

Ref SDRA 11 St Teresas Gardens and Environs (formerly SDRA 12)

Submission made by Sinead Kerins on behalf of residents of Rehoboth.

The Rehoboth residents fully support the submission of the Dublin 8 Residents Association but wish to add to their submission in relation to our strong local concern on the specific issue regarding access to Rehoboth from the adjacent development i.e., Baily Gibson/Player Wills site. The planning permission for this site is currently under two Judicial Reviews.

We strongly feel that the 2017 Framework Plan in failing to recognise the current traffic/safety issues in Rehoboth made a grave error in recommending access onto Rehoboth from the adjacent development site. While appreciating that access from the Baily Gibson site is an issue for a developer the solution should not put peoples safety at risk and it does just that for both residents of Rehoboth AND the people living in the development. Rehoboth is not the solution The 2020 masterplan has not undergone an appropriate SEA.

The planning permission for this site is currently under two Judicial Reviews.

Note:

Rehoboth residents are asking DCC to address the current road safety issues which we know will only be exacerbated by any increase in access not only by vehicular access but also by bike and pedestrian access.

Given the formal warnings, which have been ignored already on safety concerns, any future incidents would leave DCC wide open to litigation and negative publicity It would be better therefore if urgent attention is given before a future incident occurs. We respectfully request a formal meeting with residents and also for a road traffic/ safety study be carried out.

Background

1 Rehoboth Place and Avenue are continuous residential streets that run from the South Circular Road northward along the western boundary of the former industrial premises. Rehoboth Avenue is currently a cul de sac at the top /northern end. Both streets comprise of 40 mainly small Victorian houses which are a characteristic of this overall area on all sides of the site and the adjoining Baily Gibson/Player Willis premises These are narrow residential roads with on street permit parking for residents. It is currently 2 way traffic and proposed to continue 2 way under current planning application.

All of Rehoboth comprise two story terraced Victorian, red-bricked houses with Victorian paths and road, with dimensions suitable for 19th century living and demands.

To the modern eye, Rehoboth Place and Avenue present itself as intimidatingly narrow to everyone who uses it whether car, bicycle, or pedestrian. **Every path is one person wide.**(0.9m-1.4m) All the roads in Rehoboth are one vehicle wide. Some refuse trucks and HGV's cannot fit. The road is regularly gridlocked by just normal activity like a skip, delivery vans who park on the road etc. (It is more back lane in perception then can be viewed as a modern street.)

The Cork Street access is the direct route to:

- Lidl (only major supermarket in the area as Tesco is just an Express Tesco)
- The Spar and Post Office directly opposite Cork Street access
- The Luas- Fatima stop and buses on Cork Street

All of the residents of Rehoboth (and potentially the Development) will take the path represented by Figures 1-3 as the most direct route to the Luas and shops. No one will take a longer route around South Circular Road and to argue otherwise is disingenuous.

Please see Figures 1-3: A neighbour with buggy demonstrating going to the shops on bin day (on a quiet Covid lockdown day) ...but also showing what we all have to do to pass each other.



Figure 1



Figure 2



Figure 3

Whether short or long term resident, it seems it is always a process of, on leaving your house, assessing the street activity and planning your route and judging who/when you step out on the road, cross the road or deciding to just walk in the road while no cars are coming and hop back on the path when they do. The only time I feel relaxed heading to the shops is early Sunday morning for the newspapers and with nothing and no one about I walk down the centre of the road...it feels great!

Some of the photos are images taken by me and some by my neighbours but they are taken in lockdown and pre-Covid would convey a truer picture (especially HGV's going up on the path at Cork Street access or the truck every week from Lowes parking up on the path in the middle of Rehoboth Place while delivering kegs).

Figures 4-6 show the route from the beginning of the proposed pedestrian/bicycle access at Rehoboth Ave. down Rehoboth Place and out onto Cork Street (Please note path widths).



