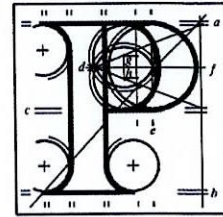


Our Case Number: ABP-313892-22



An
Bord
Pleanála

Michael Hannon
56 Ardpark Road
Navan Road
D07 C3K6

Date: 21 July 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

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

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

AA02

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

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

Michael Hannon

Eimear Reilly

From: LAPS
Sent: Thursday 13 July 2023 15:42
To: Eimear Reilly
Subject: FW: Blanchardstown to City Centre Core Bus Corridor 5
Attachments: 20230712SubmissiontoBusConnects.docx; 20220829CBC5Observation.docx

From: Micheal Hannon [REDACTED]
Sent: Wednesday, July 12, 2023 3:55 PM
To: LAPS <laps@pleanala.ie>
Subject: Blanchardstown to City Centre Core Bus Corridor 5

Attached is my submission to An Bord Pleanála in relation to Blanchardstown to City Centre Core Bus Corridor 5
I am also attaching Observation HA29N.313892 concerning the same issue and which I forwarded to An Bord Pleanála previously in 2022

--
Mícheál Ó hAinnín
Michael Hannon

[REDACTED]
56 Ardpatrick Road
Navan Road
Dublin 7
D07C3K6

Bus Connects Blanchardstown to City Centre Core Bus Corridor 5

The major issue with Bus Connects Blanchardstown to City Centre Core Bus Corridor 5 is that there is no focus on cars. Without proactively reducing the number of cars on the road the outcome of Bus Connects will be the destruction of the Navan Road environment and continuing car traffic jams.

The Navan Road is a relatively narrow road and is traffic congested from 6am to 10am morning most days and from 4pm to 7pm evening most days. Most traffic is composed of cars. To keep the same number of cars on the road with the updated cycle lanes and updated Bus Lanes will result in:

- an inevitable destruction/removal of the existing street trees on the Navan Road.
- encroachment onto many private properties on the Navan Road.
- continuing traffic chaos

This will continue to make the Navan Road, for all intents and purposes, a traffic jam road, polluted and causing continual gridlock. Trees will be removed to allow for the new and updated Bus Lanes, and they will not be replanted since there will be no space left for planting. Some property owners will allow for new trees to be planted in their front gardens - but they will be a minority.

In an article in the Irish Times on the 18th of January 2020 by the economist, David McWilliams, the issue of traffic congestion was discussed. He wrote:

“Traffic is a space issue: there are too many cars on the limited space of the road at a particular time of the day. Because cars clog up the roads, more efficient and more sociable modes of transport, such as buses and more environmentally friendly modes of transport such as cycling are crowded out”.

Because there is limited space on the Navan Road, there will be a problem making space for Buses, Cars, Cycling and Walking. The current plan is to remove most street trees from the road. And there are not enough street trees on the road, as it is. In a 2019 research study by the Journal of the American Heart Association reduced heart disease risk was tied to “neighbourhood greenness”. UK research reported that moving to greener areas is tied to improved mental health. And scientists in Miami found that living in “green” neighborhoods reduced Alzheimer’s and depression. We cannot separate infrastructure work from Green Environments. Both go hand in hand.

The reality is that there is no plan to proactively reduce the number of cars on the road. Reducing the number of cars would allow for a change in how the traffic – Buses, Cars, Cycling and Walking – would work properly. The car is the issue.

We want a proper bus service. Currently, the bus service is moving far more slowly than it should be. This is because of the lack of free space for the bus service on the road and the constant illegal use of the Bus Lane by motorists.

What the Bus Connects Core Bus Corridor 5 will result in:

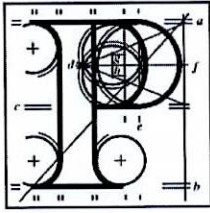
- The narrow width of the Navan Road from Ashtown to Cabra Cross
- Cars will still be a problem and traffic congestion will continue unless proactively reduced. The user guidance hierarchy from Government, as we understand it, is to prioritize:
 - First the pedestrian
 - Second the cyclist
 - Third Public Transport
 - Fourth the private motor vehicle

Unfortunately, this does not seem to be the plan of Bus Connects.

- The severe impact to householders of encroaching onto private gardens.
- No tree survey was provided and this will result in not knowing exactly what the severe impact of the tree removal will be.
- The typical cross sections shown on each map were insufficient to reflect the layout and impact of the proposals.
- The maps showed cross sections of the completed proposals, but they did not relate to any specific area of the maps.
- No mention of Castleknock Road, Blackhorse Avenue, Phoenix Park junction upgrades.
- No mention of an upgrade of Blackhorse Avenue where it is proposed to direct traffic coming from Aughrim St.

