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

The Bus Connects project has the real potential to improve Dublin 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, in particular my own road of Connaught Street and surrounding communities.

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.

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 my area, no mitigating measures are put forward to improve road safety for vulnerable road users in the worst affected areas and crucially, these impacts will not be addressed by any other bus corridor proposal.

According to the submitted documentation the proposed scheme *"is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe and integrated sustainable transport movement along the corridor. "(*Ref: www.blanchardstownscheme.ie)

As a resident of Connaught Street in Phibsborough, considered in the Indirect Study Area of this core bus corridor, I would like to state that this proposal will severely negatively impact my area in terms of safety of all users of my road, in terms of greater pollution, and in terms of severely curtailing access to both recreational, education and medical facilities in the area. Connaught Street, a 100% residential street in a Z2 zoned area (residential conservation areas), is being used as a main corridor to move all displaced vehicular traffic away from the Core Bus Corridor Route, with little or no background data given to support the decision to make it so.

Connaught Street is to be completely destroyed by the proposed road network alterations to achieve not only this Core Bus Corridor but also the Finglas/Ballymun Corridor, I must appeal to you to refuse this proposal as it will not enable or deliver efficient safe or integrated sustainable transport movement along the corridor, or surrounding the corridor. It purports to provide a system to move those from the end of the route to the city centre, it does not allow for any circular travel, and will result in a much more uncomfortable and unsafe living environment for those who live and work in the area.

While my objection would no doubt cover serval other areas along the bus corridor, I have only concentrated on the area between Phibsborough and the City Centre.

I have grave concerns about the planning application that has been made for the Blanchardstown Bus Corridor and urge you to reject it for the reasons below:

1) Inaccessible documentation:

Even narrowing my focus to the study area mentioned above, proved quite difficult to ascertain the proposed impacts of the development, with large amounts of the documentation referring to high level statistical philosophy or methodology and data manipulation which is well beyond my ability to interpret.

The information submitted as part of this application is very difficult to read and follow for members of the public. The overall BusConnects scheme is not adequately described nor is it considered in terms of the cumulative impacts of several routes in more central locations. The fact that the two bus corridors which affect Connaught Street are not being looked at together, as the Finglas corridor has yet to be submitted, is an underhanded tactic used to create greater confusion for members of the public on the cumulative impact of these routes.

The sheer size of application including physical size of documents to view online is confusing. On the webpage for this application, the following is the options for members of the public:

- Environmental Impact Assessment Report (116 tabs)

- Compulsory Purchase Order (4 tabs)

- Appropriate Assessment Screening Report (1 tab)

- Natura Impact Statement (8 tabs)

- Supplementary Information (59 tabs)

Nowhere on these tabs does it indicate corridor layout, drawings etc. If a member of the public wishes to see the impact of the proposal on their home, how are they to find the required drawings of documentation which indicates the changes and gives justification for these changes.

It is very difficult to navigate the vast amount of documentation provided**.** For example, if one was looking for the background information supplied which was the basis for the route, it is difficult to follow. The submitted application shows both Stage 1 documentation, preferred route documentation and preliminary design documentation. None clearly state this is the route – this is the baseline data – this is the result.

Additionally, I would like to raise that the file names e.g. BCIDC-ARP-GEO_GA-0005_XX_00-DR-CR-0038 (Sheet 38 of 40) are not adequate or readily accessible drawing names for members of the public.

Overall, the documentation submitted in support of this planning permission was not understandable, transparent or accessible for members of the general public, in particular those being affected by these changes. There is also no signposting of changes that have emerged since the many public consultations, nor rationale for the same.

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

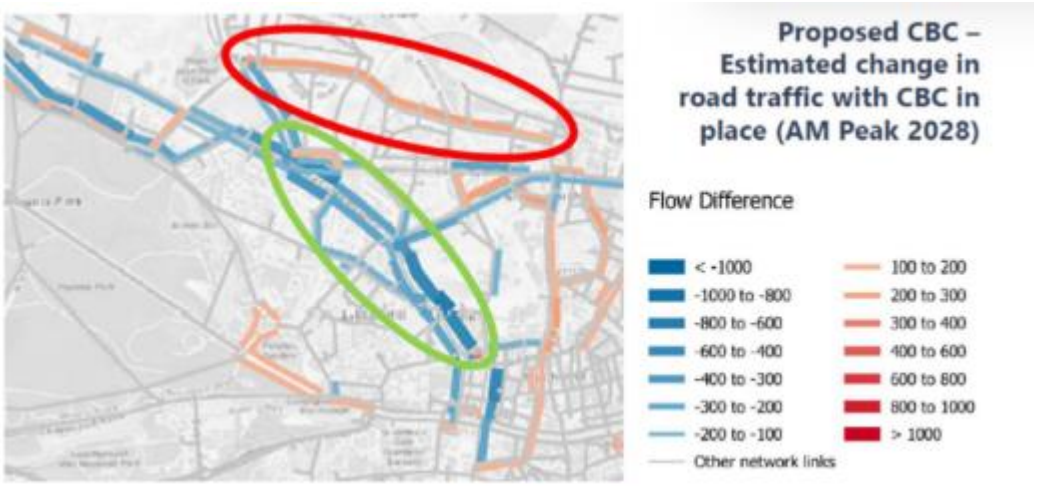
There are three road restriction changes proposed in the CPO application for the Blanchardstown Bus Corridor, none of which were set out in any of the proposed designs issued for public consultation since the Bus Connects project commenced in 2018.

