



30th August 2022

The Secretary,
An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street,
Dublin 1,
D01 V902

By email sids@pleanala.ie

Re: Blanchardstown to City Centre Core Bus Corridor Scheme

Dear Secretary,

We refer to the application being made by or on behalf of the National Transport Authority pursuant to section 51(2) of the Roads Act 1993 (as amended) (the “Act”) in relation to the proposed road development consisting of the construction of the Blanchardstown to City Centre Core Bus Corridor Scheme (the “Application”).

Introduction

Fingal County Council strongly supports the Core Bus Corridors (CBC) element of the Bus Connects programme and welcomes the opportunity to engage with the National Transport Authority (NTA) to ensure that the Blanchardstown - City Centre Core Bus Corridor is designed and implemented to take full account of the existing and future needs of the citizens, businesses and communities of Fingal and ensure that the final layout is the optimal design alignment for Bus Connects within Fingal.

Fingal County Council’s overall objective is to see the provision of a sustainable, high quality and efficient transport corridor that will underpin the future sustainable development of the N3 corridor and the wider Dublin 15 area. The coordination of the proposed CBC proposals with the various other transport proposals being considered by Fingal County Council and the NTA in this area will be a critical aspect in ensuring that the overall capacity of the corridor is maintained both during construction and in the longer-term operational stage.

General Comments

Fingal County Council has prepared various Master Plans, SDZs and Local Area Plans in the vicinity of the Blanchardstown to City Centre CBC, in order to support the sustainable development of strategic areas in the county identified in the Fingal Development Plan 2017-2023. A large number of these strategies are situated within the catchments of the Blanchardstown Core Bus Corridor, such as Barnhill, Cherryhound and Hansfield.

These development areas are in addition to the significant residential and other development that continues to take place in Fingal outside of these designated areas in line with the *Fingal Development Plan 2017-2023*. The key aim of these various policies and plans is to establish parameters for urban design and to create permeability, connectivity, and appropriate densities, alongside delivery of

community and amenity facilities, in order to leverage the potential of the existing and future transportation infrastructure in Blanchardstown, such as Bus Connects, MetroLink, Dart+ and the Greater Dublin Area Cycle Network.

There are significant planning applications likely in the Blanchardstown area, including Blanchardstown Town Centre itself, over the coming years and the provision of improved bus services operating along a Core Bus Corridor will be a significant element in the achievement of sustainable consolidated development in the wider Dublin 15 area.

Fingal County Council is committed to facilitating and providing for improved bus services in the county, with Objective MT33 of the *Fingal Development Plan 2017-2023* facilitating and promoting the enhancement of bus services through bus priority measures including bus lanes. The delivery of high quality bus services and associated infrastructure is considered a critical issue facing Fingal, and any delay to the delivery of the schemes in the short-term potentially jeopardises the ongoing development of residential and mixed-use lands across Fingal generally, and in particular in Blanchardstown, Mulhuddart and the Dublin 15 area, potentially undermining key national and local policy objectives including those of the *National Development Plan, Rebuilding Ireland, Fingal Development Plan* and *Transport Strategy for the Greater Dublin Area*.

Fingal County Council's overall objective is for a sustainable, high quality and efficient transport corridor along N3/Blanchardstown corridor. The coordination of the proposed CBC proposals with the various other transport proposals being considered (such as the GDA Cycle Network and Dart+West) will be a critical aspect in ensuring that the overall capacity of the corridor is maintained both during construction and in the longer-term operational stage.

Integration with Cycling

The proposed improvements to the bus corridor will bring substantially enhanced levels of service for bus users and will also bring improved walking and cycling facilities. Fingal County Council supports the improvements for walking and cycling at several of the proposed junctions along the bus corridor. However, it is not clear that the scheme as currently proposed will realise the opportunity to provide integrated cycle parking solutions at bus stops, including a much higher number of high quality, covered and secure facilities to facilitate passengers who wish to make the first leg of their journey by bicycle, and thereby extend the bus network catchment.

