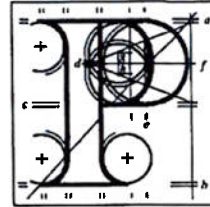


Our Case Number: ABP-313892-22



**An
Bord
Pleanála**

Deerpark Area Residents Association (DARA)
c/o John Dillon
8 Castleknock Green
Castleknock

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

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Riomhphost

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

Eimear Reilly

From: Bord
Sent: Wednesday 12 July 2023 13:32
To: SIDS; Eimear Reilly
Subject: FW: ABP-313892-22: Bus Connects Blanchardstown to City Centre Bus Corridor Scheme
Attachments: An Bord Pleanala 12 July 2023 - DARA letter.pdf

From: John Dillon (IE) [REDACTED]
Sent: Wednesday, July 12, 2023 1:26 PM
To: Bord <bord@pleanala.ie>
Subject: ABP-313892-22: Bus Connects Blanchardstown to City Centre Bus Corridor Scheme

For the attention of Eimear Reilly (Executive Officer)

I refer to your recent correspondence dated 8 June 2023, and your offer that I make a submission on behalf of DARA. Please find attached our related submission.

Kind regards

John Dillon

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DEERPARK AREA RESIDENTS ASSOCIATION

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

12 July 2023

Notice of restriction of or interference with existing Public Right of Way – Blanchardstown to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022.

Case Number: ABP-31392-22

Dear Sir or Madam,

I refer to your letter to me dated 8 June 2023 and your invitation to comment on the amended submission dated 31 January 2023, and upon which we lodged a submission on the original application dated 30 August 2022.

I am writing on behalf of Deerpark Area Residents Association ('DARA').

DARA represents over 200 dwellings in the Castleknock area immediately adjacent of the Phoenix Park. The DARA area is bounded by the Phoenix Park, Castleknock Road and Pecks Lane. This area includes residents residing in Park View, Deerpark Avenue, Deerpark Drive, Deerpark Road, Deerpark Close, Castleknock Road, Castleknock Green, Dunsandle Grove and Dunsandle Close.

DARA notes the response prepared by the NTA to various ABP submission in respect of the overall Bus Connects project, and the Blanchardstown CBC submission in particular.

We note with regret the decision by ABP not to hold public hearings.

We note that in our submission dated 30 August 2022, we limited our commentary and observations to the proposals to restrict the public right of way in respect of the Castleknock road/Ashtown junction/Blackhorse Avenue access point. We expressed the view that we do not support that application / restriction of or interference with the existing Public Right of Way, as it was not the subject to proper public consultation. We noted that resident's views have not been sought or collated on a change which will have significant impacts. We continue to hold this view.

We repeat our observations that DARA recognises that the junction in question and access point to Blackhorse Avenue and the Ashtown Gate in the Phoenix Park could benefit from some re-design, particularly to improve use by all modes of public and private transport, including cyclists and pedestrians.

We note that the updated response from the NTA includes improvements in respect of pedestrian and cycle access, with the introduction of Toucan crossings. **We welcome this proposed amendment.**

However, we note no evidence of an assessment of options as we suggested in our submission dated 30 August 2022 or that our suggestions were even considered e.g. consideration could be given to acquiring lands from the old Phoenix Park Racecourse site to create more space and a safer junction. We also noted that any assessment of transport options and / or traffic flows should be completed independently and any assessment should include the impact of all forms of transport and the needs of commuters, both current and future – and not solely seen through the lens of a public bus service and or agency.

In respect of the responses provided by NTA, specifically referenced on Pages 154-156 of their submission, we note that they state that *'it is proposed to restrict vehicular traffic from turning from Castleknock Road onto Blackhorse Avenue and Ashtown Gate Road'*. NTA states that *'access to Blackhorse Avenue and Ashtown Gate Road will still be available via the surrounding road network'*. We ask how do the NTA assess that access will still be available from the surrounding network? What network are they referring to and what routing are they proposing? The only access to Blackhorse Avenue from the direction of Castleknock Road would be to either travel from the Navan Road direction ie from Auburn Avenue and / or travel from Castleknock Road through / around the Ashtown junction and re-enter the Castleknock Road to take a left turn towards Blackhorse Avenue. Is this what is now being proposed as an accessible solution?

We note the NTA have observed that *'from the traffic modelling results, it was apparent that general traffic may divert from Navan Road to Blackhorse Avenue'*. *To address these concerns, the junction of Blackhorse Avenue/Ashtown Gate Road will be signalised to allow improved traffic management such that signal green times from Blackhorse Avenue can be minimised to limit through movement on this route'*. In our view and knowledge of the locality, this does not address the issue as it results in congestion at an end point (i.e. Blackhorse Avenue) as opposed to avoiding the congestion build up in the first place by ensuring easier traffic flow on the main Navan Road route.

We note the NTA commentary to state that *'extensive engagement took place with the OPW during the development of the Proposed Scheme at this location.'* We note that despite our requests, no public consultation has taken place. No public meetings have been held. No oral hearings were held or planned by ABP. We note that the OPW has primary responsibility for the management of the Phoenix Park. They do not have responsibility for traffic management beyond the Park. Accordingly, how does extensive engagement with the OPW address the need for wider public consultation?

We note the NTA commentary that *'traffic management measures were introduced in Phoenix Park in February 2022 which at the time of the planning application were the subject of a 9-month pilot study. Consequently, they were not considered in the impact assessments'*. This response seems unusual in that the restrictions were introduced in a period of continuing Covid restrictions. Consequently, how could the data modelling for this or other parts of the submission be considered up to date and / or reflective of current traffic flows, both as it relates to traffic measures introduced with the Phoenix Park, but equally to the surrounding Road network in a post Covid period ie Castleknock Road, Blackhorse Avenue, Ashtown junction, Navan Road?

We continue to note, as we did in our original submission, that the use of Compulsory Purchase Orders should not be used as a form of fast tracking and / or a method to avoid public consultation.

We believe that the above application should not be approved. A proper public and open consultation process should be initiated, incorporating consideration of the acquisition of adjacent lands such that the full spectrum of options for junction redesign can be fully explored as we suggested previously.

Yours faithfully,

John Dillon
Chairperson,
Deerpark Area Residents Association
8 Castleknock Green
Castleknock
Dublin 15