

NAVAN ROAD COMMUNITY COUNCIL

www.navanroad.com

navanroadcc@gmail.com

Chairperson:
Patricia Dunleavy,
10, Glendhu Park,
D07EA44

Treasurer:
Colette Timmons

Park Road,

An Bord Pleanala,
64, Marlborough Street,
DUBLIN, 1.

30th August, 2022.

Ref No. ABP 313892 Blanchardstown to City Core Bus Corridor

Dear Sir/Madam,

The Navan Road Community Council (NRCC) was set up in 1968 to help bring together community groups and sporting groups so that they would have one voice when trying to get things done in the community.

We enclose our fee €50.00. Please acknowledge receipt.

We request, on behalf of our members, and the many people who attended our recent Public Meeting – that an Oral Hearing be held. We are informed by the Board that there is no fee for this in a Strategic Roads Infrastructure Project.

The NRCC supports the Core Bus Corridor Projects. Nevertheless, we do have concerns about the possible negative impacts of this project on our Navan Road Community.

Our submission to An Bord Pleanala (ABP) is to highlight our objections to aspects of the planning application submitted by the National Transport Authority (NTA) for the Core Bus Corridor (CBC) along the Navan Road, specifically our area of interest between The Parkway Railway Station and the junction of the Old Cabra Road with the North Circular Road (NCR), and the local communities surrounding same.

The NRCC wishes to contribute pro-actively in developing this project to the benefit of our community as well as positively benefiting the wider population who access the city via the Navan Road for work and leisure purposes. We do not wish to see, nor will we tolerate a negative consequence arising because of this project.

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When the idea of a CBC was mooted some three years ago we formed a sub-committee to interact with the NTA to outline our positivity to the project but to also get fuller details and to outline our concerns. This sub-committee met with the NTA on a number of **occasions**. Our meetings were informative and constructive, with the NTA showing genuine interest in our issues.

A specific example would be where, in our first meeting, the NTA indicated that the roundabout at The Halfway House Pub would be removed for the CBC. We argued that this roundabout was an important visual sign for motorists that they were entering a built-up suburban area and should slow down. We explained that speeding was a regular occurrence on the dual carriageway leading to the roundabout and that a removal of same would lead to a continuance through our heavily populated area. The NTA took our concerns on board and, at our next meeting on 13th February 2020, they assured us that the roundabout was to be retained within a signalised junction. At that point we felt that we could work positively with the NTA to develop the CBC in the interest of commuters and the city at large, while also protecting our local communities as best possible.

Alas that was to be the last meeting with the NTA as Covid intervened. Covid also hugely impacted on the ability of our sub-committee to meet. In recent times when we attempted to re-engage with the NTA we found them unable or unwilling to facilitate us.

It was with frustration and some anger therefore when we saw the plans for the CBC as submitted by the NTA to ABP. We noted that the roundabout at the Halfway House was again totally removed in the latest maps, in spite of the NTA in 2020 agreeing with us that it be kept. On further examination of the application it seems clear to us that we simply had to object to aspects of the proposals, which surely would have benefitted by further interactions with community representatives like ours, as outlined below.

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While the NRCC supports the Core Bus Corridor Projects. We want this CBC project to be a catalyst to develop:

- A more efficient transport system to convey the commuter, our elderly and disabled community, and visitors, into and out of the wider city areas in an efficient and comfortable manner.
- A fair and attractively priced fare structure.
- Safe and enhanced Cycle lanes and pedestrian paths.
- A new vibrancy in our neighbourhood with initiatives arising from the CBC project. We want this project to be the starting point for the rejuvenation of our Navan Road area and indeed the wider Blanchardstown to City Centre Core Bus Corridor 5.
- A reduction in vehicular traffic that is currently impacting on the Air Quality, Noise and Traffic Safety- which should be attained if the proposed new bus routes and infrastructure is correctly put in place.
- A tree lined Navan Road from the Parkway Railway Station to the NCR.

However, our support is not at any price. There are many concerns with the possible negative impacts of this project on our community. We would like to engage with the NTA to resolve our concerns and to make this project a success. Our concerns and our proposals to make this project work to the benefit of our community and our city.

