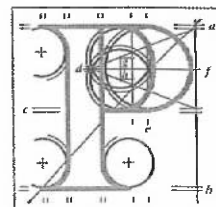


Our Case Number: ABP-313182-22



**An
Bord
Pleanála**

Martin Baker
47 Ayrefield Drive
Ayrefield
Dublin 13
D13X9R7

Date: 05 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

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64 Marlborough Street
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D01 V902

Niamh Thornton

From: LAPS
Sent: Tuesday 4 July 2023 16:55
To: Niamh Thornton
Subject: FW: Submission to NTA's response Case HA29N.313182-22
Attachments: Martin Baker NTA Response.pdf

From: frank grimes <[REDACTED]>
Sent: Tuesday, July 4, 2023 3:24 PM
To: LAPS <laps@pleanala.ie>
Subject: Submission to NTA's response Case HA29N.313182-22

Attached is my submission to the NTA's response for Case 313182

Kind regards,
Martin Baker

Submission to NTA Response

Proposed Boundary Wall Opening on Ayrfield Drive

An Bord Pleanála case reference: HA29N.313182 / 313182

Martin Baker

47 Ayrfield Drive, Ayrfield, Dublin 13

4th July 2023

I would like to begin by expressing my view that the way the NTA went about responding to the observations made by the residents of Ayrfield was often misleading and sometimes showed a total disregard for our concerns. I would also like to remind An Bord Pleanála that we have the full support of three TDs and four councillors from across the political spectrum who came out and voiced their support for the residents by submitting their observations objecting to this proposal. It must also be noted that our local Gardaí were consulted on the issue of crime and agreed this opening would make policing the area more difficult.

a. Permeability

The NTA's response to this was to mislead with maps with inaccuracies of the permeability of this estate by creating a false impression of public transport access points and walking distance to nearby bus stops. They claim that most of Ayrfield's residents are outside the 800m desired distance to the Malahide Road bus stops. In their response (pages 33-34) shown in images 3a and 4a, they claim these images support their findings. They have also fabricated a misleading chart (Image 5a), to show the number of residents who are outside the walking distance of their desired 800m catchment. I have demonstrated below using Maps software, that these claims are false and misleading.

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. Other community areas in Table 10.5 located along the Malahide Road corridor, such as Darndale, Coolock and Donnybrook, have lower travel by car percentage and higher travel by bus percentage, compared to Ayrfield. These other areas generally have good permeability to the high frequency bus services along the Malahide Road.

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 Tonleeg Road and acts as a deterrent to achieving the required mode-shift away from private car use or residents in the estate.

Image (1a): NTA's response understating Ayrfield's access to the Malahide Road, page 31

2.1.1 Location of Ayrfield Drive and Existing Environment

Location

Ayrfield Drive is part of the wider Ayrfield residential estate located to the east of the Malahide Road, adjacent to the route of the Proposed Scheme. There is a continuous boundary wall between the estate and the Malahide Road, which prevents any direct access/egress other than at the existing access points on Blunden Drive and Tonlagree Road, see Figure 2.1.1 below.



Figure 2.1.1: Location of Ayrfield Drive and Proposed new Pedestrian / Cyclist Link (Image Source: Google)

As shown in Figures 2.1.2, 2.1.3 and 2.1.4 below, between numbers 45 and 47 Ayrfield Drive there is a green area where it is proposed to remove a section of the existing boundary wall and open up Ayrfield Drive to the Malahide Road via a proposed new pedestrian and cyclist link.

Image (2a): NTA's response understating the permeability of the Ayrfield estate, page 13



Figure 2.1.12: PDR Appendix H – Catchment Areas for existing Bus Stops

As can be seen from Figure 2.1.13 the majority of the Ayrfield estate highlighted is outside the existing walking catchments for the bus stops on the Malahide Road

Image (3a): NTA's response incorrectly claiming that most residents are outside the desired 800m catchment, page 33

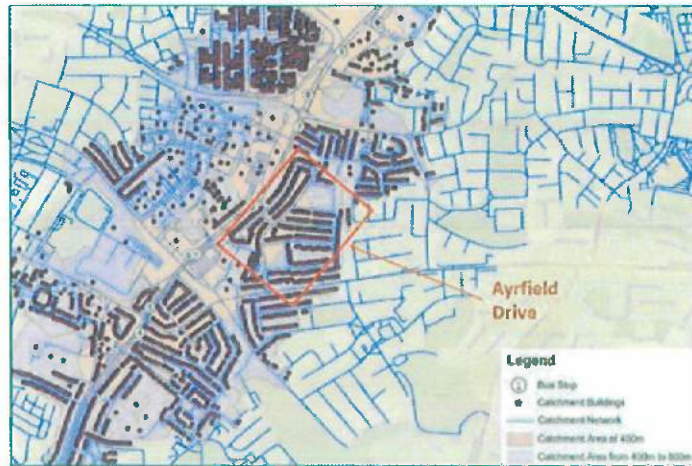


Figure 2.1.13: Catchment Areas for Bus Stops in the Proposed Scheme

The above walking catchment analysis was also re-run with the new pedestrian link to Ayrfield Drive omitted and the number of residential premises that would then be within 400m and 800m of a bus stop are presented in Figure 2.1.14 below.



Figure 2.1.14: Catchment Areas for Bus Stops in the Proposed Scheme with link omitted

Table 2.1.6 below presents the reduction in the number of residential properties in the bus stop catchments areas in the vicinity of the Ayrfield estate associated if the new link were omitted.

Image (4a): NTA response claiming that most residents are outside the desired 800m catchment, page 34

Table 2.1.6: Proposed Scheme - Bus Stop Catchment Areas

Scenario	Residential Properties in Proposed Scheme Bus Stop Catchments		
	0-400m Catchment	400-800m Catchment	Total
Proposed Scheme	225	394	619
Proposed Scheme with new link omitted	22	13	35
Reduction if link omitted	-203	-381	-584

Image (5a): NTA's misleading chart, response page 35

The maps below show that there are in fact *four* exit points from our estate which provide residents with ample access to public transport within the 800m catchment. The nearby bus stops are on Blunden Drive, Tonlegee Road, Springdale Road and Malahide Road. Three of these exits are accessible by pedestrians and cyclists only: (i) Newtown Drive through to Blunden Drive via St Paul's Church in Slademoore (ii) Ayrfield Avenue through to Blunden Drive via St. Paul's Church in Slademoore, and (iii) Rathvale Drive onto Tonlegee Road via a laneway. The fourth access point is a traffic route and is via Ayrfield Road onto Tonlegee Road. The bus stops are (i) the 27a to the City Centre via Blunden Drive, (ii) the 15, 27, 42, and 43 to the City Centre via Malahide Road at both Coolock Leisureplex stop and the Newtown Road bus stop. There is also (iii) the N6 which runs along Tonlegee Road to Finglas which takes in Beaumont Hospital, Coolock and Santry.

