6ec893f40.pdf

² Dublin Chamber Green Economy. Business Ireland. 2013

<file:///C:/Users/SineadHealy/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/JDSUQBHV/Business%20Ireland%20Magazine%20March%20Edition.pdf>

³ NPF <http://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf> p119

⁴ UN IPCC <https://www.ipcc.ch/sr15/chapter/summary-for-policy-makers/>

goals, which are set in accordance with Ireland's membership of both the UN and EU. Currently, Ireland is not meeting its renewable energy targets.⁵

In February of this year, Governor of the Central Bank Professor Philip Lane gave a warning to Irish business about the inevitable impact of climate change, arguing that the Irish economy and Irish business needs to be aware of and plan for the imminent and inevitable change to a low carbon economy.⁶

The timeline of the Dublin City Council draft Climate Action Plan is out to 2024, a five year cycle. If meaningful change is to be achieved in the lifetime of this plan it needs to take action decisively and for immediate impact. The plan needs to contribute to reducing emissions within the 12 year warning period set by the UN as well as to contribute to the long term sustainability of resources and city resilience. Furthermore, it would be advisable for the Draft Plan to include indicative actions beyond the five year cycle and lay the foundations for further actions.

The Draft Plan acknowledges past successful projects but lacks ambition in setting out future actions that can have a real impact on making Dublin a more environmentally sustainable and resilient city and to combating climate change, both of which are the expressed aims of the Draft Plan.

Transport

The Department of Communications, Climate Action & Environment's National Mitigation Plan earmarks agriculture and transport as the sectors accounting for the largest contributions to emissions.⁷ As the State's capital and most densely populated area, Dublin has the opportunity to significantly reduce its contribution to emissions through making improvements to its public transport offering and infrastructure. We commend the emphasis in the Draft Plan on looking to public transport and cycling in particular as areas for action. While the Draft Climate Action Plan targets public transport improvements, including BusConnects, expansion of Dublin Bikes (and other bike schemes soon to enter the Dublin market) and improvement of cycling infrastructure generally, Dublin Chamber is of the view that this could be done with greater urgency.

In order for any real reduction in CO2 emissions to take place, public transport infrastructure must be improved. Public transport improvements are one of the key areas in which Dublin City Council can effect significant change in a timely manner and which can result in a reduction in emission-producing behaviours by its citizens.

⁵ Independent.ie Feb 2019 <https://www.independent.ie/business/irish/power-play-ireland-left-facing-huge-bill-for-falling-to-hit-eu-targets-on-renewables-37857526.html>

⁶ Central Bank Governor Issues Warning Over Climate Change Impact RTE Feb 2019 <https://www.rte.ie/news/2019/0205/1027737-climate-change-philip-lane/>

⁷ Department of Communications, Climate Action & Environment's National Mitigation Plan 2017 <https://www.dccae.gov.ie/documents/National%20Mitigation%20Plan%202017.pdf> p20

A recent Dublin Chamber Survey showed that 60% of our members drive to work. In order to change this, improvements need to be made to the public transport system and to cycling infrastructure. Commencing constructions on BusConnects and MetroLink projects will be key in the short to medium term.⁸ While delivering MetroLink in the timeframe set by the Draft Plan is not realistic, the delivery of BusConnects is. The Chamber has voiced its views on the proposed BusConnects plan through the public consultation process, clearly outlining its support for BusConnects, if appropriate refinements to the plan are made.⁹ Local representatives have a valuable role to play in supporting the roll-out of BusConnects by engaging with the consultation and planning process in a constructive and positive manner.

Similarly, it is essential that Dublin takes advantage of emerging technology that improves the energy efficiency of daily commutes. The Draft Plan should ensure that new, smarter transport technology is catered for when it offers a means of reducing congestion and emissions. For example, in recent years, there has been a proliferation of e-scooter usage in European and US cities. Dublin has the opportunity to put the necessary rules and regulations in place for such technology to make a similarly positive addition to the city by reducing car usage. Dublin Chamber made a submission to the Minister for Transport in December 2018 in reference to e-scooter use in the City.¹⁰ In a broader sense, the case of e-scooters exemplifies the need for Government to look at newer technologies in transport as opportunities to improve the city transport offering rather than as problems that need to be prevented.

Cycling infrastructure is being improved in the city, but at far too slow a pace. While we welcome the commitment to improving cycling infrastructure and the initiatives for segregated cycleways, e.g. the Sutton-to-Sandymount Cycleway, Dodder Greenway, Royal and Grand Canal Cycleways and the Clontarf-to-City Centre Cycle Scheme, it is clear that the cycling infrastructure in the city centre is not improving to a level and at a pace that improves safety sufficiently to encourage greater numbers of cyclists.¹¹ A prime example of this is the Fitzwilliam Cycleway that has only recently received the necessary planning permission for a segregated cycle lane.¹² This project was actively supported by Dublin Chamber.¹³ Dublin Chamber is linked up with Dublin Cycling Works, a campaign for improved infrastructure with more than 90 firms signed up, a clear indication of the support that such changes have among the business community.

⁸ Dublin Chamber Survey December 2018

⁹ Dublin Chamber Submission in response to 'Dublin Area Bus Network Redesign Public Consultation. September 2018 <http://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber-BusConnects-Submission.pdf>

¹⁰ Dublin Chamber Submission to Department of Transport on use of E-Scooters. December 2018 <http://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber-E-Scooters-Submission-Dec-2018.pdf>

¹¹ Draft Climate Action Plan p68

¹² Independent.ie <https://www.independent.ie/life/city-cycling/three-major-cycleway-projects-will-begin-construction-in-dublin-city-centre-this-year-costing-an-estimated-35m-37857570.html>

¹³ Dublin Chamber Submission re Fitzwilliam Cycle Lane. October 2018 <http://www.dublinchamber.ie/DublinChamberofCommerce/media/Policy-Documents/Fitzwilliam-Cycle-Route-Submission-October-2018.pdf>

The fact that progress on this relatively small piece of city centre infrastructure took over 8 months, notwithstanding an awareness that segregated cycle ways are the safest and most efficient model for pedestrians, cyclists and motorists alike, does not bode well for the likelihood of the Draft Plan succeeding in making meaningful strides toward enabling more environmentally friendly behaviours in Dublin City with expediency.

Dublin Bikes is recognised as a successful scheme for the city.¹⁴ It has potential for greater rollout across Dublin, with widespread utilisation and further success likely in this event. The Draft Plan acknowledges the success of the Dublin Bikes project and refers to the possibility of rolling it out further; however, it does not include information on the scale of roll out.¹⁵ Considering the 5 year timeline of the plan, this is a concern.

Resources

The supply of water to the Greater Dublin Area is a significant concern but the precariousness of the water supply to the city is not adequately detailed in the Draft Plan.¹⁶ In order to improve the city's resilience and sustainability, its natural resources, particularly water, need to be secure. We acknowledge that the proposed Eastern and Midlands Region Water Supply Project, which would involve piping water from the Shannon to the GDA and the midlands, is a national infrastructure project and dependent on a national piece of legislation, the Water Environment (Abstraction) Bill. However, considering the Draft Plan's emphasis on city resilience, it should make reference to security of water supply in light of the precarious situation at present.

