Our Case Number: ABP-313182-22

An Bord Pleanála

Ken Lynam
17 Ayrfield Drive
Aryfield
Dublin 13

Date: 04 July 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

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

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Niamh Thornton

From: Ken Lynam [redacted]
Sent: Tuesday 4 July 2023 08:55
To: Niamh Thornton
Subject: Re: ABP-313182-22

Dear Board,

We are writing to you to strongly encourage you to reject the CPO proposed for the community green space between 45 and 47 Ayrfield Drive.

As a community we have no objections to the concept of the BusConnect scheme outside this element of the proposal.

We as a community have been extremely united in our rejection of the NTA's proposal to alter our community in this manner. This will affect all the community including elderly and children, impacting safety, security and the ability to enjoy our green spaces.

The NTA continues to pursue this proposal despite overwhelming community rejection. This may have been a good intentioned proposal originally but the key point remains that the only people it is planned to affect have no desire for its implementation. This fact alone should be enough to have triggered a withdrawal of the CPO.

The community objects to the CPO proposal in the strongest possible terms.

We have a mandate indicated by the overwhelming support shown in the community petition attached to ABP Objection # 17 : ABP-313182-22 - Observation - Gareth Young.pdf [PDF]

Below we have quoted and responded to the NTA response document : **NTA - Response to ABP Submissions - July 22.pdf [PDF]**

i. Need for new link not adequately investigated

Quote NTA Response Document - Page 15

> *Figure 2.1.5: Table 10.5 of EIAR Chapter 10*
>
> *As can be seen from Figure 2.1.5, of the 11 Community Areas assessed Ayrfield has the highest car mode share for travel to work trips at 62%. In addition, it is noted that this mode share exceeds the*

average mode share for County Dublin as a whole. This is also noted in section 11.3.4 of EIAR Chapter 11 Human Health.

These figures, from a census conducted 7 years ago, can now be considered significantly out of date as the Covid-19 pandemic has had more social change impact in relation to employment practices than would have been seen in the previous 20 or 30 years. There is a very large proportion of people now working from home entirely or for the majority of their working week, significantly altering these pre-pandemic figures. I would suggest this point from the NTA is completely void now.

If we were to argue this point then the very obvious counter is that the reduction of (literally) a couple of minutes walk to avail of bus services is not going to affect the proportion of car usage vs bus usage.

These figures also do not take into account a number of other factors that affect them. Did anyone survey where 62% of drivers work, as they may not work along the bus corridor in the City Centre, Malahide or Clongriffin. There are a high number of Taxi drivers, Electricians, Plumbers, and others driving vans associated with their work, bus routes and bus access is of little or no interest to them.

The estate has a large number of young families and in most of these cases a car is required for childcare drop-offs, with parents continuing on to work. The access point at Ayrfield Drive is not a good option for them, it's a danger to their children as they grow up.

Quote NTA Response Document - Page 17

The existing green area through which the link is proposed is currently privately owned, hence it has been included in the CPO (plot no 1003(1).1f), see Figure 2.1.8 below. No submission to the Proposed Scheme or the CPO was received from the reputed owner of the land in question.

The green space is owned by individuals who have been looking to build on this land and denied planning permission. This land has been deemed a green space for recreation by previous planning rulings. So the owners will obviously be happy to have a CPO. They are not members of our community and not affected by this decision, beside gaining wealth at a cost to our locality.

Quote NTA Response Document - Page 18

Of the 64 submissions, 58 were from residents of the Ayrfield estate and 6 were from elected representatives supporting the residents. It is noted that submission 17 included a petition, which is stated to include signatures from 619 households but it is noted that the submission relates to 544 property addresses.

If this is a disingenuous attempt to imply that the petition was in some way made-up then I strongly advise the NTA and/or ABP to conduct their own door to door investigations, inquiring at each door the validity of each signature.

