

Dear Sir or Madam,

I wish to make an observation on the Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme (HA29N.313892) on behalf of Kempton Residents Association.

Yours Sincerely,

John Hiney

Communications Officer

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Introduction

Approximately 1,000 people of all ages live in the Kempton Housing Estate which is on the Dublin side of the Ashtown Road/Navan Road junction. The estate is entirely residential without any amenities such as shops etc. It has a single access point which generally has a large volume of traffic especially during the morning and afternoon “rush hour” period.

Proposed Changes to the Kempton Avenue / Navan Road Junction

Turning Right into Kempton

We are gravely concerned about the removal of both the right-turning filter lane and the traffic filter green arrow, which controls traffic turning from the Navan Road onto Kempton Avenue. We believe that this will have several adverse consequences:

- Westbound Navan Road ‘non-bus’ traffic will back up behind vehicles waiting to turn right into Kempton.
- As there will be no green arrow to control traffic turning right, we fear that motorists will feel pressured by the traffic behind them to make risky turns across oncoming traffic.
- ‘Non-bus’ traffic will enter the bus lane.

A right turn filter arrow has been proposed for the Ashtown Grove /Navan Road junction. As this is a similar junction to the one at Kempton, we consider that the same format should apply to controlling both junctions and that a filter light should also be provided at the Kempton Avenue / Navan Road.

We have noted separately that the Ashtown Roundabout would provide a safe alternative for making this right turn (in that motorists could pass Kempton and use the roundabout to enter Kempton from the left).

Pedestrian Crossings

We suggest that the proposed pedestrian crossings at the Kempton Junction be changed so that there are only two crossing points instead of three; one across the Navan road to the right on exiting Kempton and the other across Kempton Avenue. The current crossing point to the left on exiting Kempton would be removed. This would facilitate a filter light for traffic turning right from the Navan Road into Kempton. The filter light would work in conjunction with the pedestrian crossing signal. This arrangement would also provide a pedestrian crossing point closer to the remaining two bus stops.

Slip Lane Exit from Kempton

We are concerned about the loss of the slip lane that currently takes eastbound traffic out of Kempton without depending on the traffic lights. We predict that the removal of this lane will cause a longer queue of vehicles on Kempton Avenue, preventing all waiting traffic from exiting the estate during a single traffic light phase.

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Removal of Ashtown Roundabout

We believe that this will have a negative environmental and aesthetic impact and make the Navan Road and the junction at Kempton less safe.

- The trees growing in the grass area in the centre of the roundabout have a strong aesthetic effect on the surrounding area.
- The roundabout acts as a boundary between the dual carriageway (and essentially the higher speed national road network) and the built-up Dublin City area. It assists in slowing down traffic to suitable speeds for suburban roads. The proposed open junction would not have the same effect.
- The removal of the right turning facilities into Kempton in conjunction with the removal of the Roundabout will make the Kempton junction less safe. To avoid making an uncontrolled right turn the current option of passing through the junction, going around the roundabout and coming back to make a safer left turn into Kempton will no longer be possible.
- We believe that the removal of this roundabout may cause a “wind tunnel” effect on nearby roads given the tall trees on the roundabout. This would reduce the shelter on the Navan Road.
- We acknowledge that there is a need to provide controlled crossing points for pedestrians and cyclists at this junction but ask that this be done without sacrificing the roundabout itself.

We propose that the Ashtown Roundabout be retained with traffic lights in operation at peak hours.

View of Ashtown Roundabout from Dublin City Side



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Views of Ashtown Roundabout from Fingal side



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Bus Gate and effect on traffic flow and access to the Phibsborough area

We are concerned that access to the Phibsborough area will be more difficult for both public and private transport due to the effective closure of the Old Cabra Road to private vehicles. The Phibsborough area is an important area of the city for Kempton Residents, containing important facilities such as the Mater, Temple Street and Rotunda Hospitals, and it is also a hub where other individual health professionals have based their practice. It is a commercial and recreational centre with Banks, Credit Unions, a Post Office as well as shops and restaurants, and it is where Dalymount football stadium is located. It is a local centre for employment and also a junction where Dublin City University students make bus transfers. The Phibsborough area is also important for other Navan Road residents as well as those living in Blanchardstown, Meath and further afield.