Images 6a, 7a, and 8a show the routes and distances to each of these bus stops from 47 Ayrfield Drive (beside the proposed green space wall demolition). As you will see, each of these distances is within the NTA's desired 800m. Images 9a and 10a show distances from other parts of the estate to the Malahide Road bus stops. These demonstrate that almost all the residents of this estate are within the 800m of the Malahide Road bus stops, which falsify the NTA's claims (image 5a).

Images 11a and 12a show distances from Ayrfield to the 27a (City Centre) bus stops on Blunden Drive and Tonlegee Road. Image (13a) shows the distance to the N6 (Finglas) bus stop on Tonlegee Road. These images demonstrate that the NTA's claim that most residents of Ayrfield are outside of *their* desired 800m catchment in the chart (Image 3a) is entirely incorrect. To this, there is a very clear message: with a signed petition of 614 residents from 544 addresses the people of this neighbourhood are more than satisfied with the current bus services and permeability of this estate.

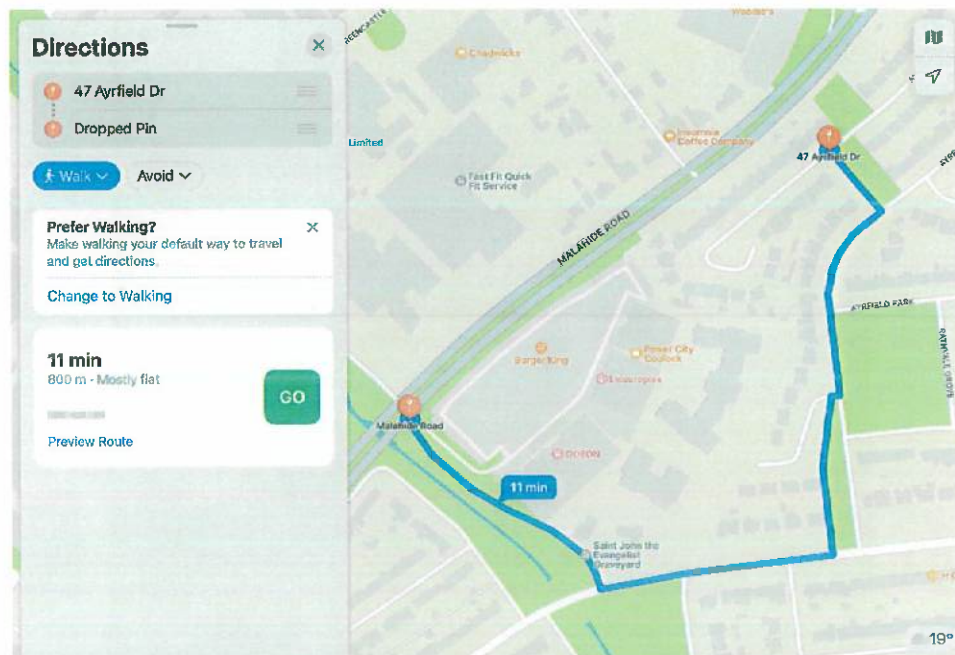


Image (6a): Distance from Ayrfield Drive to buses 15, 27, 42, 43 to City Centre at Leisureplex bus stop on the Malahide Road – 800m

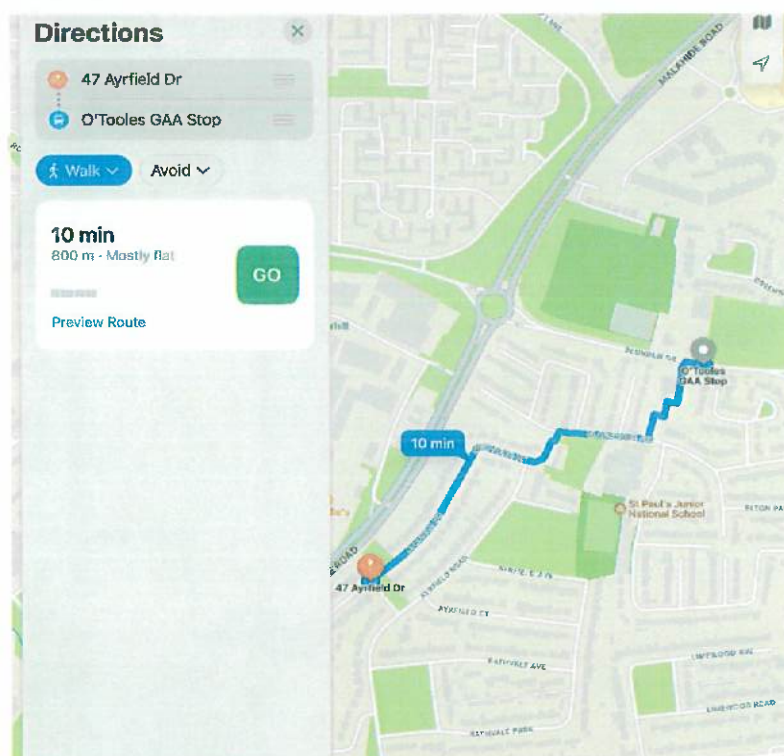


Image (7a): Distance, Ayrfield Drive to the 27a bus stop (City Centre) on Blunden Drive – 800m