There are multiple signatures from some addresses on the petition and the petition was conducted in the full Ayrfield / Ard Na Greine estate. This was performed by multiple community volunteers in absolute good faith. To suggest otherwise is a further insult from the NTA to the Ayrfield community. A community they think 'they know best' for, but I can assure you they are completely incorrect – as the petition clearly states. Maybe the NTA realise the veracity of such a petition and their only argument against it is to imply it's somehow not accurate.

Quote NTA Response Document - Page 19

> *As can be seen from Figure 2.1.5, of the 11 Community Areas assessed, Ayrfield has the highest car mode share for travel to work trips at 62%. In addition, this mode share exceeds the average mode share for County Dublin as a whole. This is also highlighted in section 11.3.4 of EIAR Chapter 11 Human Health. Reference to the data for other community areas in Table 10.5 located along the Malahide Road corridor, such as Darndale, Coolock and Donnycarney, highlights that they have lower travel by car percentage and higher travel by bus percentage, compared to Ayrfield. These other areas generally have comparatively better permeability to the high frequency bus services along the Malahide Road when compared to Ayrfield. This data suggests that the prevalence of private car journeys within Ayrfield may be linked to poorer access to public transport/ walking & cycling facilities.*

Again, similar to the point made above, the people of Ayrfield already have access to the planned Bus Connects routes. It takes less than 8 minutes on average to access the bus stops from our estate with two existing access points on Tonlegee Road and Blunden Drive. The 'permeability' suggested will reduce this time by a few minutes, for some residents only. This is going to have ***NO*** effect on the number of bus users. If people want/need to get the bus to work or for social reasons then they will, as easy access already exists. Changing the nature of our community is not worth saving a couple of minutes walk and gaining no change in the statistics detailed.

The data taken in the Environmental study is quantitative, it simply asks the community which mode of transport people take to work. There was no qualitative research done in the study to ascertain why commuters use their car, therefore it is untrue to state that the data suggests the prevalence of private car journeys is directly linked to access to public transport. There is no data anywhere in the study to link the prevalence of private car journeys to poor access to public transport.

Quote NTA Response Document - Page 20 – NTA Quoting United Nations 2030 Agenda

> *Goal 11: Make cities and human settlements inclusive, safe, resilient, and sustainable*

The NTA should include us in this decision and accept the community's objections.

We want a safe community. We do not want this proposed change; leading to higher road safety risks for our children, more noise pollution and higher crime levels.

> *As part of the Proposed Scheme, the proposed link from Ayrfield Drive will provide for enhanced walking and cycling infrastructure from the Ayrfield estate which will enable improved accessibility to sustainable transport and will reduce the distances to sustainable public transport for those in vulnerable situations, women, children, persons with disabilities and older persons*

During our door-to-door petition many residents indicated how they enjoyed the safety of the estate for evening walks, this was particularly true of the elderly, female residents who restrict their walks to the lovely estate that we have. They feel safe in its environs, and do not want an access point directly to a busy dual-carriageway. They have a feeling of safety in our low-crime estate.

There are also many existing cyclists in the estate who can just as easily access the Malahide Road through the Tonlegee Road (for access towards town) or Blunden Drive (for access towards Malahide). The Ayrfield Drive access point for these users is completely pointless, they are not going to be cycling to Woodies!

Though we agree the overall scheme does attempt to achieve the listed goals, in the unique situation of Ayrfield opening up the area, may increase the dangers to these vulnerable people. Increasing traffic pollution, taking away children's green space and safe area, opening access to a dual carriageway and increasing risks to children.