Business Community

Dublin Chamber believes that the Draft Plan does not consider the role of the business community in a meaningful way. The business community has exhibited the ability to act in a leadership role in this area and Dublin Chamber is of the view that the Draft Plan should include plans for business engagement. Large employers in the city such as Accenture¹⁷ and Kingspan¹⁸ have both shown what can be achieved in making systemic changes toward sustainability through strong leadership. They serve as examples of how this can be done by businesses acting as drivers of change within a specific sector or by imparting more environmentally sustainable habits on staff and changing general business practices to reduce carbon footprint. Similarly, climate change and renewables are of increasing importance to FDI companies, for example in the area of requiring renewable energy sources. Many FDI companies are

¹⁴ [Irishtimes.com 2016 https://www.irishtimes.com/news/health/dublinbikes-a-runaway-cycling-success-in-the-capital-1.2606304](https://www.irishtimes.com/news/health/dublinbikes-a-runaway-cycling-success-in-the-capital-1.2606304)

¹⁵ Draft Climate Action Plan p69

¹⁶ Draft Climate Change Action Plan p95

¹⁷ Accenture <https://www.accenture.com/ie-en/company-environment>

¹⁸ Kingspan <https://www.kingspan.com/group/net-zero-energy>

leading the way globally in establishing sustainable activities and can contribute to the overall transition toward sustainable practices.

The Draft Plan should take into account the positive impact that the business community can have in reducing carbon emissions and transitioning to more sustainable practices. For example, it should consider the part that the business community can play by making arrangements with its staff in support of city objectives to reduce transport emissions

The business community is part of the city and contributes to the city's emissions. However many businesses are unsure of how to make changes to become more energy efficient or environmentally sustainable. A recent Dublin Chamber survey showed 23% felt they would like to make changes to become more environmentally sustainable but they did not know how. The same survey showed that 69% of businesses feel they do not get enough guidance/support in this area from Government.¹⁹

Furthermore, inclusion of business community engagement in the Draft Plan would reinforce the need for all stakeholders to prioritise environmental sustainability.

Conclusion

The Draft Plan exhibits a welcome level of leadership from Dublin City Council, with one of the targets of the plan being to '*Actively engage and inform our citizens on climate change*'.²⁰ However, considering the proven importance of leadership and a top down approach, greater collaboration with Dublin's business community, as significant stakeholders in the city, has the potential to increase the success of the Draft Plan in engaging all of its citizens. Environmental sustainability and city resilience need to be considered as a priority both for city government and for the business community. Inclusion of the business community in the Draft Plan will reinforce this.

Dublin Chamber recommends that the Draft Plan should include targets to engage with and include the business community as an essential stakeholder in reducing emission-producing behaviours in those who work in the city and to encourage prioritisation of more environmentally sustainable business practices. The Draft Plan should take the opportunity to encourage collaboration between representative bodies like Dublin Chamber and State agencies in the space. It should include a provision to provide further access points to training and information for SMEs on how to become more energy efficient and environmentally sustainable. While SEAI has established an SME Engagement Unit it remains apparent that Dublin's businesses needs further general guidance and support in their transition toward more sustainable practices.

Immediate action is necessary to transition to a low carbon economy, considering the warning of the UN. Dublin Chamber recommends the hastening of improvements to city cycling infrastructure and the

¹⁹ Dublin Chamber Business Outlook Survey Q1 2019 [http://www.dublinchamber.ie/business-agenda/business-trend-survey/business-trends-survey-q1-2019-\(1\)](http://www.dublinchamber.ie/business-agenda/business-trend-survey/business-trends-survey-q1-2019-(1))

²⁰ Draft Climate Change Action Plan p6

further roll out of Dublin Bikes as steps that should be afforded immediate action as they will have both an immediate impact on emissions and long term implications for emission-reducing behaviours.

Broadly speaking timelines and actions in the plan are too vague and the Draft Plan lacks a step-by-step breakdown. Considering the short timeline of the Draft Plan, the actions that can be taken to encourage behavioural change and reduce emissions in transport in particular must be progressed with urgency.

12



Submission on the Consolidated Rail Strategy to 2027

May 2019

Dublin Chamber welcomes this opportunity to make a submission to Iarnród Éireann to inform its consolidated strategy to 2027 and beyond. To ensure that rail services are well placed to meet future demands, the Chamber will highlight relevant issues that are of strategic importance to companies across the Greater Dublin Area. This is an appropriate time to develop a rail strategy to complement and support the delivery of the National Planning Framework, the Regional Economic and Spatial Strategies and Metropolitan Area Transport Strategies for Ireland's cities.

Dublin was recently ranked among the most traffic-congested cities in the world, with an average of almost 250 hours lost per driver annually.¹ Traffic congestion in the Dublin region costs the Irish economy an estimated €350 million per annum, rising to €2 billion per annum by 2033.² However, the city is already experiencing a shift to more sustainable modes of transport with increasing numbers of people preferring to cycle or use Dublin Bus, Luas, DART and Rail services. In order to reduce rising congestion and meet the growing demand for alternative forms of transport Iarnród Éireann must be innovative in its future planning, aiming both to meet project future demand and to deliver high quality services that will encourage further modal shift from private car usage to public transport.

The Chamber has followed the format suggested by Iarnród Éireann, addressing three questions on the current strengths & limitations of rail services, the biggest opportunities and challenges, and prioritisation of future projects.

What are the main strengths, benefits and limitations of existing rail services?

Demand for public transport services has a strong correlation to economic activity. Increases in disposable income, consumer spend and employment caused by strong economic growth create a demand for more travel and increased journeys on all forms of transport, including Rail. Annual PSO public transport passenger journey figures from recent years show a steady increase in rail passenger numbers, with a record 47 million passenger journeys last year on Iarnród Éireann services. This figure is set to rise to 50 million in 2019.³

¹ INRIX Global Traffic Scorecard 2018, <http://inrix.com/scorecard/>

² Dáil Question No: 346, John Lahart TD. Ref No: 1857/17, Proof 348, Answered by the Minister for Transport, Tourism and Sport Shane Ross TD.

³ The Irish Times, March 2019, <https://www.irishtimes.com/news/ireland/irish-news/tender-out-for-up-to-80-pre-owned-trains-to-meet-urgent-demand-1.3813067>

National transport planning should be based on strengthening Ireland's city regions by connecting core urban areas to their natural commuter zones and to each other. As well as supporting a more sustainable model of national development, this approach will gradually reduce the overall subvention requirements of the rail service and place Iarnród Éireann on a more sound financial footing.

Rail transport plays a vital role in providing efficient and sustainable transport solutions for large urban centres, as well as national and regional connections between large settlements throughout the country. The DART and Dublin Commuter services are vital to the functioning of Dublin businesses. Employees depend on these services, both to travel to the city from commuter towns and to move between hubs within Dublin.

In 2018 both DART and Commuter services increased by 4-5%,⁴ and demand is growing across the rail network. This was impacted in particular by the expansion of services through the Phoenix Park Tunnel and the introduction of the 10-minute DART schedule. The introduction of lower capacity trains on a higher frequency led to capacity issues being reported in some of the north side stations close to the city such as Killester and Clontarf Road.⁵ While the 10-minute service is welcome, it is vital that such changes are accompanied by continued investment in extra rolling stock.

Efforts to encourage a modal shift towards public transport must be coordinated across a number of areas of public policy, including spatial strategy, urban density guidelines, and wider transport plans. Convenience is a priority for commuters at peak traffic times. Complementary services such as Dublin Bike, cycle lanes, and bus stops should be located as close as possible to rail stations to improve connectivity and encourage greater use.