Fingal County Council has an extensive programme of cycling and walking improvements planned to maximise the passenger catchment of the various existing and proposed public transport services along the Blanchardstown corridor, under the auspices of the NTA's GDA Cycle Network. Accordingly, there is an opportunity to provide enhanced levels of service to sustainable transport users and the provision of smaller interventions as part of the CBC proposals to improve accessibility should have been incorporated into the proposed development design. For instance, the inclusion of at least 5-10 cycle stands at all CBC bus stops should be applied as standard across the scheme, rather than "where practicable" as proposed in the application, to facilitate multi-modal trips and increase the catchments of the bus services. This would be consistent with Objective MT22 of the *Fingal Development Plan* which is to improve pedestrian and cycle connectivity to stations and other public transport interchanges.

Impact of the proposed development on N3

Fingal County Council in association with Meath County Council and Transport Infrastructure Ireland has a strategic objective to develop a multi-modal transport scheme along the N3/M3 corridor between the M50 and Clonee, with a focus on improving long term access to public transport and

reducing existing and future traffic congestion issues. The design for the core bus corridor must be carried out in a way that does not hinder future safety and efficiency improvements on the N3 and nearby M50. In relation to the proposed design in the area between N3 Junction 1 (M50 J6) and N3 Junction 2 (Snugborough):

- Fingal County Council is concerned with the alterations proposed to the existing diverge lane between the Mill Road bridge and the access road to James Connolly Hospital. It would appear from the drawings that this taper diverge lane is being foreshortened due to the construction of the new bus lane. This is likely to give rise to traffic weaving, safety, and operational issues at this location on the N3 mainline carriageway. Fingal County Council requests that the length of the existing taper diverge lane be retained in so far as is possible, and that the existing overhead sign gantry is retained at approximate chainage A1750.
- Bus Connects will improve cycle facilities on the city side of the N3/M50 interchange. With improved cycle infrastructure there is potential for increased cycling demand to/from nearby areas in northern Dublin 15 such as Sports Campus Ireland, the Institute of Technology Blanchardstown, corporate business parks, residential areas, and Connolly Hospital Blanchardstown. Fingal County Council would have concerns regarding the suitability of cyclists using the N3 mainline due to the speed, volume, and type of vehicles using the road. Fingal County Council accepts that a separate reduced speed limit of 60kph for the proposed bus lane is a suitable proposal and a byelaw implementation may be necessary in this regard. High quality segregated active travel infrastructure parallel to the N3 as defined in the NTA's GDA cycle network plan and allowed for in the *Fingal Development Plan*, such as the proposed Tolka Valley Greenway and the proposed improvements through Blanchardstown village, would be safer and would likely prove more attractive to cyclists if in place.

Fingal County Council would expect that the project can be developed in such a way as to address the concerns outlined and avoid any adverse impacts on the safety, security, and operation of the national road network and we are available to discuss other possible solutions that may exist.

Blanchardstown Town Centre - Transportation

The proposed bus interchange at the town centre will enhance connectivity and public transport usage. It is important that the final layout is optimised to maximise user comfort and safety.

- The provision of bus lanes and additional traffic signage and road marking will require occasional enforcement. There are several roads that are not currently in public ownership, and it is not clear how bus lane enforcement, for example, will be carried out in this regard.
- The proposed extent of the circulatory road and interchange to be under public control should have a speed limit of not more than 50km/h but 30km/h will be more suitable at locations where there are pedestrians or cyclists crossing. A lower speed limit is all the more desirable given the likely trend of development in this area, with the bus interchange and future developments likely to significantly reduce car dependency in the longer-term.
- The retention of the bus lane from the proposed bus interchange all the way to the bus only on ramp at the Blanchardstown N3 interchange should be considered to allow for better management of the bus lane.
- The location of cycleways and the crossing for cyclists at any junctions should be designed to improve priority and safety for cyclists. For example, cyclists crossing the junction of the N3 Slip Road with the Old Navan Road have to cede priority to two vehicular lanes within a short distance, which is not in line with best practice for the design of walking and cycling facilities.
- The junction of Blanchardstown Road South and Blakestown Way contains a number of multi-stage pedestrian crossings routed across a number of cycle, bus and traffic lanes. A

tighter junction arrangement, more consistent with the principles of DMURS, may be appropriate here, as in the absence of suitable signal timings at this location to prioritise the more sustainable modes such as walking and cycling, there may be significant crossing and wait times for pedestrians and cyclists.

