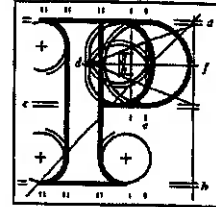


Our Case Number: ABP-313892-22



**An
Bord
Pleanála**

Navan Road Community Council
c/o Patricia Dunleavy
10 Glendhu Park
Navan Road
Dublin 7
D07EA44

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

Teil	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Navan Road Community Council

Eimear Reilly

From: LAPS
Sent: Wednesday 12 July 2023 10:11
To: Eimear Reilly
Subject: FW: ABP-313892-22 Bus Connects Blanchardstown to City Centre core bus corridor.
Attachments: Bus Connects NRCC response to NTA & refusal Oral Hearing.docx

From: Pat Allison [REDACTED]
Sent: Tuesday, July 11, 2023 6:34 PM
To: LAPS <laps@pleanala.ie>
Cc: patricia dunleavy [REDACTED]; Colette Timmons [REDACTED]
Subject: RE: ABP-313892-22 Bus Connects Blanchardstown to City Centre core bus corridor.

NAVAN ROAD COMMUNITY COUNCIL

Navan Road Community Council was formed in 1968 as an umbrella organisation to represent individuals, residents associations and other groups throughout Navan Road area, Dublin, 7.

Dear Sir/Madam,

We attach herewith our Submission on NTA responses to our original submission, in accordance with Section 217B of the Planning & Development Act, 2000, as amended, and as invited by the Board as per your letter of 8th June.

Please acknowledge receipt in due course.

Sincerely,

Pat Allison of 4 Martin Savage Park, Ashtown, D. 15
PRO of NRCC,
signing on behalf of our Chair, Patricia Dunleavy, who is abroad.

cc to our committee.

NAVAN ROAD COMMUNITY COUNCIL

Navan Road Community Council was formed in 1968 as an umbrella organisation to represent individuals, residents associations & other groups throughout Navan Road area, Dublin 7.

TO; AN Bord Pleanála, 64 Marlborough St., Dublin, I.

11th July, 2022

Re; Case No. ABP – 313892-22

Bus Connects – Blanchardstown to City Centre Core Bus corridor.

Dear Sir/Madam,

Having been advised by the Board on 8th June last that there will be no Oral Hearing in this case, we feel it appropriate to re-submit our original submissions, many parts of which appear to be ignored, due to ignorance of our local living area, lack of care for our living area, or simply more bad OIRISH forward planning.

- Our original submission, is submitted following the sections herewith, dealing with NTA responses and/or lack of consideration for our arguments.

OUR RESPONSES;

in accordance with Sect. 217B of the Planning & Development Act, 2000, as amended.

We refer to section 4 a (i) of Section 217B, as above and we request that an Order be made under 4 a (i) referring the Environmental degradation planned by removal of hundreds of mature trees along our section of Navan Road - from Ashtown to Cabra Cross.

- Under environmental terms, planting one tree, having cut down a tree has a neutral impact - However, planting 2 trees for each tree cut down is a positive impact, with a temporary loss of visual amenity. NTA refers several time to DEMURS, only in relation to traffic, but appears to ignore DEMURS on trees ?
- We understand if the Board fails to exercise due diligence in refusing to require a new road/cycle/bus lane development to amend such development on environmental grounds, it is likely a Court would set aside any decision to grant such permission ?
- We request that the Board consider making a request to the appropriate bodies seeking planning permission, to amend the proposal/s on environmental grounds, by issuing an Order under Sect. 4 a (i). This should refer the number of trees to be cut down, and references to 'replacement' trees 'where appropriate' or 'where practicable' as stated by NTA - a vacuous and vague reference to our Avenue of mature trees along Navan Road, which apart from their beauty & bird base, protects over 200 homes along Navan Road from noise and provides privacy from the top deck of all buses.
- With current NTA plans to remove or interfere with some local bus routes, i.e., No 70 from Dunboyne, no longer to travel directly down Navan Road, but be forced into Blanchardstown Centre to CHANGE to another bus – adding a minimum extra half hour to peak time journeys -AND - No. 122 which travels across Dublin from Ashington to Crumlin Childrens Hospital area, on South side, to become a city centre bus, with CHANGE to another bus to travel onwards across City to South side - Following this

dreadful planning - THERE IS NO GUARANTEE THERE WILL BE LESS CAR JOURNEYS ALONG NAVAN ROAD, AS people are already stating they will not get out of their cars, with these inconveniences imposed by NTA planners. Sadly, Irish people do not queue well, so all those ahead of them at the CHANGE site will be ahead of those getting off to CHANGE bus.

