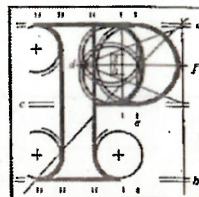


Our Case Number: ABP-313182-22



An
Bord
Pleanála

Deborah Byrne
[Redacted]
[Redacted]
[Redacted]

Date: 20 June 2023

Re: BusConnects Clongriffin to City Centre Core Bus Corridor Scheme
County Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

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

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

CH08

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Niamh Thornton

From: SIDS
Sent: Friday 9 June 2023 12:56
To: Niamh Thornton
Subject: FW: APB-313182-22: BusConnects Clongriffin to City Centre CBC Scheme - Submission on the NTA Response of 21st July 2022
Attachments: APB-313182-22 submission.docx

From: D Byrne [REDACTED]
Sent: Friday, June 9, 2023 12:17 PM
To: SIDS <sids@pleanala.ie>
Subject: APB-313182-22: BusConnects Clongriffin to City Centre CBC Scheme - Submission on the NTA Response of 21st July 2022

APB REF. NO.: APB-313182-22
SCHEME: BusConnects Clongriffin to City Centre Core Bus Corridor Scheme
NAME & ADDRESS: Deborah Byrne, [REDACTED]

Dear Sir/Madam,

Thank you for your letter dated 1st June 2023 inviting me to make a submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the National Transport Authority submission of 21st July 2022.

I attach my submission here in email format. This submission supersedes that which I sent on 7th June by email to bord@pleanala.ie - please disregard the earlier submission. I would be grateful if you could acknowledge receipt of this email.

Please let me know if you have any issues accessing the attachment, or if anything else is not in order.

Many thanks.

Kind regards,
Deborah Byrne

APB REFERENCE NO.: APB-313182-22
NTA SCHEME NAME: BusConnects Clongriffin to City Centre Core Bus Corridor
Scheme - Proposed New Link to Ayrfield Drive
NAME AND ADDRESS: Deborah Byrne, [REDACTED]
DATE: 8th June 2023

Dear Sir / Madam,

Thank you for your letter dated 1st June 2023 inviting me to make a submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the National Transport Authority submission of 21st July 2022.

Please find my observations below, included under the headings used by the NTA in their response to the sixty-four submissions made in respect of the proposed development at Ayrfield Drive.

For reference purposes, I have also included extracts from the NTA submission in red italics.

I. NEED FOR NEW LINK NOT ADEQUATELY INVESTIGATED

Summary of Issue

All of the submissions stated that the residents of Ayrfield Drive did not want the new link, with some stating their objection to the associated CPO. The submissions questioned why it was being proposed and also expressed the view that there had been inadequate investigation of the proposal. Some submissions stated the opinion that omitting the link would have no adverse impact on the Proposed Scheme as a whole and no adverse impact on the effectiveness of the scheme. Other submissions expressed the view that the existing accesses to Tonlagree Road and Blunden Drive were sufficient and stated that any perceived inconvenience of not having the proposed link was outweighed by other issues. Some submissions commented that the existing layout of the estate remains an appropriate arrangement.

Response to Issue

Existing Data

Section 10.3.2.3 of EIAR Chapter 10 provides data on the method of travel to work for each of these community areas and the results are presented in Table 10.5 of that section, which is shown in Figure 2.1.5 above.

OBSERVATION:

- The data which the NTA is using to determine the method of travel to work of the residents of Ayrfield is out of date, having been generated in 2016.
- The percentage of residents working from home is now far higher than it was in 2016, in large part due to the change in working habits established during the covid

pandemic, so the 2016 census data as it relates to the method of travel to work is no longer relevant.

- In any case the method of travel to work is not a reliable metric of overall private or public transport use. The NTA study should not have focused on a single cohort of residents (the employed) but rather on all cohorts including school children, the unemployed, retirees, etc. Additionally, the NTA should not have focused on a single use for car journeys (getting to work) but should have considered instead a range of uses (e.g. social, recreational, care provision, shopping, etc.)
- Contrary to the report's suggestion that 'This data suggests that the prevalence of private car journeys within Ayrfield may be linked to poorer access to public transport / walking & cycling facilities', the data does not in any way explain how the prevalence of private car journeys within Ayrfield is related to access to public transport, walking and cycling facilities.

