

25 Avondale Road
Phibsborough
Dublin 7

28th August 2022

An Bord Pleanála
Marlborough Street
Dublin 1

CPO: Blanchardstown Bus Corridor, Case Reference: KA29N.313961

Dear Sir or Madam,

The Bus Connects project has the real potential to improve our city and its urban village communities for many pedestrians, cyclists and for bus passengers.

In that regard a number of the changes introduced in the Blanchardstown Bus Corridor for the Navan Road and Stoneybatter area are to be welcomed. In particular, the introduction of segregated cycle lanes, the widening of footpaths and improvement in the public realm will constitute real improvements for the Stoneybatter area.

However, there are a series of other changes, introduced under this Bus Corridor scheme in Schedule Part III (Section B), Description of Public Rights of Way to be Restricted or Otherwise Interfered With, which are located outside of the core bus corridor route of the Navan Road and Stoneybatter area and which involve serious impacts for the communities involved.

These changes were not subject to public consultation and they were only introduced at the "last minute" in the context of the application to ABP for the Compulsory Purchase Order.

These changes will negatively affect access to Avondale Road and will create more traffic problems. It will add to traffic as we will need to take a very long circuitous route when coming from the north of the city to access Avondale Road via Broadstone, Western Way, Berkely Road and North Circular Road. Not only that this measure will also create additional pollution in the city which is not good for the environment and will have commuters stuck in traffic for longer than is necessary. These changes are not in any way beneficial to our neighbourhood. Furthermore the Planning notice at the end of Monck Place has been sitting on the ground since July 3rd and is not easily visible to the local residents.

I believe some of the changes put forward are not proportionate, it is not clear what precisely they fix, some of the changes contain significant adverse impacts for certain areas, no mitigating measures are put forward to improve road safety for vulnerable road users in the worst affected area and crucially, these impacts will not be addressed by any other bus corridor proposal.

1) No Public Consultation on the new changes – there must be an Oral Hearing on the impact of these changes.

There are three road restriction changes proposed in the CPO application for the Blanchardstown Bus Corridor, none of which were set out in any of the proposed designs issued for public consultation since the Bus Connects project commenced in 2018.

The final preferred route was the result of three separate and rigorous stages of consultation since 2018 and yet none the three proposed restrictions appeared in the [final preferred route](#) publication dated March 2022.

A number of changes were negotiated at a local level with residents groups, in particular **Annamoe Road and Annamoe Terrace** (ref. BI) residents and their efforts to ensure their road does not become a “rat run,” arising from the displaced traffic from the Old Cabra Road are to be welcomed and supported.

Concerns were raised by **Monck Place** (ref. BF) residents directly with the senior management of the NTA about their road, however this was in the context of another road change in the Grangeegorman area and not any changes arising from the Blanchardstown Bus Corridor. The extent of the proposals set out in the NTA’s CPO application to ABP for Monck Place do not reflect the changes requested by residents from that area at the time.

Furthermore, it appears that the concerns expressed directly to the NTA by local residents about the impact on Fassaugh Avenue, Fassaugh Road and Connaught Street have gone unheeded. The adverse impacts arising from the closure of the Old Cabra Road to general through traffic will now be exacerbated by the new changes.

In that context, the NTA has been inconsistent and arguably unfair in its dealings and responses to concerns raised locally, it has failed to attempt to resolve all major local adverse effects, it has created new problems while addressing problems elsewhere and in that context it is vital that an Oral Hearing takes place for the ABP assessment of the Blanchardstown Bus Corridor.

2. Concern about the marked rise in Traffic flows and the associated safety impact from the new changes

These specifically relate to Connaught Street, St Peter’s Road, the junction at St Peter’s church, Fassaugh Avenue and Fassaugh Road with additional concerns for Dowth Avenue and Cabra Road.

Restricting general traffic from the Old Cabra Road coupled with the no through access southbound on **Annamoe Terrace and Annamoe Road** plus no southbound access to the North Circular Road from **Charleville Road** (ref. BE) means that all Cabra to Stoneybatter traffic will now be displaced as far as St Peter’s Church junction in Phibsborough or to Skreen Road and Blackhorse Avenue.