IDENTITIES;

As we all are required, and happy to provide our names and addresses, we would ask how many, if any, of NTA personnel making these plans, live along Navan Road? The number/s will suffice, we do not require their identities.

ORAL HEARING;

'Refused', or, as an angry Bord P official said to us 'we do not refuse it, it is the Inspector who decides if he requires further information via an Oral hearing'. However, we must state that the large numbers of public disenfranchised by so much of this 'public consultation' taking place on line, might have benefitted from attending an Oral Hearing. See TILDA, Trinity Study, 2019.

DRAWINGS in NTA responses are illegible to unprofessional people. Pictures are easy to understand. Such illegible drawings disenfranchise all of us, who love our home area, and spend many hours trying to understand all.

RESPONSES FROM NTA – with their team/s of professional employees, appear to lump all our individual submissions into a lump section, rather than responding individually to each one.

Our Committee are all volunteers, as have been all committees since our foundation in 1968.

From NTA Responses:-

Pg. 27 'Outcomes achieved' - "Attracting a resilient equitable public transport network, ovactivities"

This sentence alone confirms how this entire proposal 'CONNECTS' and 'ACCESSES' other communities to travel through our long established community, with '3 – 5 buses every few minutes' - whilst removing our avenue of trees, to the detriment of our Navan Road community, its health, wellbeing, mental well being and privacy.

Pg. 31 TREES;

Yellow ribbons tied on all trees along Navan Road, TWICE, by our volunteer members and committee, were TWICE aggressively cut off and removed by a person unknown, Twice, we were informed by locals, this was done by a female with a knife.

Both DCC and Fingal Development Plans 2016-2020 and 2017 – 2023 are quoted in relation to protection of existing trees, etc, but as far as we can ascertain, NTA then proceeds to ignore most of this. NOTE; we the public are encouraged to, and do, participate in all Development Plans at draft stage, and Council meetings etc., so therefore, we the public, who vote, are also ignored, by this procedure.

Sect 6 Appendix A17.1 Section 4.5.4.9 "Landscape & urban realm Chap 4" Refers to "new street trees will be planted to - reinstate *some* of the trees and existing character of the road" - pictures showing before and after tree removal, of course, confirm that the 'existing character of the road' is not reinstated.

We can find no reference to, or understanding within NTA responses, of DEMURS 2019 – design manual for urban trees?

Pg. 33 7.9.3 “..... 793 new trees 92% increase to be planted” - But there is no plan displayed to our knowledge, showing where and how mature. “Tree pits will be provided **Where practicable** “.

Pg. 37 2.2.27 THE COMEDY -

“Loss of trees result in increased dominance of built elements in the view and a loss of visual amenity. However, this is **balanced to an extent by the urban realm improvements, overall, there would be a MINOR negative change in the character and visual amenity of the view** “

Pg. 28 Ashtown Roundabout. Responses to removal of same, refers to “safety of residents between Ashtown roundabout and Kempton area” . No one lives on Ashtown Roundabout, this appears to preclude the original residents of Ashtown; Mill Lane; Ashtown Road; Belleville Ashtown, and, the newer residents of new development at Pelletstown – at bottom end Ashtown Road,, estimated to number approx. 10,000 residents when completed ? Their safety is rather important for consideration.

Reference to a “wind tunnel created if roundabout removed” :- NOTE: Prior to widening of Navan Road to N3, there was a 4 way signalised cross-roads at Ashtown, with no wind tunnel. Drawings here are illegible.

Pg. 30 2.2.20 Pictures presented showing new planting at Ashtown, with the removal of the roundabout, show trees so close to the first of the 6 houses beside Half Way House which would entirely block the already extremely difficult exits from those houses, and put people in constant danger.

Pg. 33 shows pictures of possible new trees to be planted including Whitebeam and Dutch Elm, among others - such trees are subject to disease, and have had to be removed from areas off Navan Road. “A gain of 50 trees” is made at some stage - Sadly, one would have to be on standby on a daily basis to ensure such 50 trees are in fact planted, and where ‘possible’ or ‘practicable’ etc.