International Policy, EU Law & Policy

The proposed link from Ayrfield Drive will support and encourage growth in active travel and sustainable public transport usage

OBSERVATION:

- There has been no evidence presented by the NTA that the proposed link from Ayrfield Drive to the Malahide Road will support and encourage growth in active travel and sustainable public transport usage, and no qualitative or quantitative data has been provided by the NTA to support this assertion. For example, many of the residents of Ayrfield use the nearby dart service rather than the bus service so the proposed link will have no impact on their public transport use.
- The question might be asked as to whether the NTA has surveyed the residents of Ayrfield as to their current usage of public transport and their theoretical usage if the proposed link were developed - if such a survey has been conducted by the NTA then I have not been invited to participate as a resident of Ayrfield Drive.

National Policy

The proposed link to the Ayrfield estate will help facilitate a modal shift from car usage to sustainable transport (active travel and public transport).

OBSERVATION:

- The previous observation is reiterated here as the NTA is effectively repeating the same points: there has been no evidence presented by the NTA that the proposed link from Ayrfield Drive will facilitate a modal shift from car usage to sustainable transport support and encourage growth in active travel and sustainable public transport usage. Please see the above point on the lack of quantitative and qualitative data to support this assertion e.g. a survey of residents.

As well as providing a link for pedestrians to the new bus stops on the Malahide Road, the new cyclist link will connect the estate to the enhanced cycle tracks along the Malahide

Road. This will help reduce dependency on private car use for short journeys, with an associated shift to active travel and public transport.

OBSERVATION:

- The previous observation is reiterated here as the NTA is effectively repeating the same points: there has been no evidence presented by the NTA that the proposed link from Ayrfield Drive will help to reduce dependency on private car use for short journeys, with an associated shift to active travel and public transport. Please see the above point on the lack of quantitative and qualitative data to support this assertion e.g. a survey of residents.

The proposed link from Ayrfield Drive connecting to the new bus will make the bus transit experience more accessible for users of all abilities and ages. Provision and enhancement of cycling facilities along the Proposed Scheme, creating routes that are safe, accessible and attractive for people of all abilities and ages.

OBSERVATION:

- The Malahide Road can already be easily accessed via Blunden Drive to the north of Ayrfield - via St. Paul's Church grounds for pedestrians and cyclists, and via Slademoor Avenue for all traffic; and also via the Tonleeg Road to the south of Ayrfield - via the road itself and also via an additional path which runs between the Odeon cinema and the Santry River.
- The Malahide Road is a busy dual carriageway with a lot of fast-moving traffic, the volume of which will only increase in line with the significant increase in residential development which is currently taking place alongside it. From a public safety viewpoint, it is preferable to continue to direct pedestrians and cyclists out of the estate via the existing egress routes, that is, via the Tonleeg Road to the south, via Blunden Drive to the north, and via Slademoor Avenue to the east, all of which are much quieter roads with far less traffic.

The proposed link aligns with the goal as it will promote a viable modal shift from private car to a more sustainable forms of transport. It enhances active travel networks and thus encourages the use of these modes reducing reliance on the private car

OBSERVATION:

- The previous observation is reiterated here as the NTA is effectively repeating the same points: there has been no evidence presented by the NTA that the proposed link from Ayrfield Drive will help to reduce reliance on the private car. Please see the above point on the lack of quantitative and qualitative data to support this assertion e.g. a survey of residents.

The proposed link supports Climate Action Plans by enhancing permeability, as well as connecting to high quality cycling routes along the CBC which will encourage greater uptake of active travel from the Ayrfield estate. The proposed link to Ayrfield Drive provides improved connectivity to the public transport system for the residential estate and has the

potential to reduce CO2 emissions through the removal of unnecessary car trips from the road network and contribute towards the national target 500,000 additional trips by walking, cycling and public transport per day by 2030.