Quote NTA Response Document - Page 20 – Sustainable and Smart Mobility Strategy 2020 (EU Commission 2020)

> *This flagship states that: 'increasing the modal shares of collective transport, walking and cycling,*

Quote NTA Response Document - Page 21 – NTA Quoting European Green Deal (EDG) 2019

> *Section 2.3.2.2 of the EIAR Volume 2 Chapter 2 states that 'This Strategy has the objective of 'accelerating the shift to sustainable and smart mobility' and requires that, '[t]he EU transport system and infrastructure will be made fit to support new sustainable mobility services that can reduce congestion and pollution, especially in urban areas'. It is noted that pollution is concentrated the most in cities and that a combination of measures is needed which includes 'improving public transport and promoting active modes of transport such as walking and cycling.' The Proposed Scheme is necessary, in conjunction with a range of other initiatives, to attain the objectives of the European Green Deal, through significant investment in cycle and pedestrian infrastructure, in addition to bus priority, thereby supporting and encouraging growth in active travel and sustainable public transport usage'.*

Again, reiterating clearly the previous points. This proposal at Ayrfield Drive will likely reduce the amount of active walking for the reasons outlined already. The proposal will reduce the overall amount of walking undertaken in the estate, whether for people accessing the bus or for recreational walkers (though the loss of security).

Children in the estate will lose a green space that is very actively used. One resident counted - on one single day - 22 different children using that green space. Children will be discouraged from cycling on Ayrfield drive as high-speed scooters or scramblers will use the entrance as a rat-run from the Malahide Road to the Tonlegee Road. This is a certainty.

There will also be a reduction in children being allowed to cycle/walk to school due to the increased risk of accidents and child safety concerns. If a child was abducted from that area they would be gone in a car on the Malahide Road in moments.

This scheme is also likely to encourage people to drive to Ayrfield and leave their car there as a safe spot to park therefore ***not*** reducing pollution and increasing local car congestion within the Ayrfield estate.

In conclusion to this section we quote from Les Doyle, resident at 45 Ayrfield Drive (adjacent to the community green space in question) : "This green field has been part of the community for children to play for over 40 years and opening it onto a Dual Carriageway is reckless. Young Children use this green daily. A bicycle lane is a laughable 'facility', where would they be coming from to get any form of advantage? How long before Couriers and Fast-Food motorbikes use it as a Rat Run? I'm one of the closest to this green but I would prefer to walk the 10 minutes to the stop at UCI than see a child hurt or worse. Where will the people who will make this decision be if that happens?"

NTA Response Document - Page 20 – Response to International law, European Union Law. SDGs

Adopting any policy or goal must also give great consideration to the existing residents of Ayrfield and take into account the negative health implications of the removal of this section of wall and CPO of land

dedicated to the little green space left in Ayrfield. This negative stress that is being imposed on the residents is upheld by the large volume of Ayrfield residents who have contacted you to strongly encourage you to reject the CPO proposed for the site, and must override any advantage to what is proposed.

Reply to NTA Response Document - Pages 22-25

The Proposed scheme will not connect our community in fact it cuts a divide down the middle of the estate. It also does not take into consideration the proposal for future cycle lanes proposed along the Tonlegee Road and Springdale Road that will connect directly to the Malahide Road dual carriageway. These cycle lanes will more than adequately provide ample access to the new cycle lanes being built with the Bus Connect plan.

Accessibility to the bus network is more than adequately provided by access on Tonlegee Road or via the top of the estate through St Paul's Church onto Blunden Drive to the Malahide Road with multiple stops. Some of these bus stops are not displayed on Image 2.5 heat map, there is additional access by the walkway at UCI. These multiple bus stops are more than adequate to provide quick access to the bus network.

Reply to NTA Response Document - Pages 26-27

The negative health implications from stress being imposed on residents of Ayrfield who are opposed to the removal of the wall and CPO should be given priority over any small advantage to these modes.

Reply to NTA Response Document - Pages 28-19

The Proposed scheme will not be affected in any way by omitting this section there is and will be adequate walking and cycle links to the Malahide Road dual carriageway from already proposed future cycle lanes. The impact in fact on Ayrfield will be only of negativity as they will lose valuable green space on Ayrfield Drive for use by all especially our children damaging development of their mental health. This should be given more priority over and above any development on this site.

