

36 Park Avenue  
Sandymount  
Dublin  
D4  
joancmacarthur@gmail.com

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

20<sup>th</sup> April, 2018

**POOLBEG WEST- DRAFT PLANNING SCHEME (SDZ) : ORAL HEARING  
SAMRA : Concluding Comment**

**For the Attention of Inspector Donal Donnelly**

Thank you for your efficient running of the Oral Hearing over the 17-19<sup>th</sup> April, your courtesy afforded and the opportunity for representation at this by SAMRA.

Infrastructure planning was not fully discussed at the Oral Hearing due to lack of information initially available surrounding the transportation strategy and traffic impact assessments. It will be on the record of the Oral Hearing, that this was produced upon request of DCC towards the end of the prior Appellant Question period, afforded to SAMRA.

We offered to succinctly summarise in a follow-up note, as further questions were not permitted.

SAMRA heard the assurances provided by DCC on infrastructure but the above document once it became available, deepened one of the primary concerns, which lead to SAMRA' representation in the first place. This was around the apparent modelling assumptions used in the NTA ERM.

eg

- Access junctions operating at less than 90% and 75% at certain times
- Road network around SDZ does not show significant capacity issues with the network reporting less than 75%

Validation by enquiry was not possible – but we submit this to be inaccurate and will potentially lead to completely misleading widespread conclusions, across both car and public transportation, regarding the movement of significant numbers of people to and from the SDZ.

SAMRA suggest there are specific points which need clarification including :

- Questioning and validation of model assumptions
- Have other changing traffic impacts been considered in the modelling, eg incinerator traffic
- Traffic optimisation initiatives eg Park and Drive.
- Segregation of HGV's from residential transport routes, a key root

cause risk on road safety

- etc

As said at the outset of the representation at the Oral Hearing, we seek to work closely with DCC to mutual benefit. As a fundamental requirement however, we must have the correct basis for all decisions.

Yours sincerely,

**Joan MacArthur**

Chairperson - SANDYMOUNT & MERRION RESIDENT'S ASSOCIATION (SAMRA)

Cc : File - Poolbeg West, SAMRA

Enclosures :

1. An Bord Pleanála – Oral Hearing Appeal Notes
2. Letter SAMRA to DCC (Basis of Appeal), dated 3<sup>rd</sup> July 2017

## Enclosure 1 :

### AN BORD PLEANALA ORAL HEARING : APPEAL NOTES

- **INTRODUCTION**
  - Good morning Inspector
  - Thank you for providing the opportunity for this representation.
  - **Dave Turner**, Secretary SAMRA. I am a professional engineer and a Fellow from IMarEST. My background is from the O&G industry. I and my family live in the SAMRA area.
  - **Lorna Kelly**, Planning Specialist SAMRA
  - SAMRA represents the residents who are directly adjacent and to the south west of the proposed SDZ location. This area numbers an estimated 4,500 residents in excess of 1,000 homes
  
- **AIMs of SAMRA :**
  - To protect the environs of Sandymount Village, Sandymount Strand & Dublin Bay
  - To give the residents a voice, empowering and leveraging collective representation
  - To enable residents to develop key messages and make critical input to decisions
  
- 
- **SAMRA is pleased to support the principle of the SDZ**, providing a contribution to the national housing shortage and bringing other exciting possibilities that may emerge, to the benefit of the community and the greater Ireland.
  
- 
- The proposed SDZ is for 3,500 homes and 7-9,000 additional people – BUT we need to be aware - this is effectively **the addition of another small town**
  
- 
- SAMRA has some critical concerns which were articulated in a letter to DCC dated 3<sup>rd</sup> July 2017 and which was eventually resubmitted as the basis of objection to An Bord Pleanala.
  
- 
- These concerns remain today and are broadly :
  - **(1) Infrastructure upgrade**
  - **(2) Provision to protect the adjoining EU declared Habitat and Species zone**
  - **(3) Transparency and level of engagement with residents on the significant technical challenges that are faced**
  
- 
- **INFRA-STRUCTURE**
  - For the addition of a small town – there has to be additional enabling infrastructure which precedes development.
  - The requirements and challenges are articulated well in the plan but it is short on answers and detail.
  - There is NO COHERENT plan of how that increased volume will be accommodated or the impact of that has been assessed on the SAMRA area
  - It is also clear that it is intended that infrastructure upgrade of the surrounding area will follow house build – and not precede as is the normal case
  - We have heard quotations ranging from 10 to 30% of houses build before implementation.
  - We still hear from DCC (yesterday) that the objective is yet to develop a scheme - for example for surface and waste water