Pg. 35 2.2.23 “Entrance to St. Vincents. Primary changes and widening of the road corridor to North, realignment to verges. Change to surface of road boundary areas, loss of verges and street trees at entrance. **There is substantial negative change to character and visual amenity of the view.**”

No reference is made to the possibility of NEGATIVE IMPACT to the residents and their carers from St. Vincents. All residents have special needs requiring extreme care.

Pg. 37 2.2.27 This refers to area in and around Our Lady Help of Christians Parish Church on Navan Road. MORE COMEDY - “Removal of trees to south of road leading to increased dominance of built element and loss of visual amenity. **However, this is balanced by the urban realm improvement and minor negative change in character.** Resurfacing footpaths with concrete black paving and a band of black paving across the entrance to Church car park.”

Note: the trees to be removed to South of Church are 7 – 9 mature Cherry Trees.

CPO at Church grounds shown in previous consultation - we are unsure of its current situation ? However, it should be clear that there have been daily funerals in recent weeks at our Parish Church, sadly - they are not an occasional event.

Pg. 37 2.2.29 Refers to Junction Navan Road with Nephin Road - one of the Island bus stops suggested, NOTE: there are large numbers of youths from St. Declans Secondary

school accessing buses in both directions at this area - Island bus stops are not likely to grant safe access/exit from buses to them, from ages 11/12 up to 18.

Pg. 41 2.2.35 refers to "increased traffic along Kinvara Avenue now, and we forecast reduction of traffic on Kinvara Avenue, following Bus connects." NOTE: as already stated above, people have been saying they will not get out of their cars, with unattractive changes to No. 122 bus route, from within their area, requiring them to get two buses in am and pm peak hours.

Pgs. 48 & 49 Tables produced here cannot be read, print so tiny.

2.2.39 SAFETY. States how proposed 'Island bus stops' will operate, with all cyclists calmly slowing down on directions, to allow pedestrians access or exit buses. Sadly, cyclists and electric scooter users have become very aggressive, speeding on footpaths, never ringing a warning bell, to forewarn the legitimate footpath users. So they are to stop carefully, or worse for them, swing our around the stopped bus to pass by. Among others, a lady was killed in past couple weeks on Eccles St. by a speeding scooter.

Dangers we suggested, to school girls from St. Dominics Secondary School, and others from Navan Road Primary schools at Bus Stop 1661 opposite the Curcy (to be moved further West by NTA) have been ignored by NTA in their responses.

Pgs. 56 & 7 2.2.312 References Mary Help Christians Parish Church again. "Temporary land takeover, as part of accommodation for work progress, details of the access arrangements to facilitate funeral Hearses and associated vehicles. To be discussed with the Diocesan Trust/Parish Priest/NTA. During construction, there will be temporary disruption to parking and access to the Church at all times." We repeat that funerals can take place, and have done recently, on a daily basis.

UTILITIES ALONG NAVAN Road;

We have dealt with this matter in detail in our original submission under UTILITY WORKS, see below.

We reiterate that Gas is to be phased out entirely and replaced by electricity for cooking and health in home, and indeed, for the electric buses along Bus Connects route - (according to Radio report yesterday 10th July, 'hundreds of electric buses have been purchased by NTA and are stored somewhere (unable to get this information')) ?

The Electric wires are already in place.

NTA's unbelievable response to our input on this was 'Utilities are not within our remit' a sadly typical OIRISH forward thinking and planning ?

Confirming our support for Bus Connects, but not at the price of our residents health and well being and safety.

Sincerely,

Signed, On behalf of our Chair, Patricia Dunleavy - who is abroad.

Pat Allison, PRO,
NRCC,
4 Martin Savage Park,
Ashtown, Dublin, 15.

N.B. PLEASE READ ABOVE IN CONJUNCTION WITH OUR ORIGINAL SUBMISSION, BELOW, WHICH IS STILL RELEVANT TO OUR AREA of Ashtown to Cabra Cross.

An Bord Pleanála, 64, Marlborough Street, DUBLIN, 1. 29th August, 2022.

Ref No. ABP 313892 Blanchardstown to City Core Bus Corridor.

Dear Sir/Madam,

The Navan Road Community Council (NRCC) was set up in 1968 to help bring together community groups and sporting groups so that they would have one voice when trying to get things done in the community.

We enclose our fee €50.00. Please acknowledge receipt.

We request, on behalf of our members, and the many people who attended our recent Public Meeting – that an Oral Hearing be held. We are informed by the Board that there is no fee for this in a Strategic Roads Infrastructure project.

The NRCC supports the Core Bus Corridor Projects. Nevertheless, we do have concerns about the possible negative impacts of this project on our Navan Road Community.