Reply to NTA Response Document - Pages 30-32

To suggest that removal of the wall would be of benefit for access to the Malahide Road Industrial Park is inaccurate as there are mostly large retail units who sell mostly bulky items, one of which is a large car parts company. This does in fact encourage people to use their cars for accessing the retail park.

The removal of the wall would only benefit a very small percentage of people who are travelling directly along the Malahide Road, it would be of greater benefit to connect with the Malahide Road at the new proposed junction layout at Tonlegee Road/Oscar Traynor Road this would improve travel by reducing time by not adding an extra set of toucan crossings along the require route.

Reply to NTA Response Document - Pages 33-34

The information given for the proposed scheme doesn't give an alternative time or distance. If the same system was used for 500m and 900m the catchment area would include the whole of the Ayrfield estate, this would add very little extra time and would well be within reason. The Proposed new path and cycle way is of no benefit to the residents as they are steadfast in their opposition to its implementation.

Reply to NTA Response Document - Page 35

In regard to future bus schemes. This is exactly what it is - a proposal, and so, it is subject to change. The future bus scheme can be adjusted to better provide connection to other routes. Residents in Ayrfield who are opposed to the

removal of the wall feel the existing bus, cycle, walking that is available now more than accommodates their needs for non car related travel.

ii. Consultation undertaken

Quote NTA Response Document - Page 37

> *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. This issue was raised by the following 7 submissions in response to the Proposed Scheme:*
>
> *12, 17, 19, 20, 57, 66, 69*
>
> *Response to issue*
>
> *The Public Consultation Report 2018-2022 provided in the Supplementary Information for the*
>
> *Proposed Scheme outlines the extensive public consultation and stakeholder engagement undertaken during that period, with three rounds of non-statutory public consultation undertaken.*
>
> *Throughout the three rounds a number of consultation tools were used, including:*
>
> • *a dedicated website, launched in May 2017;*
>
> • *an individual brochure for the Proposed Scheme (updated at all 3 rounds);*
>
> • *public information events (in person for first and second rounds, virtual for third round),*
>
> • *Community Forum events, to create a two-way communication process with representatives of*
>
> *local communities, (in person for first and second rounds, virtual for third round, average*
>
> *attendees 24);*
>
> • *range of digital channels, including Twitter and Facebook;*
>
> • *traditional published material;*
>
> • *press and radio advertising;*
>
> • *outdoor advertising;*
>
> • *presentations; and*
>
> • *infographics*

That is some list, and yet not one resident in Ayrfield knew about the proposal for our community green space. So instead of the expenditure above it may have made sense to contact Ayrfield residents directly with a small leaflet drop, which is the method of communication successfully used in the NTA's case study at Dargle Wood Permeability

Scheme for the Rathfarnham to City Centre Bus Corridor. At no point was the impact of this CPO and proposed works discussed with a single member of this community.

The most striking issue here is that the NTA didn't even bother to contact the residents of 45 and 47 Ayrfield Drive, the properties directly adjacent to the community green space in question.

Did the NTA ever think of asking the residents of Ayrfield if they wanted this, and would it have changed their minds about using cars to go to work?

The mention of the site notices ...

> *"Location D included site notices 11 and 12, each comprising two A3 sized notices; site notice 11 was erected on the Malahide Road side of the boundary wall to the green area and site notice 12 was erected on the edge of the green area close to the footpath along Ayrfield Drive, as shown in Figure 2.1.21 below. The notices themselves are shown in Figure 2.1.22 and Figure 2.1.23"*

These were erected after the ABP application had been submitted. So ***too late*** for actual community consultation. These notices were in fact the first time our community became aware of the proposed CPO of our community green space. The NTA should be embarrassed about their approach to communicating with our community. In subsequent sections there is mention of Dargle Wood, Knocklyon having a similar permeability link proposed. The board should consider the difference in communication with the community (extensive) in that scenario in comparison to the communication with the Ayrfield community (none!).

