

An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough Street
Dublin 1
D01 V902

Dublin, 10-05-2022

RE: Objection to Application for Approval of a Proposed Road - CLONGRIFFIN TO CITY CENTRE CORE BUS CORRIDOR SCHEME – at Artane Cottages Lower, by the National Transport Authority, Case Ref. HA29N.313182

Dear sir, madam,

as residents and owners of properties on Artane Cottages Lower, Malahide Road, Dublin 5, we would like to submit our strong objection to the location of a new bus stop in front of the terrace of houses at Artane Cottages Lower as part of the proposed development above.

1. Physical Context – Artane Cottages Lower

The terraced single storey houses on Artane Cottages Lower (approx 140m length) are the oldest remaining buildings on this stretch of Malahide Road (dating back to the mid to late 1800s). They were built as smallholdings for tenants by Dublin Corporation and are the only visible remnants of Artane's history as a village on the outskirts of Dublin. They are now unique along the length of the above scheme, in their situation directly on the road, without the benefit of front gardens.

All houses apart from no. 10 (now a two-storey mixed use building of shops with apartments over) remain in residential use, and are suffering from severe noise, air and light pollution due to the high volume of traffic on Malahide Road, as well as from the lack of privacy due to high footfall along the footpath.

The EIA associated with the above application by the NTA to An Bord Pleanála identifies the terrace as being of “*medium regional significance*” (refer EIA Appendix A16.2 p. 30) and finds that the proposal as submitted will cause negative long-term impact (refer fig. 1). We note that Artane Cottages Lower are the only “Other Structures of Architectural Heritage Interest” (EIA, Chapter 16.4.4.4) negatively impacted along the entire scheme:

“1-12 Artane Cottages Lower (CBC0001BTH013) where a new bus-stop is proposed in front of numbers 5 and 6, and cantilevered signals are proposed controlling the junction opposite Number 9. The cottages are of Medium Sensitivity. The proposed new structures will have an adverse visual impact on the setting of the terrace, the magnitude of which is Low. The potential Operational Phase impact is Negative, Slight and Long-Term.”

We do not share the EIA's assessment that the impact is slight. The further impact (beyond architectural heritage) on residential amenity is not reflected anywhere in the EIA, and it is not demonstrated how the NTA intends to mitigate against the negative long-term impact. The impact on residential amenity is direct, severe and long-term if the proposed bus stop is implemented in its currently proposed location and form.

The architectural integrity of the terrace at Artane Cottages Lower is under threat already due to the pressures of a busy arterial road on what historically were rural cottages. The lack of effort on the side of the NTA as applicant to mitigate issues identified in the Architectural Heritage Impact Assessment (fig. 1) shows a lack of respect for architectural heritage.

The bus stop increases pressures on those properties further and undermines efforts by the undersigned residents to maintain the houses occupied and in their original character. We call on the NTA to improve the residential amenity for residents at Artane Cottages Lower, and to work with the residents during the implementation phase to lessen the impact that even a revised scheme that relocates the bus stop away from the terrace would have on the buildings and their occupants (refer section 4).

Section	Assessment Topic	Feature Sensitivity	Impact Magnitude	Impact Significance
Mayne River Avenue to Gracefield Road (Malahide Road)	Santry River CA	Regional importance, Medium sensitivity	Medium	Indirect, Positive, Moderate, Long-Term
Gracefield Road to Marino Mart / Fairview - Malahide Road	CBC0001BTH013 1-12 Artane Cottages Lower	Regional importance, Medium sensitivity	Low	Indirect, Negative, Slight, Long-Term
	NIAH 2433 Designed Landscape - Artane Castle	Regional importance, Medium sensitivity	Low	Indirect, Neutral, Slight, Long-Term
	NIAH 50130252 Our Lady of Consolation, Donnycarney Church	Regional importance, Medium sensitivity	Medium	Indirect, Positive, Moderate, Long-Term
	CBC0001BTH017 Alley Cottages	Local importance, Low sensitivity	Low	Indirect, Positive, Slight, Long-Term
	NIAH 50120122 Electricity sub-station, Clontarf Road	Regional importance, Medium sensitivity	Medium	Indirect, Positive, Moderate and Long-Term.