WE ARE A COMMUNITY - NOT A MOTORWAY!

As a community, Navan Road Community Council (NRCC) held a public meeting at very short notice in our School Hall, Tuesday 16th October, 8.00 pm. which was full to capacity, with people arriving from 5.30 onwards to view the plans, with before/after pictures, purchased from ABP. Many were very shocked at the 'After' pictures lacking trees. Many were unaware of any details, as the entire 'public' consultation process took place online only, disenfranchising all people not on the internet - Trinity Study 2019 'TILDA' on the impact on people lacking internet connection, and the disenfranchisement of all. We had appealed throughout, at Zoom meetings etc. NOT to hold the statutory stage to the Board during summer (subsequently done from end June to end August) when both the public were on holiday, as were our elected public representatives. This was confirmed at our meeting as all our TD's were away, as were several of our Councillors.

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Before we deal with the specifics of the application lodged with ABP we wish to highlight the following very serious concerns, which if not considered carefully, will lead to the Navan Road, being opened and re-opened over and over, for various utilities.

UTILITY WORKS

The developer is unable to provide replacement trees in locations where established trees are to be removed due to the location of underground utility services, notably natural gas. These utilities were installed over 25 years ago and have limited life. They are nearing end of life and will need to be decommissioned in the coming few years. Natural gas networks are being decommissioned all across Europe in favour of district heating networks to meet stringent climate change commitments. By 2050 there will be no natural gas use by residential consumers in Ireland, so the gas network has a maximum remaining life of 27 years. New trees will have a life of several hundred years, long after natural gas is no longer a fuel option in this area. It is therefore more important to get the trees in the right location, or keep them in their current locations, and divert the utilities locally than to allow short-life utilities to restrict long term investment in green infrastructure. ABP should rule it inadmissible to use utilities as a reason to exclude tree planting, or remove existing trees, and insist on local diversion of utilities to facilitate tree planting or retention of trees where a single utility is involved, especially where that utility is limited life natural gas.

Furthermore, ABP should insist on the proposed district heating network be installed as part of the Bus Connects works, to avoid doubling the inconvenience to residents and businesses by separate road opening events. This would facilitate the proper planning and development of the area by anticipating the inevitable switch from natural gas to low-carbon heat networks, which must be complete by 2035 (i.e. in only 13 years time) in the Dublin area to meet our national carbon emissions targets. SEAI's National Heat Study identifies the established residential communities along Navan Road as having a heating demand intensity which makes district heating cost optimal. The injection of hydrogen and biomethane (so-called 'green gas') into the natural gas network will not be financially or carbon-intensity viable until after significant surplus offshore wind generation capacity has been installed in Ireland, which will not be available before 2035 and will, therefore, arrive too late to justify retention of the natural gas network in Dublin. Redundant utilities should, therefore, not be allowed to determine where Ireland makes long-term investments in necessary green infrastructure. The developer should be required, by ABP attaching to any grant of permission **a condition** to replace any trees removed with equivalent semi-mature trees of similar species in the nearest proximate location as a matter of planning policy and to relocate utilities, where necessary, to facilitate that planning.

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ASHTOWN ROUNDABOUT:

The Ashtown Roundabout denotes the entrance to Dublin City and is an important, distinctive feature of our area. We are totally opposed to its removal. We propose traffic and pedestrian signalling of the Ashtown Roundabout and retention of the trees.

The roundabout acts as a boundary between the dual carriageway which has a higher speed limit and the Dublin City area. It acts to slow down the traffic to suitable speeds. The four way junction proposed would not have the same effect. We acknowledge the need for controlled crossing points for pedestrians and cyclists at this junction but feel this can be done without the removal of the roundabout and the fine stand of pine trees.

TREES

The National Transport Authority (NTA) has proposed the removal of hundreds of street trees to facilitate this project. This is very evident from the Parkway Rail Station and right along the Navan Road as far as Cabra Cross. We do not see an effort in the documentation to make our community one that has at its core the well-being our community.

We have identified at least 150 street trees to be removed to facilitate this project. There are also unquantified numbers of woodland trees to be removed.