It states clearly that all properties directly affected by the scheme will be contacted directly, this has not been the case. The website, a brochure, range of digital channels, press and radio advertising would only be of interest to those who were directly contacted and made aware of this particular CPO otherwise it would be of no interest. The fact is that the residents first became aware of any CPO or removal of the boundary wall when a site notice was erected. If Ayrfield residents were informed directly at an early stage their steadfast opposition to this particular section of the scheme could have been omitted and still could be without having any effect on the overall NTA bus scheme.

Our public representatives have also committed their support against the removal of our boundary wall as does the An Garda Siochana superintendent from Coolock citing negative security effects should this proceed.

iii. Potential for increase in crime / anti-social behaviour / security / child safety and protection for increase in crime / loss of security

Quote NTA Response Document - Page 43 - NTA's response to residents concerns regarding risk of increase in criminal activity

> *"the new infrastructure improvements ... will act as a direct deterrent to criminal activity and result in a reduction in crime"*

> *"Good infrastructure has also been shown to have a positive impact on levels of crime, particularly low level crimes such as theft and vandalism".*

The residents of Ayrfield are not disputing the fact that clearly visible and well lit bus stops may deter antisocial behaviour for users of the bus stop and will provide a safe space for commuters to wait on the bus. It is safe to assume that good, well light infrastructure will have a positive impact on levels of crime around bus stops. However,

this does not adequately address the increased risk of criminal and antisocial behaviour in the Ayrfield estate as a direct result of it opening out onto a dual carriageway.

The residents of Ayfrield, Ard na Greine and Rathvale have consulted with our local Garda station in Coolock and Gardai have expressed similar concerns to the residents, particularly with regard to the specific issue of this permeability link providing easy access/exit routes for criminals on scramblers and bikes by connecting the Tonlegee road and the Malahide Road. The gardai are concerned that this link is providing a route that they cannot pursue criminals in garda vehicles. On 14th July 2022, Superintendent Garda Ronan Barry, Coolock Garda station attended a meeting at the NTA alongside residents from Ayrfield, where he expressed his specific concerns regarding this matter to Hugh Creegan, Deputy Chief Executive NTA.

Quote NTA Response Document - Page 43 - NTAs response to residents concerns about antisocial behaviour using Dargle Wood case study

> *"In summary, the case study (Dargle Wood) demonstrates that improved pedestrian and cycling links, such as the proposed pedestrian and cyclist link between Ayrfield Drive and the Malahide Road will have a positive impact on residential amenity, rather than leading to an increase in crime and anti-social behaviour."*

The NTA references the case study of Dargle Wood Knocklyon to argue that the proposed changes in infrastructure will have a positive impact on levels of crime. P49 of their Permeability Best Practice Guide gives a detailed summary of the design process that was undertaken in Dargle Wood. It is evident from reading the summary that residents were consulted throughout the whole process and crime prevention measures were put in place in collaboration with the residents early on in the design process.

Regarding the Dargle Wood Case Study, the NTA states that

> *"During the course of consultation for the above works with local residents a number of concerns were raised and variations requested that would assist in incorporating the proposed link into the wider landscape. (These included)... Securing north and south boundaries, where motorbikes were gaining access, with 90 linear metres of railings and low wall. (They also included)... The new planting of thorny bushes close to people's back garden walls".* (Permeability Best Practice Guide, P49)

There has been no consultation process between the NTA and the residents of Ayrfield estate in the design process for this permeability link. Superintendent Barry also expressed his concern at the meeting with the NTA at the lack of consultation with the local Gardai as part of the design process and at the lack of crime prevention measures included in the plans. The residents have serious and valid concerns about removing a 35 metre long wall right in the centre of the estate out onto a dual carriageway. These concerns, which are unique to our area and not of concern to Dargle Wood, have been reiterated by the Superintendent from our local Garda station in Coolock. None of our issues or concerns have been addressed and no crime prevention measures plans have been put in place to address these issues, making our case very different to the Dargle Wood case study.

