

E: ABP-306725-20 River Poddle Flood Alleviation Scheme

To whom it may concern,

Upon reviewing the significant further information provided on the above planning application, we wish to make a further submission outlining our observations and ongoing concerns with regard to:

1. Environmental Impact
2. Wildlife Impact
3. Loss of Amenity

Introduction

As previously stated, we understand the need to address both the serious flooding that has happened along the course of this river, and the risk of a one-in-100-year event as outlined in point 15.10 of RFI Appendix 1, and we are broadly supportive of the approach taken in both the design and engineering of this scheme. We recognise the significant efforts which have been made to minimise the use of hard defences, to minimise tree loss, and to maximise the potential for ecological enhancement where possible, and we note with gratitude the commitment to undertake any and all removal of vegetation outside of nesting season, per the recommendation of the Development Applications Unit of the National Parks and Wildlife Service.

We also recognise and welcome the additional biodiversity enhancements outlined in the RFI, including a net reduction in tree loss; the provision of artificial otter holts, nesting sites for birds, and bat boxes; the inclusion of a wetland at Whitehall Park; and the commitment by South Dublin County Council to plant 10,500 trees (erroneously stated as 14,000 trees in point 15.6 of Appendix 1, but clarified as 10,500 trees and 3,500 mixed bulbs in the RFI main response document). We recognise and appreciate that a considerable amount of thought and effort has gone into mitigating concerns about environmental impact, and there is no doubt that Tymon Park and Whitehall Park will ultimately enjoy a net benefit in bioabundance, ecological richness and amenity value. However, it must be noted that this ecological enhancement is heavily weighted in the SDCC area, and in fact the updated arborist report referenced in the RFI indicates a net *increase* in tree loss within the boundaries of Dublin City Council, with tree loss rising from 53 to 59; 20 trees now set to be felled in Ravensdale Park alone; and just 13 to be replanted 'in and around' this park.

Furthermore, we note that while tree replanting in Tymon (both as part of the replanting scheme and the additional 'mini-woodlands' initiative) will result in both the recreation of habitats and the creation of new habitats with woodlands and tree clusters, the scant information available on DCC's replanting plan indicates that lost clusters and groups of trees will be 'replaced' in some cases by single trees planted on greens or residential streets within a 2km radius of the works. This is simply unacceptable as an approach as the recreational, amenity and visual value of an established tree-filled park cannot be replaced by single trees dotted around in a 2km radius of the park.

We note and welcome DCC's intention to plant trees in the green space at Poddle Close, per our suggestion, however we note also that there are no specific details available on this, and would like to see a proper proposal outlined for this space. Finally, we note the potential for the combined impacts of tree felling for BusConnects and the Poddle FAS works to decimate the tree cover in Ravensdale Park, and urgently require clarity on the cumulative loss.

It is for all of these reasons that we remain concerned that overall the Poddle FAS project will have an unacceptably high negative impact on the environment, biodiversity, amenity value, air quality and wildlife of the area around Ravensdale and St. Martin's Drive – an area already starved of trees and biodiverse green spaces. We acknowledge that the project will not result in a 'cull' of green spaces, as referenced in point 15.22 of

Appendix 1, and further acknowledge the constraints of the more intensively urbanised DCC area, as noted in point 15.8; however we simply do not see the same level of ecological mitigation being employed on this stretch of the works, nor the same level of detail provided for the landscaping or replanting plans, and we remain unconvinced that alternatives have been adequately explored.

1. Environmental Impact

Dublin City Council's Dublin City Tree Strategy 2016 – 2020 refers to trees as making a significant contribution to people's health and quality of life. It's estimated almost 70% of the world's population will be living in cities by 2050, and the environmental impacts of urbanisation are set to worsen. Mounting research highlights the contribution of ecosystem services provided by trees to quality of life in cities such as Dublin. Trees comprise many benefits, including:

1. Urban forests can help cities adapt to rising global warming by helping to reduce the amount of greenhouse gases in the air by sequestering carbon and reducing the amount of energy needed to heat and cool buildings;
2. Poor air quality has become a major cause of premature death and illness and is the largest environmental health risk. According to the World Health Organisation, poor air quality is responsible for approximately 1 in 9 deaths worldwide; studies show air pollution is a contributing factor in over 1000 deaths per year in Ireland; and a recent landmark court case in the UK found air pollution to be the official cause of death for a 9-year-old girl who suffered a fatal asthma attack. Air pollution is closely tied to urbanisation, with higher population density, industrial activity, and large traffic volumes all contributing to poor air quality in urban centres. Trees can act as a barrier between the pollutant source and the receptors, with research showing that the pollution concentration can be reduced up to 85% by trees located close to the pollution source. The constraints of existing urbanisation notwithstanding, DCC must find a way to further minimise and mitigate the loss of trees, specifically at:

Ravensdale

The initial plan for Ravensdale involved the felling of six trees and the replanting of one. According to the updated tree survey report, a total of 20 trees is now set to be lost in Ravensdale Park and this park is deemed to be not of a sufficient scale to accommodate the proposed 2:1 ratio for replacements in a proper sustainable manner. Instead the commitment is to replant, in some cases single trees, within a 2km radius of the park.

As previously outlined, this is not an acceptable replanting plan, as single, scattered trees on residential streets do not replace the amenity value of a park. We don't agree that space constraints limit the replanting opportunities in Ravensdale, and we reiterate the call for like-for-like replanting as a bare minimum, with 2:1 replanting acceptable in other areas, but 3:1 preferable where this can be accommodated.

Furthermore, Ravensdale will also see major tree loss as a result of BusConnects, leading to the further erosion of this valued green space. It is incumbent on the planners involved in this plan to examine the intersection of these projects, outline the cumulative tree loss, and mitigate accordingly.