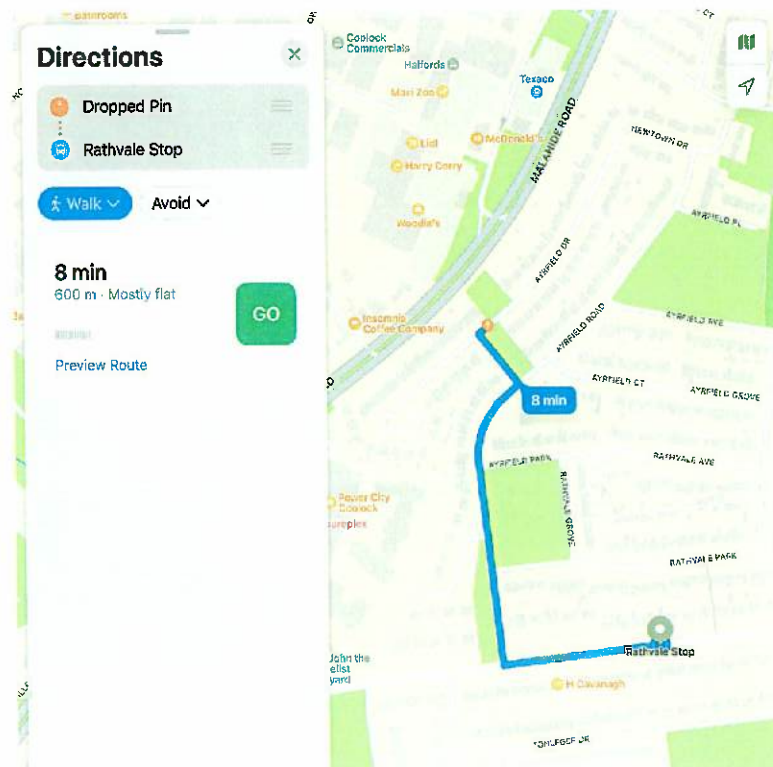


Image (8a): Distance from Ayrfield Drive to the N6 (Finglas) bus on Tonleeg Road – 600m

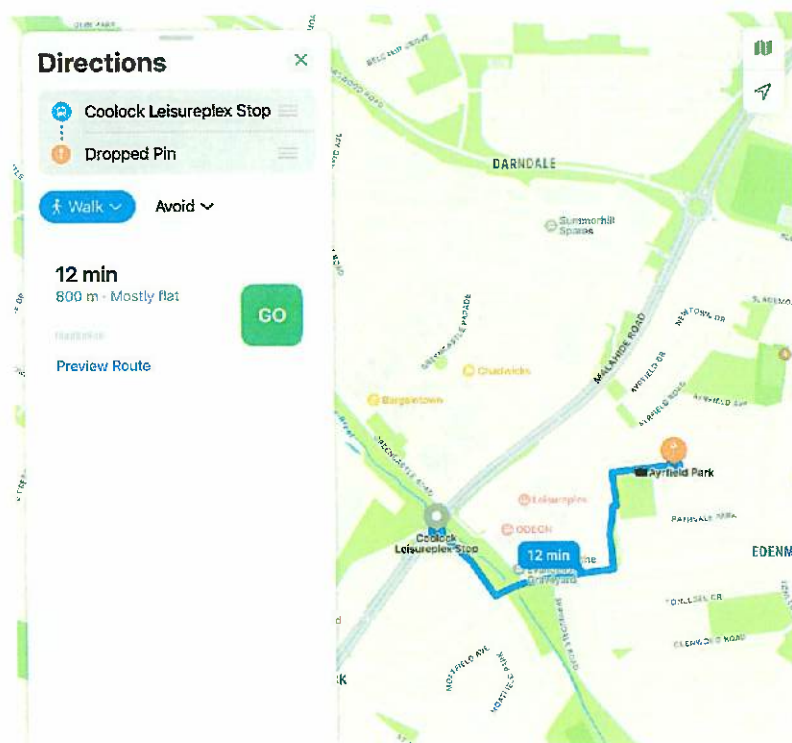


Image (9a): Distance to 15, 27, 42, 43 buses to the City Centre on Malahide Road – 800m

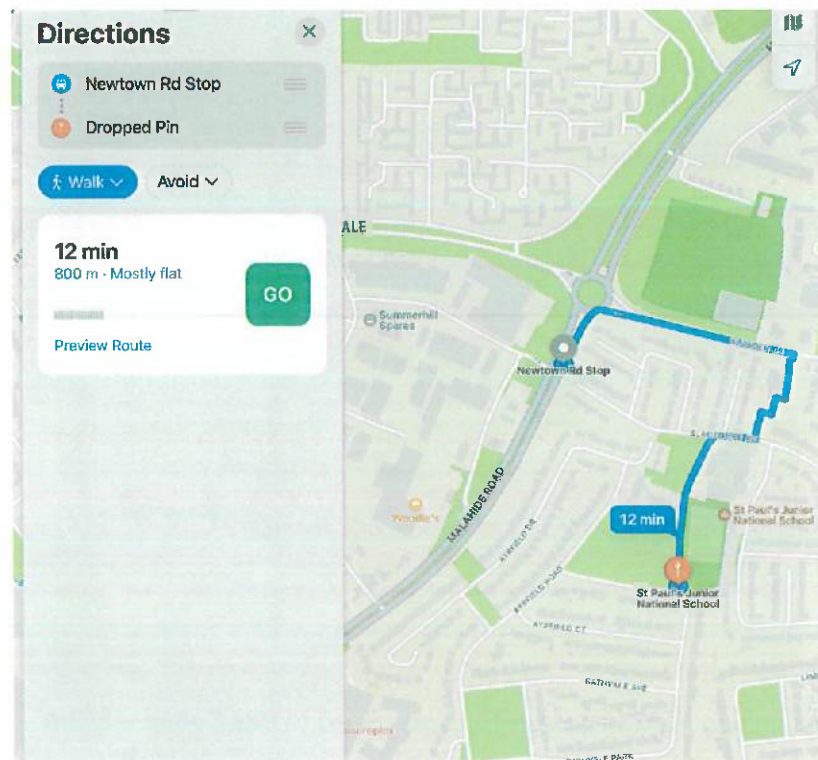


Image (10a): Distance to 15, 27, 42, 43 buses to City Centre on Malahide Road – 800m