Furthermore, southbound traffic from Glasnevin to large parts of residential areas in Phibsborough and along the North Circular Road will now be displaced off the Phibsborough road, onto Connaught street, St Peter’s Road and onto the junction at St Peter’s Church in order to access the NCR.

A number of serious concerns arise:

- 1) **Connaught Street now has to deal with displaced traffic coming from two opposing directions-southbound traffic from Cabra and southbound traffic from Glasnevin.** Dramatic increases in traffic flows are forecast (discussed below) and yet there are no mitigating measures put forward to protect vulnerable road users such as cyclists along Connaught street.
- 2) **Displaced traffic flows are being actively routed in front a primary school on St Peter’s Road.** St Peter’s National School is only marginally stepped back from the road and the NTA’s proposed changes completely undermine the “school zone” measures taken by Dublin City Council to protect school users.
- 3) **Fassaugh Avenue, Fassaugh Road and Cabra Road will take on additional traffic arising from the changes on the Old Cabra Road, yet no mitigating measures are proposed such as**

continuous segregated cycle lanes. There are four schools (three primary and one secondary) located on or just off Fassaugh Avenue, yet no protections or mitigating measures have been put forward for active road users arising from increased road traffic flows.

- 4) **Road safety impact due to the lifting of the no-right turn and no-left turn at St Peter's church junction.** There are serious concerns about cycle safety arising from the proposed changes at this narrow V shaped junction. Already three lanes of eastbound traffic and two lanes of westbound traffic merge at this junction. There will be increased eastbound traffic flows due to the Old Cabra Road changes on top of the 25,864 east/west daily vehicular movements at Dalymount (EIAR Vol. 4 of 4) and it is very difficult to see how vehicular traffic will cleanly manoeuvre this v-shaped junction. Questions arise about compliance with best practise in junction traffic management.

3. Modelling

We have serious concerns about what is published in the Impact Assessment report set out in [Appendix A6.4](#).

- 1) **Failure to use the appropriate baseline in estimating future impacts.** The baseline used for the published modelling results is not based on current traffic flows but on a Do Minimum scenario for 2028. The 2028 scenario includes a number of future transport projects which have yet to commence or be completed and there is no guarantee they will be completed by 2028 with the consequent impacts on traffic flows in the area.

In that regard, it must be argued that the baseline is artificially deflated and that the estimates under a "Do Something" scenario do not reflect the extent of the impact of the proposed bus corridor.

Furthermore, the absence of a baseline build on current traffic flows precludes local communities from assessing the impact on their area from the Bus Connects changes. As we noted at the start of this submission, we very much support the overall aims of BusConnects, we want to see a significant traffic modal shift in this city and in our communities, however failure to publish modelling that compares the current situation with future traffic flows does not present a comprehensive picture of the changes to the communities concerned.

- 2) **Flawed classification system of the impacts which sees areas forecast to experience an 80% increase in traffic flows being described as a "low impact" change.** In appendix A6.4 of the EIAR, Impact Assessments, the following are estimated when comparing a "do minimum" with a "do something" (ie BusConnects) scenario at PM peak hour:

- A 80% increase in hourly traffic flows at the junction of Connaught Street and Shandon Crescent,
- A 55% increase in hourly traffic flows at the junction of Fassaugh Ave and Dingle road,
- A 64% increase in hourly traffic flows at the junction of Fassaugh Ave and Bannow Road.

Each is described as having "not significant" effect and "negligible" impact.

Furthermore, there is an estimated 70% increase in peak hourly traffic flows at the junction of Connaught Street and St Peter's Road. This was described as being a "low impact" with "moderate" effect. It appears that only areas that are forecast to experience increases in traffic volume to beyond 85% of road capacity are classified as having any impact at all.

In effect, the classification minimises and deliberately downplays the traffic impacts arising from the proposed changes and this is simply inappropriate both for vulnerable road users but also for those living in these areas.

Overall, we believe the impact of the new and additional changes introduced at the CPO application stage for Bus Connects must be subject to an Oral Hearing at An Bord Pleanála. Unfortunately, the late addition of the changes set out above has significant adverse consequences for particular parts of our community and should not be approved without addressing all of the concerns set out above.

Yours sincerely,

Brendan and Anne Curran