

4, Martin Savage Park, Ashtown, Dublin, 15.

An Bord Pleanála,
64, Marlborough Street,
DUBLIN, 1. By hand

AN BORD PLEANÁLA	
LDG-	<u>056718 22</u>
ABP-	<u>313892-22(HA)</u>
30 AUG 2022	
Fee: €	<u>50</u> Type: <u>Comm</u>
Time:	<u>12:48</u> By: <u>Low</u>
30th August, 2022.	

Ref. No. ABP 313892 - Blanchardstown to City Centre Core Bus Corridor.

Dear Sir/Madam,

Herewith my submission on above, with fee of €50.00. Please acknowledge receipt in due course. I also wish to request an Oral Hearing. I am PRO of Navan Road Community Council (NRCC), submitting herewith on my own behalf, from my love of my own surrounding area/s.

I am a life-long resident of the Navan Road parish. Having cycled all my working life on Navan Road to City Centre, now I use buses every other day, and welcome the idea of extra, regular, clean, timely buses, with much reduced fares, which may, eventually, encourage people out of cars onto public transport or bicycles. However, extra buses and cycle lanes should not be provided at the expense of the quality of life and established residential amenity of the living community, through which they pass.

As this entire process took place on-line, all those people not on the internet were disenfranchised from the pre-planning process, and from any participation in the public consultation process. The 2019 TILDA study by Trinity College Dublin researchers was highly critical of the quality of public consultation processes in the Dublin City Council functional area. That predates the Covid19 disenfranchisement of those not capable of taking part in zoom meetings. Even those able to join the meetings were denied the opportunity to take part in the discussion by the control afforded by the technology to those hosting the meeting. The pre-planning process was therefore flawed to the point of being useless. It is now incumbent on Dublin City Council, as the planning authority, and an Bord Pleanála to ensure that the requirement to facilitate meaningful public participation in the planning process is guaranteed to all citizens, regardless of their computer skills.

As a non-professional, I am basing my concerns (listed below) on my own study of the very inadequate information supplied by NTA to the ordinary public, who are, *in this country, still entitled to participate in all planning applications.* Access to full and clear information is presumed as a requirement of the planning process. Sadly, this has not been the case through the pre-planning process with drawings and other written information are not available in a clear or easily understandable format, suitable for public access. Specifically, large format drawings were

condensed into pdf format resulting in some important text being unreadable, even at magnification.

The NTA application was lodged over the peak summer holiday period – end June to end August. This is a time when many people are on holiday, including our elected public representatives, who were not then able to assist citizens in accessing the information critical to the planning process. I am aware of requests, even from some of our elected representatives, to have the pre-planning ‘public’ consultation period extended to facilitate the public, were met with a refusal by NTA.

To overcome this deficiency, the printed planning drawings and texts should be put on public display in the Dublin City Council public library in Cabra to assist those unable to access them electronically and/or to overcome the deficiencies of electronic publication available to date. The statutory public consultation period included in the planning process should begin on the day the drawings and texts go on public display. Site notices should be attached to every bus stop advising that the plans and texts associated with the development are on public display in the *planning office and in the Cabra Library, and advising of the opening hours.* There have never been site notices/explanatory notices on our bus stops, throughout the entire Bus Connects procedures. This is not a private planning application, rather it encompasses our own public spaces and infrastructure.

We note from the An Bord Pleanála website that the planning authority is required to have due regard for ‘the protection of the environment’ in relation to all planning decisions and ask that this duty be appropriately applied in the consideration of this submission, as below;

“Our mission

To play our part as an independent national body in an impartial, efficient and open manner, to ensure that physical development and major infrastructure projects in Ireland respect the principles of sustainable development, including the protection of the environment.”

My concerns:

ENVIRONMENTAL PROTECTION

- Loss of approx. 150 mature and semi-mature trees along Navan Road
- Loss of key green infrastructure and visual amenity as a result
- Loss of residential amenity due to an increase in space dedicated to traffic and a reduction in space dedicated to residential amenity

PUBLIC SAFETY

- Loss of safety for our school-going children in the area, notably:

Dominic's Secondary Convent beside Navan Road Church; Boys & Girls Primary Schools beside same Church; St Declan's Secondary School, Nephin Road (who cross over & back at that junction to access buses), and new Edmund Rice Secondary School beside St. Brigid's GAA grounds, Navan Road. I estimate almost 2,500 school children in our immediate area of this application, i.e., approximate numbers Convent 800; Primary Schools 900; Declans 650 = approx 2,350; added to which, new Ed. Rice School beside St. Brigids GAA to be about 1,000, 500 now enrolled as far as I can ascertain = approximately 3,350 school children whose safety is essential.