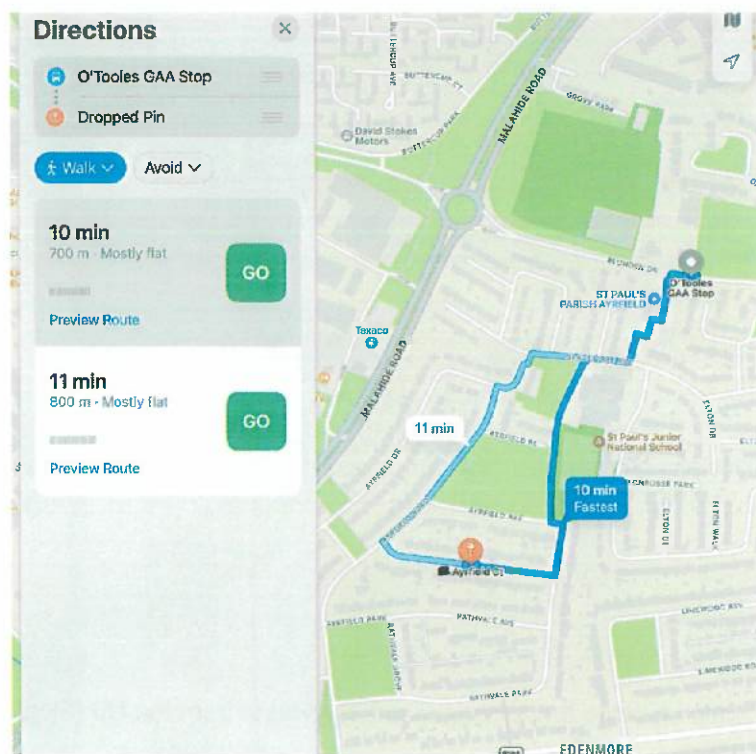


Image (11a): Distance to the 27a City Centre bus stop on Blunden Drive (north) – 700m

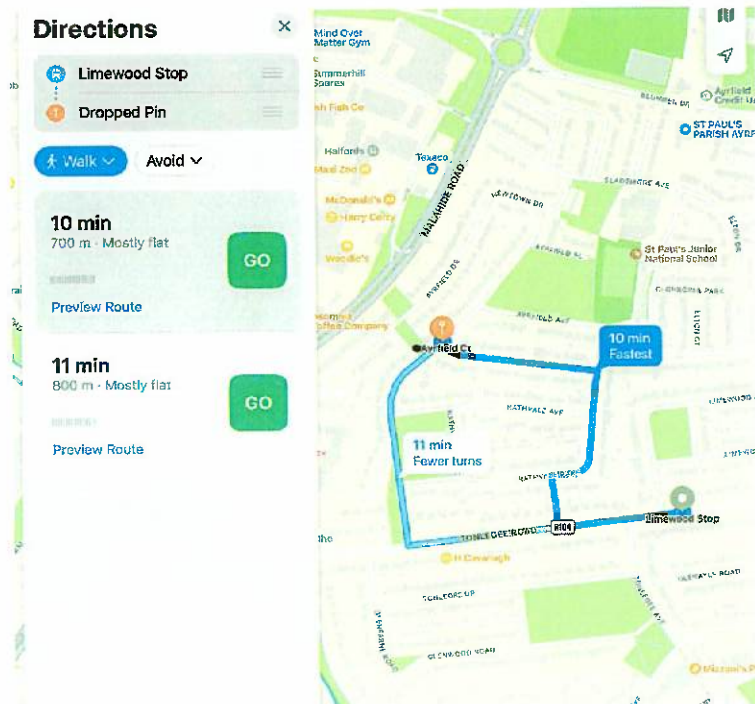


Image (12a): Distance to the 27a bus on Tonleeg Road to City Centre – 800m

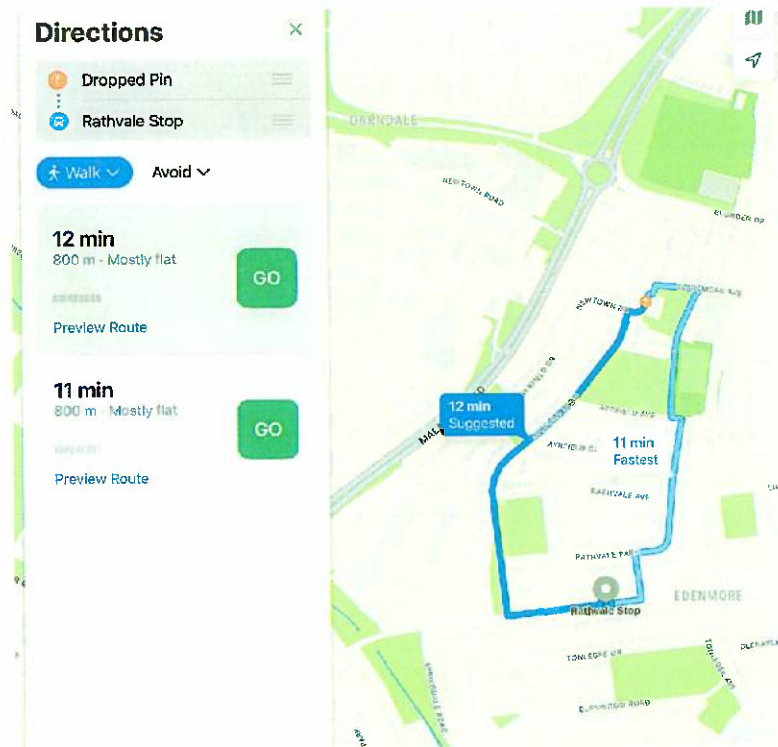


Image (13a): Distance showing the furthest point in Ayrfield from the N6 (Finglas) bus stop on Tonleeg Road – 800m

b. Car usage

In their response on page 19 (see Image 1b), the NTA has attempted to paint the residents of Ayrfield estate in a poor light for their car usage. They claim that the data obtained from the CSO suggests that Ayrfield's prevalence of car use had a direct link to a relatively low number of public transport access points on page 19 (see Image 1b). They suggest that by increasing access points they will increase public transport use in the area, and therefore reduce car use. They have also drawn a direct comparison between Ayrfield and nearby Darndale and Coolock, misleadingly claiming that Darndale's access points led to a higher use of public transport, (Image 1b).