Fig 1 - EIA Chapter 16 Architectural Heritage, 16.4.4.5 Summary of Potential Operational Phase Impacts, table 16.18, p. 35

2. Preferred Route Option development history

The scheme has been re-designed multiple times during its public consultation stages, leading up to the submission to An Bord Pleanála now.

We welcome that the Bus Connects preferred route was re-designed between public consultations 1 and 2 to maintain the footpath outside Artane Cottages Lower (the only buffer between the road and the houses), including the added distance to the carriageway by virtue of the segregated cyclepath,

and to introduce cycle / foot paths on the green verge on the (northbound) western side of the road.

"It is important to note that existing bus stops located along the Core Bus Corridors will have been subject to considerable thought by Bus Operators, An Garda Siochana, and the Local Authority. For this reason, it is imperative that each location is closely examined before it is considered for relocation or removal." (Preliminary Design Report, Appendix H, p.1)

In the development of the Preferred Route Options, there is no evidence of such careful consideration prior to proposing the removal of 2no. bus stops directly north and south to the now proposed location:

The bus stop Danieli Road (1219) was removed prior to consultation 1. Between consultations 1 and 2, a previously revised bus stop Killester Avenue (1220) was removed, both crucially without replacement or an amalgamated new stop north or south of map 15, refer fig. 2 and 3.

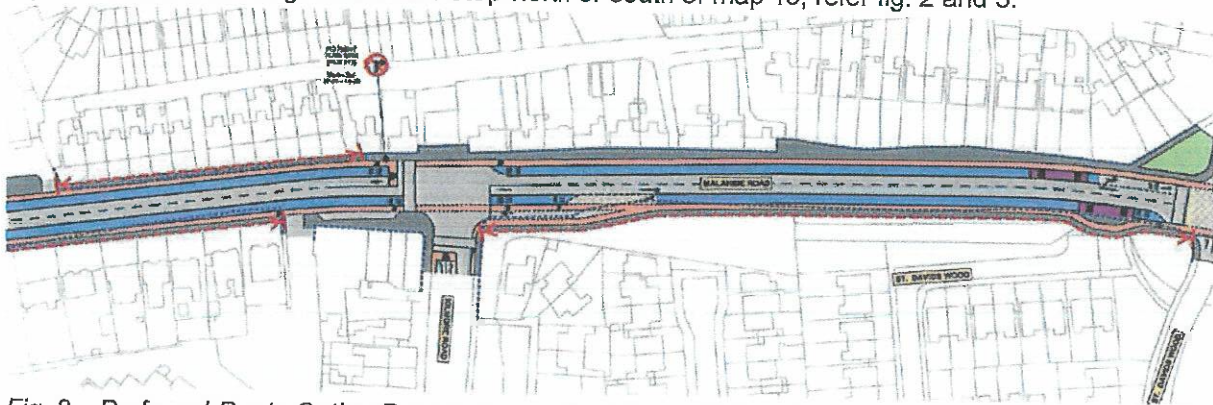


Fig. 2 – Preferred Route Option Report, Appendix G (consultation 1), map 15 (extract)

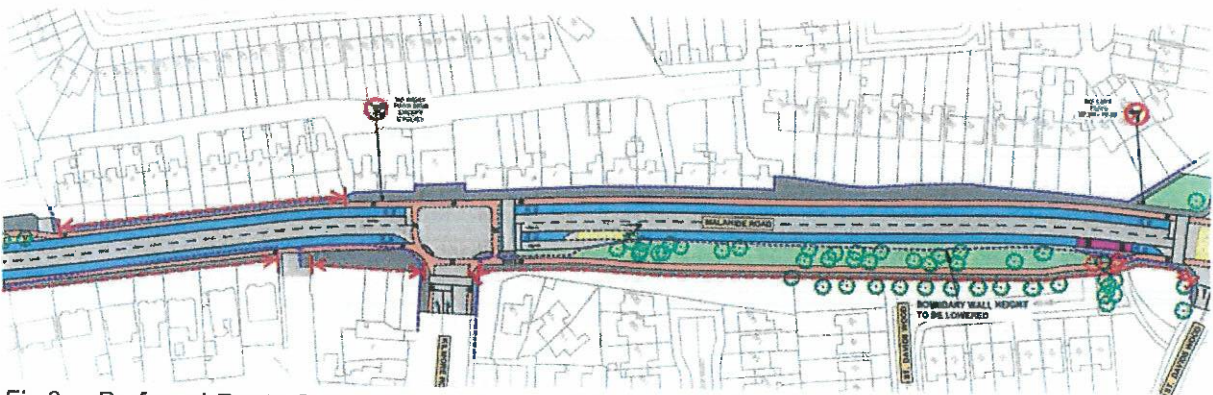


Fig 3. – Preferred Route Option Report, Appendix H (consultation 2), map 15 (extract)