Our submission to An Bord Pleanála (ABP) is to highlight our objections to aspects of the planning application submitted by the National Transport Authority (NTA) for the Core Bus Corridor (CBC) along the Navan Road, specifically our area of interest between The Parkway Railway Station and the junction of the Old Cabra Road with the North Circular Road (NCR), and the local communities surrounding same.

The NRCC wishes to contribute pro-actively in developing this project to the benefit of our community as well as positively benefiting the wider population who access the city via the Navan Road for work and leisure purposes. We do not wish to see, nor will we tolerate a negative consequence arising because of this project.

When the idea of a CBC was mooted some three years ago we formed a sub-committee to interact with the NTA to outline our positivity to the project but to also get fuller details and to outline our concerns. This sub-committee met with the NTA on a number of occasions. Our meetings were informative and constructive, with the NTA showing genuine interest in our issues. A specific example would be where, in our first meeting, the NTA indicated that the roundabout at The Halfway House Pub would be removed for the CBC. We argued that this roundabout was an important visual sign for motorists that they were entering a built-up suburban area and should slow down. We explained that speeding was a regular occurrence on the dual carriageway leading to the

roundabout and that a removal of same would lead to a continuance through our heavily populated area. The NTA took our concerns on board and, at our next meeting on 13th February 2020, they assured us that the roundabout was to be retained within a signalised junction. At that point we felt that we could work positively with the NTA to develop the CBC in the interest of commuters and the city at large, while also protecting our local communities as best possible.

Alas that was to be the last meeting with the NTA as Covid intervened. Covid also hugely impacted on the ability of our sub-committee to meet. In recent times when we attempted to re-engage with the NTA we found them unable or unwilling to facilitate us. It was with frustration and some anger therefore when we saw the plans for the CBC as submitted by the NTA to ABP. We noted that the roundabout at the Halfway House was again totally removed in the latest maps, in spite of the NTA in 2020 agreeing with us that it be kept. On further examination of the application it seems clear to us that we simply had to object to aspects of the proposals, which surely would have benefitted by further interactions with community representatives like ours, as outlined below.

While the NRCC supports the Core Bus Corridor Projects. We want this CBC project to be a catalyst to develop:

- A more efficient transport system to convey the commuter, our elderly and disabled community, and visitors, into and out of the wider city areas in an efficient and comfortable manner.
- A fair and attractively priced fare structure.
- Safe and enhanced Cycle lanes and pedestrian paths.
- A new vibrancy in our neighbourhood with initiatives arising from the CBC project. We want this project to be the starting point for the rejuvenation of our Navan Road area and indeed the wider Blanchardstown to City Centre Core Bus Corridor 5.
- A reduction in vehicular traffic that is currently impacting on the Air Quality, Noise and Traffic Safety- which should be attained if the proposed new bus routes and infrastructure is correctly put in place.
- A tree lined Navan Road from the Parkway Railway Station to the NCR.

However, our support is not at any price. There are many concerns with the possible negative impacts of this project on our community. We would like to engage with the NTA to resolve our concerns and to make this project a success. Our concerns and our proposals to make this project work to the benefit of our community and our city.

WE ARE A COMMUNITY - NOT A MOTORWAY!

As a community, Navan Road Community Council (NRCC) held a public meeting at very short notice in our School Hall, Tuesday 16th October, 8.00 pm. which was full to capacity, with people arriving from 5.30 onwards to view the plans, with before/after pictures, purchased from ABP. Many were very shocked at the 'After' pictures lacking trees. Many were unaware of any details, as the entire 'public' consultation process took place online only, disenfranchising all people not on the internet - Trinity Study 2019 'TILDA' on the impact on people lacking internet connection, and the disenfranchisement of all. We had appealed throughout, at Zoom meetings etc. NOT to hold the statutory stage to the Board during summer (subsequently done from end June to end August) when both the public were on holiday, as were our elected public representatives. This was confirmed at our meeting as all our TD's were away, as were several of our Councillors.

Before we deal with the specifics of the application lodged with ABP we wish to highlight the following very serious concerns, which if not considered carefully, will lead to the Navan Road, being opened and re-opened over and over, for various utilities.

