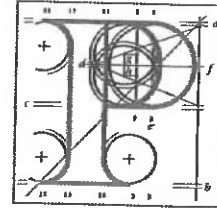


**Our Case Number:** ABP-313182-22



**An  
Bord  
Pleanála**

Roisin Harbourne  
26 Ayrfield Drive  
Ayrfield  
D13W7W8

**Date:** 06 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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## Niamh Thornton

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**From:** Roisin Brady [REDACTED]  
**Sent:** Tuesday 4 July 2023 22:44  
**To:** Niamh Thornton  
**Cc:** Dave Harbourne  
**Subject:** Response to your letter regarding case number APB-313182-22  
**Attachments:** ABP-313182-Submission-July2023 - 20230626 Roisin Harbourne.docx

Dear Ms Thornton,

Thank you for the letter that you sent to me on 01st June 2023 regarding case number APB-313182-22.

Please find attached my submission in accordance with section 217b of the Planning and Development Act 2000, in relation to the submission dated 21st July 2023 that you received from the National Transport Authority.

I appreciate you taking the time to read my attached submission and look forward to hearing from you regarding this matter.

Kind regards,

Roisin Harbourne

Dear Ms Thornton,

I am writing to you in response to your letter, which I received on 01<sup>st</sup> June 2023, relating to the BusConnects Clongriffin to City Centre Bus Corridor Scheme, case number ABP-313182-22.

Your letter invited me to make a submission in response to the NTA's submission dated 21<sup>st</sup> July 2022.

I would like to bring to your attention some of the points made by the NTA in response to my original observation.

*Issue (i) Need for new link not investigated adequately*

The NTA's rationale behind the permeability link in Ayrfield appears to be mainly based on the data they produced in Table 10.5 (NTA Response document, p15). On page 15, they state that:

*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.*

The NTA's data for this table is sourced from the 2016 CSO figures. 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.

**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%	55%	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%
Donnycarney	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%
<b>Study Area Average</b>	<b>18%</b>	<b>49%</b>	<b>9%</b>	<b>17%</b>	<b>7%</b>
<b>County Dublin</b>	<b>12%</b>	<b>56%</b>	<b>8%</b>	<b>17%</b>	<b>9%</b>

I would also argue that if we look at the data from Table 10.5 in EIAR Chapter 10 above, it is evident that the percentage of bus users in Ayrfield (17%) is in fact comparable to the Study Area Average (18%). There is a larger discrepancy between the percentage of travellers by foot/bike in Ayrfield (9%) compared to the Study Area Average (17%). However, the BusConnect scheme and cycle lane from Clongriffin to the City Centre will help to increase cyclists who commute to the city centre. The permeability link would have no bearing on the frequency of use of the Clongriffin to City Centre cycle lane for Ayrfield residents, as it would take a mere two minutes to cycle to the cycle lane with the current exit points in Ayrfield.

Furthermore, the NTA's interpretation of the data from Table 10.5 states that "*the prevalence of private car journeys within Ayrfield may be linked to poorer access to public transport/ walking & cycling facilities*" (EIAR Chapter 10, Page 19). However, the data from Table 10.5 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 suggest the prevalence of private car journeys is directly linked to access to public transport. There is no data anywhere in the study that links private car journeys to poor access to public transport.

Another argument that the NTA gave in response to the issues residents raised around the new link not being investigated properly was that the new link aligns with International Policy, EU Law & Policy, in particular the European Green Deal (EGD) 2019. The NTA states that this new link will help to "... *encourage growth in active travel and sustainable public transport usage*" (NTA response document, page 21).

Currently, it takes less than 8 minutes on average to access the bus stops from our estate with two existing pedestrian access points on Tonlegee Road and Blunden Drive. The 'permeability' suggested will reduce this time by a few minutes, for some residents only.

The NTA's response consistently refers back to the Environmental Impact Assessment Report (EIAR) Volume 2 in support of the proposed link. However, IEAR chapter 11, page 19 states

*"A study into the influence of public transport use on exercise levels suggests that those who walk to and from public transport stops achieve a notable amount of daily travel-related physical activity (median of 19 minutes) and that 29% of public transport walkers get 30 minutes of daily physical activity solely by walking to and from transport stops (Besser 2007)".*

Adding this permeability link will reduce the daily travel-related physical activity for residents of Ayrfield, in contradiction to the very same environmental study that NTA is referring to in favour of said permeability link.

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. Removing that feeling of safety with the installation of this link could reduce the amount of exercise the older residents take around the estate.

## ii. Consultation undertaken

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.

*On page 37 of the NTA's response, they responded that*

*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 including a number of consultation tools...*

The residents of Ayrfield canvassed 544 property addresses and spoke face to face with residents of each property. Not one resident in Ayrfield from over 500 properties in the Ayrfield and Rathvale estate knew about the proposal for our community green space. At no point was the impact of this CPO and proposed works discussed with a single member of this community. Most significantly, the residents of no's 45 and 47 Ayrfield Drive, the properties directly adjacent to the community green space in question, were not consulted at any point in the process of the CPO by the NTA.