Between consultations 2 and 3, the scheme was fundamentally re-designed between Kilmore Road and Killester Avenue to include a new bus stop at Artane Cottages Lower. This however is only apparent in the detailed drawings (refer fig. 4).

The written report, which is the primary document for any non-technical person, does not mention those changes. The public consultation brochure for consultation 3 (Preferred Route Option Report, Appendix I) is in fact grossly misleading in its summary at 4.4 Gracefield Road and Clontarf Road–Malahide Road, and 4.5 Key Changes. While the proposal is described in apparent detail in these sections, none of them mention an additional bus stop at Artane Cottages Lower.



Fig. 4 – Preferred Route Option Report, Appendix I (consultation 3), map 15 (extract)

Elsewhere in the submitted documentation, stops Danieli Road (1219) and Killester Avenue (1220) are listed as being removed "due to proximity with the new Kilmore Road Stop". (Preliminary Design Report, Appendix H, p. 44 of 52, Location Review). As demonstrated above, this is factually incorrect and again misleading, as the new Kilmore Road Stop was only introduced retrospectively in advance of consultation 3, while the other stops had been removed prior to consultations 1 and 2 respectively.

"Where existing bus stops on a route are in close proximity to each other they may be amalgamated into a single stop. This must be assessed on a case-by-case basis." (Appendix A4.1 - Preliminary Design Guidance Booklet for BusConnects Core Bus Corridor, section 11. Bus stops)

No such assessment has been made public, and no details of alternative proposals are available. Neither had the previous omissions of stops 1219 Danieli Road and 1220 Killester Avenue triggered an amalgamated new stop until after consultation 2. It is also worth noting that in the revisions of the Preferred Route Options up to consultation 3, no other bus stops were added or removed anywhere along the line, with only minor adjustments or re-locations made to some stops.

We maintain that such a major and impacting change should have been highlighted in consultation documents and directly to the impacted residents. This has not happened, and it could be understood that the omission of such a relevant detail in the written report may have been intentional to avoid complaints or objections.

Despite this, there have been multiple observations at consultation 3 of residents noting the unacceptable design and location of the bus stop (refer Preferred Route Option Report, Appendix C, p. 46-48), none of which have been addressed in the submitted proposal.

The final drawings lodged with the application (refer fig. 5) are broadly in line with consultation 3, with an apparent slight improvement on the footpath width at Artane Cottages Lower (which had silently been narrowed again between consultations 2 and 3), and further detail shown at the bus stop, refer to item 3 of this submission.

While some barriers to permeability as above exist in this stretch of Malahide Road (St. David's Wood and Pinebrook Road residential estates), the NTA is not addressing these in their scheme. The proposed location of the bus stop outside Artane Cottages Lower addresses none of the issues above.

If instead – as it might be assumed due to the lack of clarity of the NTA document – “permeability” here means that bus stops should not be too closely spaced together to allow for better traffic flow, the spacing of bus stops along the scheme must be compared, refer 3.1.
 If it means that any bus stop in this section must be south of the junction with Kilmore Road to accommodate bus routes along Kilmore Road and Malahide Road converging, alternatives are available, refer 3.4

3.1. Bus stop distances along Clongriffin scheme

It is reasonable to assume that distances between bus stops on a bus corridor should be roughly evenly spaced to ensure equal access for residents to the infrastructure.

