

## Observation on a Strategic Infrastructure Development Application

### Observer's details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's  
name

Anna Lalor

(b) Observer's  
postal address

13 The Waxworks, Rathborne Village, Dublin 15, D15  
YX92

### Agent's details

#### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal  
address

Click or tap here to enter text.

## Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**  
(for example: 300000)

Click or tap here to enter text.

- (b) **Name or description of proposed development**

Bus Connects, Blanchardstown to City Centre Core Bus Corridor Scheme

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Blanchardstown to Dublin City Centre

## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

My observations focus on four aspects of the proposed scheme:

- Loss of trees on the Navan Road between Ashtown Road and Old Cabra Road
- Inclusion on relevant signage of on approach to Ashtown Road in relation to Rathborne and Royal Canal Park
- Potential for traffic to divert onto Skreen Road
- Improvements to pedestrian and cycle crossing at Ashtown Road/Navan Road and the entrance to the Phoenix Park at Ashtown gate.

#### **Permanent loss of trees on the Navan Road between Ashtown Road and Old Cabra Road**

I recognise efforts to plant trees where there are areas of greater free space. However, believe that greater efforts need to be made to retain or replace existing trees. In particular I note the significant loss of trees on the Navan Road between Ashtown Road to Old Cabra Road, particularly on the south side of the road<sup>1</sup>.

The Design Manual for Urban Streets (DMURS) 2019<sup>2</sup> highlights that “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 overhand, at least in part, the vehicular carriageway. ...

The planting of trees should be considered as an integral part of street design. In general the size of the species selected should be proportionate to the width of the street. ...

To be effective, trees should be planted at intervals of 14-20m. This may be extended to facilitate the installation of 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/towards services. “

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<sup>1</sup> See

- pages 26-30 <https://blanchardstownscheme.ie/wp-content/uploads/sites/6/2022/06/5.-Landscaping-General-Arrangement-2.pdf>
- pages 15-16, 23-24, 31-32 and 35-36 <https://blanchardstownscheme.ie/wp-content/uploads/sites/6/2022/06/Figure-17.2-1.pdf>

<sup>2</sup> [https://www.dmurs.ie/files/ugd/f378bf\\_583444499f9f4095aaa4d5e05c3cf4b2.pdf](https://www.dmurs.ie/files/ugd/f378bf_583444499f9f4095aaa4d5e05c3cf4b2.pdf)

## 5. Grounds

The Dublin City Tree strategy 2016-2020<sup>3</sup> also highlights the importance of trees in the city where they provide the following eco-system services, including:

- Shading and cooling
- Storm water attenuation, where they help to reduce localised flooding;
- Improving air quality
- Biodiversity and habitat
- Storing carbon
- Physical and mental wellbeing
- Aesthetic and improved property values
- Energy saving for adjacent buildings”

Other benefits identified in other research include increased preference for walking, as well as a protective barrier effect for pedestrians on footpaths.

In particular from in the context of climate change, the following features are particularly important when it comes to tree lined streets:

- **climate resilience** - water attenuation and shading and cooling
- **climate transition** – encourages walking and cycling vs car use for local journeys

In addition, DMURS places pedestrians, followed by cyclists and then public transport at the top of the road user hierarchy. The removal of trees to facilitate public transport, could reduce the incentive for pedestrian and cycle travel, particularly for local trips, as the shading and protective benefits of trees would not be available.

The current trees along this route have co-existed with the utilities under the pavement to date and the emphasis in DMURS is on co-existence rather than prioritising utilities over trees. Indeed, the Dublin City Tree Strategy highlights the need to protect trees when work is being undertaken by utility providers. **Where a significant conflict is determined to exist, between utilities and existing or proposed trees an alternative to tree removal or non-replacement of trees would be to move utilities under the road rather than footpath.**

I note that along the Navan Road where replanting does occur, that there is little diversity with many trees being Sorbus Aria Majestica White Beam. A feature of the Dublin City Tree Strategy is for greater diversity of trees in the city to encourage resilience to disease, which is becoming a greater issue with climate change.