Image 2b taken from the same CSO data used by the NTA shows that in fact Ayrfield has almost double the number of access points with 19 to that of Darndale's mere 10. It can also be shown that the public transport usage for Darndale is a combined 25% as opposed to Ayrfield's 23%, undermining the suggestion of a correlation between the number of access points and public transport usage. Also, below in Image (3b) is the CSO table showing Blanchardstown with the highest number of access points with 100, and yet only having an overall 25% public transport usage. Other areas with similar results are Mulhuddart, Corduff and Castleknock as seen below in Image (3b). This demonstrates that any claim by the NTA that there is a correlation between the number of access points and the use of public transport is misleading and negligible.

2.1.4 Common Issues Raised

i. Need for new link not adequately investigated

Summary of Issue Raised

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 Tonlague 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 raised

This response addresses the contention that the new link is not necessary and was not investigated adequately.

Existing data

Section 10.2.1.1 of the EIAR Volume 2 Chapter 10 Population, includes the assessment of impacts on community amenity, land take and accessibility consisting of 'community areas', which are informed by the Central Statistics Office (CSO) 2016 Census parish boundaries (CSO 2016a). One of these community areas is Ayrfield.

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.

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.

Policy

The application documentation submitted to An Bord Pleanála demonstrates that the proposal for a new pedestrian and cyclist link between Ayrfield Drive and the new bus stops on the Malahide Road is consistent with, and supports elements of, international policy, European Union (EU) law and policy, national policy, regional policy and local policy.

At all policy levels, there are clear objectives to increase active travel and accessibility to public transport. In response to the submissions in relation to the creation of a new pedestrian and cycling link between Ayrfield Drive and the Malahide Road, the details of how the proposed new link supports these different tiers of policy are provided in the paragraphs below.

Image (1b): NTA's response, page 19

Table 10.5: Method of Travel to Work for Bus, Train, Car and Foot / Bike (%) (CSO 2016b)

Community Area	Travel by Bus / Minibus or Coach	Travel by Car / Van	Travel by Train	Travel by Foot / Bike	Other
Donaghmede	12%	65%	16%	9%	8%
Ayrfield	17%	62%	6%	9%	6%
Darndale	23%	47%	2%	19%	9%
Ardlea	23%	54%	4%	13%	7%
Coolock	23%	51%	4%	14%	7%
Artane	14%	51%	16%	13%	5%
Killester	8%	47%	23%	14%	8%
Donnycarn	22%	50%	6%	17%	5%
Marino	19%	46%	4%	23%	8%
Clontarf (St. Anthony's)	13%	47%	12%	20%	7%
Fairview	22%	31%	5%	34%	8%
Study Area Average	18%	49%	9%	17%	7%
County Dublin	12%	54%	8%	17%	9%

NAPTAN data published by the NTA (NTA 2020) identifies the access points for bus stops, rail stations, airports, and tram stops, providing an indication of the level of availability of public transport within community areas. There are a total of 269 public transport access points across the study area, as shown in Table 10.6. Donaghmede, Marino and Clontarf (St. Anthony's) have the largest proportion of public transport stops, together making up 43% of the stops in the study area. The furthest community area from the City Centre is Donaghmede which has a total of 44 access points (16% of the total).

Table 10.6: Number of Public Transport Access Points Across the Study Area

Community Areas	Number of Public Transport Access Points	Percent of Stops Across the Study Area
Donaghmede	44	16%
Ayrfield	19	7%
Darndale	10	4%
Ardlea	17	6%
Coolock	21	8%
Artane	24	9%
Killester	24	9%
Donnycarn	25	9%
Marino	45	17%
Clontarf (St. Anthony's)	28	10%
Fairview	12	4%

Image (2b): Showing access points and public transport usage

10.3.2.3 Commute to Work

There are approximately 50,000 commuters across the Proposed Scheme community study area and 21% of these travel by public transport (bus or train) (CSO 2016b). The method of travel to work by community area is presented in Table 10.5. The proportion of commuters travelling by bus is greater in the study area (15%) than the County Dublin average (12%). Walking and cycling is also a more popular commuting option in the study area (20%) than it is across County Dublin (17%), particularly in the community area of Halston Street where nearly half the population commute by foot or bike (48%).

Table 10.5: Method of Travel to Work for Bus, Train, Car and Foot / Bike (%) (CSO 2016b)

Community Area	Travel by Bus / Minibus or Coach	Travel by Car / Van	Travel by Train	Travel by Foot / Bike	Other
Mulhuddart	13%	66%	1%	7%	13%
Corduff	14%	61%	2%	16%	8%

Community Area	Travel by Bus / Minibus or Coach	Travel by Car / Van	Travel by Train	Travel by Foot / Bike	Other
Blakestown	17%	56%	1%	17%	9%
Mount View	11%	65%	8%	9%	8%
Blanchardstown	14%	55%	11%	12%	8%
Laurel Lodge - Carpenterstown	10%	63%	13%	9%	5%
Castleknock	11%	63%	8%	8%	9%
Navan Road	20%	56%	4%	16%	5%
Cabra West	21%	45%	4%	25%	6%
Aughrim Street	18%	27%	6%	39%	10%
Cabra	18%	39%	2%	33%	9%
Halston Street	14%	12%	14%	48%	12%
Study Area Average	15%	51%	6%	20%	9%
County Dublin	12%	54%	8%	17%	9%

NaPTAN data published by the NTA (NTA 2020) identifies the access points for bus stops, rail stations, airports, and tram stops, providing an indication of the level of availability of public transport within community areas. There is a total of 447 public transport access points across the study area as shown in Table 10.6. Blanchardstown has the largest proportion of public transport access points in the study area (22%). The furthest community areas from the City Centre are Mulhuddart, Blakestown and Mount View, which have a total of 77 access points (16% of the total).

Table 10.6: Number of Public Transport Access Points Across the Study Area

Community Areas	Number of Public Transport Access Points	Percent of Stops Across the Study Area
Mulhuddart	46	8%
Corduff	61	14%
Blakestown	11	2%
Mount View	20	10%
Blanchardstown	100	22%
Laurel Lodge - Carpenterstown	17	4%
Castleknock	26	6%
Navan Road	26	6%

Image (3b): Showing areas with the highest number of access points with relatively lower public transport usage

c. Air and noise pollution

The observations made by residents about this proposal raise the issue of noise and air pollution. This would be due to a continuous stop-start traffic situation at the new proposed pedestrian crossing beside the bus stop adjacent to a new opening in the boundary wall stretching 30m.