- Loss of safety for children using St Brigid's GAA grounds when walking or cycling- and those who may walk or cycle to our immediate club Oliver Plunketts GAA grounds, off Navan Road within Kinvara area.

SOCIAL EQUITY

- Reduction in the provision for disabled persons using buses
- The impact of CPOs on the integrity of the planning process

TREES:

I enclose my non-professional photographs of the existing mature trees on Navan Road which are proposed to be removed, see pictures 1, 2, 3, 4.

1. Shows the beginning of our 'avenue of trees' from Ashtown to Baggot Road/ Kinvara Avenue; it then continues onwards towards Navan Road Church.

2. Shows the end of this avenue of trees, facing West out of city, at Ashtown inwards bus stop No. 1969 - with lovely line of 7 - 9 Silver Birch type trees, to be seen inside the wall at Belleville, Ashtown on opposite side.

3. 'Umbrella Tree' as known, opposite Navan Road Church, suddenly giving perfect shade during our recent very hot weather.

4. Copse of Scots Pine Trees on roundabout at Ashtown, showing the site; showing the long fast straight run from West down from D.15 area, and showing mature Californian Redwood inside wall of former Phoenix Park Racecourse.

Our Navan Road trees provide us with a wonderful and beneficial visual amenity; lessen noise from homes along; provide privacy from stopped bus passengers looking into homes; protect homes and families from traffic fumes. They remove

harmful pollutants from the air and release beneficial oxygen. They provide important protection against intense solar gain producing urban heat island effects. They also host significant biodiversity. Approximately 150 of these trees are scheduled to be removed, many for being a matter of millimetres on the wrong side of a traffic engineer's arbitrary line. These important features of the urban landscape and contributors to residential amenity are insufficiently valued by the proposed design.

University of Canada Research 2015, (<https://www.nature.com/articles/srep11610>) confirms that "having 10 trees in a city block, on average, improves health perception in ways comparable to an increase in annual personal income of \$10,000 (€7,500), moving to a neighbourhood with \$10,000 higher median income, or being 7 years younger." They also found that "having 11 more trees in a city block, on average, decreases cardio-metabolic conditions in ways comparable to an increase in annual personal income of \$20,000 (€15,000) and moving to a neighbourhood with \$20,000 higher median income or being 1.4 years younger." They refer "backyard trees as equally important to public trees". I suggest Navan Road garden trees are our 'backyard trees' deserving proper consideration. The loss of 150 trees has therefore an immediate impact on health perception of €2,250,000 within a small community of people living along the Navan Road. No mitigation is proposed where trees are removed and not replaced. This is unacceptable. I therefore ask that the developer be required to justify the removal of each tree individually to the satisfaction of An Bord Pleanála, and, where removal is unavoidable, that the developer be required to replace each removed tree with semi-mature trees of similar species located within 3m of its current location. Where necessary, underground services should be relocated to ensure sufficient space for root development.

A similar provision should apply to trees and hedgerows located in front gardens which are removed as part of the works. There are approximately 222 houses fronting Navan Road, with approximately 49 trees in various front gardens and approximately 52 mature hedgerows in various front gardens likely to be affected by the works. Many of these are mature trees and hedgerows and their loss will have considerable impact on the residential amenity of the area and on the local biodiversity. These have not been adequately considered in the EIS.

Most residents along Navan Road are living in their homes, since marriages 50/60 years ago, now with grand-children, or great grand-children, or in some cases, the house is their own former family home.

The planning precedence established on Mobhi Road, where residents were granted a reprieve of the removal of their trees, with cycleways and bus lanes redesigned to reduce the number of trees to be removed, and I trust that An Bord Pleanála planners will be instrumental in ensuring a similar reprieve for the Navan Road trees.

VISUAL AMENITIES

Navan Road Community Council spent 6 years in contact with Fingal Co. Council to have the group of Scots Pine Trees on the Ashtown Roundabout trimmed to their now lovely state. These make an important urban design statement, highlighting the transition from a motorway environment to a residential area. It is vital to retain this visual transition from the speedway of upper Navan Road (between the M50 and the roundabout at Ashtown) to support the urban speed limit area.

During initial stages of 'consultations' NTA indicated this roundabout to be replaced by 4-way signalised crossing. Following objections from residents about the loss of these trees, NTA agreed it would become a signalised roundabout. Now I understand that it is proposed to revert to a signalised crossing with all trees removed. This is unacceptable to the local residents, and contributes to a serious lack of trust.

I ask that An Bord Pleanála impose a condition on the grant of permission requiring the retention of the Scots Pine trees in the centre of the roundabout at Ashtown.