Refer to the table by the NTA below (Fig. 6) with existing and proposed distances between bus stops, with relevant bus stop and adjacent stops to north / south highlighted:

Table 4-6 Clongriffin to City Centre Bus Stop Summary

Inbound							
Existing				Proposed			
No.	Bus Stop No.	Chainage	Distance between Stops (meters)	No.	Bus Stop No. / Location	Chainage	Distance between Stops (meters)
1	4563	A3375	N/A	1	4563	A3375	N/A
2	1218	A3675	300	2	1218	A3675	300
3	1270	A4100	425	3	1270	A4025	350
4	1272	A4600	500	4	New	A4440	415
5	1201(1273 GA)	A4925	325	5	1272	A4790	350
6	1274	A5225	300	6	1274	A5225	435
7	1199	A5675	450	7	New	A5475	250
8	1276	A5825	150	8	1276	A5805	330
9	1277	A6125	300	9	1277	A6125	320
10	1219	A6350	225	10	New	A6575	450
11	1220	A6725	375	11	1221	A7025	450
12	1221	A7025	300	12	664	A7375	350
13	664	A7375	350	13	665	A7675	300
14	665	A7675	300	14	666	A7975	300
15	666	A7975	300	15	667	A8275	300
16	667	A8275	300	16	668	A8700	425
17	668	A8700	425				
		Average Distance:	333			Average Distance:	355

Fig. 6 - Preliminary Design Report main report, 4.13.1 Bus Stop Summary

It is worth noting that the existing distances at the impacted stops (375m and 300m respectively) are within the range of other stop, and could conceivably just be maintained, possibly with an adjustment

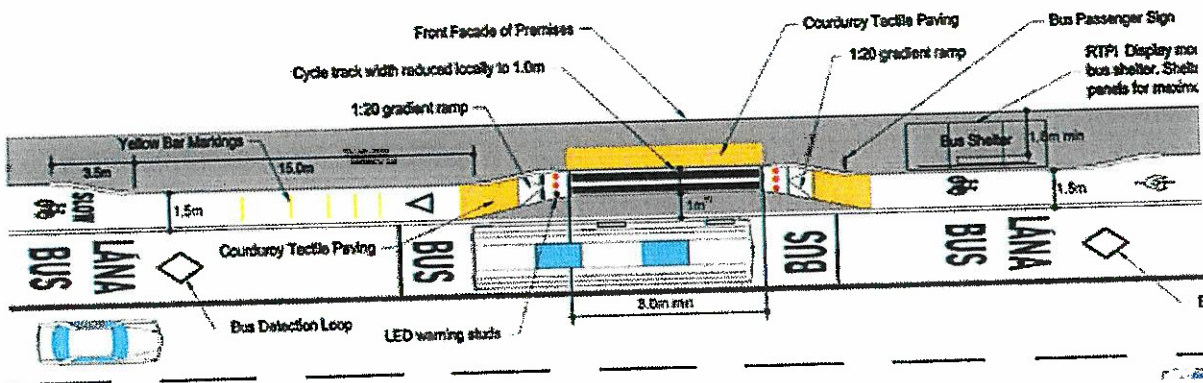


Fig. 8 – EIA Appendix A4.1 - Preliminary Design Guidance Booklet for BusConnects Core Bus Corridor, figure 36: Shared Bus Stop Landing Zone Arrangement (Urban Centres)

"In particularly constrained locations within urban centres, where the provision of a bus shelter at the rear of the footpath is not possible due to the presence of frontages, a variation of the Shared Bus Stop Landing Zone arrangement may be considered. This option is presented in Figure 36. This option provides a cantilever bus shelter adjacent to the carriageway, to maintain access to frontages at the back of the footpath." (11.2 Shared Bus Stop Landing Zone)

The design in fig. 36 of Appendix A4.1 (here Fig. 8) is quoted as being permissible only in "particularly constrained" situations within "urban centres", which implies it would be outside commercial premises. While the footpath at nos. 5 & 6 Artane Cottages Lower certainly is extremely constrained, there are alternative locations within 65m south or 190m north which are not, refer section 3.4. The site is not located within an urban centre, not even within a suburban one.

Please also note that while the overall dimensions shown in Fig. 8 were used in the proposed stop at nos. 5 & 6 Artane Cottages Lower, the design guidelines at fig. 36 crucially still include a bus shelter close to the stop – bus stops without bus shelters, as proposed at Artane Cottages Lower, are not considered appropriate anywhere in the NTA's own design guidelines. Note that the proposed layout at Artane Cottages Lower also does not follow through on the NTA's commitment to retain the full depth (3.5m) of the existing footpath.