The NTA's response (pages 45, 46) (see images 1c, 2c) was to suggest there would be no additional road traffic impacts on local air quality in this area, either in construction or in operational use. In Image (2c), they have put forward the predictions made by the EIAR which concluded that there would in fact be 'a reduced air and noise impact along the route *in general* which would lead to a positive, *not significant*, long-term impact.'

Here, rather than addressing the pollution concerns of Ayrfield residents the NTA have deflected from the issue by generalising the *net pollution* impacts of the entire project rather than the specific impact on this location at the proposed wall demolition on Ayrfield Drive. It is simply ridiculous to suggest that these changes along the route would have no negative impact. Common sense alone would tell that the opening of a 30m wall exposing the residents to the noise and pollution of heavy traffic on a busy dual carriageway is a major concern.

I would hope that An Bord Pleanála takes a realistic view of Ayrfield residents' concerns and consider them rationally and fairly.

Air Quality

The impacts of the Proposed Scheme on air quality have been assessed and are reported in Chapter 7 Air Quality of Volume 2 of the EIAR as set out below.

In terms of construction dust impacts, the removal of a section of wall between the housing estate and the Malahide Road is not considered significant demolition activity and therefore no significant impacts to air quality due to dust generation will occur. All potential demolition activities have been considered and none are reported in Section 7.4.2.1.1 as none have significant dust generating potential.

Section 7.4.3.3 of Chapter 7 Air Quality of Volume 2 of the EIAR provides the operational phases predicted change in and impact on pollutant concentrations in 2028 as a result of the Proposed Scheme. The significance of the changes in the concentration of each of the ambient receptors has been determined in the context of the TII significance criteria (TII 2011) and are summarised as follows:

- the majority of modelled receptors are estimated to experience a negligible impact due to the Proposed Scheme in terms of the annual mean NO₂ concentration;
- the Proposed Scheme will be overall neutral in terms of annual mean PM₁₀ concentrations, with all receptors experiencing a negligible impact;
- the Proposed Scheme will be overall neutral in terms of the annual mean PM_{2.5} concentration with all receptors experiencing a negligible impact; and
- In accordance with the EPA Guidelines (EPA 2017) the impacts associated with the Operational Phase traffic emissions pre-mitigation are overall neutral and long-term.

In relation to the removal of the section of boundary wall at the green area between Malahide Road and Ayrfield Drive, there are no additional road traffic impacts to local air quality in this area in either construction or operational beyond what is reported above.

Image (1c): NTA's response to noise and air pollution, page 45

Noise

The impacts of the Proposed Scheme on noise and vibration have been assessed and are reported in Chapter 9 Noise and Vibration of Volume 2 of the EIAR. The traffic noise impacts associated with the Proposed Scheme have fully considered any physical changes along the proposed scheme with potential to alter traffic noise levels. As discussed in Chapter 9 Section 9.4.4.1, the assessment calculations take account of changes to the alignment of bus lanes, traffic lanes where they deviate from the existing cross section. This also includes for areas where boundary treatments are altered, as it the case with Ayrfield Drive. The impact assessment also considers the traffic flow along the Proposed Scheme during both the Do Minimum scenario (the Proposed Scheme does not proceed) and the Do Something Scenario (with the Proposed Scheme). Along the Malahide Road, there is a forecast reduction in overall traffic volumes with the Proposed Scheme in place.

A boundary wall of approximately 30m in length will be removed between the green area within Ayrfield Drive and the Malahide Road. The closest noise sensitive locations (NSLs) to this area are residential dwellings along the immediate boundary of this green area within Ayrfield Drive. The existing property boundary 2m high wall separating the green area from these properties will remain in place, thus providing a continuous boundary wall between the Malahide Road to the rear and side of the properties and along the green area. Traffic noise levels at the rear façade of these properties remain dominated by the Malahide Road during the Do Something scenario. The calculated change in traffic noise levels at NSLs within Ayrfield Drive taking account of traffic volumes, alignment and boundary changes is neutral to slight as discussed in Section 9.4.4.1.1.5 of the EIAR.

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.

Image (2c): NTA's response on noise and air pollution

d. Privacy

This proposed opening to the boundary wall would have a direct negative impact on residents in the immediate vicinity of the green space due to a loss of privacy at the front and back of our homes. This now peaceful and quiet street which we currently enjoy would become a busy public highway for complete strangers unknown to the residents here constantly passing by the front of our homes. It would also become a pickup and drop-off point, creating traffic and parking problems and increasing the risk to children playing there.

The proposed bus stop at the rear of some homes would be brought closer to the boundary wall by cutting into the grass verge creating a recess (shown in images 2d and 3d). This would result in privacy being lost in the rear gardens by upstairs passengers overlooking them on double-decker buses that would stop there frequently.

The NTA's response on page 46 (see Image 1d) was, 'In respect of the issue of overlooking the back garden of no 47 Ayrfield Drive... [that] there is an existing footpath on the Malahide Road along the existing boundary wall to the back of the garden, which is approximately 1.8 to 2m in height.'

The NTA's response does not make sense. To suggest a 1.8m to 2m boundary wall, shown in Image 1d below, would shield the upstairs of a double-decker bus is nonsensical.

With regards to the loss of privacy at the front of our homes (bottom of page 47; see Image 2d), the NTA's suggestion that a few trees and the existing boundary wall inside the green space would somehow act as a shield to people walking directly in front of our homes also defies common sense.

2.1.5 Non-common Issues Raised

vii. Visual Impact / Loss of privacy

Summary of issue

This issue of visual impact was raised by submission 12, from the residents of number 60 Ayrfield Drive which is directly opposite the green area. Their submission stated that the proposed removal of the wall to the green area would have a visual impact as they would now have a view of constant traffic.

Submission 9 (residents of 47 Ayrfield Drive) expressed the view that they would experience a loss of privacy as a result of the new proposed bus stop on the Malahide Road to the rear of the property overlooking the back garden.