OBSERVATION:

- There has been no evidence presented by the NTA that the proposed link from Ayrfield Drive will encourage greater uptake of active travel from the Ayrfield estate or will remove unnecessary car trips, please see the above point on the lack of quantitative and qualitative data to support the NTA assertion.
- Permeable neighbourhoods can attract strangers into an area which can lead to anonymity and distrust within neighbourhoods, and people who feel threatened tend to constrain their physical and social activities. Increased permeability could lead to less uptake of active travel by residents of Ayrfield or a greater inclination to drive instead of walking or taking public transport to avoid anti-social activity.
- If the NTA is concerned with the Climate Action Plan it should give careful consideration to the development of a green space at a time of a climate and biodiversity crisis, particularly one which is situated within such a built-up area and close to such a busy dual carriageway.

Regional Policy & Local Policy

OBSERVATION:

- The same comments as the above are repeated by the NTA and therefore the same observations apply.

Scheme Objectives

OBSERVATION:

- The same comments as the above are repeated by the NTA and therefore the same observations apply.

Existing Access to Sustainable Travel

As shown in Figure 2.1.9 and Figure 2.1.10 below, Image 2.4 from EIAR Chapter 2 Need for the Proposed Scheme provides an overview of the existing combined activity density scenario along the length of the of the Proposed Scheme. This identifies the Ayrfield Drive catchment as a medium density location based on the 2011 census data.

OBSERVATION:

- I would be concerned that the NTA is using 2011 census data to determine population density in the area for the purpose of analysing the sustainability of travel as there has been a significant amount of residential development along the Malahide Road in the twelve years since the 2011 census was taken.

Section 10.3.2.3 of EIAR Chapter 10 provides data on the method of travel to work for each of these community areas and the results are presented in Table 10.5 of that section, which is shown in Figure 2.1.5 above.

OBSERVATION:

- The data which the NTA is using to determine the method of travel to work of the residents of Ayrfield is completely out of date, having been produced in 2016.
- The percentage of residents working from home is now far higher than it was in 2016, in large part due to the change in working habits established during the covid pandemic, so the 2016 census data as it relates to the method of travel to work is no longer relevant.
- In any case the method of travel to work is not a reliable metric of overall private or public transport use. The NTA study should not have focused on a single cohort of residents (the employed) but rather on all cohorts including school children, the unemployed, retirees, etc. Additionally, the NTA should not have focused on a single use for car journeys (getting to work) but should have considered instead a range of uses (e.g. social, recreational, care provision, shopping, etc.)

In comparison, as shown in Figure 2.1.11 below, the Ayrfield estate is enclosed by a continuous boundary wall between the properties in the estate and the Malahide Road. This prevents any direct access/egress other than at the existing points on Blunden Drive and Tonlegee Road

OBSERVATION:

- The access and egress points for vehicles, pedestrians and cyclists within the estate were purposefully designed and carefully chosen, after much deliberation, to provide the most appropriate point of access and egress to all residents while at the same time maximising public safety and minimising anti-social behaviour within the estate.

Overall need for the proposed pedestrian and cyclist link

The NTA document: Permeability in Existing Urban Areas Best Practice Guide 2015 is referenced in the Dublin City Development Plan, as set out in Table 2.9 of Section 2.3.5.1 of the EIAR Chapter 2, The Introduction to this on page 1 states that the policy guidance has been developed 'on how best to Clongriffin to City Centre Core Bus Corridor Scheme 37 facilitate demand for walking and cycling in existing built-up areas. This includes creation of linkages within the urban environment for people to walk and cycle from their homes to shops, schools, local services, places of work and public transport stops and stations.' The link proposed for Ayrfield Drive is a good example of this as the link and associated signalised crossing of the Malahide Road will provide a much shorter walk for residents to the established commercial and retail area on the western side of the Malahide Road.

OBSERVATION:

- The proposed link will also provide a shorter walk from the Malahide Road and the commercial and retail area on the western side of the Malahide Road into Ayrfield, greatly increasing the likelihood of anti-social activity in the estate, which, from the residents' viewpoint, far outweighs any advantage that the NTA is claiming to associate with increased permeability.

II. LACK OF CONSULTATION

Summary of Issue

Some submissions raised the issue of a lack of consultation, communication and engagement with residents, in particular those who believed their property is directly impacted by the Proposed Scheme. Others queried why the public consultation had been undertaken while government restrictions relating to the Covid pandemic were in place, and some commented that they had not had the opportunity to be involved in the consultation process.