Figure 4: Rehoboth Avenue



Figure 5: Rehoboth Place facing Cork Street access

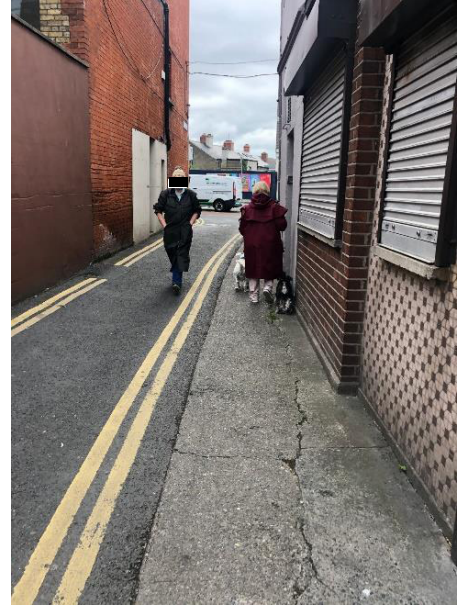


Figure 6: From Rehoboth Place to Cork Street access

Path width:1.38m

No path on other side

Path LHS: 1.01m to 1.03m

Path RHS: 1.43m to 0.9m from n^o2 Rehoboth Place all the way down until it narrows at Lowes pub of Cork Street access.

Note: The applicant is misleading in its photo on page 31 of their application, **by putting the width at 1.5m**. It is 1.5m but **ONLY** at a small tiny point near the end where it meets Rehoboth Avenue and where the path flares out a little.

Path With: 0.9M

Total Width(wall to wall): 3.17M

This is all to convey that right now the only way the risk feels manageable is **BECAUSE** the activity on the street is relatively low but the pinch point at the Cork Street exit always feels like an accident waiting to happen.

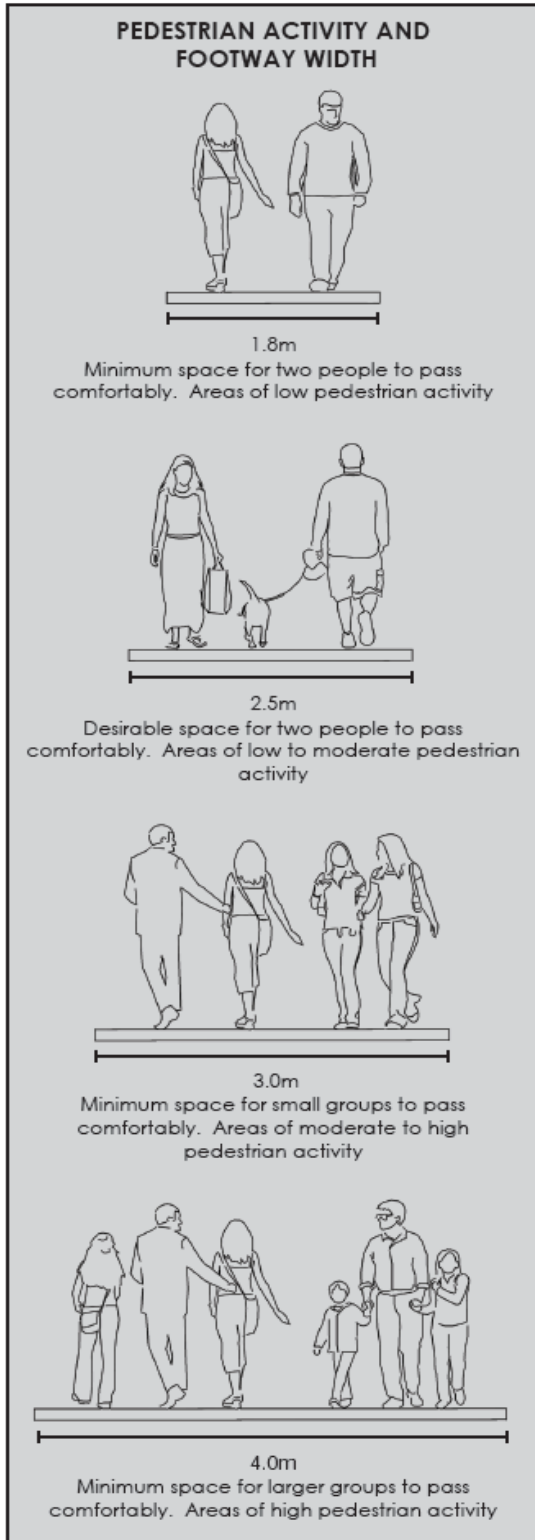
It is no small surprise that the planning permission under Judicial Review has taken care to show you only 2 photos of Rehoboth. The problems are obvious and the inappropriateness of Rehoboth as a pedestrian/bicycle access for hundreds of bikes, 900+ people and then 1000's on completion of remaining phases is apparent to anyone who stands on our road.