The LAM (Local Area Model) study of predicted traffic flows indicates a relative reduction in traffic on the new Cabra road if the proposal goes ahead when compared with the 'do nothing' scenario. This prediction appears questionable, as the bus gate at the Old Cabra Road/Navan Road junction will effectively divert all other city bound traffic down the New Cabra road towards Phibsborough. There is no evidence of an alternative study which confirms this conclusion. Even assuming a significant switch from car to bus or bicycle, we struggle to understand where the excess diverted traffic will go.

There seems to be no predictions made for journey times, by bus or car, on the routes that will serve Phibsborough. The density of the traffic in Cabra West should be key to predicting bus journey times on this route as there is no room for a bus lane on most of the New Cabra Road.

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Pedestrian “islands”

These are a feature of the Navan Road in the area. Pedestrians, in particular the elderly, those with disabilities and groups of children find them very useful for crossing the road safely. We believe that removing these will have a negative impact on the safety of the road’s crossing points for this group of pedestrians.

Pedestrian island at junction of Navan Road and Ashtown Grove - Aerial Photo (Google Maps)



Pedestrian island at junction of Navan Road and Ashtown Grove - Surface Photo (Google Maps)



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Trees

Loss of trees on the Navan Road

It is proposed to fell approx. 55 trees from the section of the Navan Road between the Ashtown Roundabout and the Kinvara Ave junction, while only 14 new roadside trees will be planted on this stretch. The negative visual and environmental impact of this will be enormous for residents who have chosen to live their lives in a leafy suburb. This is a net loss of 41 roadside trees over a distance of one kilometer which we believe will have an adverse effect on the absorption of CO2 emissions from the traffic while significantly and negatively changing the character of the Navan Road area.

New trees in Kempton

It is proposed to plant 8 new trees in the green area outside the entrance to Kempton. While we welcome more tree planting we believe that the specific area proposed for the planting of these 8 trees is too close to established mature trees. These mature trees have high branches that would cast shade and inhibit future growth of the new trees. We suggest that alternative locations within Kempton could be selected for these new trees.



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Predicted journey time gains versus environmental impact.

We consider that the negative impact of the proposed changes to the layout of the Navan Road at the Kempton/Ashtown end are disproportionate to the potential gains for commuters and residents.

Regular commuters who live in Kempton and travel between the city and Ashtown have long noted that traffic congestion on the Navan Road in the evening rush hour occurs primarily between the Ratoath Road/Cabra Road junction and the Kinvara Ave/Navan Road junction. Once passed this point, westbound traffic then begins to flow freely through the Ashtown Grove junction to the Ashtown roundabout and beyond.

We also note that the average time gained for a westbound bus journey is predicted by Bus Connects to be less than 5 minutes on a journey of approximately 30 minutes. We suggest that the proposed changes to this relatively small section of the route will not contribute significantly to this time prediction.

From Chapter 6, Environmental Impact Assessment Report, Traffic and Transport:

Table 6.56: B3 Service Bus Journey Times (Outbound Direction)

Peak Hour	Do Minimum (minutes)	Do Something (minutes)	Difference (minutes)	% Difference
2028 AM	32.4	30.6	-1.8	-5%
2028 PM	35.6	30.8	-4.8	-13%
2043 AM	32.1	30.6	-1.5	-5%
2043 PM	35.0	30.7	-4.3	-12%



Outbound traffic at Ashtown Grove junction with Navan Road

(Tuesday 23rd August 2022 at 6 PM)



Outbound traffic at Kempton Avenue junction with Navan Road

(Tuesday 23rd August 2022 at 6 PM)

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Conclusion

We consider that the planned changes to the road layout on this section of the Navan Road, with loss of right turning lanes, loss of the roundabout, loss of pedestrian islands and the loss of trees will not add a significant amount to the predicted time gained by buses on their overall journey. However, the negative impact that these changes will have on the local residents will be very significant indeed.

The Navan Road is a community and the residents of Kempton sympathise greatly with all the residents of the Navan Road who will be negatively impacted by the Bus Connects proposals. We are especially sympathetic to all of those whose gardens have been included in the CPO for permanent acquisition and those whose gardens will be used during the construction period.

We believe that there should be an oral hearing on this matter and we request an oral hearing at which we could present our views.