The application of a compromised version of the lowest grade design for the proposed bus stop should therefore be considered unacceptable by An Bord Pleanála.

The NTA in-house design guidelines are problematic also in that they contravene their own National Cycle Manual, which does not allow for cycle tracks less than 1.25 metres wide. (refer "BusConnects team refers to guidance that doesn't support it to justify cycle track narrowing to 1 metre at some bus stops", 13-02-2022, Cian Ginty, last accessed 22-04-2022 at <https://irishcycle.com/2022/02/13/busconnects-team-refers-to-guidance-which-doesnt-support-it-to-justify-cycle-track-narrowing-to-1-metre-at-some-bus-stops/>)

In addition to this, the compromised bus stop design contravenes Irish Wheelchair Association guidelines "Best Practice Access Guidelines Designing Accessible Environments" (Nov 2020, p.70):
"4.2.3 Public Transport Interface
Bus and tram stops should be located on or adjacent to pavements and should be readily and easily accessible to transport users without the person having to cross cycle tracks. The developing practice of diverting cycle tracks around bus or tram stop locations is not recommended as the bus or tram stop then becomes located on an island bounded by a carriageway and a cycle track. This practice is

considered dangerous to pedestrians and particularly to vulnerable pedestrians.

(...) The vehicle boarding area should have a minimum 2000 x 2000mm clear area, (...)."

It is worth noting that the Island Bus Stop Arrangement (fig. 7) as per NTA guidelines allows for these dimensions, but not the applied compromised Shared Bus Stop Landing Zone Arrangement (fig. 8).

The above clearly demonstrates that embarking / disembarking of the bus (at all bus stops along the route designed in line with fig. 8 above) will not be possible without an increased risk of accidents between pedestrians / wheelchair users and cyclists. In a physically constrained location as at Artane Cottages Lower, any such accident would occur less than 3m from the front elevations of single storey residential property.

It also does not provide adequate accommodation for the likely numbers of people waiting for busses during rush-hour, which would result in queues blocking the cycle path and foot path, with a higher likelihood of people using window cills of the properties on Artane Cottages Lower as seating than already is the case.

All local bus users would in this proposal receive a lesser service than at present, by removing two bus stops with shelters providing seating and protection from weather, and replacing it with just a section of shared path. This is an inclusion and disability issue for all local bus users.

3.3. Compromised proposed location

"The basic criteria for consideration when locating a bus stop are as follows: (...)

- Where there is space for a bus shelter; (...)*
- Adequate footway width."*

(Preliminary Design Report main report, p. 45)

"(...) the size of the stop needs to be sufficient to meet the expected passenger and bus demand, and the bus stop itself must not become a bottle neck to the operation of the corridor.(...)

(The Preliminary Design Report, Appendix H, p.1)

Even though the NTA criteria are extremely limited in that they only consider the physical constraints and traffic planning, we demonstrate in our submission that the proposed bus stop location is in contravention to NTA's own criteria, in addition to comments at 3.1 and 3.2. above.

The proposed bus stop is the only one along the entire length of the Clongriffin to City Centre bus corridor scheme located in front of residential property without front gardens, and does not provide space for a bus shelter, nor does it provide adequate footway width to accommodate even a compromised stop.

The residents of Artane Cottages Lower are already dealing with privacy issues due to the proximity of the footpath, such as people shouting outside the (bedroom) windows, knocking on windows and sitting down on window cills. These concerns are not taken into account. However, a scheme in this constrained situation that - if successful - will increase the number of bus users, will worsen the situation, especially for properties without any possibility to privately react to this negative impact, is unacceptable:

It is not an option here to densely plant a front garden or erect a tall gate and boundary wall to the front. Bedrooms and living rooms open out directly onto the footpath, often with the only window. It is the duty of the local authority and the National Transport Authority to protect such properties and their

residents and if possible improve their amenities, or at least not worsen the arrangement. We note that none of the Impact Assessments submitted with the application take note of this severe, ongoing negative impact.