The final preferred route was the result of three separate and rigorous stages of consultation since 2018 and yet none of 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 has meant significant changes to the original proposal which has dire consequences for our area. It is not clear why one resident's group would be successful in their endeavours to engage with the NTA to the severe detriment of another area such as mine.

Connaught Street Resident's Association have raised at every stage of the consultation with the NTA our concerns as to any increase in traffic flow on Connaught Street/Fassaugh Road/Fassaugh Avenue/St Peter's Road. It appears that our concerns on 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. Connaught Street Resident's Association have engaged fully with all the public consultations directly with the NTA and also through regular contact with TDs, Senators and local councillors. Despite this none of the things that the resident's association have raised have been taken into account and in fact we as residents are in a worse position now than at the beginning of the process in terms of unacceptable effects on Connaught Street residents and residents of the surrounding areas.

Modelled traffic flows for my road have also increased significantly since the NTA's Route 5 traffic modelling report (Nov. 2020. Pg 104) which illustrated the impact that closing Old Cabra Road to private traffic would have on the surrounding area. The major decrease in traffic volumes for Stoneybatter (circled in green) were forecasted to bring about major increases on the Fassaugh Avenue/Connaught Street corridor (circled in red):



When this report was released Connaught Street was projected to experience an additional 200-300 vehicles per hour during the morning peak. Connaught Street already has a perennial queue of traffic for the junction with Phibsborough Road. Connaught Street Resident's Association raised resident's concerns with the NTA even with this lower proposed traffic flow increase at that time. Bearing in mind this appears to have been compared with current baseline – which is not available to us in this current submission.

Despite this in Chapter 6 of the current submission it discusses the increased flow that is expected for Connaught Street in 2028 if all the proposal is allowed. The amounts are as follows:

Orientation	Map ID	Road Name	Do Minimum Flows (PCUs)	Do Something Flows (PCUs)	Flow Difference (PCUs)
	A.4	Tower Road	1,186	1,294	+108
North of R147 Navan Road, west of rail line	A.5	Dunmanus Road	630	974	+344
	A.5	Fassaugh Avenue	613	964	+351
	A.5	Fassaugh Road	594	954	+360
	A.5	Rathborne Avenue	327	563	+236
	A.5	Rathborne Drive	217	493	+276
	A.6	Berkeley Road	521	845	+324
	A.6	Berkeley Street	584	909	+325
	A.6	Bolton Street	1,571	1,879	+308
	A.6	Botanic Avenue	323	427	+104
	A.6	Church Street	1645	2,033	+388
	A.6	Church Street Upper	1,229	1,463	+234
	A.6	Connaught Street	500	868	+368

AM peak 2028, flow increase per hour.

As you can see it is now looking like an increase of 368 cars per hour in the morning peak against the "Do Minimum Scenario" which is a significantly worse position to be in than we were at the previous consultation.

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.

3) Concern about the marked rise in Traffic flows and the associated safety impact from the new changes

These specifically relate to my road - Connaught Street and the surrounding areas of 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:

- **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. As per Connaught Street's Resident's Associations previous communications with the NTA about Connaught Street and its lack of suitability for an increase in traffic flow, the reasons in summary are:

    - Connaught Street is extremely narrow. Vehicles compete to get past one another on the tight carriageway without causing damage to one another. Residents' car wing-mirrors are often damaged. When a larger vehicle tries to squeeze down the street, it does so to blaring horns and slows traffic in both directions.

    - Pinch-points exist on the already narrow footpaths where public lighting columns are set. It is often necessary to step onto the carriageway to allow another pedestrian or a buggy to pass. This is particularly evidenced at the pedestrian crossing on Connaught Street at the junction of Connaught St/St Peter's Road where it is extraordinarily narrow. Two pedestrians cannot pass each other in this area – let alone a vulnerable pedestrian for example someone pushing an infant in a buggy or a wheelchair user.

- There is no allowances for cyclist safety on the road and it is a very hostile environment for cyclists already – given that 2 cars cannot pass abreast, let alone allow safe space for a cyclist.