The NTA goes on to state on page 41 that

*“Location D included site notices 11 and 12, each comprising two A3 sized notices; site notice 11 was erected on the Malahide Roadside 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*

These site notices were erected after the ABP application had been submitted, which was far 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 states clearly that all properties directly affected by the scheme will be contacted directly, this has not been the case. If Ayrfield residents were informed directly at an early stage their steadfast opposition to this particular section of the scheme could have been noted and actioned without having any effect on the overall NTA bus corridor scheme.

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

The NTA’s response to residents’ concerns regarding risk of increase in criminal activity on page 43 states that

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

*and that*

*“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 from 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-lit 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 Ayrfield, 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.

Furthermore, the NTA responded to residents' concerns about antisocial behaviour using Dargle Wood case study, where on page 43 they state

*"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 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. Page 49 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.



Specific to the consultation process for Dargle Wood, on page 49 of their Permeability Best Practice guide, 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”.*

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 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**

60 submissions raised concerns regarding the loss of the green space, which they stated is used daily by young children and families from within the estate. It provides benefits particularly for young children as the space is viewed as a secure and enclosed space (NTA Response document page 44)

*On page 44 of the NTAs response document they argued that*

*“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 footpath 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.

**(v) Risk of traffic accidents and hazards from increased traffic parking in the estate to access the Core Bus Corridor.**

This issue was raised by 57 of the 64 submissions related to the permeability link in Ayrfield drive.

NTA's response to issue on page 44:

*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 Tonlegee 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.*

This response from the NTA fails to address the valid and genuine concerns regarding traffic accidents for the residents of Ayrfield Drive. Figure 2.1.19 from the NTAs response document on page 40 illustrates a draft drawing of the proposed permeability link from Malahide Road onto Ayrfield Drive.



**Figure 2.1.19: Extract from Updated Draft PRO Drawings - Third round of non-statutory consultation**

As you can see from the red arrow and yellow highlight, the proposed link from the Malahide Road to Ayrfield is connected very close to a T-junction. This T-junction is the main access point to the only exit out of the estate for car users. This means that car users will be effectively colliding with cyclists and pedestrians coming off the bus corridor

and cycle lane, creating a dangerous junction and significantly increasing the risk of road traffic accidents for the residents that live there. The majority of the residents that live in this part of Ayrfield have very young children, who frequently play on the green space illustrated in the drawing. The NTA have failed to address the residents' concerns about safety issues regarding this junction in their response.

As you can see from this drawing the NTA propose to completely remove the 35-metre wall between Ayrfield Drive and the Malahide Road (indicated between the two dotted red arrowed lines). The drawing clearly illustrates the proximity of houses to the boundary wall. The removal of this wall allows children a wide and direct exit point onto the dual carriageway and bus corridor. The NTA did not respond in any way in their submission about the increased risk of potentially fatal road traffic accidents for young children with such a wide and close opening of the estate out onto a dual carriageway.

In conclusion, I feel that the NTA's response to my observation against the proposed permeability link failed to satisfactorily address my concerns.

The fact remains that the risk of serious and potentially fatal road traffic accidents for young children used to living in an enclosed estate is significantly higher with a 35-metre opening onto a dual carriageway and busy Bus Corridor. The NTA provided no evidence in their response to my observation to dispute this claim in any of the data they have produced so far. As a resident of Ayrfield Drive, I feel that these risks far outweigh the proposed benefits that the NTA outlines.

The NTA suggests that they followed a detailed consultation process with local residents regarding the CPO of this green space, but the overwhelming response from the face-to-face petition that residents did from over 544 households in the area shows that residents were not consulted prior to the ABP application and are in fact opposed to the proposed new link.

Concerns about increase in crime and anti-social behaviour was not satisfactorily addressed by the NTA's response. These concerns are shared by Superintendent Ronan

Barry from Coolock Garda station, who attended a meeting at the NTA with residents of Ayrfield.

The concerns about child safety, road safety and loss of green space for the area is given further credence by the support of TDs across all political parties such as Denise Mitchell (Sinn Fein), Aodhan O'Riordain (Labour), Cian O'Callaghan (Social Democrats) and Sean Haughey (Fianna Fail), as well as local councillors such as Tom Brabazon and Daryl Barron, who have all submitted their own observations against this permeability link.

Finally, I would like to thank the Board for taking the time to review our observations initially and this subsequent response. I urge the Board to put the safety of the residents of Ayrfield Drive at the centre of your decision when rejecting the CPO of the community green space between 45 and 47 Ayrfield Drive.

Yours Sincerely,

Roisin Harbourne  
26 Ayrfield Drive  
D13W7W8

References:

1. EIAR Chapter 10, <https://clongriffinscheme.ie/wp-content/uploads/sites/2/2022/03/Ch.-10-Population.pdf>, accessed 04<sup>th</sup> July 2023.
2. EIAR Chapter 11, <https://clongriffinscheme.ie/wp-content/uploads/sites/2/2022/05/Ch.-11-Human-Health.pdf>, accessed 04<sup>th</sup> July 2023.
3. NTA's Response Document, <https://www.pleanala.ie/publicaccess/Responses/313182/NTA%20-%20Response%20to%20ABP%20Submissions%20-%20July%2022.pdf>, accessed 04<sup>th</sup> July 2023.
4. Permeability Best Practice Guide, [https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability\\_Best\\_Practice\\_Guide\\_NTA\\_20151.pdf](https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability_Best_Practice_Guide_NTA_20151.pdf), accessed 04<sup>th</sup> July 2023.