They also only deal with the small strip leading from South Circular Road to the proposed vehicular access as a possibility for road widening. The omission of details and pictures, especially at the Cork Street access point, is revealing and damning and they mislead An Bord Pleanála about the true nature of the area by doing so. Rehoboth in its entirety is a pinch point.

From the experience of living here and of negotiating the paths and roads of Rehoboth, reading the Design Manual for Urban Roads and Streets (DMURS) was akin to watching an episode of Father Ted...surreal and laugh out loud funny. It's another world.

One was the entire section on trees and green belts. Given a resident Teresa Lalor from [REDACTED] [REDACTED] was turned down twice by Dublin City Council (DCC) when she requested a few trees...again due to the narrow paths and road width. So, if the DCC are saying our paths and road cannot manage a few trees safely, how the planners can justify inflicting not one but three access points from the site?

Please see below the DMURS guidelines (DMURS, page 87) on recommended path widths.



Fact: Rehoboth Place/Ave. paths are currently not just inadequate but dangerous.

1. No pathway in Rehoboth meets the minimum recommendation (see Figures 4-6)
2. No retrofitting/adjustment is possible to the paths (other than the path on RHS from South Circular Road to the proposed vehicular entrance before house 40 as proposed in plan)
3. ALL paths allow for 1 pedestrian only
4. When one person passes another, one is forced to either cross the road or walk on the street (and around the park cars if outside our houses) until they can step back up on the path again (see Figures 1-3)

Conclusion: Not only does the vast percentage of Rehoboth currently fail to meet the minimum recommendation of DMURS for low pedestrian activities, **it has no ability to ever do so.**

(We can accept/manage and live with the current risk ONLY because the activity is low)

Proposed Pedestrian access:

Accepting that Rehoboth Place and Ave. currently does not remotely meet DMURS guidelines and does not now give a safe or comfortable pedestrian experience, how can the applicant possibly justify increasing the pedestrian footfall from its current “low activity” to “high activity”?

1. Given the proposed development with 900+ occupants, the pedestrian activity will switch from low to high (and on completion of other Phases 1000’s...extremely high.)
2. The effect on residents of BOTH Rehoboth Place/Avenue AND the residents of the proposed Development is clear: **It will further endanger life.**

Figure 7: Diagram showing the amount of space needed for pedestrians to pass each other with regard to pedestrian activity levels

Conclusion: All of Rehoboth is and always has been totally unsuitable for any impact from development. Everyone knows this. If we were in any doubt, then the looks of pity, from residents from surrounding neighbourhoods, when we say where we live, says it all. In this unstable time, where we are all feeling more unsafe and vulnerable, inflicting dangerous levels of street activity on all of us seems particularly cruel and upsetting. And especially on those of us who are already struggling physically and psychologically. But the bottom line is.... it is simply dangerous.

