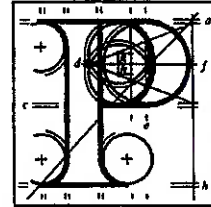


Our Case Number: ABP-313892-22



**An
Bord
Pleanála**

Carl Reynolds
142 Navan Road
Dublin 7
D07 T6C4

Date: 21 July 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

AA02

Tell
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Carl Reynolds

Eimear Reilly

From: LAPS
Sent: Wednesday 12 July 2023 10:11
To: Eimear Reilly
Subject: FW: Blanchardstown to City Centre Bus Connects - Ref No ABP 313892-22
Attachments: Submission August 2022 ABP - 313892.docx; Submission July 2023 ABP - 313892-22.docx

Importance: High

From: Carl Reynolds [redacted]
Sent: Tuesday, July 11, 2023 6:55 PM
To: LAPS <laps@pleanala.ie>
Cc: Carl Reynolds [redacted], Anne Martin [redacted]
Subject: Blanchardstown to City Centre Bus Connects - Ref No ABP 313892-22
Importance: High

Dear Sir/Madam,

On advice from Christine at your office over the telephone today I'm sending the attached reply letters in response to your letter of 8th June 2023. It was confirmed by Christine that the attached response letters could be sent to you office via this email address instead of by post.

Please see attached for response letter 'Submission July 2023 ABP – 313892-22'.

Also included for reference is 'Submission August 2022 – 313892', as referred to in the response letter.

Could you please send an acknowledgement for receipt of this email and attached letters?

Kind regards,

Carl Reynolds.

An Bord Pleanála,
61-64 Marlborough Street
Dublin 1

Carl Reynolds
142 Navan Road
Dublin 7
D07T6C4

29/08/2022

Ref No ABP 313892

Blanchardstown to City Centre Bus Connects

Dear Sir/Madam,

My Submission on above, enclosed is fee of 50.00 Euro. Please acknowledge Receipt in due course. I am writing to you regarding concerns on behalf of myself and my neighbours at 136 – 140 Navan Road Dublin 7. We also request that an oral hearing be held on this matter.

My concerns are as listed below:

Changes to footpath outside cottages at 136 – 142 Navan Road:

In recent correspondence through Senator Mary Fitzpatrick with the NTA (see Appendix 1 attached), it was noted by the NTA that the footpath width outside the front doors of 136 – 142 Navan road would be reduced from 2.8M to 2.1M.

Having measured the path in this location, the width is not 2.8M along the full length of the cottages 136 – 142 Navan Road as stated by the NTA in reply to a query from the cottage residents. In particular the path width outside 142 Navan Road ahead of the existing bus stop reduces to 1.85M. Reducing the path size, in particular outside no. 142 will present a clear danger to path users and residents at 142 entering or leaving the property.

The proposed foot path width reduction is as described as meeting the minimum width as set out in the *BusConnects Preliminary Design Guidance*. Firstly, I would like to note this document is *preliminary* and not adopted formally as approved guidance. I believe this to be inappropriate and the NTA should reference applicable current standards and best practice. *BusConnects Preliminary Design Guidance* does cite reference to the *Design Manual for Urban Roads and Streets*. The manual cites reference to the *UK Manual for Street* which states

In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2m. Additional width should be

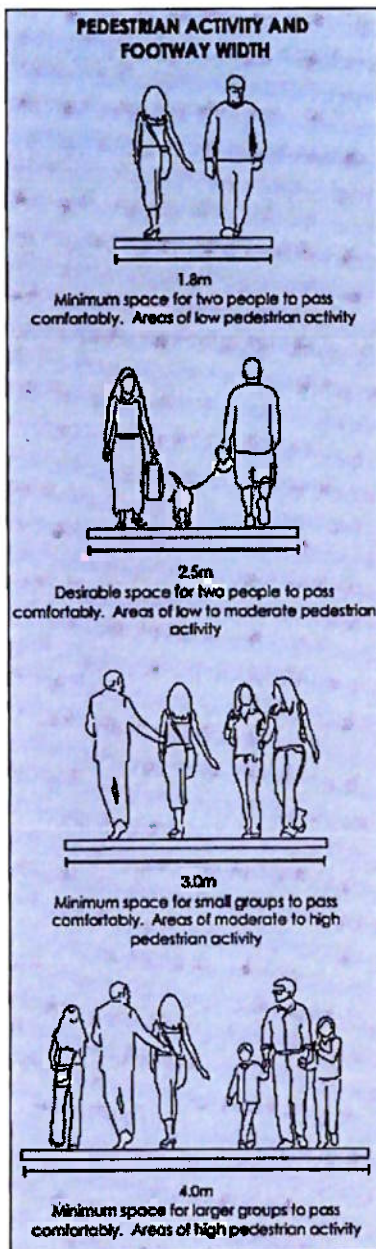
considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops.

