387 Navan Road
Ashtown
Dublin 7
D07A6F6

29th August 2022
ABP Case Reference No. 313892

Re: Bus Connects Dublin - Blanchardstown to City Centre - Route 5

from Ashtown Roundabout (Sheet 20) to Screen Road (Sheet 28)

To Whom It May Concern

As a cyclist, motorist and a user of public transport, the proposed Bus Corridor and road upgrades is, in general, welcomed however I do have some concerns regarding what impact the proposed works will have on the Parish of Navan Road and the immediate surrounds of my home which is located 60m from the Ashtown Roundabout.

My main objections/concerns are;

- Replacing Ashtown roundabout with a signalised junction.
- Removal of 90 mature trees along Navan Road from Ashtown Roundabout to Screen Road
- The quality and location of the proposed bicycle lanes

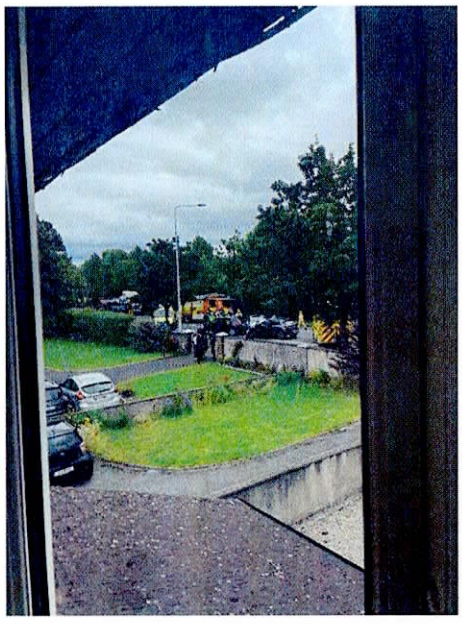
Replacing of Ashtown roundabout with a signalised junction

Of the 7 national roads/arteries entering Dublin City the M1, N1, N2, N3, N4, N7 and the N11. The N3 is unique in that it goes from a national road to a regional road (R147), namely the Navan Road, at the Ashtown Roundabout.

The M1 joins the M50 and continues to the port tunnel into the city centre. The N1 is a wide throughfare through Whitehall and Drumcondra, the road already wide enough to accommodate bus lanes and cycle tracks. The N2 becomes the R135 which is a dual carriage way through Finglas until Glasnevin cemetery, again a wide throughfare. The N4 becomes the R148 which is a dual carriage all the way to Heuston Station and the N11 becomes the R138 a dual carriage until Donnybrook. With the exception of the much wider R138 through Donnybrook Village - *none* of these above routes are residential roads, lined both sides with houses.

The Ashtown roundabout acts as a divide between the non-residential part of the Navan Road, toward Blanchardstown and the residential Navan Road/Parish of Navan Road. It is a clear indication to the motorist that you are now entering a residential road.

Speeding is already a regular occurrence on the dual carriageway and the removal of the roundabout will lead to a continuance onto the Navan Road towards the city centre. Already this year between the roundabout and Kempton traffic lights there have been two car accidents due to speeding traffic.



12th May 2022

01st July 2022

I don't think the NTA has taken into consideration the safety of the residents who live in the 8 houses between the roundabout and Kempton traffic lights. The roundabout also acts as a buffer to slow city bound traffic down. Between the Ashtown roundabout and Kempton Estate traffic lights there is a row of 8 houses the furthest of which is 80m from the roundabout. I live at 387 Navan Road; my driveway entrance is about 60m from the current roundabout. Because the traffic usually slows down to navigate roundabout it helps myself and the other residents to enter and leave our driveways safely. Also, if I am travelling from the city centre, it is safer to loop around the roundabout to access my driveway. The other option would be to stop and when oncoming traffic is clear cut across the Navan Road to access my driveway. If traffic is heavy this usually leads to a tail back until oncoming traffic is clear.

Can it be noted that, following consultations with the NTA and local residents the previous 2 preferred options in March 2020 and November 2020 showed the roundabout retained with new traffic lights so It's a bit surprising that the roundabout was removed in favour of signalised junction for this final submission.

Removal of Trees along Navan Road

By removing so many trees the NTA is ignoring the policies and objectives of the Dublin City Development Plan 2016-2022, Dublin Tree Strategy 2016-2020 & The Design Manual for Urban Roads and Streets.

Dublin City Development Plan 2016-2022

Extract 10.5.7 Urban Forest - Chapter 10 Green Infrastructure & Recreation

10.5.7 Urban Forest - *The city's urban forest consists of* street trees, *garden trees, trees in parks and open spaces, hedge lines and woodlands. Trees bring extensive benefits to the city by humanising space, enhancing the environment and minimising the impacts of climate change. They provide ecosystem services such as cleaning air, providing natural water management / flood control and*

creating diverse habitats while also storing carbon, cooling the urban environment, masking noise and acting as a wind barrier.....