St Martin's Drive Area

We understand and acknowledge that flood defences at this location are an absolute requirement to prevent houses along the drive from flooding. We also note that two options were considered here and the option preferred by planners and some residents was option 2, which removed more vegetation and trees but limited the opportunity for 'congregation' and mitigated fears around anti-social behaviour. There is a fine balance to strike here, and we remain unconvinced that option 1 would lead to anti-social behaviour, or that it is unworkable in light of its potential to protect more of the established trees and riparian zone.

The proposed construction of a flood defence wall at the right bank of the river at the end of St. Martin's Drive, Kimmage will lead to the removal of bankside vegetation and the felling of an estimated 38 trees. While we

welcome that this is now seven less than the original count according to the updated tree survey report, this quantity would still have a devastating impact on a park that is recognised as having a level of high biodiversity. Mature trees have far higher biodiversity and carbon sequestration value than new trees, and should be given high level protection where possible, and we would therefore welcome a more in-depth analysis of the design options in this particularly sensitive area.

While we appreciate the difficulty of incorporating nature-based solutions as a whole in an urban catchment area, we still believe there is a missed opportunity here to look at the inclusion of additional trees and hedgerows which would ultimately have multiple benefits beyond flood defence, such as the provision of wildlife habitats. We note the written explanation provided for the landscaping and replanting plan which would follow Option 2; however we note that where more detailed drawings and illustrative photographs were provided for the proposed wetland at Whitehall Park, this level of detail is missing from the proposals for St Martin's Drive. Furthermore, while the RFI notes consultation will be undertaken with the residents of St. Martin's Drive on the landscaping plans, we believe this process must include the wider community as this is a much-loved amenity area for more than just the residents who live opposite it.

Finally, with regard to illegal dumping, the EIAR states the inclusion of trash screens at key culvert locations together with a unified maintenance programme from SDCC/DCC limits the risk of blockage from dumping, and we note the intention to build-in a 60% blockage capacity to the final design. However, the request to provide CCTV for this dumping blackspot was not addressed, and it should be noted that current maintenance is not sufficient to tackle illegal dumping in the area as is. If the plan to build a wall around the entrance to the culvert increases the incidents of illegal dumping at the site and leads to the entrance of the culvert becoming blocked more often, maintenance will have to be stepped up significantly. A mechanism to report such dumping is not satisfactory if the damage has already been done.

2. Wildlife Impact

Further information states that potential impacts on tree-nesting birds have been assessed in the EIAR and that the mitigation strategy will be updated to say that "any clearance of vegetation from the banks of the Poddle or adjacent areas as part of this Scheme should only take place outside the main bird nesting season, i.e. in the period from September to February inclusive". We are grateful for this clarification.

Further information also states it is expected that most birds will move between 'fragments' of suitable habitat along the river corridor, as well as using nearby gardens and green spaces. However, it must be noted that birds and animals congregate in the area of St. Martin's Drive as the existing habitat supports them to do so. Birds are key indicators of the health of our environment and they face many challenges, including habitat loss, habitat fragmentation and disturbance, and the impacts of climate change, to name just three. Some bird species are more adaptable than others, but for many the rate of loss of their habitats is happening so fast that they cannot cope with the change, and their populations have been decimated. We should endeavour not to cause further fragmentation of established habitats on the "expectation" that they will simply move along.

We are in a nationally acknowledged biodiversity crisis, but bioabundance is also critical to the ecological stability of our city. Biodiversity is vital to human well-being and economic stability through the provision of essential ecosystem services. Many studies have stressed the importance of biodiversity in maintaining an adequate supply of ecosystem services. Unfortunately, biodiversity loss continues at an alarming rate, with no signs of significant slowing. We should endeavour not to 'push out' or place further pressures on urban wildlife where options exist to support it instead.

3. Loss of Amenity

Finally, we note the further information states: "*The Scheme proposals do not involve culling of local parks and green spaces. The modifications proposed in the Scheme such as the flood wall in Ravensdale Park, the re-aligned channel at Whitehall, and the embankment in Tymon Park will alter these parks and spaces and the way they are used and enjoyed by the public, but they will not result in the loss of these spaces.*"

The Dublin City Tree Strategy 2016 – 2020 recognises that trees in and of themselves are an amenity, and so it should be acknowledged that any felling, as proposed in this plan, will result in a loss of that amenity.

Urban trees bring nature into our urban environments and provide amenity spaces that have never been more important to our communities than they are right now, as the world continues to grapple with the impacts of Covid-19. As trees mature, they add character and a sense of place and permanence to our communities, and green spaces and pockets of nature bring calm to city areas and promote mental and physical well-being. We therefore continue to have serious concerns around the impacts of significant tree loss on the amenity value of the urban green spaces affected.

Conclusion

While we are supportive of the measures which have been outlined for the ecological enhancement of several of the work areas along the Poddle course, we feel there is a significant difference in the approaches taken by SDCC and DCC in mitigating the environmental impact of these works. Nowhere is this more apparent than at Ravensdale Park and St. Martin's Drive, both of which are located in a part of Dublin which already suffers from a deficit of biodiverse green spaces. We therefore request that further consultation is undertaken with DCC to look at what additional measures could be undertaken; to provide detailed plans and drawings for landscaping and replanting schemes; and ultimately to establish how these works might result in a net biodiversity gain for this highly urbanised area, as will be the outcome in SDCC. Equitable access to ecologically rich green spaces should be the desired objective for the entirety of the Poddle course, and not just selected areas.

Yours Sincerely

Patrick Costello TD,

Francis Noel Duffy TD,

Councillor Carolyn Moore

