

An Bord Pleanála,  
61-64 Marlborough Street  
Dublin 1

Carl Reynolds  
142 Navan Road  
Dublin 7  
D07T6C4

29/08/2022

**Ref No ABP 313829**

**Blanchardstown to City Centre Bus Connects**

Dear Sir/Madam,

My Submission on above, enclosed is fee of 50.00 Euro. Please acknowledge Receipt in due course. I am writing to you regarding concerns on behalf of myself and my neighbours at 136 – 140 Navan Road Dublin 7. We also request that an oral hearing be held on this matter.

My concerns are as listed below:

**Changes to footpath outside cottages at 136 – 142 Navan Road:**

In recent correspondence through Senator Mary Fitzpatrick with the NTA (see Appendix 1 attached), it was noted by the NTA that the footpath width outside the front doors of 136 – 142 Navan road would be reduced from 2.8M to 2.1M.

Having measured the path in this location, the width is not 2.8M along the full length of the cottages 136 – 142 Navan Road as stated by the NTA in reply to a query from the cottage residents. In particular the path width outside 142 Navan Road ahead of the existing bus stop reduces to 1.85M. Reducing the path size, in particular outside no. 142 will present a clear danger to path users and residents at 142 entering or leaving the property.

The proposed foot path width reduction is as described as meeting the minimum width as set out in the *BusConnects Preliminary Design Guidance*. Firstly, I would like to note this document is *preliminary* and not adopted formally as approved guidance. I believe this to be inappropriate and the NTA should reference applicable current standards and best practice. *BusConnects Preliminary Design Guidance* does cite reference to the *Design Manual for Urban Roads and Streets*. The manual cites reference to the *UK Manual for Street* which states

*In lightly used streets (such as those with a purely residential function), the minimum unobstructed width for pedestrians should generally be 2m. Additional width should be*

*considered between the footway and a heavily used carriageway, or adjacent to gathering places, such as schools and shops.*

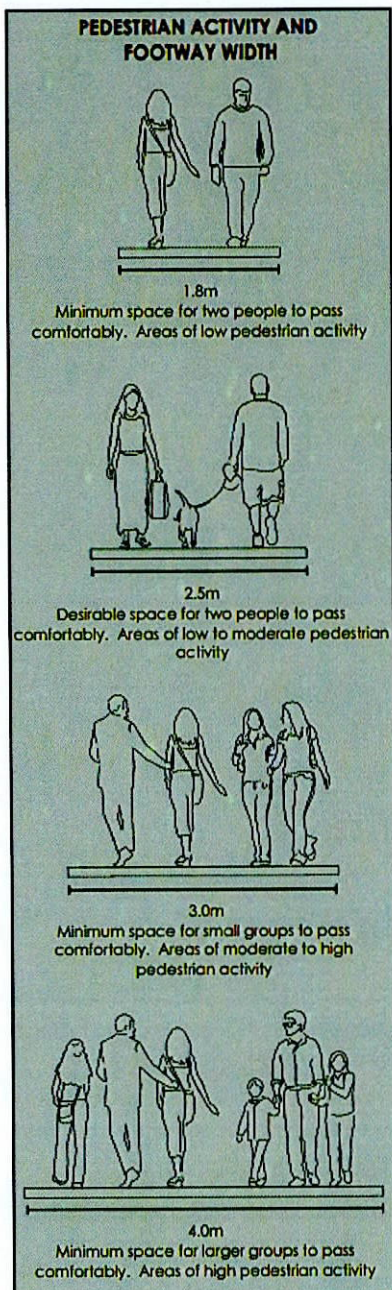
Regarding this statement the immediate locality is home to a number and variety of vulnerable road users namely:

- Nephin Nursing Home
- St. Joseph's School for Deaf Boys
- Curam Care Home

In addition to this the presence of the adjacent bus stop and St. Declan's College generates significant waves of footfall on this section of footpath and especially at the junction with Nephin road as the pedestrian crossing. I have been unable to ascertain if the NTA has carried out any analysis such as diversity impact assessment to consider if the proposed works will impair or reduce the safety of vulnerable road users. Further to this point has the NTA undertaken any risk assessment analysis to confirm if width reduction will increase risk to pedestrians in the event of a vehicle losing control and mounting the foot path. The manual also noted that minimum widths are based on there being no obstruction such as signage. Currently where is existing signage and traffic lights on this section of foot path. The proposal drawings do not provide the required detail to confirm that there will not be additional signage that would further inhibit the pedestrian flow.

The manual references the UK *Pedestrian Comfort Guidance for London* and the associated figure below.