- It is already an unusually difficult transport environment for a residential street, particularly when you bear in mind that only approximately 50% of households in Phibsborough own a car (according to previous submission to the NTA by Rothar and Phizzfest).

- The presence in the area of a large number of schools (see below) and Naomh Fionbarra GAA Club, meaning there are a lot of vulnerable children and young adults needing to walk or cycle to and from school and activities.

- The area has a large demographic of elderly persons – who need to be assured of safe access to local services as pedestrians and car drivers.

- **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.

- **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 seven schools that are accessed predominantly from the Connaught Street / Fassaugh Avenue / Road corridor yet no protections or mitigating measures have been put forward for active road users arising from increased road traffic flows. These schools are:

1) St Peter's National School;

2) Christ the King Girls;

3) Christ the King Boys;

4) Broombridge Educate Together;

5) Cabra Community College;

6) St Finbarr's; and

7) Gael Scoil Bharra.

The traffic these generate is already huge and the risk to school children on this road already high, which as you may remember unfortunately led to the death of a child on Fassaugh Road on his way home from school due to a collision with a bus in 2007. The risk to safety and the quality of life of residents does not seem to have been considered in the enormous increase in traffic that the proposed Blanchardstown Bus Corridor scheme would create for my street.

From detailed evaluation of the documentation, it does not appear that any mitigation measures are planned for Connaught Street/Fassaugh Avenue/Fassaugh Road and St Peter's Road to allow for this enormous increase in traffic. So, no measures appear to be proposed to address vulnerable road user safety, noise, vibration, air quality.

There also does not appear to be any impact assessments undertaken on the impact that essentially "*driving around in circles*" will have in allowing residents to have adequate traffic flow in local areas to access amenities.

It also needs to be raised that Connaught Street is extremely close to the Mater Hospital and ambulances regularly use my road for access to the communities of Cabra, Ashtown and Navan Road area. Increased traffic on Connaught Street/Fassaugh Avenue/Road is a danger to citizens of the area as emergency services will not be able to access them, as the road is so narrow there is no way at all an ambulance could pass a row of cars which will inevitably be stationary due to traffic congestion. As discussed above it is not possible for even 2 cars to pass abreast on many parts of Connaught Street currently due to the narrow road width. This would also become a citywide issue as the emergency vehicles would get stuck in this area unable to pass traffic.

This also applies to access to Connaught Street and surrounding areas by fire engines. This is already a challenge due to the narrow roadway and a recent example is the attendance of the fire service to a property on Connaught Street on Sat Aug 13th 2022 (~8pm), where multiple fire engines arrived to a property (between St. Peters Road and Connaught Parade) resulting in no traffic being able to go down the road for ~10 to 15 mins.

In Chapter 6 of the submission is states: *"The biggest increases are predicted on Blakestown Road, Connaught Street, Fassaugh Road and Fassaugh Avenue."*

It also states: *"The biggest reductions are predicted on Blanchardstown Road South, North Circular Road, Castleknock Road, Blackhorse Avenue and Ratoath Road."*

It makes absolutely no sense that the massive reduction in traffic on a much bigger road in the area (North Circular Road) is being diverted onto a very narrow, residential road like Connaught Street/Fassaugh Avenue/Fassaugh Road.

With the enormous proposed increase in traffic flow on my road I have concerns for the health of people on my street - not just the residents of the street but the large volume of pedestrians who use our footpaths, between children walking to and from schools in the area and commuters walking towards Phibsborough, as well as cyclists who already struggle to make their way in either direction due to the narrow road and high volumes of traffic. The high volume of idling cars will make the air on my street toxic for the wider community of active travel commuters making it less attractive at a time when such travel should be encouraged.

4) Modelling

I have serious concerns about what is published in the Impact Assessment report set out in Appendix A6.4.

- **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 me as a resident of a highly affected area from adequately assessing the impact on my area from the BusConnects changes. As I noted at the start of this submission, I very much support the overall aims of BusConnects, I 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 communities such as mine.

It is presumed that the tables in Chapter 6 refer to the number of additional cars proposed to travel on Connaught Street per hour although this is not clear. According to table 6.65 – Road Links where the 100 Flow Additional Traffic Threshold is Exceeded during AM Peak Hours. Connaught Street is defined as P6 (Map ID). Under the "Do Minimum" flows there is 500 (PCUs), "Do Something" 868 (PCUs) with a flow difference of +368.

According to table 6.70 – Road Links where Link Threshold of 100 Combined Flows is Exceeded (PM Peak Hour) Connaught Street is defined as P6 (Map ID). Under the "Do Minimum" flows there is 641 (PCUs), "Do Something" 1,179 (PCUs) with a flow difference of +538.

According to diagram 6.25 which refers to 'Flow Difference on Road Links, PM Peak, 2028 Opening Year Connaught Street appears to have a combined flow difference (Passenger Car Unit) of up to 600.