Integrated ticketing is now the norm in most European and Western cities and more needs to be done to deliver an integrated transport system. From a Dublin perspective passengers should be able to easily move between the DART, Luas and DublinBus with a single ticket that is valid for the complete journey. Similarly those using the Intercity services and arriving in Heuston or Connolly should be able to step onto a Bus or Luas service without needing an additional ticket.

The rollout and uptake of the Leap card across the public transport network has been highly effective and provides integration across all public transport in Dublin, with the exception of Intercity Rail services.⁶ The roll out of the Leap card to the Intercity services would be a final step in linking up all public transport services in Dublin including DublinBikes, Bus Éireann, DART and Luas. Following international trends, Irish people increasingly regard contactless card payments as standard, with Touch-Pay technology now used for even the smallest purchases. Rail users in Dublin should be able to 'tag on' using their bank cards as they can in London. Short of this, they should be able to pay from their Leap card account using their smartphone. A simplification of the fare structure should also be considered.

⁴ Transport for Ireland, Press Release, January 2019, <https://www.transportforireland.ie/further-growth-in-passenger-journey-numbers-on-transport-for-ireland-subsidised-services/>

⁵ The Irish Times, Press Release, September 2018, <https://www.irishtimes.com/news/ireland/irish-news/irish-rail-acknowledges-dart-changes-have-led-to-problems-1.3625988>

⁶ Joint Committee on Climate Action debate, *Third Report of the Citizens' Assembly: Discussion*, October 2018, https://www.oireachtas.ie/en/debates/debate/joint_committee_on_climate_action/2018-10-04/2/

Dublin Chamber also recommends investment to ensure that stations and trains are accessible and inclusive, particularly to commuters with mobility issues. Wheelchair ramps and accessibility assistance can be provided at most stations but Iarnród Éireann suggests that those with a mobility impairment contact them in advance of travelling to arrange assistance.⁷ This severely impacts on users' ability to rely on the service and use it the same way as a person with no mobility issues. More needs to be done in embracing innovative solutions and encouraging commuter inclusion. Trains should be installed with technology that allows those with mobility issues to be able to safely exit and enter the train and train station without assistance. Such changes would help to support business efforts towards greater workplace inclusion.

Where are the biggest opportunities and challenges to improving services and attracting additional demand?

Dublin Chamber surveyed over 300 companies in 2016 on the question of what would encourage increased use of public transport. Almost half (49%) of respondents said reliability was the most important factor, followed by one-in-four (25%) who cited frequency as their number one requirement. The third most important variable was journey time (13%), followed by cost at point of use (9%). Just under 3% said comfort was most important.

Dublin Chamber recommends increasing frequencies and maximising the potential of existing lines and services in the Greater Dublin Area. This includes opening up access to existing lines and prioritising new stations, including in expanding areas such as Phibsborough and Pelletstown. The recent calls for tender for a multidisciplinary consultancy team to support the proposed expansion of the Maynooth line is welcome, as is the news that similar tenders will follow this year for the Kildare and Drogheda lines.⁸

With the opening of the Luas expansion and the preferred route of the MetroLink taking shape, strategic planning and smart design is required to ensure that stations where the main transport lines meet, such as Tara and Glasnevin, become future transport hubs and are equipped to handle the increased passenger volume. The proposed relocation of the Docklands Station in Dublin, due to low passenger numbers, to a site significantly closer to the Luas stop at Spencer Dock illustrates the need for joined-up thinking to ensure closer integration of transport services.⁹

Dublin Chamber recommends that in order to facilitate the greater use of public transport, car and bike parking facilities need to be further enhanced at train stations to reduce congestion in the city. Enhanced parking facilities will enable people to switch to public transport services as they travel closer to the city centre.

⁷ Dublin Public Transport, Dublin Trains, <https://www.dublinpublictransport.ie/dublin-trains>

⁸ <https://www.independent.ie/business/irish/ergo-iarnrod-eireann-kicks-off-badly-needed-dart-plan-38033187.html>

⁹ Irish Independent, April 2019, <https://www.independent.ie/irish-news/irelands-newest-train-station-could-move-because-of-major-shortfall-in-passengers-36916197.html>

Commuter services are currently operating at maximum capacity during the morning and evening peaks¹⁰ and can only provide additional services in off-peak times and at weekends. This has led to an increase in complaints in relation to overcrowding on services and their reliability as a means of commuting to work. While steps have been taken to address the problem, improvements will not be in place before 2021. In the meantime overcrowding and capacity problems will continue to increase. This presents a significant short-term challenge in regards to the reputation of the rail service as being a reliable, comfortable and effective commuter service.

Management of Dublin commuter services which are already at full capacity will be a key challenge in the coming years. Currently these services cannot afford to attract additional demand, and will therefore not be in a position to support modal shift and reduced carbon emissions. Dublin Chamber notes that Iarnród Éireann is currently progressing an order for between 60 to 80 vehicles to go into service by February 2020.¹¹ These are urgently needed to meet commuter demand.

The backlog in train capacity which Dublin faces over the coming years demonstrates the need for longer term planning with regard to investment in rail infrastructure and new rolling stock in particular.

Are there potential changes that should be prioritised to improve:

- **Trains? – station location and access?**
- **Route frequencies and timetables?**
- **Route journey times? – freight transport services?**

Rail investment must be focussed on where it will have the greatest economic, social, and environmental impact. Economic activity in the Greater Dublin Area accounts for just under 50% of Ireland's GVA and represents over 51% of all taxes paid nationally.¹² As well as being the heart of the Irish economy, the Dublin region is home to 40% of the State's population.¹³ Some 696,200 people were employed in Dublin City in 2018¹⁴ and the average disposable income per person was highest in Dublin.¹⁵

¹⁰ Irish Independent, November 2018, <https://www.independent.ie/irish-news/news/irish-rail-to-operate-70-additional-dublin-commuter-services-a-day-37507223.html>

¹¹ The Irish Times, March 2019, <https://www.irishtimes.com/news/ireland/irish-news/tender-out-for-up-to-80-pre-owned-trains-to-meet-urgent-demand-1.3813067>

¹² CSO Statistical Release 3 April 2019, *County Incomes and Regional GDP*, <https://www.cso.ie/en/releasesandpublications/er/cirgdp/countyincomesandregionalgdp2016/>

¹³ CSO Press Statement 14 July 2016, *Census 2016 Preliminary Results*, <http://www.cso.ie/en/media/csoie/census/census2016/pr/COPprelim2016.pdf>

¹⁴ Dublin Economic Monitor, February 2019, https://issuu.com/256media/docs/dem_-_feb_2019?e=16581915/67588868

¹⁵ CSO Statistical Release 3 April 2019, *County Incomes and Regional GDP*, <https://www.cso.ie/en/releasesandpublications/er/cirgdp/countyincomesandregionalgdp2016/>

Compact growth is the number one strategic outcome in the National Planning Framework (NPF) and when we look at Dublin, the City and suburbs are set to grow 20-25% up to 1.41m people by 2040. This increase in population and move towards high density compact growth will drive increased demand for housing, urban infrastructure and most importantly transport links in the capital.

Dublin Chamber notes that research commissioned by Iarnród Éireann's reveals a very strong correlation between subvention requirements and population density. Whereas the Limerick-Ballybrophy route requires an extraordinary subvention of €552 per passenger journey, this requirement falls to a mere €10-€20 on intercity routes, less than €5 on suburban commuter routes, and under €1 on DART routes.¹⁶ This confirms the need for an urban focus in railway investment. The latter rates of subvention are clearly more feasible in the long run and represent a better return on investment for the public exchequer.

