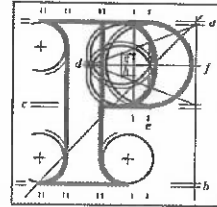


Our Case Number: ABP-313182-22



An
Bord
Pleanála

Cllr. Tom Brabazon
75 Grattan Lodge
Dublin 13

Date: 11 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
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Faint, illegible text located below the first horizontal line on the left side of the page.

Niamh Thornton

From: Tom Brabazon <brabazontom@gmail.com>
Sent: Wednesday 5 July 2023 11:23
To: Niamh Thornton
Subject: Fwd: Bus Connects Response to NTA Observation on Submissions
Attachments: Re CPO.pdf

----- Forwarded message -----

From: Tom Brabazon <brabazontom@gmail.com>
Date: Wed, 5 Jul 2023 at 11:17
Subject: Bus Connects Response to NTA Observation on Submissions
To: <nthornton@pleanala.ie>

A Chara,

Please see attached response regarding the proposed CPO leading to a breach or "link" to the Malahide Road from Ayrfield Drive.

Le meas,

ClIr Tom Brabazon



Cllr. TOM BRABAZON

FIANNA FAÏL
THE REPUBLICAN PARTY

DONAGHMEDE WARD

nthornton@pleanala.ie

Re; CPO on lands on Ayrfield Drive, Ayrfield, Dublin 13
Reference ABP-313182-22

Dear Sir,

I wish to make observations on the response from the NTA regarding the above CPO application which forms part of the overall Bus Connects Project.

Again I would state that this CPO is an unessential aspect to the overall aims and efficiency of the Bus Connects aims and objectives which are broadly supported by the local community.

Where the community diverges from the NTA is in relation to this CPO application.

I respond to the NTA Responses as follows:-

Donaghmede is well serviced by both buses and by the Dart and consequently comparing Ayrfield/Rathvale to this area is not a fair or indeed a valid comparison.

Ayrfield itself is only a few minutes walk from the Malahide Road, through Ard Na Greine and through the publicly open grounds at St Pauls Church onto Blunden Drive, somewhat shorter than NTA misleadingly portray in their response. Alternatively there is an equally short walk to the Tonlegee Road where the Malahide Road can be accessed either at the top of the Tonlegee Road or by the UCI Cinema Walkway at St Johns Church. There are significant health benefits to walking to the Bus Stop.

All submissions from the local community opposed this.

The policy is to increase Active healthy travel not to reduce it.

Goal 11 make cities safe

This response does not deal with the biggest local issues i.e. security and child safety. Better accessibility might be easily achieved by providing a city centre route on Tonlegee Road or providing a feeder service from the estate without having to change the local infrastructure. If this element of the project were to proceed it would undermine child safety and security. Serious problems with uninsured scramblers on the Malahide Road would spread in to Ayrfield Estate, it is therefore a question of proportionality. This is not the only way of helping modal shift e.g. improve services to the adjoining Tonlegee Road, reduce fares and introduce introductory offers.

STANDING UP FOR OUR COMMUNITY

Contact Tom

☎ 086 8092944

✉ tom.brabazon@dublincity.ie

✉ 75 Grattan Lodge, Dublin 13

👤 Tom Brabazon

✉ Message Minder 8673940



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Page 2

High quality segregated cycle tracks could be provided on Blunden Drive out to the Malahide Road . In fact, there is already a proposed scheme for the Tonlegee Road ...providing cycle links at this point is not critical in encouraging cycling as using either existing exit is literally minutes away and any impact on increase would be marginal at best. Again, no evidence has been provided that breaching the wall would be decisive in making a person switch from one mode of transport to another. As a public representative for the area for 20 years, I have never received any representations from local residents stating that access to the Malahide Road has been in any way problematic at all.

Section 2.3.3.14 of Chapter 2 re prioritisation of modes ..That is fine but this not justify the disproportionate attack on security and child safety, especially when there are other ways of achieving the same goals as outlined above. With every respect to the table 2.4 of Section 2.3.3.5 of Chapter 2 ...if the EIAR meets the key goals . However, dealing with nuisance dangerous scramblers, anti-social behaviour, creating a point of sale for drugs that allows evasion from law enforcement and allowing all of the disturbance attendant with those behaviours. The dilution of existing security cannot be said to allow for the improvement of quality of life and to suggest that is true is preposterous and misleading and ignores any of the negative impacts on the area as a consequence.