UTILITY WORKS

The developer is unable to provide replacement trees in locations where established trees are to be removed due to the location of underground utility services, notably natural gas. These utilities were installed over 25 years ago and have limited life. They are nearing end of life and will need to be decommissioned in the coming few years. Natural gas networks are being decommissioned all across Europe in favour of district heating networks to meet stringent climate change commitments. By 2050 there will be no natural gas use by residential consumers in Ireland, so the gas network has a maximum remaining life of 27 years. New trees will have a life of several hundred years, long after natural gas is no longer a fuel option in this area. It is therefore more important to get the trees in the right location, or keep them in their current locations, and divert the utilities locally than to allow short-life utilities to restrict long term investment in green infrastructure. ABP should rule it inadmissible to use utilities as a reason to exclude tree planting, or remove existing trees, and insist on local diversion of utilities to facilitate tree planting or retention of trees where a single utility is involved, especially where that is utility is limited life natural gas.

Furthermore, ABP should insist on the proposed district heating network be installed as part of the Bus Connects works, to avoid doubling the inconvenience to residents and businesses by separate road opening events. This would facilitate the proper planning and development of the area by anticipating the inevitable switch from natural gas to low-carbon heat networks, which must be complete by 2035 (i.e. in only 13 years time) in the Dublin area to meet our national carbon

emissions targets. SEAI's National Heat Study identifies the established residential communities along Navan Road as having a heating demand intensity which makes district heating cost optimal. The injection of hydrogen and biomethane (so-called 'green gas') into the natural gas network will not be financially or carbon-intensity viable until after significant surplus offshore wind generation capacity has been installed in Ireland, which will not be available before 2035 and will, therefore, arrive too late to justify retention of the natural gas network in Dublin. Redundant utilities should, therefore, not be allowed to determine where Ireland makes long-term investments in

necessary green infrastructure. The developer should be required, by ABP attaching to any grant of permission a condition to replace any trees removed with equivalent semi-mature trees of similar species in the nearest proximate location as a matter of planning policy and to relocate utilities, where necessary, to facilitate that planning.

ASHTOWN ROUNDABOUT

The Ashtown Roundabout denotes the entrance to Dublin City and is an important, distinctive feature of our area. We are totally opposed to its removal. We propose traffic and pedestrian signalling of the Ashtown Roundabout and retention of the trees.

The roundabout acts as a boundary between the dual carriageway which has a higher speed limit than the Dublin City area. It acts to slow down the traffic to suitable speeds. The four way junction proposed would not have the same effect. We acknowledge the need for controlled crossing points for pedestrians and cyclists at this junction but feel this can be done without the removal of the roundabout and the fine stand of pine trees.

TREES

The National Transport Authority (NTA) has proposed the removal of hundreds of street trees to facilitate this project. This is very evident from the Parkway Rail Station and right along the Navan Road as far as Cabra Cross. We do not see an effort in the documentation to make our community one that has at its core the well-being our community.

We have identified at least 150 street trees to be removed to facilitate this project. There are also unquantified numbers of woodland trees to be removed.

IF OUR STREET TREES ARE FORCIBLY REMOVED, against the wishes of the majority of our community there should be a condition that they are replaced by an equal or greater number of mature street trees, planted in properly constructed tree pits, that will still allow for the provision of cycle, public

transport, and car lanes. These large tree pits (and they will have to be large) should be constructed to current European standards where it has been possible to plant trees in particularly challenging locations. There are a few examples in the Navan Road itself, of street trees that were previously planted into restricted tree pit sizes in pedestrian paths that have not grown properly as a result. What we demand is a recognized standard for tree pits to be used in the replanting of new street trees. This will include proper structural soil growing media for the tree roots, and protection for the hard surface above the root areas.

An alternative solution, which would save a large number of trees and would be of major benefit to the local community, would be to remove the outbound bus lane from Nephin Road to Kempton Estate. Our studies indicate that this would have a very minor impact on traffic times given the new proposed junction layouts along this stretch of road. This will only reduce the total bus lane length by approximately one kilometre. A PRICE WORTH PAYING!

PARK & RIDE FACILITIES

To encourage commuters to move from car to public transport, it is imperative that proper, secure, safe and free park and ride facilities are provided for the commuter belt at current bus and rail transport hubs. These must be of an appropriate size. Shuttle services should be provided to link outer park and ride facilities to the proposed improved bus network.

OLD CABRA ROAD

There is a proposal for two Bus Gates on this road.