OBSERVATION:

- There was no attempt by the NTA to ensure the residents of Ayrfield were aware of the Public Consultation meetings, for example by the distribution of leaflets to residents. I only became aware of the proposed development in April 2022 when a notice was erected on the site.
- The NTA response on the consultation tools lacks detail in relation to dates etc., but the proposal was not brought to my attention via any media channel or any other channel prior to my observation of the notice on the site.

III. POTENTIAL FOR INCREASE IN CRIME / ANTI-SOCIAL BEHAVIOUR / SECURITY / CHILD SAFETY AND PROTECTION FOR INCREASE IN CRIME / LOSS OF SECURITY

Summary of Issue

All of the submissions stated that they believed there was a risk of an increase in crime / public order offences and / or anti-social behaviour, including loitering, littering, illegal dumping, and riding of scramblers/motorbikes, as well as a loss of security, in the residential estate as a result of the new pedestrian and cyclist link between Ayrfield Drive and the Malahide Road as it would provide an easy route for criminals to quickly exit the estate. The majority of those making submissions stated that they believed that the inclusion of the new link would create a child safety issue with the potential for unsupervised children able to leave the estate and access the main road. Other submissions raised concerns about increased risk of child abduction and the stealing of pets.

Response to issue

Section 10.2.1 of the EIAR Chapter 10 Population, and Appendix A10.2 to Chapter 10, assesses the Economic Impact of the Core Bus Corridors, which includes consideration of the impact of transport infrastructure on criminal activity. The conclusion reached on page 25 is that "the new infrastructure improvements should have a direct and immediate impact on crime along the corridors. It will provide better, safer and more visible bus stops whilst also improving the wider public realm infrastructure through investments such as improved street lighting. This will act as a direct deterrent to criminal activity and result in a reduction in crime. This in turn has been shown to encourage people onto the streets into the evening which will also support the night time economy in community centres."

OBSERVATION:

- The use of the words 'direct' and 'immediate' are appropriate here, because while infrastructure improvements may result in a reduction in crime rates in the immediate vicinity of the bus stops on the Malahide Road corridor, there is no doubt that there will be an increase in crime, public order offences and anti-social behaviour, including loitering, littering, illegal dumping, and riding of scramblers and motorbikes, as well as a loss of security, in the estate of Ayrfield.
- Permeable neighbourhoods are more vulnerable to crime because better accessibility makes it easier for criminals to enter and escape. Additionally strangers are attracted into an area which can lead to anonymity and distrust within neighbourhoods.

Good infrastructure has also been shown to have a positive impact on levels of crime, particularly low level crimes such as theft and vandalism. There is evidence from a wide range of studies that redesigned public realm, especially those which are better lit and more visible, see significant reductions in the level of crime.

OBSERVATION:

- The relevance of this paragraph, and indeed much of this section, to the development of the proposed link is not clear. The visibility of the bus stops and the general lighting along the Malahide Road bus corridor can be improved whether or not the proposed link is approved.

A study from Los Angeles in the late 1990s discovered that the location and visibility of bus stops can have an impact on crime. Where bus stops were clearly visible, offered shelter to the user and were on streets with high levels of vehicle traffic, criminal activity was less common. In contrast, crime rates were found to be higher if the bus stop was at an intersection with an alley, next to off-licences, cashpoint services, vacant buildings or on street parking, or in areas where there was a lot of graffiti and litter

OBSERVATION:

- With reference to the line "In contrast, crime rates were found to be higher if the bus stop was at an intersection with an alley" – this point made by the NTA strengthens the argument that the throughway/alley which would be created by the proposed link could be the focal point of anti-social behaviour in the future.

The NTA document: Permeability in Existing Urban Areas Best Practice Guide 2015, referenced in the Dublin City Development Plan (as mentioned in response to issue i) supports this assessment. This policy guidance states that "a higher number of pedestrians and cyclists in housing estates and neighbourhood centres also changes the perception of a place in terms of safety. Passive supervision, the mere presence of more people, makes the place safer..."