The bus stop is located less than 25m from the proposed controlled pedestrian crossing to Kilmore Road, at a junction where two bus lines (from West on Kilmore Road, from North on Malahide Road) converge. This will likely lead to busses backing up north and west of the junction, which in turn will lead to busses backed up in front of nos. 7, 8 and 11 Artane Cottages Lower, resulting in increased noise and air pollution, as well blocking out light to those properties. This appears contrary to proper traffic planning and will further reduce residential amenity of the entire terrace, and constitutes a bottle neck along the bus corridor.

In this context, **we object also to the local narrowing of the footpath at the junction to accommodate a right turn hold for the cycle path** (refer Preliminary Design Report, Appendix L, p. 40 of 68) – the proposed layout leaves less than 1.8m footpath, compared to currently approx 3.5m, directly in front of the front door of no. 9 Artane Cottages Lower. This is in direct contravention to the commitment by the NTA to retain the full width of the footpath. In addition to undue increased pressure on the residential amenity of no. 9, it also diverts any pedestrian footfall closer to the front elevations to the terrace than a continuous 3m wide footpath would do. Any right turn arrangement for inbound cyclists onto Kilmore Road could conceivably be accommodated at the much wider footpath in front of no. 10 Artane Cottages Lower, allowing for example a two-way cycle lane on the northern and western arm of the junction, or a revised cycle crossing layout on the southern arm.

Note: this issue is independent of a relocation of the bus stop as argued elsewhere, and should therefore be identified by way of a separate condition by An Bord Pleanála.

3.4. Alternative locations

As demonstrated above, the proposed design and location is of a lesser quality than both stops 1219 and 1220 currently.

The proposal effectively replaces two bus stops in front of wide footpaths and front gardens (1219: 14m footpath in front of commercial property, 1220: 5m footpath plus 14m front garden to residential property) with one bus stop with a 3m foot path outside residential properties without front gardens.

Both at the terrace of commercial properties at 25a-g Malahide Road (stop 1219 previously outside 25G Malahide Road) and at 276 – 302 Malahide Road (stop 1220 previously outside 282 / 284 Malahide Road), there would be sufficient depth of the footpath / public realm to introduce island bus stops fully in line with the stated preferred NTA bus stop design, refer fig. 7.

A revision of bus stop 1219 south by approx. 30-50m to in front of 25a Malahide Road would bring the distance Mornington Grove 1277 to Danieli Road to longer than 250m. In this scenario, stop 1220 could be retained in its current location, and all distances southbound would be within the proposed range as at 3.1.

If it was not deemed feasible to retain stops 1219 and 1220, the proposed new stop could be relocated: The footpath widens a mere 65m south of the proposed bus stop, at nos. 302 / 300 Malahide Road, to approx. 8m deep. The properties here have front gardens in excess of 15m depth. The location would allow for adequate detailing of the bus stop (again fully in line with details in fig. 7) and appropriate congregation space for people waiting for busses. This, possibly in tandem with a

relocation of stop 1277 south towards Danieli Road, would achieve acceptable distances comparable to the proposed.

"Another important aspect of bus stop positioning is proximity to pedestrian crossings. Failure to provide high quality pedestrian facilities on the pedestrian desire line may lead to a higher accident risk associated with a bus stop. Therefore, designers need to consider how passengers are going to cross the road to get access to the stop, in general this will require bus stops to be located close to safe crossing points." (Preliminary Design Report, Appendix H, p.8)

The NTA proposal at Artane Cottages limits its considerations only to absolute proximity to the pedestrian crossing. As above, if the stop was located 65m further south where the footpath widens, the only pedestrian desire lines would be straight north towards Kilmore Road (towards the pedestrian crossing) and south towards Killester Avenue, as there is no permeability directly opposite to the west into St. David's Wood and Pinebrook Road residential estates (as noted before, there is no proposal by the NTA to improve permeability here).

The minimal improvement with regard to proximity to the crossing is disproportionate to the negative impact on Artane Cottages Lower and the bad bus stop design (refer section 3.2. of this submission).

The NTA proposes multiple bus stops with distances in excess of 50m to the nearest pedestrian crossing, and only stops in excess of 100m from a junction (refer Kilmore Rd outbound, Preliminary Design Report, Appendix L, p. 40 of 68) were relocated to be in line with the criteria (refer Preliminary Design Report, Appendix H (Bus Stop Review Methodology), p. 42-46 of 52 Location review). A relocation of the contested bus stop outside Artane Cottages Lower to 302 / 300 Malahide Road could still remain within the 100m distance.