Transport infrastructure in Dublin has become increasingly strained over the last number of years with the focus being placed on the Luas expansion, proposals for Bus Connects and the new MetroLink. Meanwhile the Commuter Trains and the DART have maintained their current level of service. Dublin Chamber recommends that the DART and Dublin Commuter routes must be prioritised for maintenance and the development of network infrastructure. These are of critical importance to the national economy and have the greatest impact on congestion levels in the capital at peak traffic times.

Dublin Chamber recommends a focus should also be placed on maintaining and improving good rail links between Dublin and the other larger cities. Capacity issues are in danger of developing on these services due to significant increased demand and last year there was an 8.4% increase in passenger journeys on Intercity services.¹⁷ Timetables should be examined to ensure that they are commuter and business friendly services. Passengers should be able to board a train in any city in Ireland and arrive in Dublin before 9am to facilitate those doing business or attending meetings and conferences in Dublin, similarly, return services should operate after 6pm.

Investing in intercity rail will foster greater economic collaboration between our cities. Presently, however, direct rail connections between the major cities as identified by the National Planning Framework are either too slow or non-existent.¹⁸ As well as improving existing services, Iarnród Éireann should take an ambitious long-term view by planning ahead for high-speed and high-frequency rail connecting Ireland's major cities. Ireland should be actively working towards the long-term goal of being able to travel from Cork to Dublin in one hour and from Dublin to Belfast in one hour, connecting not just our cities, but the island.

The DART Expansion Programme cannot afford to experience any further delays and a definite timeline needs to be put in place to guide delivery. The National Development Plan prioritises investment in the non-tunnel elements of the Programme which will enable

¹⁶ NTA, *Public Consultation on the Role of Rail in Ireland and Funding its Delivery*, November 2016, p.6

¹⁷ Transport for Ireland, Press Release, January 2019, <https://www.transportforireland.ie/further-growth-in-passenger-journey-numbers-on-transport-for-ireland-subsidised-services/>

¹⁸ City Regions Ireland, 2018, <http://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/City-Regions-Ireland-28-11-18.pdf>

additional services to be put in place much quicker. Dublin Chamber welcomes this move to enhance the current service offering. However DART Underground remains a critical national infrastructure project. As well as linking all rail, DART and Luas services in the capital, it would potentially provide direct connections between Cork and Belfast, or Waterford and Dundalk.¹⁹ Together with the DART Expansion Programme, it would result in a high-capacity integrated rail network across the Greater Dublin Area which would support the economy, the growing population, and the required shift towards greater urban density.²⁰

While public transport only accounts for 5% of Ireland's overall transport emissions,²¹ the transport industry needs to be a leader in improving fuel efficiency and sustainability. Dublin Chamber welcomes the plans for further electrification and the purchase of electric and bi-mode trains. This will allow the expansion of the DART to progress initially without electrification using a hybrid fleet to build up capacity prior to electrification of those lines. Ultimately, electrification of the rail network needs to expand beyond the Greater Dublin Area, and InterCity services should be prioritised for transition to a low-carbon service.

Recommendations

- Focus rail investment where it will have the greatest economic, social, and environmental impact. Services that offer the greatest return on investment need to be prioritised.
- Prioritise the delivery of enhanced rail services for the Greater Dublin Area which will enable high-density and compact growth to become a feasible option in the city as the required transport links will be in place.
- Ensure investment in infrastructure, such as new carriages, is progressed before services reach capacity. Future planning needs to be prioritised to ensure that the rail network is servicing current and future demand.
- Put in place a definitive timeline for the delivery of the DART Expansion Programme.
- Improve the environmental sustainability and energy efficiency of rail services by progressing electrification plans in the Greater Dublin area and continuing the roll out to the Intercity services.
- Develop key stations into transport hubs where DART, DublinBus, DublinBikes, Luas and future MetroLink services meet to facilitate integrated transport and increased passenger numbers.
- Increase frequencies and maximising the potential of existing lines and services in the Greater Dublin Area. This includes opening up access to existing lines and prioritising new stations
- Work towards a sustainable, high frequency, high speed Intercity service connecting Dublin to the other major cities identified in the National Planning Framework.

¹⁹ The Journal, September 2017, <https://www.thejournal.ie/dart-underground-dublin-delays-2-3609701-Sep2017/>

²⁰ Iarnród Éireann, *Dart Expansion Programme*, <http://www.irishrail.ie/about-us/projects-investment/dart-expansion-programme>

²¹ Joint Committee on Climate Action debate, *Third Report of the Citizens' Assembly: Discussion*, October 2018, https://www.oireachtas.ie/en/debates/debate/joint_committee_on_climate_action/2018-10-04/2/



SUBMISSION re METROLINK | EMERGING PREFERRED ROUTE

- MAY 2019 -

1. Introduction

Dublin Chamber, which represents 1,300 companies across the Greater Dublin Area, welcomes the opportunity to make a submission regarding the preferred route for MetroLink. This submission follows on from a previous Dublin Chamber submission made in May 2018 regarding the Emerging Preferred Route for MetroLink. Dublin Chamber uses this submission to re-state many of the points made in that previous submission.

MetroLink remains a project that Dublin Chamber is supportive of. We believe the publication of the Preferred Route to be another small, but significant, step along the path to delivery of a project that is urgently needed.

Dublin Chamber has long advocated the construction of an underground rail link between North County Dublin and the city centre, including a stop at Dublin Airport. Following many false dawns over the past two decades, we are delighted to see that the delivery of such a project is again being considered.

2. Dublin Chamber's Transport Vision

Dublin Chamber's vision is for Dublin to be a city that offers a high quality of life and a world class transport system. In order for that vision to become a reality it is vital that Dublin is an easy city to move around and where short, consistent commute times are the norm. Sadly, Dublin is significantly behind where it needs to be in this regard as a result of severe under-investment in our public transport infrastructure over recent years. This is a major frustration for businesses and for citizens. The delivery of projects such as MetroLink are key to that ambition being realised and Dublin and its businesses cannot afford further delays in its delivery.

Dublin Chamber's position on MetroLink is based on feedback from our member companies and also from the fruits of our Dublin 2050 project. The cornerstone of this project was the Great Dublin Survey, which was carried out in the summer of 2017 and garnered responses from more than 20,000 Dubliners about how they would like to see Dublin develop over the coming decades. The findings, published in 'A Vision for Dublin 2050' identified a number of red line issues for citizens if Dublin is to become one of the best places in the world in which to live.

Dublin Chamber welcomes the progress made in recent years in reducing private car use in the city. However, insufficient investment in public transport means that progress has been too slow in this regard.

Looking ahead, we believe that public transport, cycling and walking should be the dominant way of moving around Dublin, certainly within the M50.

As well as the public transport network, cycling and walking infrastructure in the city requires a significant upgrade. This improvement cannot be made overnight and will take time to be delivered, with investment required at consistent levels over a concerted period of time.

Similarly, it is vital that we aim for the infrastructure that we do build over the coming years – in light of the significant shortfall over recent decades – to be of a world class standard. MetroLink will be one of the biggest and most ambitious projects ever delivered in Ireland. That should not put us off building it, but rather the focus must be on delivering the best piece of infrastructure that we possibly can. Dublin Chamber and the Dublin business community look forward to working with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) over the coming months and years to ensure that such an outcome is achieved.