I have a number of issues with the modelling which I deem to contain many faults, and can be summarised as follows:

- **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" (i.e., BusConnects) scenario at PM peak hour:

    - An 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.

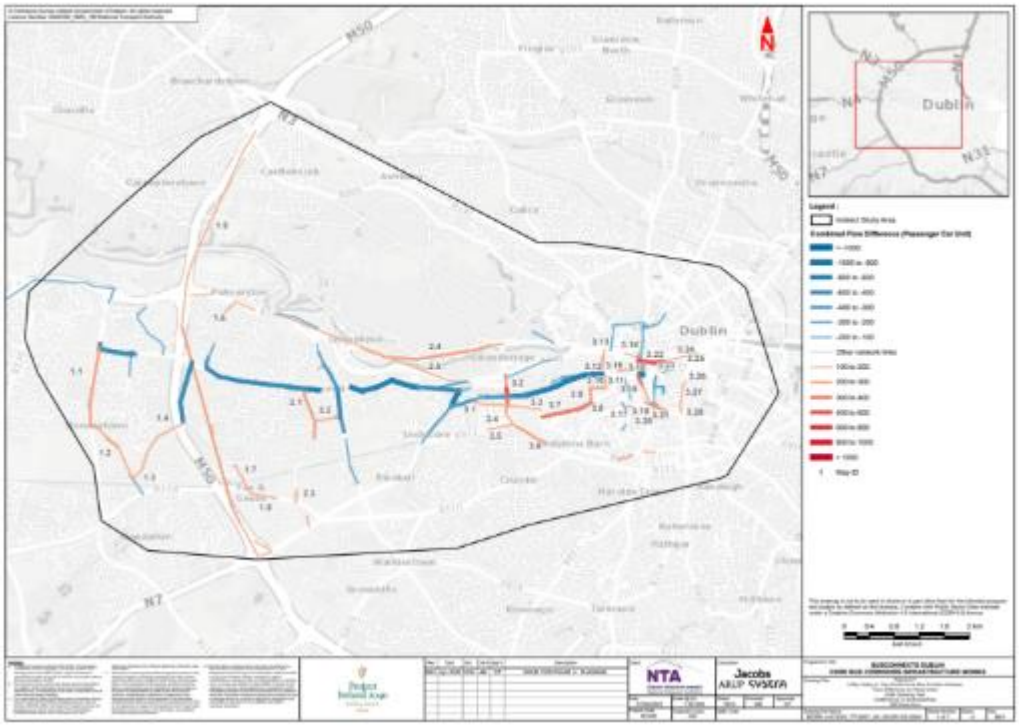
Each is described as having "not significant" effect and "negligible" impact. I can tell you as a resident of Connaught Street there is no way that changes of this nature can be considered "not significant" and "negligible" in their impacts on our abilities to go about our daily lives and live in a safe environment!

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. Additionally, is doesn't provide baseline data for the current traffic flow in any area it is impossible to know how much of an impact it will have on residents of my road and surrounding areas as it is impossible to make a "like for like" evaluation.

- **Inadequate referencing and lack of consistency in documentation:**

In Chapter 6 section 6.4.6.2.8.3 "General Traffic Flow Difference – Am Peak Hour" a diagram 6.4 is referenced as being as extract from Figure 6.7 in Volume 3 of this EIAR. Having reviewed this document in pdf format from the website (map reference: BCIDE-JAC-ENV_TT-0007_XX_00-DR-GG-0004) it is clear that the Cabra/Phibsborough area is not included on this map with annotations as seen below it is left grey with no indication of traffic flow differences show on this map.



Therefore, this reference is incorrect and I cannot find anywhere in the documentation the correct source for Diagram 6.24 in Chapter 6.

Additionally, it is not at all clear if this diagram referenced above takes into account the traffic flow effects of all the proposed bus corridor schemes or just the Blanchardstown one. At a meeting with Hugh Creegan and others from the NTA on Wednesday 27th July 2022 (also attended by Senator Marie Sherlock) Dr Lucy Chadwick, a member of Connaught Street Resident's Association Committee, asked a number of questions about traffic modelling. The NTA at the meeting were clear that the modelling undertaken on traffic flow as shown in the tables in Chapter 6 is only in relation to the Blanchardstown Bus Corridor so the compound effects of all the corridors and in particular

the Finglas/Ballymun corridor which will also massively impact my area and has not yet been brought forward for planning permission.

5) Discrepancies in the maps submitted as part of the planning permission:

The drawings submitted as part of the application are not clear, either in terms of legibility or in terms of ease of access. The legibility of directional arrows, road features or even road names even when magnified on the screen is difficult to interpret and there are several discrepancies in terms of drawings of junctions and description of development in terms of cul-de-sacs, new junctions' layouts resulting in one way or no way for cars. These maps are inconsistent with both the stated purchase orders and the information provided at the meeting with the NTA described on the previous page.