4. Request for direct engagement with residents during implementation phase

We note that there is no commitment evident by the NTA to engage directly with residents during the implementation phase of the bus corridor scheme. We would ask An Bord Pleanála to include a condition with any decision on the overall scheme to require formal engagement with relevant resident groups to finalise details along the route.

The undersigned are in the process of setting up a residents' association for Artane Cottages Lower. The NTA must engage with the residents (via the residents' association) of Artane Cottages Lower to clarify the proposed design, beyond the above requested relocation of the bus stop away from Artane Cottages Lower:

4.1. proposed works to the northern gate

Clarification is required on the proposed works to the northern gate accessing the rears of Artane Cottages Lower. While we do not object to the CPO issued in this context, it is unclear in the documents how the NTA undertakes to re-instate the gate – a new gate will be required in a new location (as the purchased area encroaches on the existing location of the gate), at cost of the NTA and to detail agreed with the residents.

4.2. proposed detail junction to existing buildings

Clarification is required as to the proposed detail junction of the new footpath with the brick front walls of the terrace – the current concrete footpath is badly detailed and is poured directly against the brick walls, which leads to ongoing damage to the historical building fabric in that it leads to drainage issues, excessive rising damp and to unacceptable levels of impact

sound transfer. This needs to be addressed in the detail plans by the NTA, including a physical separation between concrete and brick walls, and a French drain below ground.

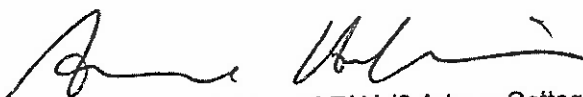
4.3. proposed access to residential parking

Clarification is required as to the proposed access to residential parking for Artane Cottages Lower. Vehicular access to the rear lane is primarily via the southern gate between nos. 3 and 4 Artane Cottages Lower. The manual gate at this location requires any vehicle looking to access the rear lane to pull up on the footpath in order to open the gate, with a risk of obstruction to the proposed cycle and bus lane. Therefore, most residents parking currently is via informal parking on the footpath. This arrangement needs to be formalised either into residents permit parking (1 space per house, with planted areas in between), or into improvements to the access to the rear lane during the implementation phase, e.g. via motorised gate.

Likewise, the NTA must undertake to not install any bollards between cycle path and bus lane outside Artane Cottages Lower, as this interferes with short-term deliveries and maintenance access to the properties.

We trust that you will consider the points above and see the necessity to revise the proposed bus stop location and the overall junction design, and will instruct the applicant to revise their design to omit any bus stop outside any of the properties at Artane Cottages Lower.

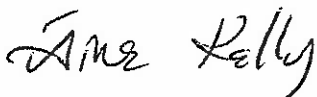
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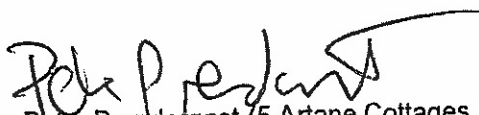
Anna Hofheinz dipl.ing. M.RIAI (8 Artane Cottages Lower)



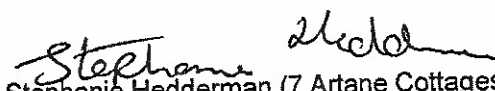
Pawel Jaskowski (8 Artane Cottages Lower)



Aine Kelly (5 Artane Cottages Lower)



Peter Prendergast (5 Artane Cottages Lower)



Stephanie Hedderman (7 Artane Cottages Lower)

Margaret Radford
Margaret Radford (7 Artane Cottages Lower)

Laura Meaney
Laura Meaney (11 Artane Cottages Lower)

Gerard Whelehan
Gerard Whelehan (11 Artane Cottages Lower)

Patricia Walsh
~~Patricia Cotter~~ (6 Artane Cottages Lower)
WALSH

Paul Cotter
Paul Cotter (6 Artane Cottages Lower)

Derek Mahony
Derek Mahony (3 Artane Cottages Lower)

Sophie Mahony
Sophie Mahony (3 Artane Cottages Lower)

Dessie Kiernan (9 Artane Cottages Lower)

Desmond Kiernan