3. The Need for a Metro

Dublin Chamber strongly welcomes the ambition of the NTA and TII to provide a safe, fast, efficient, high frequency, and high capacity rail service connecting Swords, Dublin Airport, Dublin City Centre and the south-side of Dublin.

Over the past 20 years, Dublin Chamber has consistently called for the delivery of an underground Metro to be prioritised. It is a huge frustration for Dublin's workers, citizens and businesses that the project has been repeatedly delayed.

Dublin Chamber believes that the MetroLink project is a piece of infrastructure that will have a lifespan of well over 100 years and that will potentially act as the spine of an underground rail network in Dublin. It is in this context that the cost and disruption involved in the delivery of the project must be considered.

Many of the big infrastructure investments required in the GDA, including MetroLink, will have a major national impact.

Dublin Chamber welcomes the plan to link the MetroLink line up with the existing commuter and DART lines, via the placement of stations at Cross Guns and Tara Street. These links will significantly enhance Ireland's national rail network and will mean that people from all over the country will be able to access Dublin Airport directly by train for the very first time.

This is particularly important in the context of the need to better link Ireland's main cities via improved public transport links. The National Competitiveness Council has said that enhanced city performance has positive spill-over effects in the country as a whole, and that prioritising investment and initiatives to develop the competitiveness of our cities is a most effective use of Exchequer funds.

Dublin has been ranked as the 7th most congested city in Europe, with public transport usage by commuters in the capital standing at just 21.5%. Meanwhile, TII's 'National Roads Network Indicators 2017' report notes that congestion levels returned to pre-boom levels in 2015 and now stand at a record level.

The Department of Transport recently released its estimate of the economic cost of traffic congestion in the GDA in response to a parliamentary question. Its estimate is an annual cost to the Irish economy of €350 million, rising to an annual figure of €2 billion by 2033. Dublin Chamber believes this to be a conservative estimate. Back in 1997 the Dublin Transportation Office estimated the cost at £500 million, or c. €1.2 billion today adjusted for inflation.

The European Commission has noted that urban Ireland particularly suffers as a result of shortcomings in transport infrastructure, and warned that the situation will be further aggravated by rising economic activity and population growth.

It is worth noting also that among both high-income and low-income groups, levels of life satisfaction are lower in Irish cities than in rural areas. Other research has found that Dublin has one of the lowest levels of self-reported life satisfaction in Ireland. Urban Ireland should not be punished for its success, but rather supported in driving prosperity nationally. Dublin Chamber believes we should provide Irish city-dwellers and commuters with the same high standard of urban living that can be expected elsewhere in Europe.

Many transport projects within Dublin are of national and European importance. Dublin Airport, for example, is of paramount importance to the country's global connectivity. With over 80% of overseas visitors arriving through the facility, it is

effectively Ireland's national airport. Improved connectivity to Dublin Airport is a national and EU imperative for the years ahead.

4. Creating an Integrated Transport Network for Dublin

To develop Dublin and other urban regions, the Government should learn from models of best practice in urban planning such as Copenhagen, where planners have followed a coherent cross-party policy of 'infrastructure first'.

The proposed MetroLink line has the potential to become the spine of Dublin's public transport network, providing the foundation for the city to become one of the world's most attractive and competitive cities in which to live and do business.

Dublin Chamber is pleased to see that the proposals for a revamp of Dublin's bus network, in the form of BusConnects, have been published since the last round of consultation on MetroLink. While the BusConnects proposals undoubtedly require further refinement, the potential is there for BusConnects to provide Dublin with the standard of bus service that the city requires. The publication of the draft BusConnects proposal means that people now have a clearer idea of how the two plans – BusConnects and MetroLink - will work together to provide Dublin with an integrated public transport network.

Dublin Chamber remains very disappointed that the Dart Underground project is not being progressed at the same time as MetroLink. MetroLink and Dart Underground are the two most important major transport infrastructure projects that will be built in Dublin over the next 50 years. Operating together, they will form the spine of a public transport network that will support Dublin for the next century and beyond. It is unfortunate that the plans for Dart Underground are not available at this time, with details of start and completion dates. Considering the route and construction of both

MetroLink and Dart Underground in conjunction would have made sense, with the potential for some infrastructural works being done in tandem, i.e. station box construction. Dublin Chamber is concerned that not enough future-proofing is being done with MetroLink, particularly in terms of the construction of station boxes (at key points such as St Stephen's Green). It is essential that there is greater recognition of the need to lay the foundations for the integration of more underground metro lines in the future.

Dublin Chamber would like to see extensive bike parking facilities included at all MetroLink stations. For inspiration, Dublin would do well to look at the types of bike parking infrastructure that has been put in place at train stations in other European cities such as Amsterdam, Copenhagen and Edinburgh.

Dublin Chamber welcomes the idea of creating a large park and ride facility at MetroLink stops in North County Dublin. This will help encourage increased use of the new MetroLink line.

Dublin Chamber strongly welcomes the linking up of MetroLink to the Maynooth and Hazelhatch rail lines, as well as to the DART and commuter network via a stop at Tara Street station. We strongly recommend that these aspects of the project be retained in any future iterations of the MetroLink plan.

5. Accelerating Modal Shift

Progress on getting people in Dublin to switch from the private car to public transport has been too slow over the past 20 years. This is mainly a result of the consistent under-spend on infrastructure in the Greater Dublin Region. There are still too many people in Dublin who do not have a compelling public transport option available to

them. As a result, congestion remains a major problem in Dublin and a significant detractor from quality of life.

No single infrastructure project alone will solve Dublin's current or future congestion problems. What is required over the coming years and decades is a consistent ambitious infrastructure investment that will deliver an integrated transport system in Dublin so that it can rival the best cities in the world.

6. A Solution for Dublin Airport

Dublin Chamber is keen to see more information regarding how the Metro stop at Dublin Airport will be linked to the two terminals. While the Chamber accepts that the placement of the station at the mooted area is necessary, we believe it is extremely important that both terminals are well-linked to the Metro station. A great deal of care must be shown regarding how passengers will move between the terminals and the Metro station. Dublin Chamber's preference is for both terminals to be linked to the station via an underground tunnel. Failing that, a fully enclosed and covered over ground tunnel will be required that provides for a speedy and comfortable transition between the airport terminals and train station.

7. A Solution for North County Dublin

Building MetroLink – together with new and improved bus links, cycle infrastructure and park and ride facilities – is key to solving North County Dublin's congestion issues and to ending the commuter misery of thousands of existing and future residents of the region.

The current modal share of car traffic into Dublin city centre at peak traffic times will not be sustainable as the economy continues to grow. However, currently, public

transport is incapable of dealing with the additional demand required for the modal shift required for Dublin to remain a thriving and living city centre.

The largest feeder town to Dublin city and suburbs currently is Swords, with almost 8,000 of the 20,000 workers in Swords commuting to work. Almost two thirds of this group travelled to Dublin's inner metropolitan area by car. By contrast, in Skerries, which is on the Dundalk rail line, almost half of workers travelled by train to work in Dublin City and Suburbs. The story is similar in Donabate, where 44 per cent of workers take the train.

These figures prove that MetroLink is a project that can transform how people living north of Dublin access the city and move around the region.

8. The Scrapping of the Southern Section (Charlemont to Sandyford)

Dublin Chamber notes the decision not to proceed with the upgrade of the Luas green line between Charlemont and Sandyford.

