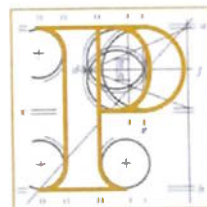


Our Case Number: ABP-317121-23



An
Bord
Pleanála

Deirdre & Pamela Scully
255 Swords Road
Santry
Dublin 9
D09 RK31

Date: 15 February 2024

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Sir / Madam,

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

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

If you have any queries in the meantime, please contact the undersigned officer of the Board on 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,

Breda Ingle
Executive Officer
Direct Line: 01-8737291

HA0

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Breda Ingle

From: LAPS
Sent: Friday 9 February 2024 09:23
To: Breda Ingle
Subject: FW: Re. Response to Response of NTA. /Ref. ABP-317121-23
Attachments: Response to NTA Response PDF.pdf

Categories: Letter Tasks To Do

From: Deirdre Scully [REDACTED]
Sent: Thursday, February 8, 2024 4:02 PM
To: LAPS <laps@pleanala.ie>
Subject: Re. Response to Response of NTA. /Ref. ABP-317121-23

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam,

I am responding to the N.T.A.'s response to the submission made in September by myself and my sister. I attach a PDF with signatures.

Thanking you,
Deirdre Scully . 8th Feb. 2024.

Re. Swords to Dublin City Centre Bus Corridor

Ref. No. :ABP-317121-23

Deirdre & Pamela Scully
255 Swords Rd.,
Santry,
Dublin 9.
D09RK31

We, the undersigned, acting on our own behalf, wish to make a submission in accordance with Section 217B of the Planning and Development Act 2000 as amended in relation to the submission dated 23rd Nov. 2023 received from the N.T.A..

1/ Health Issue

Firstly, the N.T.A's response to our concerns regarding a health hazard from the reduction in the size of our garden with the resultant increased proximity to the flow of traffic was not adequately addressed and perhaps not comprehensively understood. In response to the N.T.A. we ,firstly, acknowledge that the proposed amount of land to be taken from our front garden is small at 1.1 metre and I quote from the N.T.A.'s response : "*The extent of change proposed at this location will result in only a reduction of 1.1m to the distance between the front door and the street.*" and "*It is intended that boundaries and accesses will be replaced on a like for like basis.*" However, the 'change' is more than a mere change of 1.1m. The main green boundary of our garden and that of many of our neighbours will be gone, that is the greenery: shrubs, hedging and in some cases, trees. Our hedge is very mature -65 years of growth and provides a necessary barrier to mitigate the effects of the air pollution and the noise. It is disingenuous of the N.T.A. to use a photomontage of the proposed changes which inserts our mature hedging (and that of our neighbours' hedging) into the picture. This photomontage has been placed in the Authority's response but our hedge will cease to exist and the streetscape will not have any greenery of note for many, many years to come. "*The extent of change*", as the N.T.A. puts it, is not inconsiderable taking into account that a 'two-lane road' will become a 'four-lane road' - a doubling in size! This 'change' will completely alter the rhythm of the area to the detriment of salvaging any vestige of a sense of community as, what is effectively a road resembling a motorway will cut through Santry village. In addition, it is indisputable that the boundaries to our house can never be replaced 'like for like' as the N.T.A. puts it.

The N.T.A.'s response mentions the inconveniences of the 'construction phase' quite a bit. However, in our submission we were referring specifically to the permanent threat from increased proximity to air and noise pollution. The bus corridor is a twenty-four hour corridor and the Dublin Bus fleet is exceptionally noisy. We will have no greenery of any note as a barrier (as mature hedging /trees take almost twenty years to grow). I didn't get a sense from the N.T.A.'s response that the Authority understands or appreciates, in its own words, "*the extent of the change*" as proposed.

The N.T.A. goes on to cite reduced risks of certain health conditions due to the construction of this road. The reference cited draws our attention to the Operational Phase, Section 11.4 of Chapter 11 which describes the potential health benefits and I quote:

"The likely level of increase in physical activity to be gained is uncertain but could contribute to approximately 30% to 50% of weekly recommended physical activity on the assumption that the studies can be generated to this area of Dublin. The health outcomes associated with increased physical activity are:

*reduced risk of stroke and heart disease;
reduced risk of hypertension;
reduced risk of type 2 diabetes;
reduced risk of eight types of cancer;
reduced risk of depression;
improved musculoskeletal health; improved weight management; and mental wellbeing.*

This is quite a breathtakingly ludicrous claim by any standards! The N.T.A. goes on to make very expansive claims as to the benefits as follows and I quote two sentences in full as they are quite remarkable :

"The proposed scheme will facilitate increased levels of physical activity among the residential population within the study area. School children may be particular beneficiaries of this new infrastructure due to the presence of schools."

This latter statement does not make complete, logical sense.