Regarding this statement the immediate locality is home to a number and variety of vulnerable road users namely:

- Nephin Nursing Home
- St. Joseph's School for Deaf Boys
- Curam Care Home

In addition to this the presence of the adjacent bus stop and St. Declan's College generates significant waves of footfall on this section of footpath and especially at the junction with Nephin road as the pedestrian crossing. I have been unable to ascertain if the NTA has carried out any analysis such as diversity impact assessment to consider if the proposed works will impair or reduce the safety of vulnerable road users. Further to this point has the NTA undertaken any risk assessment analysis to confirm if width reduction will increase risk to pedestrians in the event of a vehicle losing control and mounting the foot path. The manual also noted that minimum widths are based on there being no obstruction such as signage. Currently where is existing signage and traffic lights on this section of foot path. The proposal drawings do not provide the required detail to confirm that there will not be additional signage that would further inhibit the pedestrian flow.

The manual references the UK *Pedestrian Comfort Guidance for London* and the associated figure below.



Accordingly, this figure clearly shows that the footpath environment at 136-142 Navan is not purely residential and is currently aligned with the third scenario for 3.0m width due the presence of the bus stop, schools and care homes. I also note the manual states:

In a retrofit situation increasing footpath widths should be a priority for designers.

With regard to the impact on 136-142 Navan Road the front gardens of these properties were already removed in a previous widening of the Navan Road, subjecting residents to associated noise and air pollution with no mitigations. This proposed scheme further expands the through put of vehicles. The NTA has not provided any specific analysis or risk assessment to quantify the impact on the residents. Nor have any mitigations been proposed as part of this scheme. The NTA has failed to demonstrate

that the proposed project will for immediately adjacent residents not result in additional exposure to nitrogen dioxide (NO₂) levels mandated by the World Health Organisation and European Union.

In conclusion and with reference to the information set out above:

1. A reduction of the path width from 2.8M to 2.1M per the reply received from the NTA is neither practical or correct given the width is not consistently 2.8M across the 4 cottages. It actually reduces to 1.85M and given the footfall detailed above, anything less that this will create safety concerns for pedestrians and the home owners at 136 – 142.
2. There are currently regular noted instances of vehicles mounting the path outside the cottages, in particular from traffic travelling from Cabra, along Nephin road, turning on to the Navan Road in the direction out of the city. These vehicles often turn the corner from Nephin Road on to Navan Road (in front of the cottages 136 – 142) too wide, resulting in the vehicle mounting the path. In addition, there is a history of accidents at this location of cars crashing into the front of the cottages at no. 136, no. 138 and no. 140. Reduction of the path width will only exacerbate this issue and reduce safety for all concerned. To this point, I am not aware of any risk assessment being carried out to assess the further danger reducing the size of the existing path could cause.
3. At no point were the residents of 136 – 142 contacted or consulted about the reducing the width of the path or what implications such a change could have.
4. The cottages at 136 – 142 Navan Road once had front gardens and during an earlier widening of the Navan Road these gardens were removed under a CPO, resulting in a significant loss of amenity. Holding a reasonably sized path after the gardens were removed was essential in order to maintain a safe and reasonable distance between the living rooms of the houses from heavy traffic. Having already lost the gardens to the houses it seems entirely unreasonable to expect the residents to accept further encroachment and further loss of amenity on their properties.

Removal of Trees and loss of amenity to residents

- The loss of Trees 150 trees along Navan Rd will facilitate a dual carriageway at the expense of the locality and local community.
- Given how much traffic uses the Navan Road, the trees provide a noise shelter that will be removed, further impacting residents daily lives.
- The removal of mature trees creates environmental concerns. Although there is mention from the NTA that some trees will be replaced, the replacement will be with sapling trees which could take decades to mature again, so this is not a like for like change

- The benefits of mature trees far outweigh those of saplings. Habitat for wildlife and contribution to halting climate change are only two examples

Yours sincerely,

Carl Reynolds

Anne Martin – 136 Navan Road

Henry Reynolds – 140 Navan Road

Vincent and Winnifred Walsh – 138 Navan Road

Appendix 1:

From: Mary Fitzpatrick [REDACTED]
Sent: Wednesday 24 August 2022 14:59
To: Carl Reynolds, Anne Martin
Subject: FW: Bus Connects Update

Hi Carl & Anne,

Further to my recent representations to the NTA about Bus Connects Blanchardstown Route, please find their response below:

In order to achieve the optimum scheme design which best meets the scheme objectives, it is necessary to rearrange the road layout in this area. This to facilitate a cycle track, bus lane and footpath in each direction. In the area outside cottages 136 – 142 Navan Road, the available road width is insufficient to accommodate this layout. It is therefore necessary to widen the road through a combination of land acquisition from properties on the opposite side of Navan Road and by narrowing the footpath in front of the cottages from c. 2.8m to c.2.1m. This retains the footpath width above the desirable minimum of 2m as set out in the BusConnects Preliminary Design Guidance Booklet. It is noted that this is greater than the minimum footpath width recommended in the Design Manual for Urban Roads and Streets.

Submissions/observations may be made in writing to the Bord at An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902 between July 5th and August 30th 2022.

Any submissions/observations must be accompanied by a fee of €50 and must be received by the Board not later than 5.30 p.m. on August 30th 2022. This fee will not apply to certain prescribed

bodies including those specified in section 51(3)(b) of the Roads Act 1993 (as amended) or to landowners and others with a legal interest in land who are objecting to compulsory acquisition of land in which they have such an interest in a compulsory acquisition case.

Submissions/observations can also be made on the An Bord Pleanála website at the following address: <https://online.pleanala.ie/en-ie/sid/observation>.

Any objection to the Compulsory Purchase Order should be made in writing to An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902, so as to reach the said Board before 5.30pm on August 30th 2022.

We would encourage all parties to ensure that, if they so wish, that they make a submission/observation to An Bord Pleanála

Yours Sincerely

NTA Oireachtas Liaison

An Bord Pleanala,
61-64 Marlborough Street
Dublin 1

Carl Reynolds
142 Navan Road
Dublin 7
D07T6C4

01/07/2023

Ref No ABP 313892-22

Blanchardstown to City Centre Bus Connects

Dear Sir/Madam,

I refer to your letter of 8th June 2023 regarding the above mentioned reference.

I am resubmitting my objections to the proposed road development on the following points in relation to the document 'NTA Observations on the Proposed Scheme Submissions and CPO Objections':

Section 4.101.1 and 4.101.2

Point 1 – Footpath widths.

As it relates to the actual width of the footpath outside the cottages 136 – 142 Navan Road, although the response refers to sections 2.2.3 and 2.10.2 for this, there are no dimensions described or outlined for this specific area that we can find in the document. The reason for raising this point in the original correspondence was out of concern for the size of the pathway after development and proximity to the roadway and associated safety (see point 2). As residents of the cottages impacted by this development, we feel it is of great importance to be properly consulted on changes to the size of the pathway directly outside or homes.

As mentioned in our original letter, the path width is not 2.8M across the length of the 4 cottages, in particular the path width at 142 Navan Road already narrows to 1.85M and any further reduction to this will present danger to pedestrians using the path and residents entering or leaving their property, namely at 142. Further, we feel clarity is necessary on what the exact measurement of the pathway outside 136 – 142 Navan Road in this development is.

Finally, as referred to in our original letter, the front gardens of 136 – 142 Navan were removed via CPO in a previous development widen the Navan Road. It is completely unreasonable to yet again further reduce the distance between traffic and our front doors having already lost a significant amount of property and distance to the road.

Point 2 – Safety at Navan Road / Nephin Road Junction

We feel the response to this point is inadequate in that it does not address the particular issues outlined in the original submission (attached). The drawing in figure 4.101.1 shows traffic turning left from Nephin Road to Navan Road, whereas the point of the original submission was in relation to traffic turning right on to the Navan Road from Nephin road and travelling outbound from the city. Please see as outlined in our original letter where cars regularly mount the footpath in this area outside our properties. Note also the history of car accidents in this area where vehicles have crashed either into the railings or fully into the front of the houses at 136, 138 and 140 Navan Road.

Further to above and in relation to a heavily used pathway by schoolchildren and other users of the nearby bus stop, what if any risk analysis has been done to assess the dangers outlined per above and in our submissions?

Kind regards,

Carl Reynolds.

Anne Martin – 136 Navan Road

Henry Reynolds – 140 Navan Road

Vincent and Winnifred Walsh – 138 Navan Road