Dublin Chamber admired the ambition shown by the NTA to have a dedicated Metro line that would run all the way from Swords to Sandyford. However, the NTA's decision to alter this aspect of the plan is understandable and necessary in order to push the project forward. Dublin Chamber's own submission last year called for more detail on how the upgrade of the Luas Green Line to Metro standard would work and also the level of impact this would have on the running of the Green Line during the construction phase.

The proposed approach makes sense and will hopefully allow for construction of the project to begin as soon as possible.

Dublin Chamber believes that stopping the Metro at Charlemont leaves open a whole host of opportunities to expand the Metro in the coming years and decades into other areas of Dublin's southside. As mentioned previously in this submission, it is vital in this regard that consideration is given in the planning and construction of MetroLink to the future expansion of Dublin's underground network.

9. Managing Disruption to the City

The Dublin business community is acutely aware of the benefits that MetroLink will bring for the Dublin region for decades to come. That said, while we accept that disruption to the city is inevitable during the construction phase, Dublin Chamber's support for the project is based on a condition that the adverse effects of the construction work be mitigated to allow businesses in the city to operate effectively and to allow commuters to move around the city as easily as possible. Good communication between the various stakeholders in the city will be essential to ensure that disruption is kept to a minimum during the construction phase.

Dublin Chamber recommends that a MetroLink Project Group be established to ensure that all stakeholders, including business groups, Gardaí and public transport operators, are kept up-to-date on all issues during the enabling, construction and completion phases. This group should replicate the successful Department-led 'Luas Cross City Project Group', which was in place during the construction of Luas Cross City.

10. Cost Benefit Analysis

Much has been made of the price tag associated with MetroLink. However, Ireland can no longer afford to shy away from expensive infrastructure developments. Ireland's unambitious and sporadic patterns of investment in infrastructure cannot be

allowed to continue. This pattern undermines economic potential and competitiveness, reduces quality of life, and leaves Ireland in a permanent state of catch-up with respect to its public infrastructure needs.

Unstable capital investment patterns have undermined Ireland's ability to plan its cities effectively in the past, and a shift in policy will be required if future urbanisation is to be managed consistently. Government should explore alternative financing models for major infrastructure projects, paying particular attention to the role of private finance or public-private partnerships, in order to ensure a more stable flow of capital investment in the future.

Once the route for MetroLink is finalised, Dublin Chamber looks forward to seeing a full and comprehensive schedule for works. Similarly, Dublin Chamber looks forward to seeing a full cost/benefit analysis of the project once the proposed route has been finalised.



Dublin Chamber
7 Clare Street
Dublin 2
(01) 644 7200
policy@dublinchamber.ie

Name:

Roshan Jamshidi

Organisation:

Comment:

Hello my name is Roshan. I am one of the – Address Redacted. I have recently learned that a 10 story or higher building plus a 5 to 8 story or so will be planned for the coming months in cherry orchard and I am objectifying to this first of all cherry orchard is a small community when we asked for homes we asked for houses or small apartments not massive buildings blocking everything and causing a huge population bringing more traffic. The roads will also have to be joined up bringing in more of wait in line to get home. I was also told two years ago across from barnville and cedarbrook walk would be a lidl or aldi, the residents were looking forward to this as we do not have any amenities near us except a spar which is located in parkwest and for people who do not drive heavy shopping is an issue with so much weight and over time causes back problems. Please build a supermarket for cherry orchard. There is adequate space in that area. And as for the tall story apartments can you please build apartments that are at least only 4 stories or houses like the ones near st ultans school. The proposed plan makes no sense as it will be blocking a lot of peoples way and causing disruptions. The cedarbrook way and Avenue will have more people coming through for short cuts also causing residents more hassle. The park across from cedarbook way is where everybody walks their dogs as some residents do not have gardens and walk their dogs at least 3 or 4 times daily. I am asking you with the bottom of my heart please do not go ahead with tall buildings it will destroy cherry orchard/cedarbrook not only that but residents in parkwest apartments will have issues and a massive view blockage and harder times also with traffic. We have had a very bad time with people from outside also they set the bins on fire and cars etc so it will also bring more crime to our doors. People are asking can you build a playground for the children of cedarbrook as they have nothing to do here and make people angry with noise and taking things from bins. I have gone into details here to give you an insight to how us residents of cedarbrook are very upset and concerned by this. I also own my home and have been here years and love it here and I really do not want to leave because of this new change. Please I am begging you and Dublin County Council consider my email. A nice supermarket. Houses and some 4 story apartments. Please be vigilant on

peoples objections and feeling on this as this is our lively hood where we live. I'd be grateful if you reply when this email is received.

Sincerely

Attachment:

Details as above from received written submission

Name:

Prison Staff – Name Redacted

Organisation:

Comment:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a
With reference to the above, I wish to support this proposal. As a prison officer in Cloverhill Prison, I am part of an established workforce embedded within the local community. However due to the security arrangements within my place of work, there is little opportunity to engage in normalized recreational activity or leisure. The proposal would allow for such an environment. I have no doubt of the mental and physical benefits of such a development. To be able to access clean air and an open sky, within a relaxed environment would hugely benefit the many staff employed within the Irish Prison Service in this location. I sincerely hope that this proposal will be adopted by the council and look forward to the long term benefits it will bring.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

potential benefits to your physical and mental health and to have a safe and secure area to exercise .

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I would love if this land was allocated for use by the Irish Prison Service. Between both Cloverhill Prison, Wheatfield Prison and the Courthouse there are numerous employees that could benefit from the use a recreational and fitness area in their day to day work life. The benefits for mental health and well being are very high. It would be nice to have a safe and enclosed area to run in that is close to my job. Working in a Prison is a stressful and challenging environment. There are very few outlets in this area for recreation currently available to the staff here. Thanks

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

I am a Prison Officer working in Cloverhill Prison.

Comment:

I am submitting an application that the vacant ground across the road from Cloverhill/Wheatfield Prison be made available for recreation/social use by the prisons.

This would be a great amenity and would be cost neutral to the council as the development of the site would be carried out by the Irish Prison Service and the various staff bodies within the prisons. Visually, this would also be an attractive proposition as planting/landscaping would be carried out. Any on-going maintenance would also be undertaken by the IPS.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

The land would be an excellent asset for the Cloverhill/Wheatfield Prison staff. It could be transformed into an area in which staff could exercise, unwind and associate with one another. The land itself could be turned from scrub into a beautiful environment. The prisons are already there as is a large car park so the staff would neither add to congestion in the area nor would further development be required in the future to access the area through a car park etc. In turn I believe the surrounding area would benefit through land utilized and maintained by dedicated public servants who would cherish the land.

Thank you for taking time to read this,

Kindest regards,

Neil

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I have worked in Prison Staff – Details Redacted .This would be an unbelievable social asset for all the staff working right opposite this location. A chance to leave the confines of the prison and get some valuable fresh air and exercise

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Hi there, I'd just like to state the benefits to myself and my colleagues, if this development was given approval for us....

Help with weight loss

Increases good feeling and moods

Help to increase energy levels

Help with mental health and wellbeing

Reduces the risk of chronic diseases

Also it would give us a secure area to train and relax.