It is the Policy of Dublin City Council:	
GI40	**Tree Planting - General** To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native species as appropriate to the location of the development in the interests of natural heritage, amenity, environmental quality and climate resilience.
GI41	**Protect Existing Trees as Part of New Development** To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.
GI42	**Tree Management** To adopt a pro-active and systematic good practice approach to tree management with the aim of promoting good tree health, condition, diversity, public amenity and a balanced age-profile and as per Dublin City Tree Strategy 2016 or as updated.
GI43	**Hedgerows** To protect and enhance the City's hedgerow network, in particular, hedgerows that form townland, parish and barony boundaries. It is Council policy to increase hedgerow coverage and promote the planting of hedgerows in new developments using native species.
GI44	**Resilient Urban Forest** To deliver and manage a resilient urban forest for the City to help increase resilience to the effects of climate change to consist of native and exotic trees and to target and prioritise locations in the city with a low canopy cover for an increased level of tree cover.

It is an Objective of Dublin City Council:	
GIO40	**Forthcoming Dublin City Tree Strategy 2016** To support the implementation of the Dublin City Tree Strategy 2016 and any future revision thereof, which sets a vision for the long-term planting, protection and maintenance of trees, hedgerows and woodlands within Dublin City.
GIO41	**Trees as Wildlife Corridor or 'Stepping Stones'** To protect trees, hedgerows or groups of trees which function as wildlife corridors or 'stepping stones' in accordance with Article 10 of the EU Habitats Directive.
GIO42	**Urban Tree Canopy Plan** To support the preparation of an Urban Tree Canopy Plan for the City Centre Area. To increase the tree canopy cover to a minimum of 10% in all areas with an emphasis in increasing the tree canopy cover in areas where there is a deficit, and a minimum of 5% each year in the city centre.

Dublin Tree Strategy 2015-2020

extract 3.0 Tree Policy

3.3.1 Protection of Existing Trees

Dublin City Council will consider the protection of existing trees when granting planning permission for developments and will seek to ensure maximum retention, preservation and management of important trees, groups of trees and hedges.

The successful retention of suitable trees is a benchmark of sustainable development. Trees of good quality and condition are an asset to a site and significantly increase its attractiveness and value. They add a sense of character, maturity and provide valuable screening, shelter and privacy and will often have a useful life expectancy beyond the life of new buildings.

The Tree Strategy for the City provides the vision and direction for long-term planning, planting, protection and maintenance of trees, hedgerows and woodlands within Dublin City and will be a material consideration in the determination of planning applications and other development.

3.5.6 Footpath / Road obstruction due to trees

The Council will undertake work to a tree in Council ownership / management where a tree is causing an obstruction to a public highway, public footpath or cycleway, public right of way, access to property or public open space, where reasonably feasible.

4.1 Aims and Objectives

There are four key aims for the City's Trees:

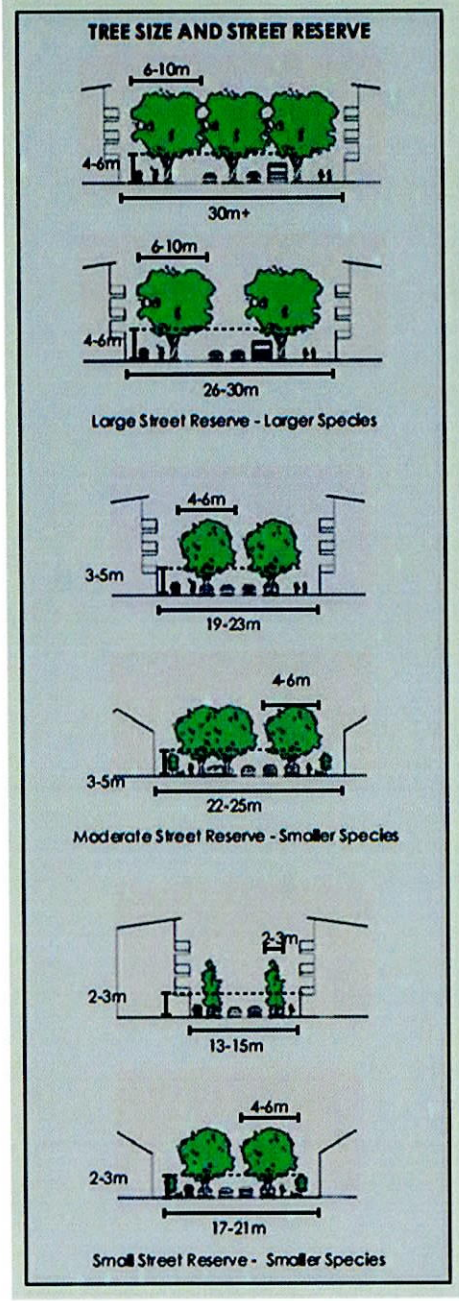
- Protect the trees that we have.
- Care for trees to promote healthy growth and development.
- Plant more trees to ensure a sustainable urban tree canopy.
- Communicate effectively with the public and stakeholders regarding trees.