For example, I have taken the drawings for three junctions for which I am familiar: Charleville Road, North Circular Road, Cabra Road and Monck Place

a. Charleville Road

On the document "Blanchardstown to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022" Schedule Part III Section B Reference BE (page 934) it states*: "All rights of vehicular traffic (except pedal cycles and other bicycles) in a southeast-bound direction (from Charleville Road to North Circular Road) over that section of the public right of way at the junction of Charleville Road and North Circular Road in the County of Dublin and between the lines BE1 and BE2, shown coloured green on the deposit map reference 0005-DM-0028."* According to Chapter 4 of the EIAR, the reason for this proposed change is 'to minimise general traffic levels on local side streets. This is inconsistent with the annotations on the map referenced here as on the map it shows in Drawing file name: BCIDC-ARP-GEO_GA-0005_XX_00-DR-0038 at the junction of Charleville Road and Cabra Road a symbol and words "CUL-DE-SAC EXCEPT BICYCLES" which would indicate that road is not open to traffic in either a southeast-bound or northbound direction. Additionally, this same map shows at the junction of Charleville Road and North Circular Road the annotation "NO THROUGH ROAD SIGN" and it is not clear is this is for one direction only or both directions. At the meeting mentioned above the NTA stated that the closure of Charleville Road to through traffic was only for southbound traffic but the map is in direct contradiction to this so it cannot be deemed to be clear for lay people looking at this documentation.

b. Annamoe Terrace & Road

On the document "Blanchardstown to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022" Schedule Part III Section B Reference BI (page 935) it states *"All rights of vehicular traffic (except pedal cycles and other bicycles) in a southwest-bound direction (from Annamoe Road and Annamoe Terrace to Annamoe Road) over that section of the public right of way at the junction of Annamoe Road and Annamoe Terrace in the County of Dublin and between the lines BI1 and BI2, shown coloured green on the deposit map reference 0005-DM-0027."* This is inconsistent with the annotations on the map referenced here as on the map it shows in Drawing file name: BCIDC-ARP-GEO_GA-0005_XX_00-DR-0030 at the junction of Annamoe Terrace and Annamoe road a symbol and words "No through road" which would indicate that road is not open to traffic in either a south bound or northbound direction. This change is also on the very edge of the mapped area which makes it very hard to see and not at all accessible to a lay person. At the meeting with the NTA as mentioned above they stated that the closure of Annamoe Road to through traffic was only for southbound traffic but the map is not aligned to this and it is confusing so it cannot be deemed to be clear for lay people looking at this documentation.

In addition to the discrepancy between the maps and the other documentation I also object strongly to all of these road closures in their entirety due to the effects it will have for my road and surrounding roads. All of these road closures and restrictions will have a massive effect for the communities living north of the Cabra Road and will hugely hamper the ability of residents to access amenities for example Lidl Supermarket in Cabra and the Phoenix Park. The increase in traffic that these closures would bring to Connaught Street in particular will put the safety of residents in extreme jeopardy.

c. Right turn at St Peter's Church – not shown on map

In order to allow the flow of cars from Cabra Road to North Circular Road in light of the proposed closure of Charleville Road and Annamoe Road to traffic going North to South and also the loss of use of Old Cabra Road as it is proposed to be bus only, at the meeting with the NTA on 27th Jul 2022 (as referenced earlier) it was confirmed to Dr Lucy Chadwick on behalf of the CSRA by NTA members present that the current turning ban at St Peter's Church would be reversed. At present turning from Cabra Road to North Circular Road is banned at this junction and vice-versa. However, this change is not stated anywhere in the proposed documentation that I can see and it is not annotated on the relevant map: Drawing file name: BCIDC-ARP-GEO_GA-0005_XX_00-DR-0039 (sheet 39 of 40).

Additionally, despite the NTA members stating at this meeting that turning circles were evaluated for up to HGV sized vehicles I can find no evidence in the documentation that turning circles were in fact evaluated. Additionally, I can find no indication that a safety audit has been undertaken to ascertain how this will affect vulnerable road users e.g., cyclists and no evidence as to how this will affect traffic flow in the area, nor justification for this proposed change.

I have major concerns on the potential 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.

However, in light of the road closures mentioned above and the ban on traffic on Old Cabra Road it is imperative that the road closures are not approved without another solution to traffic flow from areas North of the Cabra Road to North Circular Road and Stoneybatter, that does not involve increased traffic flow on Connaught Street and St Peter's Road.

It is clear that no scenario planning was undertaken to look at potential local traffic flow when putting together this proposal, especially in light of the "last minute" changes since the consultation.