Regards, Prison Staff – Name Redacted

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Having such an area available would greatly benefit the mental health and fitness of the staff who would surely be encouraged to avail of such a facility in such close proximity to work. Working in a Prison can be very stressful and finding a place to relieve that stress for a short while would be beneficial to all in the in the Prison.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This area would be very beneficial to the physical and mental health of the Prison Staff, to get outside of the Prison for breaks etc.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

“Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a”

Comment:

I think it would be very good for the officers to have somewhere to go on their breaks to get out of the prison environment and to train in the fresh air. it would be very beneficial for mental health issues. etc

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Cloverhill and Wheatfield Prisons have several hundred employees who work in a difficult and, at times, stressful environment. Having a secure outdoor recreation area right on our doorstep would be a fantastic addition to the basic facilities available inside the Prisons but, more importantly, it would give staff the opportunity of being able to go outside, relax, exercise and socialise. Having an amenity such as this would be hugely beneficial to the physical and mental wellbeing of those who use it.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a
There are over 350 staff working in Cloverhill Prison, with no facilities for staff for recreation or exercise except for a small staff gym. This site would be ideal for staff go

Comment:

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill prison sports and social club (Irish prison service) land at 3A.

Comment:

I like many of my colleagues working in Cloverhill prison work long shifts in a challenging highly stressful environment. To acquire this land and develop it into a purposeful recreational sports area would be so beneficial to a majority of Cloverhill/wheatfield staff helping both their physical and mental wellness. Working in such an enclosed environment such as a prison means staff are without natural light for long periods of their working day and to have an outdoor area to go and train/relax walk take in some fresh air and natural light has so many knock on health benefits. This is a great opportunity and to acquire this land would be very much appreciated by the staff .

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

This would be of huge benefit to Prison Staff as will create a great opportunity to promote exercise in the workplace which will aid physical and mental health of staff

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Land at 3a

Cloverhill sports and social club

Comment:

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Sports and Social Club (Irish Prison Service)

Comment:

I feel that the area of land across from Cloverhill Prison could be developed to a high standard and would be a benefit to not only the Prison service personnel but to the general look of the area . It would be a great asset to the staff to relieve some of the pressure of such a stressful job . It would be an area staff could relax in , exercise in and just take time out for themselves and well being of their mental health .

This land has been lying idle for as long as ive worked in Cloverhill and is in dire need of development

It would be most appreciated if the application from the Prison Service could be looked on in a favourable manner .

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Clover hill sports and recreation area Irish Prison Service

Comment:

I would like to see this area developed in a recreational manner for the staff of Cloverhill and Wheatfield Prisons to benefit their mental and physical Health. It could also be used to benefit the wider community at large.

Attachment:

Not Answered

Name:

Niamh McDonald

Organisation:

Irish Water

Comment:

Irish Water (IW) acknowledges receipt of your correspondence dated June 11th, regarding the draft LAP for the Parkwest/Cherry Orchard area and have the following observation:-

Section 4.10.3

2nd Paragraph, we suggest replacing Surface Water with Waste Water

4th Paragraph, we suggest replacing the word run off with waste water. This is because term run-off is usually associated with surface water and is not permitted to put run-off into sewers.

At the end of the 4th paragraph we suggest the following working to be added:-
"IW are currently undertaking studies and the surveys to prepare a Drainage Area Plan and model for the area. The report and model will identify the main issues and propose solutions for same. The current estimated date for completion of the study is the end of 2020".

Section 4.10.4 - 2nd Paragraph, remove the word "both" from the last line.

Section 4.10.4 - 3rd Paragraph, delete the whole paragraph and replace with the following:-

"As developments progress, Irish Water would have to model the required demand for water against latest network demands to ascertain local network upgrade requirements. New connections may be assigned on a first come, first served basis until any necessary capital works are completed. Local works will be developer led. Developers should engage early with IW through the IW New Connections or Pre-Connection Enquiry Process. IW will then assess and review the local network to develop a solution/options for the developer's proposals.

In line with Irish Water and RSES Objectives, the Water Supply Project for the East and Midlands Region, is key to securing a robust water supply for the region in the longer term. Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable

public drinking water supply over the next 25 years, whilst safeguarding the environment. The NWRP will outline how Irish Water intends to maintain the balance between the supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country".

Attachment:

Details as above from received written submission

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Potential benefit to physical and mental health of Prison Officers with an area dedicated to having a measured walking / jogging track on it, along with some park benches, outdoor gym equipment etc. where prison staff could exercise or relax.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Sports and recreation club 3a plan

Comment:

I believe development of this site would be of great benefit to the staff of both establishments numbering 800 approx. It would provide an alternative environment namely a quiet space for staff away from the hectic intense atmosphere in which they work .whilst also providing a beneficial environmental impact.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports & Social Club (Irish Prison Service) – Land at 3a

Comment:

Getting this land and turning it into a sports and recreational area would massively benefit me and my fellow colleagues as it would allow us to engage in a number of physically and mentally challenging activities which are vital for our health and wellbeing. I believe that having this recreational area to ourselves will enable us to be more productive and successful at work, personal life and our local communities.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

Cloverhill Prison Sports and social Club (Irish Prison Service) Land @ 3A

Comment:

This would be a great advantage for staff. Somewhere safe and secure for staff to relax or exercise which would greatly enhance the mental health of all.

Attachment:

Not Answered

Name:

Prison Staff – Name Redacted

Organisation:

prison officer in wheatfield prison

Comment:

the area in question would be ideal for all the staff of both wheatfield and cloverhill prisons, to be used as a fitness and training facility for all staff who train on a daily basis,

Attachment:

Not Answered

Name:

David Clements

Organisation:

National Transport Authority

Comment:

Dear Sir / Madam,

Please find attached the submission of the NTA on the draft Park West - Cherry Orchard Local Area Plan.

Attachment: Please see following documents.

Planning Department,
Dublin City Council,
Civic Offices,
Wood Quay,
Dublin 8.

10th July 2019

NTA

Údarás Náisiúnta Iompair
National Transport Authority

Dún Scéine, Lána Fhearchair
Baile Átha Cliath 2, D02 WT20

Dún Scéine, Fionnghall Léana
Dublin 2, D02 WT20

t 01 879 8300

info@nationaltransport.ie
www.nationaltransport.ie

RE: Park West-Cherry Orchard Draft Local Area Plan

Dear Sir / Madam

The National Transport Authority (the "Authority") has reviewed the Park West – Cherry Orchard Draft Local Area Plan and make the following observations.

Section 19 (2A) of the Planning and Development Act (as amended) states that each planning authority within the GDA shall ensure that its local area plans are consistent with the transport strategy of the NTA. The Transport Strategy for the Greater Dublin Area 2016-2035 (the "Transport Strategy") was approved by the Minister for Transport, Tourism and Sport in early 2016.

In our submission at the Issues Paper stage, we made the following recommendations:

- that densities are maximised in the local area plan, subject to other planning considerations,
- that walking and cycling linkages between existing development areas, new development areas and public transport services are provided for by way of specific objectives; and
- that cycling is fully considered in the plan in terms of infrastructure and cycle parking, in accordance with the Greater Dublin Area Cycle Network Plan and the National Cycle Manual.

The NTA is satisfied that these recommendations have been brought forward into the Draft Local Area Plan, most notably through Objectives UD4, UD8, UD10, and Movement Objectives MO1-MO15. As such, the NTA is of the view that the Draft Local Area Plan is consistent with the Transport Strategy and therefore recommends only minor text changes to the draft plan. The NTA would also like to take the opportunity to update and clarify our investment priorities for transport infrastructure and services which will serve the plan lands.