2. Objection to vehicular access on Rehoboth Place.

Current operation of the roads in Rehoboth Place and Avenue:

Rehoboth is a one way narrow road providing a two way system road (see Figure 8)

Bikes are especially challenged and often are forced to go up on paths to allow the vehicle to pass. This occurs not only at Cork Street pinch point. (Figure 9)

Cars coming in opposing directions often involve one reversing back to the pinch point at the junction of Rehoboth Place and Rehoboth Ave. (see Figure 10)

There is no clear visibility between driver and pedestrian (on the side with parking) and children are totally invisible. This road is a parent's nightmare.



Figure 8: View from Cork St. access towards Development on Rehoboth Place

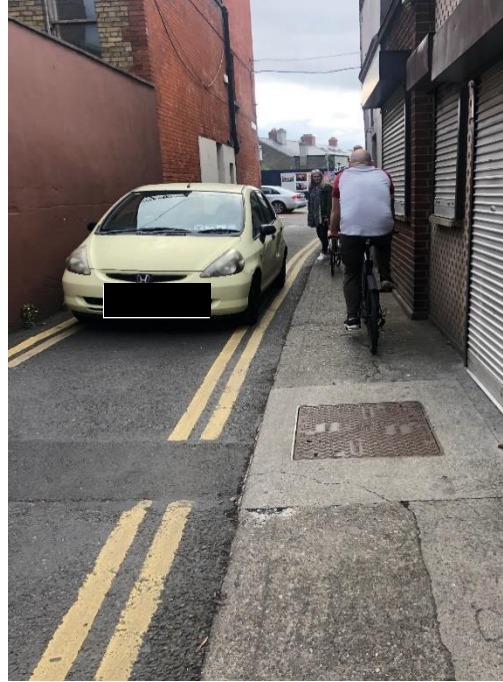


Figure 9: Rehoboth Place leading onto Cork Street



Figure 10: Rehoboth Place and Avenue Junction

The applicant proposes widening the road from South Circular Road entrance to the vehicular entrance to the site only as a solution which is failing to address the rest of Rehoboth. The applicant also mentions a one-way traffic solution but does not clarify where to. Is it just the short distance from South Circular Road to vehicular access point or throughout Rehoboth (except Rehoboth Ave. which is impossible) or from South Circular Road all the way to Cork Street?

DMURS says in its traffic management guidelines the following:

“ One-way streets have also been widely implemented, retrospectively, in order to filter vehicle permeability and relieve traffic congestion. The use of one-way systems for traffic management should also be approached with caution by designers as they:

- Promote faster speeds as drivers are likely to drive faster when no risk is perceived from oncoming traffic.
- Will result in longer vehicular journeys, including those for cyclists and public transport.
- Can be confusing for users when they deflect people away from destinations.
- Require additional signage.

Conversion to one-way systems may be beneficial on narrow carriageways where the street reserve is limited to provide additional space for pedestrians, cyclists and other public realm improvements. Counter flow cycle lanes should also be considered in order to maintain permeability for cyclists.”

(DMURS)-extract.

Vehicles are so intimidated by the narrowness of Rehoboth and fearing they will contact someone on the path, often spontaneously stop before proceeding and wait for pedestrians to pass. This takes quite a while!

Larger vehicles are often seen going up on the path (e.g. Lowes keg, refuse trucks, HGV's). This is currently a major hazard.

Note: People tend walk on Rehoboth road not the footpath regardless ... possibly it is essentially more a lane than a road and it is just human nature as we can't bear to walk in single file and need to walk side by side as they chat...

In summation: We all want a great city and a safe city to live in. This is a wonderful opportunity for DCC to adjust and improve on safety considerations in the new Dublin City Development Plan and to listen to the voices of local residents. We hope our concerns will finally be heard.

A Chairde

Sinead Kerins- **All addresses supplied have been redacted due to Personal Information**

Liz O'Brien-

Teresa Lalor-

A and M Mc Kenna-

Yvonne O'Toole-

Kate Maloney-

Una and D

Annie and Connor Mc Carthy-

Deidre Brennan-

Paddy Boyle-

Liz Claffey-

Valerie Fitzgerald-

Pauline O' Reilly-

Dave Quinn-