iv. Loss of Green / Community Space

Quote NTA Response Document - Page 44

> *"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". 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. The change is limited in scale and characteristic in the context, with a beneficial impact on access. The magnitude of change is low."*

This response from the NTA regarding residents' concern about the loss of our green space is completely inaccurate. This field is used by the children of Ayrfield as a play area. Football goals are erected on it and there is a swing on the tree where the children play. It provides a safe route for children up and down Ayrfield drive as there is a continual path running along Ayrfield Drive so the children can access the field without crossing any roads. The changes that the NTA propose in removing the 35 metre long wall will completely change this open space from a safe playing field to a large open access for the dual carriageway. Children will no longer be able to play on the field as it will now become a double cycle track and walkway onto the Malahide road/QBC. Although the magnitude of change may be low in terms of planning/zoning, the magnitude of change to how the green space is utilised is very high.

The green space which currently exists between 45 and 47 Ayrfield Drive is used for recreational use by children, residents and dog owners. They play here safely every day. When the residents refer to a loss of Green space it is not in terms of a visual green space which is what the townspace in chapter 17 shows.

It is in relation to a blank space which is used by dog owners and families daily, inputting a cycle lane and pedestrian footpath, filling it with hedging and trees and removal of the wall will mean there is nowhere for these children to play safely whilst being close to their homes and without having to cross busy roads. They cannot possibly kick a football beside a dual carriageway without there being future, potentially fatal road accidents, this will result in children no longer being allowed to play outdoors with their friends where they learn important social and emotional life skills.

The NTA mentions "passive supervision" making a place safer, there is absolutely no way that opening a currently closed area to anybody and everybody can make it safer. When you don't know who is coming and going and create a quick entrance and exit it instantly becomes less safe. We, as residents, know everybody within the area as there is no need to travel into Ayrfield unless you are living here, visiting family, or attending the local school or church. Passive supervision is not required as we are a strong community who offer a stronger supervision among ourselves already.

I would like to refer you to a government study carried out by "Growing up in Ireland", the majority of the children in our area are within wave 3 and wave 4 (age 5 to age 8). E3 Egan (growingup.gov.ie)

This is a national longitudinal study of children and young people in conjunction with the government whose purpose is to make informed policy based decisions in relation to young children and young people. In the link attached it is a clear breakdown of the importance of outdoor play for children.

As can be seen here (Neighbourhood safety and outdoor play..... (growingup.gov.ie) Block 1 – safety and Block 2- social cohesion are the 2 biggest factors in parents allowing children out to play. Removal of this wall will only ensure that more children are sitting indoors, affecting future mental and physical health. The children are the future of this country and the impact of removing their green space is not being considered in this decision.

vii. Increased air and noise pollution

As residents we would query the accuracy of the information around noise pollution and air pollution. If you stand on the opposite side of the wall directly beside the traffic it is notably louder than if you were to stand on the green space between 45 and 47 Ayrfield drive.

I'd like to refer you to the Dublin city air and noise map through this link - Home | Dublin City Air & Noise (dublincityairandnoise.ie)

As you can see Ayrfield Drive backs on to Power City and the LeisurePlex Coolock. Power City and the LeisurePlex have been filled out in red which means it is high for air and noise pollution.

Malahide Road is marked in yellow which means it is moderate for air and noise pollution.

The only difference between both Ayrfield Drive and the Leisureplex / Power City is the lack of an enclosed boundary wall.

Whilst appreciating the aim of the NTA is to reduce car users we have an excellent range of buses in the area already and the community have expressed they are happy to walk 8 -10 minutes to get the bus so would have to question how the removal of a wall is not going to increase the air and noise pollution in the area.