Michael Hannon, 56 Ardpatrick Road, Navan Road, Dublin 7 D07 C3K6





An
Bord
Pleanála

Observation on a Planning Appeal: Form.

Your details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

Michael Hannon

(b) Address

56 Ardpatrick Road, Navan Road, Dublin 7 D07
C3K6

Agent's details

2. Agent's details

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not Applicable

(b) Agent's address

Not Applicable

Postal address for letters

3. During the appeal process we will post information and items to you **or** to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

You (the observer) at the address in Part 1

The agent at the address in Part 2

Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

(a) Planning authority

(for example: Ballytown City Council)

National Transport Authority

(b) An Bord Pleanála appeal case number (if available)

(for example: ABP-300000-19)

(c) Planning authority register reference number

(for example: 18/0123)

HA 29N.313892

(d) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

Observation on the Blanchardstown to City Centre Core Bus Corridor 5

Reference number: HA-313892-22

1.0 Introduction

We, the Hannon household, support the Core Bus Corridor Projects (CBC) and particularly the Blanchardstown to City Centre Core Bus Corridor 5.

Nevertheless, we do have concerns about the possible negative impacts of this project on our Navan Road Community. Our focus is particularly on the area from the Parkway Railway Station to the Old Cabra Road junction with the North Circular Road. We support the Navan Road Community Council (NRCC) in its efforts to make this CBC a project that will enhance the life of our community and to contribute pro-actively in developing this project. We are also cognizant that there is a wider population that must benefit from this project and who access the city for work and leisure purposes. We do not wish to see, nor will we tolerate, a negative consequence arising because of this project.

Unfortunately, our time for discussion with the National Transport Authority (NTA) via the NRCC was cut short by the Covid pandemic and we were left in a situation where we had no direct engagement with the NTA. Many of the issues that have now arisen could have been dealt with if this engagement had continued.

While we and the NRCC support the Core Bus Corridor Projects, we are focused on an end outcome that is positive for our community and that produces an enhanced, efficient, modern, transport system.

We want this CBC project to be a catalyst to develop:

- A more efficient transport system to convey the commuter, our elderly and disabled community, and visitors into and out of the wider city areas in an efficient and comfortable manner.
- A fair and attractively priced fare structure.
- Safe and enhanced Cycle lanes and pedestrian paths.
- A new vibrancy in our neighbourhood with initiatives arising from the CBC project. We want this project to be the starting point for the rejuvenation of our Navan Road area and indeed the wider Blanchardstown to City Centre Core Bus Corridor 5.
- A reduction in vehicular traffic that is currently impacting on the Air Quality, Noise and Traffic Safety and impacting on the viability of the Public Transport service of our area.
- A tree lined Navan Road from the Parkway Railway Station to the North Circular Road. Indeed, a Blanchardstown to City Centre Core Bus Corridor 5 that is tree lined.

However, our support is not at any price. There are many concerns with the possible negative impacts of this project on our community. We would

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

request that An Bord Pleanála would support our efforts to retain existing trees and to add to the existing tree population. This is real planning.

2.0 Our concerns and our proposals to make this project work to the benefit of our community and our city.

We are a Community. Not a Motorway!

Our community vision has been gradually negatively interrupted by the continual growth of car commuting and the consequent impediments to an efficient public transportation system. However, this Core Bus Corridor project now provides our community with a vision and the investment to undertake a major restructuring of transport, not alone in our area but also in creating a mobility system template for other towns and cities. If implemented properly it will not alone provide a safe and less costly way to commute but it will also transform the health, environment, and wealth of our area - and indeed other towns and cities.

We want a Community. Not a Motorway!

3. Trees

What the Core Bus Corridor Proposes	What the Core Bus Corridor can do better
<p>Trees The National Transport Authority (NTA) has proposed the removal of hundreds of street trees to facilitate this project. This is very evident from the Parkway Rail Station and along the Navan Road as far as the North Circular Road. We do not see an effort in the documentation to make our community one that has at its core the well-being of people and their economic lives. The well-being of our community arises from many areas: for example, trees, reduction in pollution, safe walking and cycling opportunities and an efficient and clean public transport system. Together with the NRCC we have identified at least 150 street trees to</p>	<p>There is an opportunity to replant street trees in properly constructed tree pits that will still allow for the provision of cycle lanes, public transport, and car lanes. The technology for this is available in other countries, e.g., Denmark, France, Germany, Britain and indeed in Ireland. These large tree pits (and they will have to be large) will be constructed to current European standards and where it has been possible to plant trees in particularly challenging locations. There are many examples in the Navan Road itself, of street trees that were previously planted into restricted tree pit sizes in pedestrian paths and that have not grown properly as a result. What we demand is a recognized and agreed standard for tree pits to be used</p>

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

be removed to facilitate this project. There are also unquantified numbers of woodland trees that will be removed.

in the replanting of new street trees. This will include proper structural soil growing media for the tree roots, and protection for the hard surface above the root areas.