6) Ballymun/Finglas bus corridor:

This will also have massive impacts on the area and in particular the centre of Phibsborough and Connaught Street/Fassaugh Avenue/Fassaugh Road. Without combined modelling of these 2

proposed corridors, it is impossible to get a true picture of the potential issues that BusConnects raises for my road.

An example of an area of Phibsborough that I feel is being inappropriately changed by the proposed Blanchardstown Bus Corridor scheme but will also be massively affected by the as yet to be released Blanchardstown and Finglas Bus Corridor schemes is the area adjoining the Phibsborough Road, and traffic restrictions in this area will have an enormous impact on the traffic flow in my area too.

An example of this is Monck Place and Avondale Road. On drawing number BCIDC-ARP-GEO¬_GA-0005_XX_00-DR-CR-0039 (Sheet 39 of 40) it indicates that Monck Place will become a cul-de-sac with two signs proposed indicating no left turn and no right turn onto Phibsborough Road except for bicycles. The closing on Monck Place and the Phibsborough junctions results in all the residents from Phibsborough, Phibsborough Avenue, Spire View, Castle Terrace, Avondale Avenue, Norton's Avenue, Monck Place, Leslie's Buildings, Avondale Road, Great Western Square and Great Western Villas approximately 200+ residential units, will have to exit out onto the Avondale Road/North Circular Road junction, regardless of where they wish to travel in the city. This is just one example of the numerous, inconsiderate blanket changes to junctions with little or no consideration of the residents of the area or justification for their closure.

I believe that the proposed changes for Monck Place and Avondale Road massively overstep the changes that should be attributed to the Blanchardstown Bus Corridor.

7) Data collection:

I have serious concerns about the inadequacy, appropriateness and robustness of the data collection, and the data used for modelling for this scheme.

For the purposes of this objection, I would like to concentrate on the following issues in relation to Connaught Street:

- Traffic and Transportation

- Air Quality

- Noise and Vibration

- Road safety Audits

a) Traffic and Transportation – Chapter 6 of the EIAR

This is a key chapter in the EIAR which provides baseline data to ascertain the impact of the proposed development on surrounding streets. It should be noted that the transportation modelling calibration and validation used for the strategic model and micro-simulation models feeds into all other sections of the EIAR in terms of proposed traffic volumes throughout both the route and the surrounding roads which will be affected. This in turn feeds into the impacts associated with the Construction Phase and the Operational Phase and the necessary mitigation measures required to alleviate some of these impacts.

According to section 6.2.5 of the chapter 'Data Collection and Collation', it states that traffic surveys were undertaken in November 2019 and February 2020 with the surveyed counts used as inputs to the model calibration and validation proves of the strategic model and micro-simulation model. The two types of counts used in the study are Junction Turning Counts and Automatic Traffic Counts.

Journey Time Data was taken from TomTom Traffic Stats portal from 2019. It states that this data excludes all bank holidays and days close to those dates, which is unclear as to what this means.

Again, this data was used from the development of the strategic model and micro-simulation models.

Since the baseline studies were completed there have been a number of major road closures and alterations in the area from Phibsborough to the City Centre. These include the permanent closure of Grangegorman Lower and Capel Street, the reduction of the North Quays to a single lane to provide for new cycling lanes, a segregated cycling lane from the canal to the Liffey along Constitution Hill to give a few examples. This has resulted in a reduced road capacity for both public and private vehicular traffic. It has resulted in a much longer travel time from Phibsborough into the City Centre on both Bus, Luas and private car due to tail backs at key junctions. These major changes to the current transport system have not been taken into consideration in any of the baseline data and so it cannot be considered sound to base all the modelling on out-of-date, faulty, inaccurate data.

The Chapter concludes that '*the results of the assessment demonstrate that the surrounding road network has the capacity to accommodate the redistributed general traffic as a result of the Proposed Scheme. The majority of assessed junctions that required further traffic analysis have V / C ratios that are broadly similar before and after the Proposed Scheme implementation. Overall, it has been determined that the impact of the reduction in general traffic flows along the Proposed Scheme will be Positive, Significant and Long-term whilst the impact of the redistributed general traffic along the surrounding road network will be Negative, Slight and Long-term. Thus, overall, there will be no significant deterioration in the general traffic environment in the study area as a consequence*'. This statement is misleading and inaccurate. The applicants have not provided any evidence to prove that the surrounding road network has the capacity to accommodate the redistributed general traffic.

