

## **Submission to OPW on Phoenix Park**

Dear Sir/Madam,

As a resident of Dublin/visitor to the Phoenix Park I would like to make the following observations on the published plans for the Visitor Experience Strategic Review for the Phoenix Park.

### **1. Development of Retail Facilities**

#### **1.1 Amount of New Build Within Park**

I believe that the proposed development of visitor facilities and retail in the OPW document constitutes a considerable overdevelopment of our green space within the historic park boundary. The new buildings proposed include

- an entirely new visitors centre
- a new welcome lodge
- two new welcome pavilions (with an information centre for visitors?)
- facilities for visitors at each gate

I submit to the process that there should be NO further and/or major developments of land or green space within the park. Any and all work should only consolidate and upgrade existing structures. As the report outlines itself there are a number of structures of conservation interest within the park that could be used to provide toilets and tourist facilities.

There is little outline in the documents provided on the standard or ambition for new or retrofit buildings in relation to sustainable design. The proposal should commit to carbon neutral retrofit and passive design strategies for all existing buildings within the park. A focus on retrofit rather than new build would also ensure that current structures are used to their full potential- some sections of the current Visitors' Centre dedicated to children's activities have been closed to the public for over a year.

#### **1.2 Use of Buildings for Retail**

The document outlines almost twenty pages of retail opportunities within the park area. The Phoenix Park is the lungs of our city and a vital green oasis away from the shopping and commercial areas of Dublin. This plan promotes a policy of colonising the park for profit generating programming. This is a direction that will damage the park for generations of Dubliners into the future who will be unable to experience the park as a quiet, green amenity in the heart of a busy city. The document makes very little mention of what business models will access opportunities within the park. This is a missed opportunity as the park is hugely important to the local community and any economic output should aim to have a community wealth building focus and ensure that owner operated businesses are preferred over large scale chains providers.

It is also worth noting that the OPW has declined in recent years to make dwellings within the park available to park employees which, during a time of historic housing shortage within the state and in particular within Dublin is a highly questionable policy. The plan would be greatly improved by

the adoption of a housing plan for park workers as is a traditional and historic practice in the life of the park.

## **1.2 Impact of New Retail**

The proposed level of retail facilities creates an inevitable demand for more traffic into the park (which is outlined in section 3) and more concerning even, a requirement for considerable access for commercial deliveries and waste collection to all sections of the park. The plan as published makes little mention of sustainable solutions for delivery or waste pick up to these centres such as small-scale vehicles, electric delivery vehicles or, as increasing common in parks of our European counterparts, delivery by cargo bike. The current proposal can only result in noise, danger and congestion of standard delivery and waste collection traffic, mixed with the active travel modes of park users.

## **2. Parkland, Nature and Wildlife**

### **2.1 Oversight**

The document proposes to relegate a focus on biodiversity to one section of the park instead of allowing green space, wildlife and nature to be the guiding principle of all work proposed within the park boundary. It is unclear from the proposed material if suitable, independent consultants on habitat loss, biodiversity, native wildlife and historic landscapes have been employed to review the proposals. If this is not the case such individuals should be engaged as a matter of urgency and before any further planning or costing is undertaken.

### **2.2 Quality of the Natural Environment**

This proposal sets out very little on the quality of the natural environment that would be created by this significant redevelopment. The park should be a place of wildness and safety for native flora and fauna. This plan sets out an inadequate and poorly defined set of goals for the natural realm within the park. This oversight is of particular note since visitors to the park, who the proposed document intends to cater for, presumably come to this area specifically to experience nature in a Dublin context. There is little discussion of the native plants and wildlife of Ireland that would be of interest to both regular and occasional visitors and almost no specific plans on how to maximise this fundamental aspect of the park.

At a minimum the document should set out a park wide, rather than sectorised plan for supporting park wildlife through creating and outlining in detail plans for; new roosts for bats, installing nest boxes for native birds, including green roofs and permeable hard surfaces in every instance where conservation considerations allow, providing ponds and swales for natural drainage and to minimise flooding, creating wildflower areas rather than close mown grass, increasing tree planting and native hedgerows and adopting a policy of managed rewilding over and above any other approach.