In specific response to our concerns about air quality the N.T.A. dismisses them as being 'Negligible' and cites results from modelling at an air quality monitoring station close to the residence of no. 287 on the Swords Rd. (which is further up the road from our house (17 houses up the road to be specific and beyond the traffic lights/ junction at Shanowen Rd.)). The figures cited here in relation to this residence are not relevant to our situation/our house at 255 because this residence at 287 is not as near to the road and is on a raised platform above the road and is not near a junction and traffic lights where the traffic builds up and is stationary (spewing out fumes while waiting for the lights to change) nor is no. 287 opposite a bus stop as we are.

(The proposed pedestrian crossing at the Comet Pub will also add to the exhaust fumes building up as the traffic will build up with this new, proposed stoppage.)

2/ Destruction of Village Landscape & Acceleration of Climate (however marginal)

The issue we raised re. the destruction of mature trees and of the replacement of them with new planting/seedlings has been acknowledged as 'fact' but the wisdom of doing this in a time of CLIMATE CRISIS has not been adequately addressed nor EXPLAINED. I make this latter point considering that the ONE-WAY ROUTE OPTION for Santry would avoid all of this destruction of bio-diversity in general (not just the trees) and would COST A LOT LESS. This ONE-WAY OPTION ought to be reconsidered at a time when the E.R.S.I. has warned the government of an impending shortage of money for major infrastructural projects such as Bus Connects.

The N.T.A. admits that the removal of trees from Northwood Ave. to Shantalla Rd. will result in, as the Authority puts it, *"an impact rating of Negative"* and goes on to state that this rating will not return to positive for 15 years post-construction i.e. the impact will be long-term and I quote directly: *".....long-term at 15 years after new planting has had time to fully establish."*

and

"While the construction works will not alter the existing townscape character along this section of the Proposed Scheme the works are extensive and will result in changes to elements of the existing streetscapes, most notably, through the removal of mature trees, giving it an impact rating of Negative".

Fifteen years is a conservative estimate of the length of time it takes for most trees to reach maturity. In a time of climate crisis we do not think that the N.T.A.'s response has given this issue sufficient consideration especially as opting for the One-Way System would have avoided all of this needless destruction and considerable waste of money on construction, reconstruction, not-to-mention CPOs.

3/ ONE-WAY SYSTEM (Reducing Congestion & Saving Money)

Regarding this issue, the N.T.A. responds by pointing out that this option would be 'inconvenient' for residents of Lorcan and Shanrath Roads. I would like to point out that it is a little bit more than 'inconvenient' for us to feel that we are being driven out of our home by having a CPO on part of our front garden that will impact adversely on our health and wellbeing! (On health grounds we have our house up for sale.)

TWO MAIN REASONS:

Two main reasons as to why the Two-Way Option is preferred are cited in the N.T.A.'s response and I quote directly:

The Two-Way Option:

“ It performs more favourably under the Integration criterion because this option requires no changes to the current traffic management regime in Santry. SYIC would require detours and increased journey times for traffic..... “

and

“It performs more favourably under the Accessibility and Social Inclusion criterion because under Option SYIC journey times made by local residents would be increased.”

However, we thought that one of the overall aims for the N.T.A. , and I quote from one of its own statements, is about discouraging and reducing car traffic:

“ Cars will have to take longer journeys to facilitate other road users.”

Isn't this the aim i.e. to encourage more people to make way for public transport ? We thought that cars' having to give way to buses was part of the raison d'être for Bus Connects , is it not? Yet, now with the two reasons stated above for opting for the Two-Way System it seems that the N.T.A. wants to ensure that car users (we are only talking about local traffic here) are not inconvenienced by increased journey times and the Authority also does not want to have to consider alternative traffic management.

The N.T.A. would rather knock down the mature trees and plough a four-lane road through a village and carve up gardens (with CPOs) at enormous expense rather than inconvenience car users!

These two reasons cited for proposing the Two-Way Option need further interrogation.

The One-Way Option deserves reconsideration.

4/ Why Widen in the First Place?

A Final Point in response to our query re. the Destruction of the Tree Canopy for Another Cycle Lane

In our submission, we pointed out that the cyclists in the area do not obey any rules and constantly use the footpath outside our house to cycle in both directions and will continue to do so when the new road is constructed. It is fictional to imagine that they will go looking for an alternative detour onto Lorcan Rd.. In response , the N.T.A. acknowledges that some cyclists will want to continue to use the Swords Rd. and I quote:

“It is acknowledged that some experienced cyclists may choose to continue to cycle up the main road however the quiet street provides an option to make cycling more accessible to the less confident cyclist.”

So, it seems that the Tree Canopy will be destroyed and a cycle lane will be created up Lorcan Rd. simply to be used by a handful of amateur cyclists regardless of the reality on the ground. It would be much more sensible to acknowledge defeat on this one and go with the reality

i.e. provide for a designated cycle lane on the Swords Rd. by choosing the One-Way Option.

END

Date: 8th Feb. 2024

Sully *Rosalea Sully*