They conclude that for the surrounding road network the predicted impacts will be negative and long term however they also state that '*Given that the Proposed Scheme results in a positive impact for walking, cycling, bus and people movements, mitigation and monitoring measures have not been considered for these assessments. The impacts to general traffic and parking / loading, including the mitigation measures incorporated into the Proposed Scheme have been outlined in Chapter 4 (Proposed Scheme Description) of this EIAR. No further mitigation measures are required to be considered as part of the Proposed Scheme*.' No mitigation measures have been considered for the negative long-term effects on the surrounding road network either in this chapter or in Chapter 4.

b) Air quality – Chapter 7 of EIAR

According to the methodology undertaken to the air quality impact assessment is outline below:

- A detailed baseline air monitoring study has been undertaken in order to characterise the existing ambient environment in areas along the Proposed Scheme. This has been undertaken through a review of available published ambient air monitoring data and site-specific ambient air monitoring at sensitive locations along the Proposed Scheme.

- Predictive calculations have been performed to assess the potential air quality impacts associated with traffic alterations associated with the operation of the Proposed Scheme at the most sensitive locations.

Connaught Street is not in any of the description of the study area, even though the rerouting of traffic will result in significant increases in traffic levels throughout the day.

The baseline ambient air quality environment has been characterised through a desk study of publicly available published data sources and site-specific baseline ambient monitoring surveys. The most recent reports considered in the desktop study was the Air Quality in Ireland 2019 report. This means that the baseline desktop study is 3 years out of date.

With regards to the site-specific baseline monitoring study, the chapter is confusing in terms of when this was undertaken and what it entailed in terms of sampling locations. The chapter firstly states that the study was undertaken at monthly internals from November 2019 to June 2020 as part of the air quality assessment for No2 using diffusion tube monitoring at 10 locations. Section 7.3.2.2 of the same chapter states that '*monitoring at 112 locations was completed for a seven-month data collection period (with six diffusion tube change overs between 15 November 2019 to 8 June 2020). However, due to COVID-19 impacts on the baseline traffic environment, the final two data sets (16 March 2020 to 8 June 2020) are considered non 'typical' baseline data and therefore are not included in the baseline data set.'*

Finally, it also states in the same section that '*the ten monitored locations in the vicinity of the Proposed Scheme are shown Table 7.17 and Figure 7.1 in Volume 3 of this EIAR. Table 7.18 and Diagram 7.4 outlines the results of the baseline NO_2 diffusion tube monitoring over the period 15 November 2019 to 16 March 2020.*'

In any case whatever the site-specific monitoring entailed it cannot be considered an adequate study of the indirect study area in particular. There was little or no monitoring locations beyond the proposed corridor, the study was only undertaken at 10 locations along the entire 10km of the proposed corridor and the study was not undertaken over a year long period, rather 4 months, and the table of the results of the study also included 'lost' results for several monitors within this short period thereby reducing the amount of baseline data again.

On the figures included with chapter 7 in the EIAR, it illustrates that for the various pollutants (nitrogen dioxide (NO_2 - 200µg/m^3 NO^2) and nitrogen oxides (NOX), particulate matter (PM) with an aerodynamic diameter of less than 10 microns (PM10), PM with an aerodynamic diameter of less than 2.5 microns (PM2.5), lead (Pb), sulphur dioxide (SO_2), benzene and carbon monoxide (CO)) in both the Construction and Operational phase that the 'significance of the modelled change in the annual mean concentrations of these pollutants would be negligible.' This is physically impossible if the modelled increased number of vehicles to travel on Connaught Street is to come about. To have an additional 1000 cars on a confined residential street, even if idling is not considered, will have an impact on pollutant levels. This proves that the applicants have not adequately modelled or measured the effects of the proposal on the adjoining streets.

According to section 8.2 Air Quality as '*vehicle emission technology improving, it is anticipated that impacts associated with the Proposed Scheme in this location would be short-term. In general, the impacts associated with the Operational Phase traffic emissions are predicted to be overall neutral and long-term.*' I believe it is not considered appropriate to mitigate the negative impacts of your development by depending on others to act on your behalf i.e., the negative impacts of traffic concentrations on Connaught Street, due to the redirection of traffic onto the street to reduce

conflict on the bus route, will result in increased levels of traffic pollutants due to idling traffic outside residential units. This impact will be negative but short lived as these vehicles may change to electric vehicles as their owners replace them but this is not guaranteed

c) Noise and Vibration: Chapter 9 of the EIAR

For the baseline noise surveys, attended surveys were undertaken at a total of 18 locations along the length of the Proposed Scheme during July to September 2020. An unattended survey was undertaken at two locations during September 2020. It should be highlighted that these surveys were undertaken during Covid restrictions and cannot be seen as an accurate reflection of the true baseline noise levels.

Baseline vibration surveys were conducted during July and August 2020 at a number of locations adjacent to existing bus lanes within Dublin City. It should be noted that capacity on buses at this time was restricted, increasing only to 75% on July 19 2020, as part of Covid restrictions and so is not a true reflection of baseline vibration levels. None of the baseline vibration monitoring locations are within the proposed development area (they are in Harristown and on the Malahide Road).