Submissions 9 and 12 (residents of 60 Ayrfield Drive), expressed the view that there would be a loss of privacy arising out an increase in the number of people passing their property.

Response to issue

In respect of the issue of overlooking of the back garden of no 47 Ayrfield Drive, as shown in Figure 2.1.24 below, there is an existing footpath on the Malahide Road along the existing boundary wall to the back of the garden, which is approximately 1.8m to 2m in height.

Image (1d): NTA's response to the loss of privacy in back gardens, page 46

Reference to the EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings, see extract in Figure 2.1.25 below, shows that the boundary walls to the rear and side of 47 Ayrfield Drive are to remain. In addition, the proposed bus stop and passenger waiting area will be accommodated within the space occupied by the existing cycle land and grassed verge, with existing trees and footpath retained. As such there will be no change to the existing situation in terms of any potential for overlooking the back garden of number 47 Ayrfield Drive.

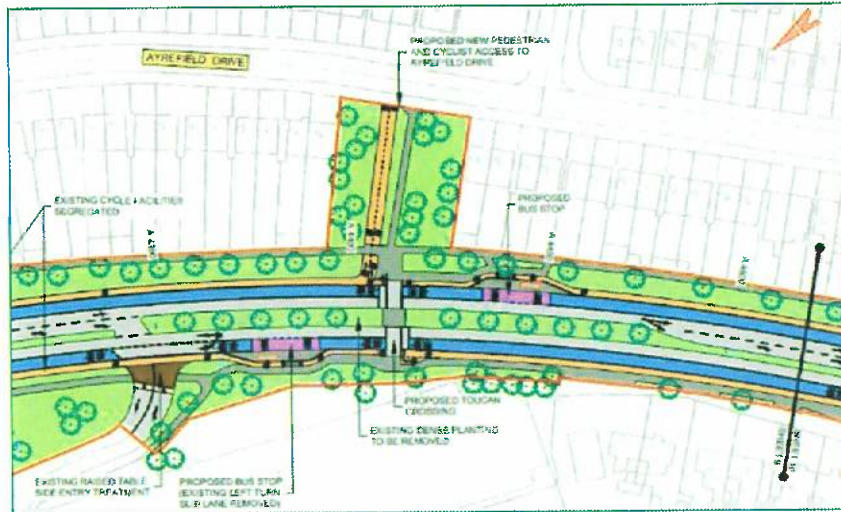


Figure 2.1.25: Extract from General Arrangement Drawings showing boundary wall retained

In relation to the concern raised about loss of privacy, and visual impact, Figure 2.1.25 above, shows that the Proposed Scheme does not include any changes to the boundary walls to the sides of numbers 45 and 47 Ayrfield Drive, or to the existing footpaths on Ayrfield Drive. In addition, in respect of the concern about an adverse visual impact on 60 Ayrfield Drive as a result of the boundary wall to the rear of the green area being removed, 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

Image (2d): NTA's response to loss of privacy in back gardens, page 47

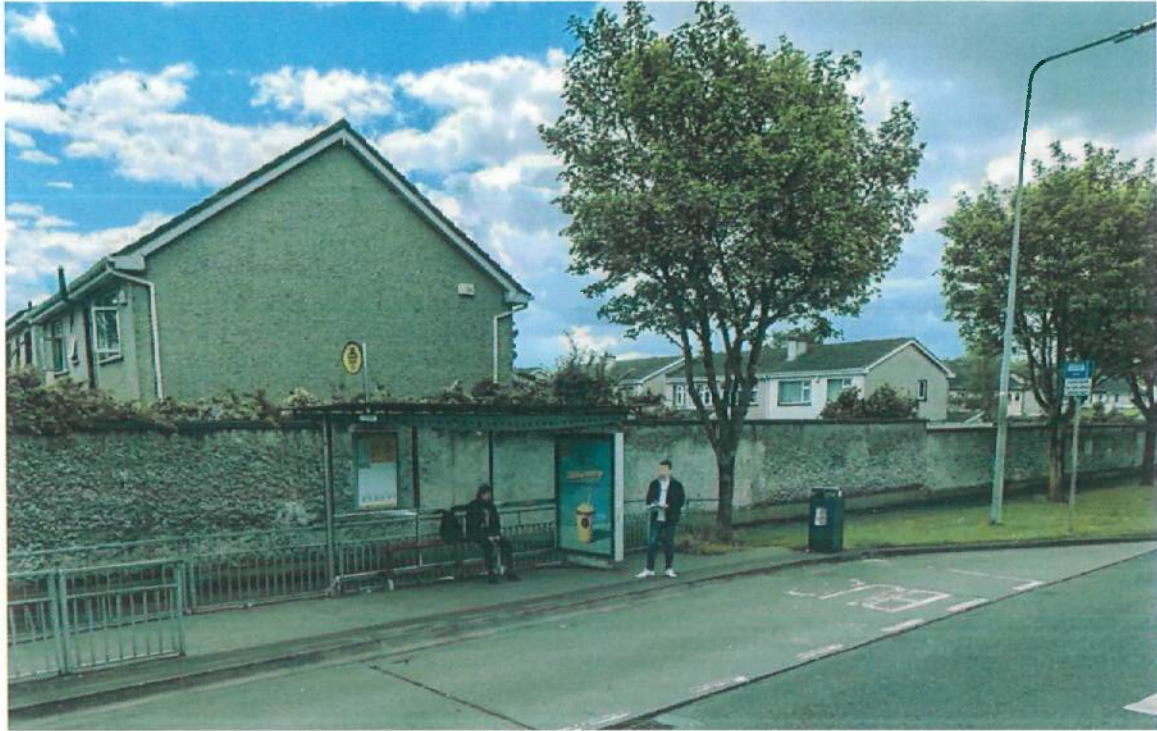


Image (3d): Showing how close the bus would be to the boundary wall and the wall height

e. Crime

The concerns of the residents on the issue of crime are supported by three TDS, four elected councillors and our local Gardaí.

Our concerns specifically are that opening this boundary wall will lead to criminal activity such as burglaries and car theft, vandalism, and antisocial behaviour in our now peaceful and quiet estate. It will allow for easy access and escape for criminals from outside this estate. It would also allow for scrambler bikes and scooters to drive dangerously through, putting people at great risk and, in particular, young children who use the green space to play in.