Other Tree Planting Opportunities

There are potentially several locations where trees could be planted and that can contribute positively to a more livable environment. There are areas adjacent to the Navan Road. Here are two examples:

The School for the Deaf

There is a long linear space in an area between the boundary wall to the Navan Road and the school buildings where trees could be planted. We would suggest Birch trees and that are not invasive but would provide a greener environment that would enhance the livability of our NRCC area as well as contribute to CO₂ reduction.

Open Spaces and Institutional lands fronting onto the Navan Road

There are open spaces in these areas where extra trees could be planted with the agreement of the residents. There are opportunities to plant trees in local schools.

4. Dealing with Vehicular Traffic

What the Core Bus Corridor Proposes

4.1 Reducing Vehicular Traffic

We are not anti-car. The reality is that there will be cars on our roads for some time to come.

Nevertheless, more and more cities throughout Europe and even in the US, are grasping with the issue of

What the Core Bus Corridor can do better

The example of other European Cities

Many European cities, e.g., Bilbao, Freiburg, Berlin, Copenhagen, Paris, Bordeaux and even London, to name a few have managed to proactively reduce or begin to reduce vehicular traffic in their cities. Such actions in these cities

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

<p>overwhelming numbers of cars that reduce public space, contribute to CO₂ emissions, and contribute to negative health outcomes for their population. The same is true of this country and particularly in Dublin. However, we have been unable to find in the NTA documentation any consideration of proactively reducing vehicular traffic and in particular, commuter traffic and in a manner that will benefit the commuter and the wider citizen population both financially and healthily. Has the NTA considered the programme of Government to reduce Carbon emissions?</p> <p>Before Christmas 2019, in a very short evening period we counted over 100 cars on the Old Cabra Road from the North Circular Road to the Navan Road. We only counted the cars that had one driver and no passenger – and the cars were not moving.</p> <p>There must be a better way to commute!</p>	<p>contribute to making them more attractive for business and for people to live in. They are becoming livable cities. There is, from what is now published, no evidence that such a proposal has been considered by the National Transport Authority (NTA).</p> <p>The NTA has, in effect, avoided learning from the experience of other countries in helping to create living cities that are good for the economic viability and health of our wider area and its people.</p>
<p>What the Core Bus Corridor Proposes</p>	<p>What the Core Bus Corridor can do better</p>
<p>4.2 Providing a positive alternative for the Commuter</p> <p>There has been discussion and provision of Park and Ride facilities but with the existing facilities the evidence seems to suggest that, without enforcement a significant proportion of commuters will continue to access the city and suburbs by car.</p> <p>In the NTA document there is a reference to “movement of people, rather than solely, the movement of vehicles”. Again, without enforcement there will be significant</p>	<p>How to make Park and Rides Work!</p> <p>Several significant interventions to entice the commuter to move to public transport are:</p> <ul style="list-style-type: none"> • Provide Park and Ride facilities at strategic locations with: <ul style="list-style-type: none"> ○ cheap or preferably nominal or no parking fees ○ a regular bus service. ○ comfortable enclosed shelter for the commuter

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

<p>avoidance by the commuter of using the public transport system.</p>	<p>who is waiting to make a bus connection</p> <ul style="list-style-type: none"> ○ properly maintained and regularly serviced public toilets ○ Clean, safe, and comfortable Café/Restaurant and open at hours that will benefit the commuter ○ Security <ul style="list-style-type: none"> ● Restrictions Creating a computerized system that only allows a reduced number of cars into the city each day. This will start at the Park and Ride locations and to make it work it will have to be enforced.
<p>What the Core Bus Corridor Proposes</p>	<p>What the Core Bus Corridor can do better</p>
<p>4.3 The Old Cabra Road</p> <p>There is a proposal for a Bus Gate on this road. Whilst this would seem to be a positive idea, the consequences of it may be to create new issues on at least four narrow roads in our area.</p> <ul style="list-style-type: none"> ● Blackhorse Avenue ● Baggot Road ● Nephin Road ● Screen Road. <p>Motorists and other road users will use these roads to take short cuts (also known as "Rat Runs") onto Blackhorse Avenue. This will result in congestion, danger to the young, the old, the disabled, pedestrians and cyclists and who must navigate narrow and busy road areas.</p>	<p>We propose that:</p> <ul style="list-style-type: none"> ● extra ramps will be installed on Blackhorse Avenue to mitigate and reduce the volume of traffic on this road. ● The Blackhorse Avenue Road is upgraded to make it fit for purpose for the commuter, the pedestrian, and the cyclist. The ramps should allow for cyclists to be able to ride across the ramp without having to reduce speed and to do this may mean having bollards to prevent motor vehicles moving into the cycle space area.
<p>What the Core Bus Corridor Proposes</p>	<p>What the Core Bus Corridor can do better</p>