Section 9.4.4.1.1 refers to calculations of road traffic noise levels during the operational phase of the development. It states that '*the output of the traffic modelling has been used to undertake a detailed analysis of traffic noise levels changes. The noise impact assessment has focused on all modelled roads within 1km of the Proposed Scheme red line boundary to assess the potential noise impacts on the surrounding road network. Review of the traffic modelling outputs confirmed that a 1km zone was sufficient to capture all roads with potential noise impacts resulting from the operation of the Proposed Scheme.* ´ Again it is noted that the traffic noise level changes are based on the traffic modelling, which is based on faulty and inaccurate baseline data.

According to section 8.4 Noise and Vibration of the Non-Technical Summary of the EAIR '*During the design year, 2043, increased traffic noise levels will occur along a small number of roads adjacent to the Proposed Scheme as a result of traffic re-distribution during daytime periods. During the long-term phase, indirect impacts are calculated as positive, imperceptible to minor and long-term, to negative, slight and long-term. The overall prevailing long-term impact associated with the Proposed Scheme is positive to negative and slight*.' Again, this is confusing, how can an impact be both positive and negative at the same time in the same location.

d) Road Safety Audit

Appendix M1 Emerging Preferred Route Road Safety Audit – the Audit submitted is for the Blanchardstown to UCD Bus Corridor and not the Blanchardstown to City Centre Bus Corridor. It was also completed on 16th June 2018, but has September 2018 on its front pages, four years prior to the application being submitted.

Section 4.1.1 states that 'No details have been provided to the Audit Team of an assessment of the likely effects on the surrounding road network. Some of these effects could have safety implications (e.g., where unsafe parking takes place, or where capacity issues arise on the adjacent road network leading to driver frustration, unsafe manoeuvres and/or rat running within residential areas where there are high volumes of vulnerable road users).

The audit recommendation 'Undertake an assessment of the effects of the proposals on traffic and parking on the adjacent road network. Where necessary incorporate measures to address any issues

which may arise as a result of the proposals on the adjacent road network, including any safety measures which may be necessary'.

According to the Road Safety Audit Feedback Form at the end of the Audit, with regards to section 4.1.1's problem. This problem was acceptable by the applicants, and the recommended measures were accepted. No Assessment of the effects of the proposal on traffic and parking on the adjacent road network was seen in the submitted documentation.

According to the checklist at the end, pg. 30, the following was not included in the audit brief:

- The design brief

- Departures from the standard

- Scheme details such as signs schedules, traffic signal staging

- Collision data for existing roads affected by the scheme

- Traffic surveys

- Previous road safety audits

How can this audit be considered to be complete or to any way endorse this application when none of the above seems to have been taken into consideration, or provided to those creating the audit, prior to its completion.

As this audit was completed in 2018, it does not include the most up to date design of the various junctions. For example, Study Area Section 3, Sheet 5 of 8 shows the Aughrim Street Manor Street Junction, still indicates the parking and also indicates that this will be a through road for all traffic unlike the proposed application.

Appendix M2 – is referred to as Stage 1 Road Safety Audit and was completed in July 2021 according to the front page. It states that 'The Road Safety Audit took place during December 2020 and comprised an examination of the documents provided by the designers. In addition to examining the documents supplied the Road Safety Audit Team visited the site of the proposed measures on the 14th December 2020…. In May 2021, a revised design was submitted to the Audit Team, which prompted the need for a revised Stage 1 RSA Report.'

This audit had 40+pages of observations in terms of the proposed scheme, and alterations that were required. Again, according to Appendix 1 of this document the checklist at the end, pg. 42 states that the following was not included in the audit brief:

- The design brief

- Departures from the standard

- Scheme details such as signs schedules, traffic signal staging

- Collision data for existing roads affected by the scheme

- Traffic surveys

- Previous road safety audits

Even though it was stated that revised drawings were submitted after the original audit was completed, several of these drawings appear to still have a number of unresolved problems.

Overall it is clear that the proposed scheme would massively increase the volume of traffic on Connaught Street/Fassaugh Road/Fassaugh Avenue and St Peter's Road, all of which are residential roads which are wholly inappropriate for such an increase. This will have huge impacts on resident's lives and health and cannot be allowed to happen.

Connaught Street Resident's Association have engaged wholly at every stage of the NTA consultations, repeatedly raising the concerns discussed in this observation and engaged with many TDs and councillors in relation to my and other resident's concerns about the proposed BusConnects changes. I am therefore extremely disappointed to not only have none of our concerns addressed but to also be in a worse position now than in the early consultation rounds.

Overall, I 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 my community, and my road in particular, and should not be approved without addressing all of the concerns set out above.

I therefore urge you to reject this proposal so that all of our concerns can be adequately addressed.

Yours sincerely,

Patricia Hughes