OBSERVATION:

- I would question the assertion that "the mere presence of more people" makes a place safer, particularly in an urban context. The less densely populated areas of Dublin have less anti-social behaviour than the more densely populated areas, and for this reason are usually safer places to live.
- The NTA has not addressed the child safety issue. The Malahide Road is a busy dual carriageway with a lot of fast-moving traffic, the volume of which will only increase in line with the increased residential development which is currently taking place alongside it. There is a very real danger that young children from the estate could get hurt by traffic on this busy dual carriageway if pedestrian egress is permitted. The presence of more people will not deter a child from running out onto the busy Malahide Road and being injured or killed.

"If people have a higher tendency to walk and cycle around their neighbourhood, they are more likely to meet each other. Often it is these meetings which give a sense of community more than formal arrangements and a greater sense of community is often cited as a key requirement in addressing many anti-social behaviour problems in Irish urban areas." This is directly applicable to the proposed link to Ayrfield Drive for pedestrians and cyclists.

OBSERVATION:

- If the objective of the proposed link is to reduce the length of time the residents of Ayrfield spend walking or cycling to the Malahide Road then this point would appear to be contrary to that objective as stated.
- At the moment, residents enjoy walking and cycling in and around the estate because it is a quiet and safe neighbourhood, and the enclosed nature of the estate makes it more likely that neighbours will meet each other. The proposed link will attract strangers into the area which may lead to anonymity and distrust.
- People who feel threatened tend to constrain their physical and social activities, curtailing the health and social benefits of neighbourhood walkability, and fear of crime and anti-social activity can even discourage people from leaving their own homes.
- The National Transport Authority should be cautious about increasing neighbourhood permeability in an effort to promote neighbourhood walkability because personal safety is also essential to quality of life.

This Best Practice Guide also includes a case study from Dargle Wood, Knocklyon which is relevant to the new link to Ayrfield Drive... The Best Practice Guide also includes following

text provided by a local resident and member of the Residents Association Committee when discussing views amongst residents before implementation of the Dargle Wood Scheme: 'This green space has a long history of antisocial behaviour... drugs, alcohol abuse, loitering motorbiking etc. Residents thought that making the area more accessible and providing public lighting would worsen these problems and they opposed the project on these grounds.'

OBSERVATION:

- It cannot be assumed that just because increased permeability may have been beneficial in another area of Dublin that it will be beneficial to the residents of Ayrfield Drive. Contrary to the presented history of Dargle Wood, there is no anti-social behaviour on or near the green space on Ayrfield Drive at present.

IV. LOSS OF GREEN / COMMUNITY SPACE

Summary of Issue

The majority of the submissions objected to the loss of the green space which they stated is used daily by young children and families from within the estate, which provides benefits particularly for young children as the space is viewed as a secure and enclosed space.

Response to issue

As highlighted earlier, the NTA document: Permeability in Existing Urban Areas Best Practice Guide 2015, referenced in the Dublin City Development Plan (as mentioned in response to issue i) states that "a higher number of pedestrians and cyclists in housing estates and neighbourhood centres also changes the perception of a place in terms of safety. Passive supervision, the mere presence of more people, makes the place safer. By maintaining or creating links for pedestrians and cyclists, this enhanced safety can be provided".

OBSERVATION:

- I would question the assertion that "the mere presence of more people" makes a place safer, particularly in an urban context. The less densely populated areas of Dublin have less anti-social behaviour than the more densely populated areas, and for this reason are usually safer places to live.
- The NTA has not addressed the matter of the potential loss of security for young children. The Malahide Road is a busy dual carriageway and there is a very real danger that young children from the estate could get hurt on this busy dual carriageway if pedestrian egress is permitted.
- There will be a loss of security and safety for all residents as a result of the hazards posed by mechanically propelled vehicles entering and exiting the estate. For example, there is likely to be an increase in electric scooters and electric bikes which can present a danger to residents.

- Additional cars driving into the estate for the purpose of taking public transport on the Malahide Road will present an increased traffic hazard.
- The green space on which this development is proposed is extremely valuable to the residents of Ayrfield Drive, and the park is mainly used by young children to play on. Green spaces within urban settings promote health and wellbeing, and are important to both young and old.
- The increased permeability of the estate will detrimentally alter the fundamental character of the neighbourhood as it will become a less quiet, less peaceful and less safe place to live.