The NTA's response was to suggest that improved lighting and a bus stop help reduce crime and anti-social behaviour (pages 43 and 44; see images 1e and 2e). They offer a study conducted in Los Angeles studies in the 1990s to try to shore up their case (Image 2e). They point us to the Dargle Woods project (Image 1e), a project that showed how a green space with a long history of drug use, antisocial behaviour and scrambler bikes had an improvement by having new lighting and accessibility.

It must be pointed out that there is no way to improve on zero crime. Zero is the amount of crime and antisocial behaviour currently experienced in this green space at Ayrfield Drive. The

NTA is therefore suggesting that with new lighting and accessibility, we would go from a state of *zero crime* to one of 'low crime'.

I would also draw your attention to Image (2e) highlighted in blue and yellow. In this very study offered up by the NTA, it is shown that having a bus stop near an intersection or alley *increased* the crime rate. Quite clearly this is exactly what we would have if the wall were demolished, and a bus stop placed beside it—*higher* crime.

This wall has given the residents of the estate safety and peace of mind, which we have no intention of giving up.

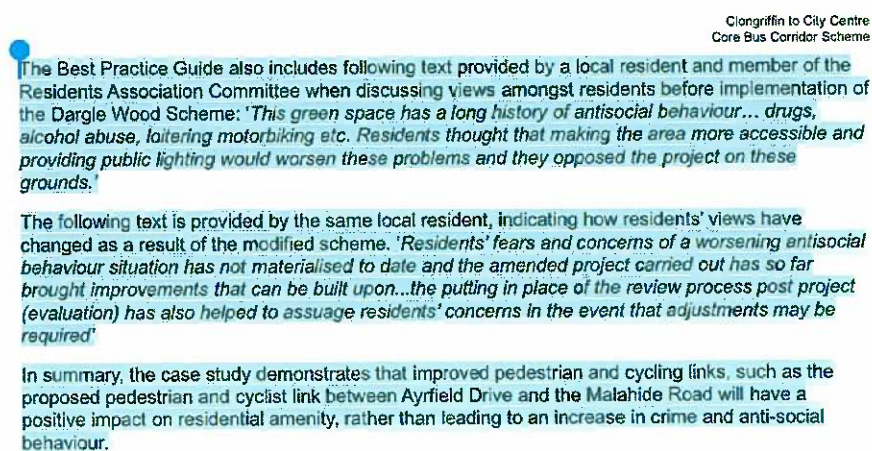


Image (1e): NTA's response, page 44

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."*

Section 3.2.3 a), Section 10.4.4.1.1 of EIAR Chapter 10 Population considers the Community Amenity and for the Ayrfield community area this is assessed a Positive, Not Significant and Long-Term impact. Additional information in relation to the potential community impacts arising from crime and antisocial behaviour is set out in EIAR Chapter 10 Population Appendix A10.2 Economic Impact of the Core Bus Corridors, which notes the following:

- *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.*
- *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.*

Image (2e): (Highlighted) Crime rates were found to be higher where a bus stop was beside an intersection or alley, page 43

f. Retail

The NTA has decided to include the issue of retail in their response on page 15 (see Image 1f). They have suggested that this new opening will be a convenience to the residents of Ayrfield. An Bord Pleanála should be reminded of the petition signed by 615 residents who are against the opening of the wall, all of whom are fully aware of the location of this retail park—and its reputation for criminal activity and antisocial behaviour. Therefore, we do not wish to have any direct connection with this retail park.

2.1.2 Description of Proposed Scheme at this Location

As described in section 4.5.1.1 of Chapter 4 of the EIAR, between Priorswood Road Junction and Newton Cottages the Proposed Scheme includes a new pedestrian footpath and cycle track through an existing green area. This new link will connect directly Ayrfield Drive with the Malahide Road adjacent to proposed bus stops serving each direction including a new toucan crossing for safe access and provide a much shorter route for residents and visitors to access high-frequency reliable public transport services, safe segregated cycling facilities and pedestrian facilities. The creation of this new pedestrian footpath and cycle track will require the removal of a short section of wall (approximately 32m) between the green area and the Malahide Road. The new link will also provide a connection between the retail and residential areas, as shown in the relevant extract from EIAR Volume 3 Chapter 4 Proposed Scheme Description Figures, General Arrangement drawings in Figure 2.1.6 below.

(Image 1f): NTA's response on the retail link, page 15

e. Safety

The concerns here are for child safety. The first issue is opening a long-established play area and green space onto a very dangerous and busy dual carriageway. The other extremely worrying concern for the parents of young children who use the space is strangers with malign intent having easy access to a play area, where a car could pull up close by and disappear with ease.

The NTA's response to this is simply jaw-dropping. They have put forward the notion that the very strangers who would give those parents cause for concern would act as passive supervision by their sheer numbers (Response page 43; Image 1e).

This response suggests the NTA would agree there would be a danger but claims it would be counterbalanced by the number of strangers passing through. This response also suggests that they think there would be a lot of footfall traffic—which would strengthen the argument around a loss of our privacy at the front of our homes. This response exhibits total disregard for those parents who have genuine concerns.

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. By maintaining or creating links for pedestrians and cyclists, this enhanced safety can be provided". The document goes on to state that "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.

This Best Practice Guide also includes a case study from Dargle Wood, Knocklyon which is relevant to the new link to Ayrfield Drive. The case study notes that proposals for the permeability link at Knocklyon through Dargle Wood open space "generated considerable concern in the immediately adjacent area, mainly with regard to the risk of increased anti-social behaviour, increased litter and increased pedestrian and cyclist traffic through the open space where there was no existing east-west route."

Image (1e): NTA's response on child safety, page 43

Summary

We have put forward our case for not opening this boundary wall. We have outlined a wide range of arguments that vastly outweigh any perceived benefit. I believe it was shown that the NTA's response was at times misleading and demonstrated a total disregard for our concerns. With a petition of 615 signatures, we have shown that we are united in our stance and have the full backing of our local Gardaí, three sitting TDs, and four elected councillors from across the political spectrum.

Ultimately the decision to open this children's play area to a busy dual carriageway lies with An Bord Pleanála. I would only hope that they take a commonsense approach to this matter, and rule in our favour.