



Phoenix Park – Transport & Mobility Options Study
An Chomhairle Oidhreachta, the Heritage Council

11th March 2021

The Heritage Council welcomes the OPW's *Transport & Mobility Options Study* and the extensive public engagement process undertaken to raise public awareness and understanding of the proposed changes to transport layout and arrangements in the Phoenix Park (The Park). This submission covers several areas relating to the remit of the Heritage Council and is based on council's advice on previous consultations, as well as from experience of running various Heritage Council national initiatives and programmes on a day-to-day basis. The submission is set out below in six parts:

1. Wider Policy Context – Dublin City Council;
2. Cultural Heritage impacts;
3. Natural Heritage implications;
4. Noise and Vibration;
5. Enhancement of Key Entrances/Gateways to the Park; and
6. Phoenix Park Boundary Walls.

In addressing the issues in the options report, several assumptions have been made, these are as follows:

1. The Park is being used as a commuter 'rat-run' and that the level and nature of this activity is having a significant adverse impact on The Park, in terms of public safety and well-being;
2. Additional traffic, that will be no longer facilitated cutting through The Park, will be pushed onto adjoining roads;
3. Real transport sustainable alternatives are being sought to offer options to longer distant visitors seeking to use The Park and its facilities (Dublin Zoo; Garda HQ etc.) by means of a bus service to and from transport hubs (*Train and LUAS lines*), the Heritage Council welcomes the proposals as detailed; and
4. Any reduction in vehicular traffic will have a real and positive outcome for biodiversity, public safety and the overall well-being of visitors using the Park.

1. Wider Policy Context – Dublin City Council

The Heritage Council recommends that the planned works and any supporting Environmental Management Plan (EMP) for the scheme should link to the emerging *Dublin City Development Plan 2022-2028* along with the Dublin City Heritage Plan and City Biodiversity Plan, both of which will shortly be up for review. As such, the Heritage Council would recommend that an Environmental Manager is put in place to oversee the implementation of the proposed scheme at the Phoenix Park.

The *Phoenix Park Conservation Management Plan 2011* is an important document and the Heritage Council strongly supports its implementation. We would welcome discussions with the OPW and DCC's Heritage Unit as to how we can support this plan during and after the proposed works, e.g. the creation of a Phoenix Park heritage and public participation programme.

2. Cultural Heritage impacts

The cultural heritage of the Phoenix Park is diverse and very rich. It includes megalithic burials from the prehistoric period, medieval burials, a late-medieval tower, the remains of World War I practice trenches and other important military heritage. There is also a strong likelihood that there are further archaeological monuments, which lie undiscovered within the Park. In terms of intangible cultural heritage, the names of locations and routes within the Park are significant in their own right, as well as the locations where significant events occurred during Ireland's long and complex history.

The association of many generations of Park users with picnic spots, mass gatherings, cycle races, horse races, and days out are all equally important forms of intangible and deeply personal heritage.

Specific heritage components include the designed, 'militarised landscape' that was created over several hundred years of British rule, including military and landmark buildings that were then taken over at the creation of the Irish State. The Park's gas lighting is also a unique feature that should be conserved and protected during any proposed works.

Any proposals for mobility and access in the Park should seek to maximise opportunities to engage with this varied heritage and rich 'time-depth' by ensuring there is high quality interpretation. The Heritage Council also feels that access (in any form) should enhance and not detract from the interaction with the overall heritage of the Park.

3. Natural Heritage implications

The Heritage Council has read the Transport & Mobility Options Study and understand the various competing elements that all have, both shaped the Phoenix Park (The Park) as it is today, but is now showing signs of stress, as modern Ireland seeks to utilise the many ecosystem services The Park offers.

Specifically:

- The Heritage Council see this proposal as a proportionate response to Dáil Éireann's declared National Emergency on Climate Change & Biodiversity Loss in May 2019; and
- The current global Covid pandemic has highlighted Dublin's need to facilitate citizen's well-being but also generally, and to ensure future generations have a robust and resilient Park to love and enjoy. This proposal will support this outcome.

In order to ensure that the positive response expected can be demonstrated and can support this approach, the Heritage Council strongly suggests that a baseline study be instigated to allow for robust data that track predictive changes in air and biodiversity over time.

This monitoring study need not be complex or over burdening but should be comprehensive.

- At a most basic nature the monitoring study should look to current lichen diversity and distribution, which will reflect air quality in the general Liffey valley area in and around The Park;
- The Heritage Council is aware of a historical and long relationship between the OPW and UCD Zoology Dept. Behavioural studies set up now and cross-checked against the new transport regime should potentially offer solace that the right decisions are being taken; and
- Lastly, wider general studies, such as the Hop-to-it Frog Survey, carried out by Park Rangers, will have zero cost but should reflect better outcomes for the overall biodiversity health of The Park.

4. Noise and Vibration

Another issue is the background noise associated with vehicular traffic and we are still attempting to understand implications for certain species, particularly birds and their ability to communicate. The Heritage Council would suggest that baseline recordings are taken at key times (both quiet and peak traffic) of The Phoenix Park dawn & dusk chorus.

The Heritage Council would also be concerned that any proposal is cognisant of excavation works and planned traffic arrangements associated with an upgrade of rail links/tunnels between railway stations in Dublin City Centre.

5. Enhancement of Key Entrances/Gateways to the Park

Existing key entrances to the Phoenix Park are mostly car-based and vehicular-focused. It is envisaged that this study will in turn lead to a significant enhancement of the key entrances to the Park along with the creation of a design palette of materials (preferably local materials and in keeping with conservation standards) to inform significant and conservation-appropriate public realm upgrades and a focus back to the human scale. A new tree planting scheme could form part of this upgrade along with the creation of bicycle parking facilities, including family cycling facilities for all shapes and sizes of bikes at key arrival points to The Park.

6. Phoenix Park Boundary Walls

Phoenix Park's boundary walls are a significant heritage feature within Dublin's overall cityscape. They also define the protected and attendant lands surrounding important landmark structures within the historic, designed landscape. It is important that the proposals ensure that the walls are an integral part of any planned environmental improvements.

For further information on this submission, please contact:

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