### **Directional signage approaching the junction of Navan, Ashtown and Castleknock Roads**

I note that directional signage approaching the junction of Navan Road, Ashtown Road and Castleknock Road does not make reference to the areas of Rathborne and Royal Canal Park which are accessible via Ashtown Road<sup>4</sup>. With a population

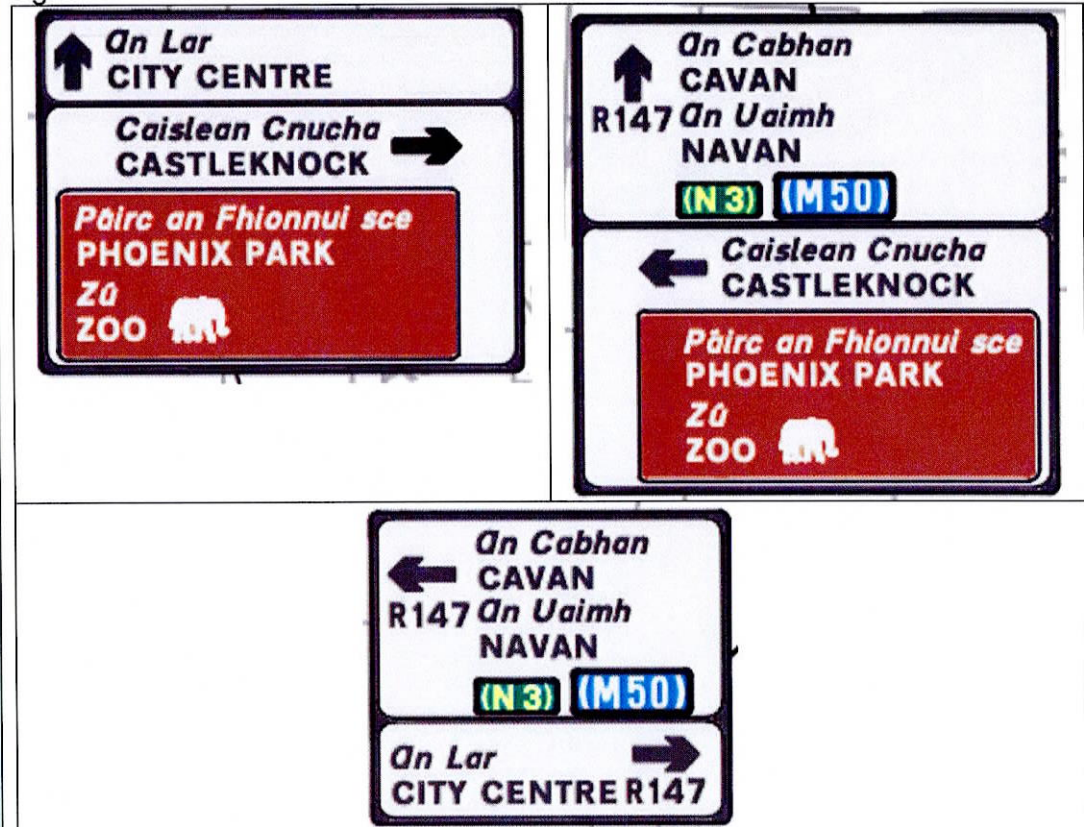
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<sup>3</sup> [https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-08/Dublin\\_City\\_Tree\\_Strategy\\_2016-2020.pdf](https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-08/Dublin_City_Tree_Strategy_2016-2020.pdf)

<sup>4</sup> Page 23 <https://blanchardstownscheme.ie/wp-content/uploads/sites/6/2022/06/8.-Traffic-Signs-and-Road-Markings-1.pdf>

## 5. Grounds

of close on 6,000, which will rise above this based on current planning permissions, it is important that Rathborne and Royal Canal Park are included on relevant signage. It may also be relevant to include Ashtown train station on these signs<sup>5</sup>.



### Skreen Road – traffic and speed limit

I have some concerns that changes to traffic patterns resulting from the closure of Old Cabra Road and much of Stoneybatter to car traffic could result in greater use of Skreen Road by traffic. I suggest that the road be changed to 30km an hour speed limit with the inclusion of relevant signage.

### Ashtown Roundabout removal

While saddened at loss of trees on roundabout at Ashtown, the pedestrian and cyclist road improvements here and at the junction of Castleknock Road, Blackhorse Avenue and the Ashtown Gate entrance to the Phoenix Park are long awaited and will mark a significant improvement in the safety of access to the Phoenix Park from surrounding areas and as part of the Greater Dublin Area Cycle Network, linking the Royal Canal and Tolka Greenways with the Phoenix park and greenways to the south of the park.

<sup>5</sup> Similarly for Navan Road Parkway station for which there is no road signage – see pages 19 and 21 at above link.

## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

## Fee

7. You **must** make sure that the correct fee is included with your observation.

### **Observers (except prescribed bodies)**

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

## Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

**Yes, I wish to request an oral hearing**

**No, I do not wish to request an oral hearing**

## Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

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**For Office Use Only**

<b>FEM – Received</b>		<b>SIDS – Processed</b>	
Initials		Initials	
Date		Date	

**Notes**