## **3. Transport to and Around the Park**

### **3.1 Car Parking**

The document proposes a large-scale car park at the centre of the Phoenix Park and additional car parking facilities at every major entrance. The following excerpt from the published document is one which every current user of the Phoenix Park must read and consider carefully.

*'The resolution of the car parking issue may be contained within the methods employed by large events, such as Bloom, which temporarily colonises discreet parts of the park for temporary parking of cars. This transitory dynamic could be reproduced **in a more permanent form** with well designed (green) car parking spaces.'*

The car parking facilities used during Bloom are vast intrusions into the natural landscape of the park. It is incredible that the OPW would propose to make these a permanent feature. Not only will the loss of habitat and green space in the park be regressive and permanently change its historic layout but it will inevitably promote the use of cars to access the park instead of focusing on suitable public transport and internal active travel. There is no 'green' version of promoting the use of private automobiles over these other modes of travel and the OPW must now adopt a focus on reducing car access to the park not making it easier for visitors to drive through and into the park.

### **3.2 Overall Transport Methodology**

The proposal for transport to, in and around the park is somewhat unclear although the document does outline some excellent proposals. The inclusion of an electric powered route within the park would greatly aid movement around the vast area and the focus on active travel, cycling and pedestrian safety is badly needed. It is encouraging to see a fully integrated strategy for routeways within the park that recognises the balance of rights and needs of all groups and that could provide for them appropriately. It could be significantly improved by the inclusion of a specific strategy to provide resting places throughout the park for people with mobility impairment and lower levels of fitness. Better and more comprehensive cycling infrastructure would see less negative cyclist pedestrian interactions; more frequent and accessible public transport would make life easier for park users and less cars would reduce air pollution for families using the park.

However, it would be more beneficial to visitors and to the future life of the park if any further development took a clear position on vehicular movement through the park by private traffic and was clearer on how public transport to the edge of the park could be supported. As stated previously the park should be a special, green, natural place and good management of the park with that emphasis calls for private vehicular access to be minimised if not phased out. The document as proposed is a lost opportunity in this regard.

There are a number of key points around the park where the pedestrian should have full and primary access to crossings, footpaths etc over any other park user. The area around the zoo in particular is currently excessively dangerous for those on foot. Young families, children are forced to run across heavy traffic, often moving at speed.

The plan is at an overview stage with particular design details to follow but the inclusion of shared

space on that central spine is a cause for alarm for pedestrians. In recent years the number of people using alternative modes of transport has grown; cyclists on racing bikes, those commuting using the city bike schemes, leisure cyclists, joggers, and new vehicles such as scooters etc. We would urge the design team to rethink this strategy. The vulnerable pedestrian should be basis for the development of the park, and they will not be served by this particular strategy.

#### **4. Quality of Space: Historic and Social Value, Noise and Disruption**

Nature is our oldest form of heritage. The Phoenix Park is one of our oldest and most significant planned landscapes. Its green spaces are no less worthy of historical conservation than any of the individual buildings contained within its boundaries.

In 2011 the Office of Public Works published a Conservation Management Plan for the Phoenix Park. This document gave careful consideration to the historic fabric of the area and how best to support and nurture it. Some of the stated aims were:

- To protect the historic setting and conserve the archaeological and architectural heritage of the Phoenix Park.
- To conserve the Phoenix Park's natural plant and animal species along with their habitats while improving biodiversity.
- To preserve the peace and tranquillity of the Phoenix Park.
- To seek appropriate international and national designation status and to establish and enforce appropriate legislative controls.
- To manage the levels of traffic within the Phoenix Park and reduce through traffic.

This observation would submit that the new Visitor Experience Strategic Review for the Phoenix Park not only fails to honour these aims but in its approach to new construction within the park and to supporting its biodiversity it is, in fact, directly opposed to them.

**END**