IF OUR STREET TREES ARE FORCIBLY REMOVED, against the wishes of the majority of our community there should be a **condition** that they are replaced by an equal or greater number of mature street trees, planted in properly constructed tree pits, that will still allow for the provision of cycle, public transport, and car lanes. These large tree pits (and they will have to be large) should be constructed to current European standards where it has been possible to plant trees in particularly challenging locations. There are a few examples in the Navan Road itself, of street trees that were previously planted into restricted tree pit sizes in pedestrian paths that have not grown properly as a result. What we demand is a recognized standard for tree pits to be used in the replanting of new street trees. This will include proper structural soil growing media for the tree roots, and protection for the hard surface above the root areas.

An alternative solution, **which would save a large number of trees and would be of major benefit to the local community**, would be to remove the outbound bus lane from Nephin Road to Kempton Estate. Our studies indicate that this would have a very minor impact on traffic times given the new proposed junction layouts along this stretch of road. This will only reduce the total bus lane length by approximately one kilometre. **A PRICE WORTH PAYING!**

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PARK & RIDE FACILITIES

To encourage commuters to move from car to public transport, it is imperative that proper, secure, safe and free park and ride facilities are provided for the commuter belt at current bus and rail transport hubs. These must be of an appropriate size. Shuttle services should be provided to link outer park and ride facilities to the proposed improved bus network.

OLD CABRA ROAD

There is a proposal for two Bus Gates on this road.

Whilst this would seem to be a positive idea, the consequences of it may be to create new issues on the surrounding road structure e.g. Blackhorse Avenue, Baggot Road, Nephin Road, Skreen Road. Motorists and other road users will use these roads to take short cuts onto and from Navan Road. The resulting congestion will have a huge impact on residential access, emergency services and deliveries on residential quiet ways. A further consequence will be the migration of traffic via the quiet ways onto Blackhorse Avenue which is not suitable for increased traffic. **As a condition** we propose that a detailed traffic analysis, to ensure the design is suitable, should be undertaken before implementation.

ASHTOWN GATE/ CASTLEKNOCK ROAD

The proposal to implement a “no right turn” from Castleknock Road into The Phoenix Park and also onto Blackhorse Avenue (Inbound) would appear to be counterproductive to a proper traffic plan. This would have a major negative impact on local residents and commercial premises on Blackhorse Avenue. **As a condition** we suggest a detailed traffic and health and safety analysis at this busy junction. Please not a similar situation occurs at the junction of Ratoath Road and Swilly Road.

CABRA ROAD

With the proposed closure of the Old Cabra Road it is inevitable that inbound traffic will migrate to the Cabra Road. This will hugely impact on the Navan Road, the Cabra Road, North Circular Road and Phibsborough. These roads and their junctions are already at over capacity. There is no provision in the BusConnects proposals to deal with this problem. **As a condition** a detailed traffic analysis is required.

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CPO'S & NOISE AMELIORATION

Residents are very unhappy with the process, explanations and communication they have received from NTA as to why their property is being taken temporarily or permanently. As previously discussed (TREES SECTION) the removal of the outbound bus lane from Nephin Road to Kempton Estate would have a major impact on the amount of CPO's necessary.

As a condition an audit should be undertaken on the CPO BusConnects process which appears to have been very unsatisfactory for our residents.

We note that grants for noise reduction have been awarded to residents adjacent to the new runway at Dublin Airport. **As a condition** similar grants should be made available for noise reduction to impacted residents along the Navan Road.

DISABILITY

A condition should be contained in any permission granted, that our Government Statutes on the rights and legal obligations to represent people with disabilities is honoured, e.g. relating to bus stops/dangers from cycle lanes intruding on the stops/bicycle racks erected in a dangerous fashion to become a danger to people with sight deficiencies.

CORE BUS CORRIDOR & DART+ WEST

It is unclear from our non-professional perusal of the copious documentation in both these current proposals, what liaison, if any, is taking place between both applications, and their applicant, on the effects on our area and the wider Dublin 15 area from both plans.

We can see no evidence that BusConnects has taken the passenger movements and traffic impacts from Dart+ West into consideration. Nor can we see any indication that further studies have been made to take into account the changes in traffic and passenger demographics post Covid. **A condition** should be that a fresh evaluation of the BusConnects project should be made in light of current impacts.