Accordingly, this figure clearly shows that the footpath environment at 136-142 Navan is not purely residential and is currently aligned with the third scenario for 3.0m width due the presence of the bus stop, schools and care homes. I also note the manual states:

*In a retrofit situation increasing footpath widths should be a priority for designers.*

With regard to the impact on 136-142 Navan Road the front gardens of these properties were already removed in a previous widening of the Navan Road, subjecting residents to associated noise and air pollution with no mitigations. This proposed scheme further expands the through put of vehicles. The NTA has not provided any specific analysis or risk assessment to quantify the impact on the residents. Nor have any mitigations been proposed as part of this scheme. The NTA has failed to demonstrate that the proposed project will for immediately adjacent residents not result in

additional exposure to nitrogen dioxide (NO<sub>2</sub>) levels mandated by the World Health Organisation and European Union.

In conclusion and with reference to the information set out above:

1. A reduction of the path width from 2.8M to 2.1M per the reply received from the NTA is neither practical or correct given the width is not consistently 2.8M across the 4 cottages. It actually reduces to 1.85M and given the footfall detailed above, anything less that this will create safety concerns for pedestrians and the home owners at 136 – 142.
2. There are currently regular noted instances of vehicles mounting the path outside the cottages, in particular from traffic travelling from Cabra, along Nephin road, turning on to the Navan Road in the direction out of the city. These vehicles often turn the corner from Nephin Road on to Navan Road (in front of the cottages 136 – 142) too wide, resulting in the vehicle mounting the path. In addition, there is a history of accidents at this location of cars crashing into the front of the cottages at no. 136, no. 138 and no. 140. Reduction of the path width will only exacerbate this issue and reduce safety for all concerned. To this point, I am not aware of any risk assessment being carried out to assess the further danger reducing the size of the existing path could cause.
3. At no point were the residents of 136 – 142 contacted or consulted about the reducing the width of the path or what implications such a change could have.
4. The cottages at 136 – 142 Navan Road once had front gardens and during an earlier widening of the Navan Road these gardens were removed under a CPO, resulting in a significant loss of amenity. Holding a reasonably sized path after the gardens were removed was essential in order to maintain a safe and reasonable distance between the living rooms of the houses from heavy traffic. Having already lost the gardens to the houses it seems entirely unreasonable to expect the residents to accept further encroachment and further loss of amenity on their properties.

#### **Removal of Trees and loss of amenity to residents**

- The loss of Trees 150 trees along Navan Rd will facilitate a dual carriageway at the expense of the locality and local community.
- Given how much traffic uses the Navan Road, the trees provide a noise shelter that will be removed, further impacting residents daily lives.
- The removal of mature trees creates environmental concerns. Although there is mention from the NTA that some trees will be replaced, the replacement will be with sapling trees which could take decades to mature again, so this is not a like for like change



- The benefits of mature trees far outweigh those of saplings. Habitat for wildlife and contribution to halting climate change are only two examples

Yours sincerely,

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Carl Reynolds

Anne Martin – 136 Navan Road

Henry Reynolds – 140 Navan Road

### **Appendix 1:**

**From:** Mary Fitzpatrick <[Mary.Fitzpatrick@oireachtas.ie](mailto:Mary.Fitzpatrick@oireachtas.ie)>

**Sent:** Wednesday 24 August 2022 14:59

**To:** Carl Reynolds, Anne Martin

**Subject:** FW: Bus Connects Update

Hi Carl & Anne,

Further to my recent representations to the NTA about Bus Connects Blanchardstown Route, please find their response below:

***In order to achieve the optimum scheme design which best meets the scheme objectives, it is necessary to rearrange the road layout in this area. This to facilitate a cycle track, bus lane and footpath in each direction. In the area outside cottages 136 – 142 Navan Road, the available road width is insufficient to accommodate this layout. It is therefore necessary to widen the road through a combination of land acquisition from properties on the opposite side of Navan Road and by narrowing the footpath in front of the cottages from c. 2.8m to c.2.1m. This retains the footpath width above the desirable minimum of 2m as set out in the BusConnects Preliminary Design Guidance Booklet. It is noted that this is greater than the minimum footpath width recommended in the Design Manual for Urban Roads and Streets.***

***Submissions/observations may be made in writing to the Bord at An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902 between July 5th and August 30th 2022.***

***Any submissions/observations must be accompanied by a fee of €50 and must be received by the Board not later than 5.30 p.m. on August 30th 2022. This fee will not apply to certain prescribed bodies including those specified in section 51(3)(b) of the Roads Act 1993 (as amended) or to***

**landowners and others with a legal interest in land who are objecting to compulsory acquisition of land in which they have such an interest in a compulsory acquisition case.**

**Submissions/observations can also be made on the An Bord Pleanála website at the following address: <https://online.pleanala.ie/en-ie/sid/observation>.**

**Any objection to the Compulsory Purchase Order should be made in writing to An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902, so as to reach the said Board before 5.30pm on August 30th 2022.**

**We would encourage all parties to ensure that, if they so wish, that they make a submission/observation to An Bord Pleanála**

**Yours Sincerely**

**NTA Oireachtas Liaison**