The existing green space is to be retained and Chapter 17 Landscape (Townscape) and Visual of the EIAR assesses the impact of the proposed scheme on amenity values during the operation phase. In Section 17.4.4.1.8 Amenity Designation it assesses that: "Ayrfield Open Space will remain as open space with additional footpath / cycle track link to Ayrfield Drive..."

OBSERVATION:

- The residents of Ayrfield will no longer have use of the green space, and it will no longer be a safe place for children to play on or for adults to enjoy.

V. RISK OF TRAFFIC ACCIDENTS AND HAZARDS FROM INCREASED TRAFFIC PARKING IN THE ESTATE TO ACCESS THE CORE BUS CORRIDOR

Summary of Issue

Many submissions expressed the view that there was a risk of increased vehicular traffic within the estate associated with parking / dropping off passengers for the CBC in light of the new link providing direct access to the new bus stops. One submission cites existing parking issues at local Dart stations.

Response to issue

Due to the location of the residential estate along the Proposed Scheme corridor and that it can only be accessed by car via Blunden Drive or Tonleeg Road it is considered that the journey time associated with driving by car into the Ayrfield estate to park and access the new bus stops via the proposed link would be highly unattractive to potential bus passengers and will not lead to any significant increase in vehicular traffic within the estate.

OBSERVATION:

- It would be naïve to assume that cars will not be driven into the estate to avail of public transport on the Malahide Road, as this tends to happen in suburbs where parking is available at no cost and public transport is immediately accessible. Particularly, I would expect that the residents of estates to the east and north of

Ayrfield who need to access the public transport on the Malahide Road might avail of the opportunity to park in the estate.

- As well as presenting a traffic hazard and increasing the risk of accidents an increase in traffic in the estate will invariably lead to an increase in air and noise pollution for all of the residents of Ayrfield.
- The increased permeability of the estate will detrimentally alter the fundamental character of the neighbourhood as it will become a less quiet, less peaceful and less safe place to live.

VI. INCREASED AIR AND NOISE POLLUTION

Summary of Issue

Many of submissions felt that the removal of the wall over the length of the plot would give rise to an increase in noise pollution and a reduction in air quality, arising from exposure to the traffic on the Malahide Road.

Response to issue

In Chapter 10 Population of Volume 2 of the EIAR, Section 10.4.4.1.1 considers Community Amenity impacts, which arise from a combination of traffic, air quality, noise and visual impacts. It concludes that there will be reduced air and noise impact along the route in general, leading to a positive, not significant, long term impact.

Air Quality

OBSERVATION:

- The increased prevalence of cars in the estate may lead to an increase in air pollution for residents.

Noise

OBSERVATION:

- It is acknowledged by the NTA that the proposed scheme will impact on the traffic noise and vibration levels for the residents immediately adjacent to the development.
- The noise generated by pedestrians (e.g. people talking loudly or shouting) is likely to be a much bigger problem for the residents of Ayrfield Drive and those parts of the estate which are adjacent to the pedestrian throughfare.
- The increased permeability of the estate will detrimentally alter the fundamental character of the neighbourhood as it will become a less quiet, less peaceful and less safe place to live.

VII. VISUAL IMPACT / LOSS OF PRIVACY

Summary of issue

The proposed removal of the wall to the green area would have a visual impact

OBSERVATION:

- The removal of the wall will have a visual impact for all of the residents of Ayrfield Drive. The wall is preferred over the alternative proposed by the NTA which is a view of fast traffic on a busy dual carriageway.

reference to the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, Landscaping General Arrangement drawings, see extract in Figure 2.1.27 below, show that three "woodland copses" are proposed within the green area to supplement the existing trees that are present. These three landscaping features will provide substantial screening

OBSERVATION:

- When the foliage on the existing trees is lost in the autumn the visual screening provided by the trees is minimal.

In conclusion, I would like to take this opportunity to reiterate that I strongly object to this proposal on the grounds that it will deprive the residents of Ayrfield Drive of our much loved green space, make the road a less safe place to live, and significantly disrupt our peace and quiet in order to provide an access route to the Malahide Road that is neither wanted nor needed.

Thank you again for your consideration to this submission.

Yours faithfully,

Deborah Byrne