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ISLAND BUS STOPS

The proposal for Island Bus Stops raises serious concerns for pedestrians, elderly people, people with disabilities, wheelchair users and the visually impaired who will have to pass through the cycle lane to board or alight from a bus making it dangerous and harder to see an oncoming bike or scooter electric/manual.

The major Bus Stops which we have concerns for are:

1. Parkway Outbound. Circa 1000 school children will attend in future the new Edmund Rice School.
2. Ashtown Grove/Daughters of Charity (DOC) in/out – DOC provide services to persons with intellectual and physical disabilities using buses to bring clients on trips to Blanchardstown Centre, the local library, swimming pools etc
3. Our Lady Help of Christians Church
 - Boys and Girls Primary Schools Circa 1000;
 - St. Dominic's College Circa 800;
4. Nephin Road. St. Declan's College Circa 650 in/out.

A condition is required to provide detailed analysis that the design is suitable for bus stop capacity.

BICYCLE STANDS:

We have concerns that the bicycle stands are too close to bus stops and areas where they will cause serious obstacles to all pedestrians and bus passengers particularly the visually impaired.

A condition is required to provide detailed analysis that the design is suitable for these locations.

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Park Road,

CONCLUSION

We thank you for considering our submission. The Navan Road Community Council is committed to ensuring that our community and environment will not be negatively impacted. The proposals as they stand, particularly the removal of our street trees, would have a devastating impact on our locality, environment and our residents.

While we support the CBC Project we feel that, as proposed, there are many flaws as outlined above. We strongly feel that, had our meetings with NTA continued over the last years, we could have arrived at a mutually agreed position to the benefit of all.

We feel that an Oral Hearing will allow us to further explain and flesh out our proposals. We would welcome same.

Yours sincerely,

Patricia Dunleavy,
Chairperson,
Navan Road Community Council,
10, Glendhu Park,
Navan Road,
Dublin 7,
D07EA44

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Eimear Reilly

From: Eimear Reilly
Sent: Monday 7 November 2022 15:04
To: barneyt10@hotmail.com
Cc: dunleavypatricia1@gmail.com; ctimmons01@outlook.com; sinead.owens@gmail.com
Subject: RE: Blanchardstown to City Centre core bus corridor - Error in NTA Report Vol 3 6.1-6.12

Hi Patricia

The Board acknowledges receipt of your email and will be in touch in due course.

Kind regards

Eimear

From: SIDS <sids@pleanala.ie>
Sent: Monday 7 November 2022 15:00
To: Eimear Reilly <e.reilly@pleanala.ie>
Subject: FW: Blanchardstown to City Centre core bus corridor - Error in NTA Report Vol 3 6.1-6.12

From: Pat Allison <barneyt10@hotmail.com>
Sent: Thursday 3 November 2022 13:39
To: SIDS <sids@pleanala.ie>
Cc: patricia dunleavy <dunleavypatricia1@gmail.com>; Colette Timmons <ctimmons01@outlook.com>; sinead owens <sinead.owens@gmail.com>
Subject: Blanchardstown to City Centre core bus corridor - Error in NTA Report Vol 3 6.1-6.12

NAVAN ROAD COMMUNITY COUNCIL

Navan Road Community Council was formed in 1968 as an umbrella organisation to represent individual residents, residents associations, clubs & other groups throughout Navan Road area, D.7.

Chair:

Treasurer:

Patricia
Dunleavy,

Colette Timmons.

10, Glendhu Road,
Dublin

7.
3rd November, 2022.

To An Bord Pleanala.

Dear Sir/Madam,

We refer to our previous observation dated 29th August, 2022, including our fee €50.00, and welcome opportunity to re-submit on this EIA error, as lodged with you by NTA and Bus Connects.

We are a volunteer group, submitting as non-professionals, specifically to highlight the environmental issues within our community from this stage of the consultation. We were forced to hold a public meeting in our school hall on 16th August to try inform people throughout our area of the then stage of consultation, as many are not on internet, and were deprived of all information, as NTA/Bus Connects refused to hold any in person public meetings, long after the initial COVID restrictions were lifted.