Noise

Quote NTA Response Document - Page 46

> *For the properties on Ayrfield Drive that face the green area impacts are defined as 'slight', with noise level increases of the order of 1dB and the specific noise levels are below those defined as*
>
> *significant.*
>
> *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.*

Is this a guess or was there a professional measurement conducted? There is no data provided in the EIAR regarding the actual decibel levels of noise at numbers 45 & 47 Ayrfield Drive before and/or after the removal of the wall to support the NTA's response.

The removal of trees from the centre island to make a Pedestrian Crossing on the Malahide Road is

going to add to the noise pollution. As residents we find it very very hard to believe the difference in noise stated here, at best it is a poor guess.

Some of the biggest impact on the residents will obviously be those bordering and facing the green, the rise in traffic noise, the increase in footfall at all times of the day & night, whether we like it or not if the weather is bad even people in Rathvale will drive over to park somewhere close.

viii. Loss of Property Value

Quote NTA Response Document - Page 46

> *"As regards the view expressed that the combined impact of all the issues raised would have an adverse and negative impact on the value of 60 Ayrfield Drive, EIAR Chapter 10 Population includes Appendix A10.2 Economic Impact of the Core Bus Corridors. Section 3 on page 14 the appendix discusses the impact of the Proposed Scheme on property prices. The conclusion reached is that in overall terms the public realm improvements planned by the NTA may lead to an increase in value of both residential and retail property prices, especially in the community centres along the corridors, with evidence showing that investing in public realm creates improved spaces that are more desirable for people and business to locate in, thereby increasing the value of properties in the area."*

The suggestion of an increase in valuation of properties is a joke, who would want their children having access directly onto a busy dual-carriageway where evening and night time speeding and even 'racing' of vehicles can be seen regularly. Safety first and foremost, children are curious and access to Malahide Road is dangerously reckless.

Even though this is not a point that was made by most residents in the original objections, it needs to be pointed out that the NTA response here is very naive.

In conclusion, the most important point to make is that the NTA believe they are doing a service for the Ayrfield community.

Ref: Preliminary Design Report

> *"A new offline footway and two-way cycle track is proposed at Ayrefield Drive. This will require land take to facilitate the proposal and provides an excellent opportunity for local residents to avail of direct connectivity to the corridor with a proposed new bus stop also located in the immediate vicinity."*

The community strongly feel this is not 'an excellent opportunity for local residents'. Local residents categorically have objected to the proposal. So if the only intended benefactors for the CPO and associated works are the Ayrfield residents, and we have strongly opposed the proposal enmasse then it is clear the board should reject this CPO element of the scheme.

For the NTA to have responded to our observation in the manner they have would indicate a lack of concern for their ultimate clients.

Their own Statement of Strategy document states :

> *"Engaged with stakeholders including relevant Government Departments, other State entities, public transport operators, interest groups and the general public"*

We are engaged and we are indicating our displeasure with this CPO. Please respect our community's stance. We are not looking to block anything related to the bus corridor itself, we are asking you to not implement the specific CPO of this field, a proposal you think is in our benefit - it isn't.

In the 'Mission, vision and values' section of that Statement of Strategy, two of the five key values listed are : ***Customer focus*** and ***Trust***

In the 'Strategic objectives' section :

"Continue developing a deep understanding of customer needs to help ensure the

> *infrastructure and services delivered, effectively address those needs"*

If these principles are followed it would lead you to the conclusion that the Ayrfield community is happy with the Bus Connects scheme but we do not require the proposed CPO and associated works.

If the board and NTA proceed with this proposal the conclusion can only be that statistics and performance indicators are more important than the people affected.

In closing, we thank the Board for taking the time to review our observations initially and this subsequent response document. We now ask the Board to reject this CPO of the community green space between 45 and 47 Ayrfield Drive.

Yours Sincerely,

Ken Lynam and Mary Lennon

17 Ayrfield Drive,

D13 N2Y6