- 
- **INFRA-STRUCTURE : Roads, Traffic and Bridges –**
  - All roads in the area are now so congested FOR A LARGE PART OF THREE DAY that the whole area regularly comes to a standstill. These roads cannot take any further increase in the volume of traffic. Significant proportions of every day, roads are completely log-jammed with stationary traffic which is adding to the huge delays.
  - It is not possible to incrementally add 7-9,000 additional people a large number of which will pass through the area without significant negative consequences
  - The Transport Management Strategy and Traffic Impact Assessment is quoted to be NOT AVAILABLE
- **INFRA-STRUCTURE : Waste Water Disposal –**
  - the tertiary waste water treatment plant (Ringsend) constructed in 2003 and twice upgraded since is still being grossly overloaded and cannot be further expanded. Sandymount Strand is a green flag beach (bathing water quality) and this status is already continuously violated. This is of **major concern** to all who live in the area and will have a devastating effect on the beach as an amenity area.
- **SUMMARY (INFRASTRUCTURE)**
  - SAMRA is deeply concerned about these aspects
  - Good work has been done TO DATE by DCC
  - The IMPACT on the neighbouring area HAS NOT been assessed
  - We are being asked to support a proposed scheme
  - WE SAMRA submit that it is **premature at this point** until these issues related to infrastructure have been addressed

**NOW GOING TO HAND YOU OVER TO LORNA KELLY –**

- TO TALK ABOUT OUR 2<sup>ND</sup> POINT - THE PROVISION IN THE PLAN TO MEET THE EU DIRECTIVE - FOR PROTECTION OF HABITAT AND SPECIES, ON THE PROTECTED AREA TO THE SOUTH OF THE SDZ

**FINALLY, TO CLOSE THE SAMRA SUBMISSION**

- **We have covered**
- 
- **1 – INFRA-STRUCTURE**
- **2 – HABITAT and SPECIES**

**The 3<sup>rd</sup> and last point is the level of engagement that we seek with the LOCAL RESIDENTS – in reaching solutions to this PROPOSAL.**

**WE SUBMIT THAT IT WILL BE SIGNIFICANTLY TO OUR COLLECTIVE BENEFIT IF WE CAN WORK MORE CLOSELY TOGETHER WITH DCC.**

**WE ARE SEEKING TO ENSURE THAT THIS DEVELOPMENT WHICH IS IN THE NATIONAL INTEREST DOES NOT IRRETRIEVABLY DAMAGE THE ADJOINING AREA IN THE PROCESS.**

**Enclosure 2 :**

36 Park Avenue  
Sandymount  
Dublin  
D4  
joancmacarthur@gmail.com

Poolbeg West Draft Planning Scheme  
Dublin Docklands  
Dublin City Council  
Customer House Quay  
Dublin 1

3rd July, 2017

**POOLBEG WEST- DRAFT PLANNING SCHEME**

Dear Sir/Madam,

At a recent SAMRA meeting dated 29th May, 2017, it was unanimously agreed to object to the Poolbeg West Planning Scheme and subsequent proposed material alterations.

It is directly in violation of the AIMS of SAMRA and the basis for objection is as follows :

1. It is quoted that infrastructure upgrade of the surrounding area is out-with the scope of this planning scheme. Given that many aspects of infra-structure in the Sandymount and Merrion areas are already grossly overloaded and inadequate at present – this is a totally unacceptable premise and absolutely contrary to normal planning practice when enabling infrastructure **must precede development**.
2. The main areas of concern are :
  - a. Sewage Disposal – the tertiary waste water treatment plant (Ringsend) constructed in 2003 and twice upgraded since is still being grossly overloaded and cannot be further expanded. Sandymount Strand is a green flag beach (bathing water quality) and this status is already continuously violated. This is of **major concern** to all who live in the area and will have a devastating effect on the beach as an amenity area.
  - b. Traffic and Bridges – All roads in the area are now so congested in the morning and the evening that there is a risk of the whole area coming to a standstill. These roads cannot take any further increase in the volume of traffic. Significant proportions of every day, roads are completely log-jammed with stationary traffic which is adding to the huge delays.

- c. Vehicle environmental damage already causing significant air and noise pollution.
  - d. Property damage from vehicle ground vibration, transmitted readily across the “Marine Silt” ground bed. Damage is now evident in a number of properties due to increased levels of vibration from haulage vehicles and must be stopped before irreparable damage is caused to property.
3. There is insufficient provision in this plan to protect the adjoining EU designated Habitat and Species Directive. The increased height proposed in the material alterations chapter 11, reference number 5 would increase the adverse impact of the proposed plan on the EU designated Habitats and Species.
  4. The level of engineering challenge in a number of areas give rise to residential concern and requires transparency and engagement of the local community as the solutions are developed.

We endeavour to support this development, recognising the challenges we face and some of the problems resolved. However, many more problems will be created by going ahead with this scheme and the proposed material alterations, as it is currently proposed.

Therefore, we are deeply concerned and respectfully request that you consider these concerns (*sent by registered mail*) and include our SAMRA representation in the forward debate that is required to ensure that the area adjoining Ireland’s capital city is not **irretrievably violated for future generations.**

Yours sincerely,

**Joan MacArthur**

Chairperson - SANDYMOUNT & MERRION RESIDENT’S ASSOCIATION (SAMRA)

Cc : Poolbeg File, SAMRA