Whilst this would seem to be a positive idea, the consequences of it may be to create new issues on the surrounding road structure e.g. Blackhorse Avenue, Baggot Road, Nephin Road, Skreen Road. Motorists and other road users will use these roads to take short cuts onto and from Navan Road. The resulting congestion will have a huge impact on residential access, emergency services and deliveries on residential quiet ways. A further consequence will be the migration of traffic via the quiet ways onto Blackhorse Avenue which is not suitable for increased traffic. As a condition we propose that a detailed traffic analysis, to ensure the design is suitable, should be undertaken before implementation.

ASHTOWN GATE/ CASTLEKNOCK ROAD

The proposal to implement a "no right turn" from Castleknock Road into The Phoenix Park and also onto Blackhorse Avenue (Inbound) would appear to be counterproductive to a proper traffic plan. This would have a major negative impact on local residents and commercial premises on Blackhorse Avenue. As a condition we suggest a detailed traffic and health and safety analysis at this busy

junction. Please not a similar situation occurs at the junction of Ratoath Road and Swilly Road.

CABRA ROAD

With the proposed closure of the Old Cabra Road it is inevitable that inbound traffic will migrate to the Cabra Road. This will hugely impact on the Navan Road, the Cabra Road, North Circular Road and Phibsborough. These roads and their junctions are already at over capacity. There is no provision in the BusConnects proposals to deal with this problem. As a condition a detailed traffic analysis is required.

CPO'S & NOISE AMELIORATION

Residents are very unhappy with the process, explanations and communication they have received from NTA as to why their property is being taken temporarily or permanently. As previously discussed (TREES SECTION) the removal of the outbound bus lane from Nephin Road to Kempton Estate would have a major impact on the amount of CPO's necessary.

As a condition an audit should be undertaken on the CPO BusConnects process which appears to have been very unsatisfactory for our residents.

We note that grants for noise reduction have been awarded to residents adjacent to the new runway at Dublin Airport. As a condition similar grants should be made available for noise reduction to impacted residents along the Navan Road.

DISABILITY

A condition should be contained in any permission granted, that our Government Statutes on the rights and legal obligations to represent people with disabilities is honoured, e.g. relating to bus stops/dangers from cycle lanes intruding on the stops/bicycle racks erected in a dangerous fashion to become a danger to people with a visual impairment.

CORE BUS CORRIDOR & DART+ WEST

It is unclear from our non-professional perusal of the copious documentation in both these current proposals, what liaison, if any, is taking place between both applications, and their applicant, on the effects on our area and the wider Dublin 15 area from both plans.

We can see no evidence that BusConnects has taken the passenger movements and traffic impacts from Dart+ West into consideration. Nor can we see any indication that further studies have been made to take into account the changes in traffic and

passenger demographics post Covid. A condition should be that a fresh evaluation of the BusConnects project should be made in light of current impacts.

ISLAND BUS STOPS

The proposal for Island Bus Stops raises serious concerns for pedestrians, elderly people, people with disabilities, wheelchair users and the visually impaired who will have to pass through the cycle lane to board or alight from a bus making it dangerous and harder to see an oncoming bike or scooter electric/manual.

The major Bus Stops which we have concerns for are:

1. Parkway Outbound. Circa 1000 school children will attend in future the new Edmund Rice School.
2. Ashtown Grove/Daughters of Charity (DOC) in/out – DOC provide services to persons with intellectual and physical disabilities using buses to bring clients on trips to Blanchardstown Centre, the local library, swimming pools etc
3. Our Lady Help of Christians Church
 - Boys and Girls Primary Schools Circa 1000;
 - St. Dominic's College Circa 800;
4. Nephin Road. St. Declan's College Circa 650 in/out.

A condition is required to provide detailed analysis that the design is suitable for bus stop capacity.

BICYCLE STANDS:

We have concerns that the bicycle stands are too close to bus stops and areas where they will cause serious obstacles to all pedestrians and bus passengers particularly those with a visual impairment.

A condition is required to provide detailed analysis that the design is suitable for these locations.

CONCLUSION

We thank you for considering our submission. The Navan Road Community Council is committed to ensuring that our community and environment will not be negatively impacted. The proposals as they stand would have a devastating impact on our locality, environment and our residents.

While we support the CBC Project we feel that as proposed there are many flaws as outlined above. We strongly feel that, had our meetings with NTA continued over the last years, we could have arrived at a mutually agreed position to the benefit of all.

We feel that an Oral Hearing will allow us to further explain and flesh out our proposals.

Signed;

Patricia Dunleavy, Chair,
Navan Road Community Council,
10, Glendhu Park,
Navan Road, Dublin 7.