An Bord Pleanala Marlborough Street Dublin 1 Alan Fitzgerald 8 Rosmeount Road Phibsborough D07 N225

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

Date: 30 August 2022

Dear Sir / Madam

I would like to object to certain aspects of the above scheme. I am especially concerned with the decision to alter the current usage of Charleville Road, Monck Place and Annamoe Road and Terrace. These changes were not part of the proposal until the final application for a CPO lodged with An Bord Pleanála in late June 2022. Below are the major concers:

- 1. The late alteration of the project raises serious questions in relation to public participation.
- 2. These changes of usage will likely lead to considerable difficulties for residents and businesses in certain streets and local areas.
- 3. The entire CPO process may be premature as it should wait for the enactment of the Road Traffic and Roads Bill 2021.

Inadequate public participation

It may be that these changes are necessary for the viability of the BusConnects project and for the benefit of the local community. However complete lack of public participate on them means that the concerns of the local community and residents have not been addressed.

There has been extensive consultation on most of the plan but changes that significantly impact my community have arisen at the last moment. While I do not know why these changes were introduced at this point in the process, the suspicion is that residents and business that benefit from them made submissions in their favour during the final public consultation stage and those submissions were adopted in the draft CPO plan. This is fundamentally unfair. Any significant issues with the original proposal should have been anticipated and the original consultation phase designed to allow for alterations to the plan and consultation on those alterations.

A partial remedy is for An Bord Pleanála to allow for an oral hearing into this project where there can be a full and proper discussion of these changes and the NTA can show the rationale and necessity from them. But this Oral Hearing must start on the basis that these late changes are materially different from the rest of the draft CPO in that they have never been properly examined. For example, the changes were announced in very late June, just as many of those affected were starting annual leave. There was no time to request information from the NTA on the data behind these changes, such as who lobbied for them and the traffic data on which they are based.

Difficulties for local residents

The proposed changes will mean the local residents in Charlivelle Road, Rathdown Road, Rosemount Road, Cherrymount Park and Great Western Square will have significant difficulties making any journey that requires access to their homes from north of the North Circular Road (the NCR). Such journeys include any travel from schools north of the NCR, from the airport, retail outlets in the north city, the northern natural amenities and Northern Ireland. At present residents have a choice of using Charleville Road to access the NCR or Monck Place. The closure of these roads means that all traffic will now have to make a right-hand turn in front of St Peter's Church. Such a turn is currently prohibited at that junction, presumably for the reason that to allow right-hand turns at such a sharp junction would cause significant traffic problems. Yet the current proposal is to funnel a significant amount of traffic through that area. It is important to state that the proposal will close off four routes from north to south:

- Cabra Road
- Annamoe road
- Charleville Road
- Monck Place

The following are just a number of examples:

Monk Place

There will be no access south bound on Phibsborough road from Monck Place. In order to access the Phibsborough Road southbound from the NCR, it will require either:

- 1. driving along Peters Road (accessed either by Charleville road or a U-turn at St. Peters church), driving Connaught St and then through the junction at Doyle's corner, or
- 2. driving down through Doyle's corner from the St Peters Church junction. Down Berkeley St and then along western way.

Both of these routes will increase traffic through Doyle's corner. In addition as there is no left turn from Phibsboro road to Monck Place, access to the North Circular road will also necessitate by going to Doyle's Corner and turning left, again, increasing traffic in Doyle's corner.

Charleville Road & Annamoe Rd & Old Cabra Rd

There will be no access to through access to the North Circular Road from these roads Charleville Road, Annamoe Rd and the Old Cabra Rd, the reason to prevent rat runs. However, as mentioned above, no consideration has been given to the fact that locals living in the area require access by these roads to prevent funnelling all traffic through the junction at St. Peter's Church to get to the North Circular Road.

The above routes will funnel traffic through the St Peter's church junction. These journeys will now be competing for road space with all the normal traffic seeking to use Doyle's Corner, in addition that that displaced from the Old Cabra Road. Given the late changes in the project design, I do not think that all of these problems can have been considered by the project team and factored into the decision. For a variety of reasons we will all still need vehicle access to our homes and residents and even the most committed cyclist need to drive on occasion. The Busconnects project will bring

greater public transport options to certain residents on certain routes but this should not be done at the expense of inner city communities.

Roads and Traffic Bill 2021

This Bill is currently going through the legislative process. It proposes one amendment that is relevant to this project. The CPO Order relies on a number of statutory provisions, including s. 44 of the Dublin Transport Authority Act 2008. This section is to be amended by the above Bill in two ways, most significantly but the insertion of s. 44(6A). This amendment gives the NTA the powers it is purporting to exercise in this CPO. Thus the current application must be considered invalid. Otherwise the Oireachtas would not seek to extend the powers of the NTA in this way.

Finally I wish to adopt the submissions of the Rathdown Road, Charleville Road and Cherrymount Park residents association, and of Ms Marie Sherlock, Labour Party Senator.

Regards

Alan Fitzgerald

Alar Titzgerall