These aims translate into 4 specific objectives:

- Protect
- Care
- Plant more
- Communicate

The Design Manual for Urban Roads and Streets - *4.2.2 Street Trees*

General guide to the canopy width and clearance height of street trees



Appendix 4.
Extract from Design Manual for Urban Roads and Streets

Street trees are an integral part of street design as they contribute to the sense of enclosure, act as a buffer to traffic noise / pollution and enhance place. A traffic calming effect can also be achieved, where trees are planted in continuous rows and their canopies overhang, at least in part, the vehicular carriageway. Street trees can also be used to enhance legibility by highlighting the importance of connecting routes and distinguishing one area from another through variations in size and species selection.

The planting of trees should be considered an integral part of street design. In general, the size of the species selected should be proportionate to the width of the street reserve. See examples left:

- Larger species, with a canopy spread greater than 6m will be best suited to wider streets, such as Arterial and Link streets.
- Smaller species with a canopy spread of 2-6m will be best suited to narrower streets such as Local streets.
- Designers may seek to vary this approach in keeping with the characteristics of a place.
- For example: Sparse planting may be more appropriate in a Centre, enhancing its urban qualities.
- Smaller species may be more appropriate where buildings are located in close proximity to the street edge carriageway (i.e. to take account of overshadowing and growth restrictions).
- Larger species may be desirable within suburbs, to enhance the greener character associated with these places.

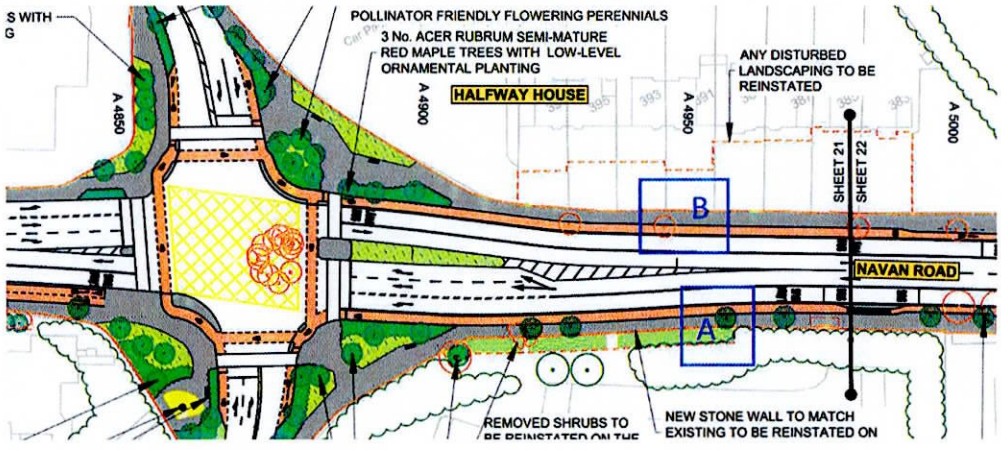
To be effective, trees should be planted at intervals of 14-20m. This may be extended periodically to facilitate the installation of other street facilities, such as lighting. Designers should also consider the impact of root growth. Tree roots may need to be contained within individual tree pits, continuous soil planting strips or using other methods to restrict growth under pavements/ toward services.

Comments:

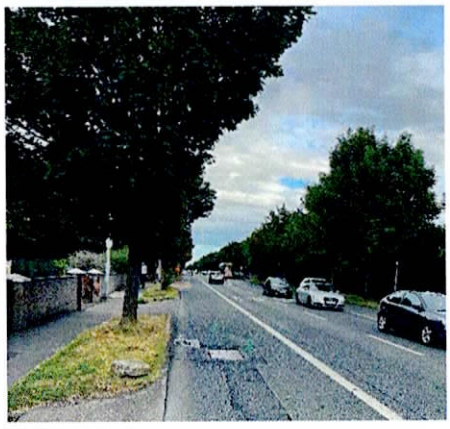
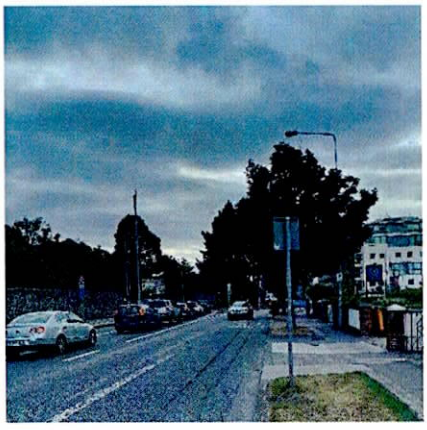
The extracts above cannot be any clearer in stating the importance of trees to Dublin City. Trees are part of the fabric of this city both now and will be in the future. Even the 'Design Manual for Urban Roads and Streets' a government manual 'designed to be universally accessible to all professionals associated with street design' states trees are an 'integral part of street design'.

In relation to the submitted drawings the NTA 'Landscape General Arrangement Plans' show the removal of 110 of the 150 mature trees between Ashtown Roundabout and Screen Road, these numbers include the 15 trees on the Ashtown roundabout. If this project is completed 40 existing mature trees and 55 new trees should be in place, although it will take 20 years for the new trees to reach maturity. In total there will be a 40% reduction in trees on the Navan Road.

However, where exactly will these new trees be located as there is no landscape verge between the proposed bike lane and footpath. Judging by the plans, the new trees are planted in the middle of the footpaths. Even if the trees are planted centrally between the foot path and cycle lane, they will surely be a hazard in the future due to roots coming out of the ground and low-lying branches for both pedestrians and cyclists. *(See extract 3.5.6 Footpaths above).* Also, if it is acceptable to plant new trees on the footpath/cycle lane (A below) why are existing trees been removed from proposed footpath/cycle lane (B Below). This scenario occurs the entire length of Navan Road to Screen Road.



Ashtown Junction

In the photos above, taken from outside my house, every tree between the footpaths as far as the eye can see will be removed.

It's clear that the current proposal will have a both detrimental effect on the character of the area and quality of life of the local residents. The majority of trees to be removed are at least 20 years old (or more). Even with the additional new trees it will take years to re-create what is already there. By removing these trees, this proposal is effectively changing what is a busy but pleasant residential tree lined road into a traffic thoroughfare with no regard to the households on the Navan Road and the further Navan Road parish.

The quality and location of the proposed bicycle lanes.

The NTA's 'National Cycling Manual' states that the Five Needs of Cyclists are; road safety, coherence, directness, attractiveness, and comfort. Due to the number of junctions (most collisions involving cyclists occur at junctions), driveways and bus stops (there is a conflict between pedestrians and cyclists at all bus stops also the position of proposed trees) along the proposed route from the Ashtown Roundabout to the city quays. The proposed cycle route is not safe, coherent, attractive or comfortable.

I commute daily to work on my bicycle. Although I live on the Navan Road I avoid it, my preferred route is either Blackhorse Avenue or through the Phoenix Park. This is because there is less traffic, no traffic lights, and no cars parked outside

houses blocking the cycle lane resulting in a safer and more comfortable journey. Blackhorse Ave runs parallel to the Navan Road.

I think the NTA have missed an opportunity to create a safer more attractive cycling route via Blackhorse Avenue to the city centre and at the same time stopping the inevitable increase in traffic on Screen Road, Nephin Road, Blackhorse Avenue and the New Cabra Road, due to the Old Cabra Road and Prussia Street becoming bus only. Surely it is common sense to keep motorised traffic on the main thoroughfares into the city instead of creating 'rat runs' through heavily residential areas.

Summary:

If Dublin City is to thrive going forward the reduction in car journeys is necessary and quality bus corridors and safe cycling routes are part of the solution but at what cost? I don't understand why the NTA are trying to fit a certain type of road design, 2 x footpath-bike lane-bus lane-traffic lane, on an existing road where it clearly does not fit, without looking at other design options. Trying, even on a trial basis, a shared bus lane that is used city bound in the morning and Blanchardstown bound in the evening up to the Ashtown Roundabout or making Blackhorse Avenue a designated cycle route. The bus corridor development is also going to increase traffic flow on the secondary roads off Navan Road.

Communication with the NTA regarding this Bus Connect Corridor was very limited and frustrating. As the project is an Infrastructure SID, members of the public cannot lodge objections/observations with Dublin City Council so An Bord Pleanala is our last (and first) chance to make an observation on this very contentious project. With this in mind, I am asking An Bord Pleanala to get the NTA to reconsider aspects of the proposed development so that it benefits not only members of the public passing through but also the residents of the Navan Road Parish.

Yours Faithfully

Thomas Good