The link or breach in the wall might assist in reducing dependency on fossil fuels but it is by no means the only way to achieve the same goal. This proposed breach of the wall with it's consequent disproportionate effect on Ayrfield Drive in particular is entirely unacceptable as a consequence. If it were refused it would not disproportionately undermine the overall efficiency of the proposed bus corridor. It would only encourage Active Travel.. it will not definitely achieve that and the NTA must agree with that. The NTA state that the proposed scheme will reduce the number of car trips by 18,000 to 19,500 per weekday. They do not offer any breakdown of the minimal contribution that the breaching of the wall might make towards this target.

While all contributions must be considered, the disproportionate impact on the community in terms of child safety, security, anti-social activities, evasion of law enforcement is very evident.

RPO 5.3 Future Development...creating a safe street environment .. I believe I have addressed how this is not achieved above. MT3 facilitate the development of an integrated public transport network. The breaching of the wall does not, with every respect to the NTA, achieve this. In fact, as there is no provision for car parking at or near this proposed facility , this may create parking and congestion issues for the local residents by users from outside the estate. This has happened in all residential estates adjacent to the DART line, where no actual parking is provided.

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DONAGHMEDE WARD

Page 3

MT 11....The NTA quoting their own policy , which clearly is an aspirational and idealistic policy, which does not take in to account security and child safety, to be applied in a wholly law abiding world. The same applies for MT 045 ..There is no evidence that there is in fact any desire line to the Malahide Road but in fact this is the creation of a desire line. Quoting from their own Hymn book is hardly the most objective way to justify the project. Submissions do not respond to the legitimate security and child safety concerns of the estate residents for whom this is supposed to serve.

Any positive impacts of an enhanced bus corridor can still be enjoyed without the undemocratic imposition of this wall breach, de facto removal of safe play area for the resident's children. Creation of permeation is quoted in the development plan , which will largely govern new estates and is not intended to retrospectively influence the shaping of older estates. Consultation was largely about an enhanced QBC and a different design of link or breach so points around consultation about this particular project (the actual subject matter of this particular application) holds no water.

The Development plan also supports Housing infills. This is using retrospection which the development plan is not intended for.

Response to Section 10.2.1There is no crime issue in Ayrfield Drive that could be improved on . This is an exclusively residential area in which there is no support or reason to support night time economy other by means already available. Quoting the study from 1990 Los Angeles which with respect is culturally and socially different to the Ireland of 2023, points out that crime levels were found to be higher if the bus stop was at an intersection with an alley. This proposed link is de facto creating an alley scenario. The suggestion that the meeting of people reduces anti-social behaviour is correct but this idea as it is presented somehow tries to reverse engineer the situation. In fact, many of the items appearing on the North Central Area of Dublin City Council monthly meetings are about extinguishing public rights of way to prevent precisely the diminution of security of residential premises and anti-social and criminal behaviour. This so called 'link' proposal is completely counter intuitive to this despite what the NTA say who on the record per Mr Hugh Cregan, at a meeting last year said they were not too worried about the link aspect of the project in the presence of a public representative and a senior member of An Garda Síochána. Some of the crime anticipated would include burglaries etc, which usually but not exclusively take place under cover of darkness when cyclists and walkers would largely be sleeping.

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Page 4

The comparison of Dargle Wood in Knocklyon is a churlish comparison. The socio economic breakdown of neighbouring areas differs radically from the largely middle class suburb of Knocklyon. In addition, the green area proposed to be opened up does not have a history of any anti-social behaviour. The green open space area will be divided down the middle and its small size will be further shrunk as a play area and accordingly it may well become defunct.

Increase in vehicular traffic in the estate....The NTA opine that such suggestions will not lead to an increase in traffic flow. This is patent nonsense and if it were true this completely undermines and contradicts the NTAs own arguments for the need for the link or breach in the estate boundary wall. This is not true of the high frequency Dart service and the QBC will be a high frequency service.

The boundary wall without doubt keeps the noise from the vehicular traffic which is only going to increase with high frequency bus service. This is incontrovertible. The breach will open up the green open space to noise pollution and will make it less attractive as a play area or for recreation. Saying that the noise sensitive points are only the houses at either end of the green is nonsense and demonstrates the NTAs ignorance of the factual situation on the ground and their lack of insight into the popular localised use of the green open space.

I urge the Board to reject this application for the CPO in full as it is unnecessary for the overall efficacy of the Bus Connects Project and would as stated herein negatively impact on local residents.

Best wishes,

Councillor Tom Brabazon

Dublin City Council – Donaghmede Ward

A Designated Official for the purposes of the Regulation of Lobbying Act 2015.

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