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

<p>4.4 Castleknock Road</p> <p>The NTA does not propose any intervention on Castleknock Road leading from the Ashtown Roundabout to the Phoenix Park Gate.</p> <p>This section of Castleknock Road is unfit for purpose and dangerous for:</p> <ul style="list-style-type: none"> • pedestrians • parents and guardians with children • the old and the disabled • cyclists <p>Essentially the pedestrian path is too narrow to allow safe access for this cohort of residents.</p>	<p>The existing path should be reconstructed and widened, and it may be more effective and safer that the road should essentially become a one car lane direction road only.</p>
<p>What the Core Bus Corridor Proposes</p>	<p>What the Core Bus Corridor can do better</p>
<p>5.0 Our Environment</p>	
<p>5.1 Ashtown Roundabout</p> <p>When NRCC met with the NTA on several occasions some years ago, it was eventually agreed that the Ashtown Roundabout and the trees growing on it would be retained. This is a landmark feature.</p> <p>For our community, this roundabout has signified a positive and landscaped entry point to our local area, and it was also a positive signal point for traffic leaving the Navan Road towards Blanchardstown and the northern counties. Additionally, it provided an attractive signal to the entrance to Dublin City itself.</p>	<p>Unfortunately, and without any discussion with NRCC the eventual plans showed that the roundabout would be removed and with it the particularly fine stand of Pine trees.</p> <p>This roundabout planting should <u>not</u> be removed. It is an intrinsic element of the positive environment of our area.</p> <p>We do support the existing proposals to make this location a safe one with a traffic light system and that safeguards the pedestrian and cyclist.</p>

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

<p>What the Core Bus Corridor Proposes</p>	<p>What the Core Bus Corridor can do better</p>
<p>5.2 Enhancing the Environment of our area</p> <p>The proposed works to create the new Core Bus Corridor and the enhanced cycle lanes are welcome. There are however, two potential negative outcomes arising from the Core Bus Corridor works.</p> <ol style="list-style-type: none"> 1. There will be an inevitable reduction in tree numbers and in many locations, there is a current deficit of street trees due to previous infrastructure works. This then impacts on the health of the community as well as the environment of the area. 2. The works that will be necessary to undertake the construction of new cycle and pedestrian path infrastructure will, as outlined in the NTA proposed works, necessitate the undertaking of remedial work in front gardens. We understand that this work will necessitate the rebuilding of the boundary walls and railings. 3. There are proposals for tree planting in the NTA document. However, many of the proposed trees are not suitable for this environment. 	<ol style="list-style-type: none"> 1. We want to work with the NTA to create a positive and "green opportunity" for the residents of the existing houses that face onto the Navan Road - and from the Ashtown Roundabout to the junction of the Old Cabra Road and the North Circular Road. This "Green Opportunity" is to have suitable trees planted in the front gardens of their houses. This planting would be with the agreement of the residents. The planting would be smaller type trees, for example, Birch, small Maple trees. The trees would be planted in the gardens by the agents of the NTA and the maximum number of trees to be planted would be three for each garden and subject to the agreement of the householder. The maintenance of the trees would be undertaken in the first two years by the NTA agents and in the third year would then be the responsibility of the house owners. 2. The boundary walls of the front gardens should be reinstated to a high standard and using the same palette of materials as had been included previously during the construction of the houses. In addition, the disturbed garden

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

<p>In addition, there are too many tree species proposed and, in many cases, the specified trees will be too large for such a narrow road corridor</p>	<p>areas should be reinstated by a reputable landscape firm under the supervision of the NTA.</p> <p>3. A palette of suitable trees should be agreed with members of our community that have arboriculture knowledge.</p>

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

Fee

7. You **must** make sure that the correct fee is included with your observation. You can find out the correct fee to include in our Fees and Charges Guide on our website.

This document has been awarded a Plain English mark by NALA.

Last updated: April 2019.