NOTE:

The public were NOT informed in adverts about this 'amended' consultation from NTA/ Bus Connects that NO FEE was required for those who had already submitted on the original consultation, if resubmitting on this new stage - up to 3rd November. We had to enquire by phone to Bord Pleanala, to have it confirmed that no second fee is required, as we have submitted previously.

We have a few short items, relating to specific Environmental issues, in Vol 3 6.1 - 6.12, as amended, on sections from Navan Road/Parkway Station to Cabra Cross, which runs through the centre of our area.

As the entire Blanchardstown to City Centre bus corridor runs centrally through our large residential area of Navan Road, impacting homes fronting it especially, as well as all roads leading off Navan Road, such as Baggot, Nephin, Skreen Roads to South, and Blackhorse Avenue to Skreen Road, as well as Ashtown Grove, Kinvara/Ashington areas and Nephin Road on North side - it is vital that every environmental issue is considered carefully, especially for the Health & Safety of residents.

NOTE:

An air quality report some years back, referred in Sunday Tribune, quoted 'well above recommended amounts of carbon emissions at sites monitored, such as Rathmines; College Green and **Ashtown Grove**'.

- **TREES;**
- We respectfully refer you to University of Canada Research 2015, which confirms that "even 10 trees in a residential area is of great health benefit
- to residents, , equal to 7 years longer life" They include the added benefit of 'back-yard trees' i.e., Navan Road that would be front garden trees.
-
- We have counted approximately 220 + residential homes on Navan Road, with front gardens, from Ashtown to Skreen Road/just West of Cabra Cross.
- Within those front gardens there are approximately **49 mature trees, and 52 mature hedges.**
- We did not count newly planted trees inside front gardens.
-
- We respectfully ask that you consider these mature carbon swallowing trees and hedges, in any CPO considerations.

- **CPO's**

- Whilst we cannot submit on individual private CPO's, we feel we can comment on the proposed CPO of the public area immediately to the front
- of our Parish Church - **Mary Help of Christians Church.**
- i) On both sides of this public area are main entrances to two local schools - Boys & Girls Primary Schools to West of Church, and
- Dominican Convent Secondary Girls school to East - with pedestrian crossing directly in front of Church, creating a safe crossing
- for all children, both Primary and Secondary age.

ii) Traditional Irish Funerals - sadly, almost a daily occurrence in our said Church.

In all such funerals, extended family, neighbours & friends wait inside Church grounds & outside on the public area, to greet an arriving funeral, with Hearse and 1 or 2 funeral cars. Again, after each funeral, an even larger group will come out of the Church to meet and greet, and eventually standing inside and outside Church grounds, to wave away the departing Hearse and funeral cars.

We respectfully ask that you consider this in your considerations on CPO'ing our public area - also, beside City going Bus stop.

- **BUS STOP No. 1661.**
- Currently this outgoing bus stop - almost opposite Church, is close to the above-mentioned safe pedestrian crossing;
- Proposals to move it 20m East, will bring it directly opposite the entrance to Dominican Convent; we fear this will lead to students
- dashing across the road, if they see their bus approaching - putting themselves in grave danger.
-

We respectfully ask that you consider this as a Health & Safety issue, in your decision.

It is unclear from all Zoom only meetings whether Bus Connects & NTA liaised with DART+ Maynooth & NTA plans, which are likely to result in extra car journeys along our Navan Road areas, with rat running through our side roads & Blackhorse Avenue, in order to avoid closures of level crossings/large bridges, and longer routes to access buses etc.

We support the Bus Corridor and improved services, but not at any cost, ignoring the well being of our local population.

We respectfully refer you to Section 14 of the NTA documents;

"LANDSCAPE & URBAN REALM

A well designed realm contributes to the identity of localities and realms and enhances the everyday lives of local communities and those passing through."

We respectfully suggest this sets a good standard to please judge your decisions on our behalf, and even on behalf of those 'passing through' our beloved area.
Please acknowledge receipt.

Yours sincerely,

Pat Allison (Mrs.) PRO
on behalf our Chair - absent at present.

cc our committee.