- The Blanchardstown Road South (Mulhuddart Interchange) N3 bridge crossing has a wide, unused kerbed central reservation. Fingal County Council has previously requested that the possibility of converting that median to a traffic lane be investigated, to allow the traffic lanes be shifted northwards and a facilitate a wider footpath and cycle lane on the southern side of this bridge.
- Some 34 Sheffield stands for cycle parking are proposed at the Blanchardstown Town Centre Interchange which seems very low for such a major facility. It is considered that as well as additional Sheffield stands, a suitable number of covered, secure parking stands should also be provided as it would be more attractive to potential users including in particular all-day users.

Blanchardstown Town Centre - Public Realm

The new interchange in Blanchardstown town centre is an opportunity to enhance the experience of public transport users and the wider community, and enable and encourage greater usage of bus services. It is also important that the design of the structures and public realm works enhance the visual qualities of the area. The materials, including paving, street furniture, and landscaping should assist in the legibility of the area and assist in switching the priority of this section of the street network to pedestrians, cyclists and public transport.

The materials used should be durable, conducive to the open nature of the development and appropriate to the site context which currently lacks enclosure and is dominated by hard surfacing. The materials used for the shelter structures consist of steel columns, metal coated roofs with glass infill panels. The use of green roofs is a positive feature. There is extensive use of timber for seating areas, which would soften the appearance of the structures. However, there are concerns regarding weathering and durability of these and so further consideration should be given to them. The successful implementation and maintenance of planting is desirable in 'greening' this area and making it more attractive for users. Further consideration should be given to the paving used for the interchange area to improve the aesthetics and the final materials for the structures themselves to maximise the visual qualities of the scheme.

R147 Navan Parkway Interchange

The layout of bus lanes at the junctions with the N3 overbridge should be designed to minimise delay for all users. The retention of a shared left turn lane with buses should be considered.

Drainage

Fingal County Council notes the contents of the Flood Assessment carried out by Arup on behalf of the National Transport Authority as part of the planning application process for the Blanchardstown to City Centre Core Bus Corridor Scheme. The site-specific flood risk assessment summarized the entirety of the route to be at low risk of fluvial flooding. The route was deemed to be at low risk of tidal flooding from the river Liffey and the risk of groundwater flooding to the route was low.

The risk of pluvial flooding to the route was considered high but it is noted that this risk will be reduced as a result of the proposed scheme. This is an improvement on the infrastructure being replaced. It is welcomed that new drainage infrastructure provided will include new Sustainable (Urban) Drainage Systems (SuDS) such as rain gardens, swales, and tree pits. These SuDS features will provide surface water storage and reduce the risk of pluvial flooding.


Fingal County Council promotes the implementation of nature-based solutions to the management of rainwater and surface water runoff in urban areas wherever possible and further detailed SuDS design should continue to be aligned with the principles of the best practice interim guidance document from the Department of Housing, Local Government and Heritage “Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, March 2022.”

Fingal County Council received the River Tolka Flood Study Hydrology and Hydraulics Summary Report (McCloy) in July 2022 in support of the Fingal Development Plan 2023 – 2029. This report is now available for the NTA in continuance of its flood risk assessment of the project.

Conclusion

We welcome the decision to progress with the Blanchardstown Core Bus Corridor project and believe that it will deliver significant benefits to Dublin 15, Fingal and the wider Dublin region. There are certain areas that require further consideration, as set out in the foregoing, and we look forward to working with the Bord and the applicant, as appropriate, to assist in the delivery of this key piece of transport infrastructure.

Yours faithfully,



Matthew McAleese, Director of Services
Planning and Strategic Infrastructure Department

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