SAFETY FOR SCHOOL GOING CHILDREN Moving the west-bound Bus Stop (No. 1661) opposite Navan Road Church closer to the city centre by some 20m will result in it being closer to the entrance to Cabra Convent Secondary School, which must be regarded as a road safety concern. The increased danger I perceive is that young people exiting the secondary school, seeing their bus approaching the stop, may be inclined to dash across the road, avoiding the signalised crossing, as their stop is directly opposite and has been moved further away from the crossing. Please consider if the benefit gained from this move is of greater benefit than the potential endangerment of school children it brings. A resident of "The Paddocks", Ashtown was killed a few years ago, whilst crossing to the east-bound bus stop (No. 1696), without using the pedestrian crossing.

New Edmund Rice Secondary School, beside St. Brigid's GAA grounds, Castleknock – opposite Parkway/Navan Road train station - concern has been expressed by local people for the HEALTH & SAFETY of pupils walking/cycling to and from that site also. Please consider if the proposed access arrangements to bus stops near that school is adequate to ensure the safety of school-going children.

St. John Bosco's schools are junior and primary schools with very young children with families entering and leaving. The proposed CPO of lands at the entrance to these schools must not result in a diminution of the safety of children entering or leaving the school access roadway. It is not clear if driver sightlines will be affected by the widening of the carriageway and the removal of parking at this point.

Prior to granting permission, a study of the safety impact on the school access should be undertaken to ensure no greater endangerment of children using schools *because of the proposed development.*

ABLED/DISABLED ACCESS TO BUSES

The design of the cycleway adjacent to bus stops is unresolved. Running cycle lanes between a footpath and access area to buses is a health and safety issue for *both passengers and cyclists and should be conditioned-out from any planning grant.* Wheelchair users seeking to access bus services are at even greater risk of collision due to limited manoeuvrability and the deployment of the bus ramp.

A revised arrangement is required to ensure the safety of cyclists and bus users at bus stops along Navan Road.

CPOs

Whereas I cannot make any submission in relation to individual CPOs, the CPO of lands outside the Mary Help of Christians parish church and adjacent "Pastoral Centre" are public lands. Please note, the 'Pastoral Centre' is no longer such, and is not in private ownership.

Arrangements for the current practice of parking of hearses and mourning cars outside the church grounds during funerals will need to need to be maintained. The developer should be requested to provide details of how the space which is to be CPO'd will be used in the event of a funeral to afford third parties the ability to assess if proper consideration has been afforded in the proposed development for funerals. Our traditional funerals, sadly almost daily nowadays within Navan Road Parish, involve large groups of people awaiting arrival of hearse before funeral, followed by same groups standing outside, meeting & greeting, and eventually to see the Hearse and mourning cars depart.

TRIPLE GLAZING

Given the significant reduction in residential amenity due to the removal of trees which act as an acoustic buffer and/or the reduced separation between existing *dwellings and 24hr bus traffic, the developer should be required to fund the installation of triple glazing when requested by residents affected by either:*

1. the removal of existing trees between their property and the bus lane
2. the reduction in the distance between the bus lane and the front wall of their house

I look forward to the display of planning documents in Cabra Library and to the proper consideration of the matters raise and for the proper clear information for my fellow residents, throughout Navan Road area.

Junction Castleknock Road/Blackhorse Avenue at Ashtown Gate entrance to Phoenix Park.

As far as I can see, the plan here is to prevent entry to Blackhorse Avenue from Castleknock Road, with also a No Right Turn into Phoenix Park at this junction. This will drive all traffic down onto Navan Road - whilst roundabout is in place at Ashtown, they will turn around and go back up to turn left at Blackhorse Avenue. There is currently a NO LEFT TURN sign here, during early peak hours ? If, the new plan to remove the roundabout to a signalised crossing, how will all that traffic proceed ?

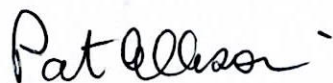
Finally, I note from NTA's own copious planning documentation AT Section 14 I forget which document -

"Well designed urban realm contributes to the identity of localities and enhances everyday lives, of both local communities and those passing through" - I could not put it better myself.

- We wish to retain our Navan Road 'identity' ;
- We look forward to our 'everyday lives being enhanced' - NOT reduced to concrete;
- As our entire area is under threat for the benefit of those 'passing through' we wish for their lives also to be 'enhanced'.

Yours sincerely,

Pat Allison (Mrs.)



4 Martin Savage Park,
Ashtown,
Dublin, 15.

1

Trees down from Ashtown

Pat Allison <barneyt10@hotmail.com>

Fri 26/08/2022 14:12

To: Pat Allison <barneyt10@hotmail.com>



2



Sent from my iPhone

3

Umbrella tree opp Church

Pat Allison <barneyt10@hotmail.com>

Fri 26/08/2022 14:20

To: Pat Allison <barneyt10@hotmail.com>



Sent from my iPhone