Transport Investment Priorities:

BusConnects

There are a number of references to BusConnects throughout the draft plan. The NTA would like to clarify the nature of this programme and recommend that this clarity is reflected in the final plan. There are a number of strands to the BusConnects programme. The strands of most relevance to the planning process are the Core Bus Corridors (CBC) and the Metropolitan Bus Network Review. These are separate but related projects and should be expressed in the plan as such.

The Liffey Valley CBC project – Route 7, as currently conceived, will benefit but will not impact directly on the development sites in the plan area. It is proposed to provide full bus priority along Ballyfermot Road, with some minor land-take proposed at Cherry Orchard Hospital at the existing bus stop. This scheme will deliver benefits for the plan area, by facilitating reduced journey times by bus for residents and employees in Park West and Cherry Orchard. Design and planning work is continuing for this project with an application to An Bord Pleanála expected in 2020.

Separately, the on-going Metropolitan Bus Network Review is seeking to significantly enhance the level of bus service in the plan area. At present the area is served primarily by the 79/A with a bus every 15 minutes to the city centre splitting into the 79 and 79A within Cherry Orchard with only the 79A connecting to the train station. The draft network published in 2018 maintained this level of service for the area but sought to bring all services to the train station. The revised second draft – to be published in September – is likely to improve the offer for the plan area in terms of frequency and connectivity to the city centre, heavy rail and Luas. Moreover, the revised network will be more adaptable than the existing network in terms of its ability to expand to serve developing areas such as Park West – Cherry Orchard, and make use of emerging new road links, as proposed in the draft plan.

The NTA recommends that the sections of the draft plan which make reference to BusConnects are reviewed with the above in mind.

DART Expansion

As part of the DART Expansion Programme, the NTA intends to deliver DART levels of service along the Kildare line through the acquisition of battery-electric carriages which can run at higher speeds and frequencies than existing diesel vehicles. This will allow enhanced levels of service to operate along the line in advance of electrification and in advance of DART Underground. The Local Area Plan would benefit from a reference to this staged approach to enhancing services on this to Park West – Cherry Orchard.

Recommended Changes to the Draft Local Area Plan

The NTA recommends the following changes to the text of the Movement Objectives:

- MO13 – Include reference to the National Cycle Manual; and
- MO14 – Insert the word “local” before “Park and Ride”

Concluding Remarks

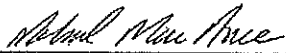
It is the view of the NTA that Park West-Cherry Orchard is an optimal location for residential and commercial development due to its location on an existing commuter rail line which is linked directly

into Dublin City Centre, and which will benefit from significant levels of investment in the medium to long-term. It can also be readily served by high-quality, high-frequency bus services linking the area to a wide range of destinations, and will benefit from increased bus priority to be provided along the main axis from the plan area to the city centre through the NTA's *BusConnects* programme.

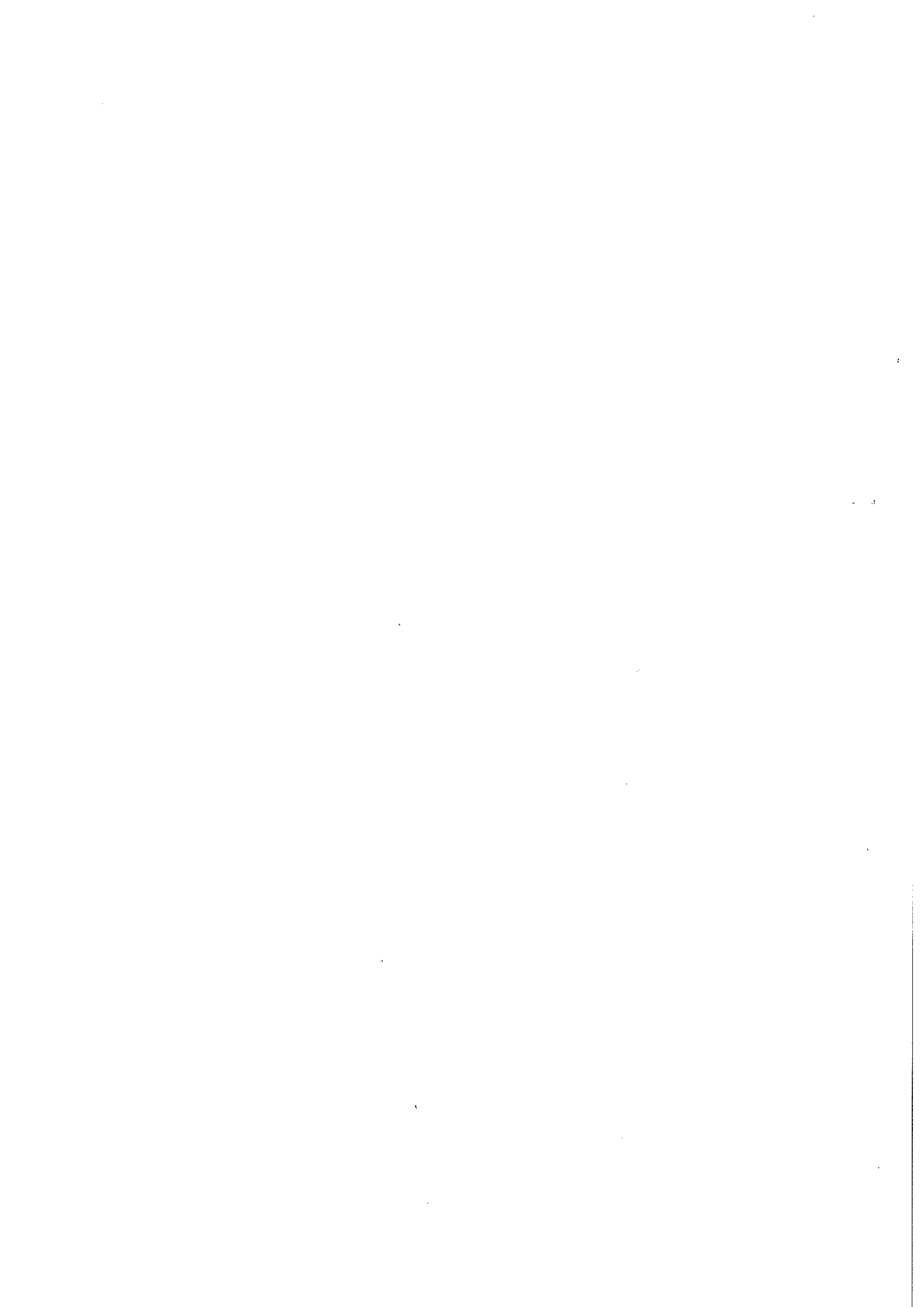
As such, the development of Park West-Cherry Orchard and the refocussing of the area onto the rail line, is fully supported by the NTA as an example of the integration of land use and transport planning in a manner consistent with the Transport Strategy.

I trust that the views of the Authority will be taken in to consideration by Dublin City Council in finalising the Park West-Cherry Orchard Local Area Plan.

Yours sincerely,



Michael MacAree
Head of Strategic Planning



Name:

cloverhill prison sports and leisure club

Organisation:

Prison Staff – Details Redacted

Comment:

Cloverhill sports and leisure club land at 3a

I hope we could obtain the land at 3a

It would have great health benefits both mentally and physically

Working long hours most times never seeing daylight for 12hours

Having somewhere you can go for a walk ,see daylight and some fresh air

the effects would be priceless

Please give this submission serious consideration

Attachment:

Not Answered
