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Blanchardstown to City Centre Core Bus Corridor Scheme Submission (Ref. No. 313892)

Submitted on Behalf of:
Kevin Lawler
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30th August 2022

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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by our client, Kevin Lawler, to make a submission in respect of the Blanchardstown to City Centre Core Bus Corridor Scheme currently being planned by the National Transport Authority (NTA).

This submission, which is accompanied by the relevant submission fee (€50), is made in response to a public notice, available at <https://blanchardstownscheme.ie/>, inviting submissions, up until 30th August 2022, as part of a public consultation process in to the route corridor (Ref. No. 313892).

The purpose of this submission is to outline our client's concern to the intended route option. We note the map which presents the location of the route corridor options as presented in Figure 1.0, below.

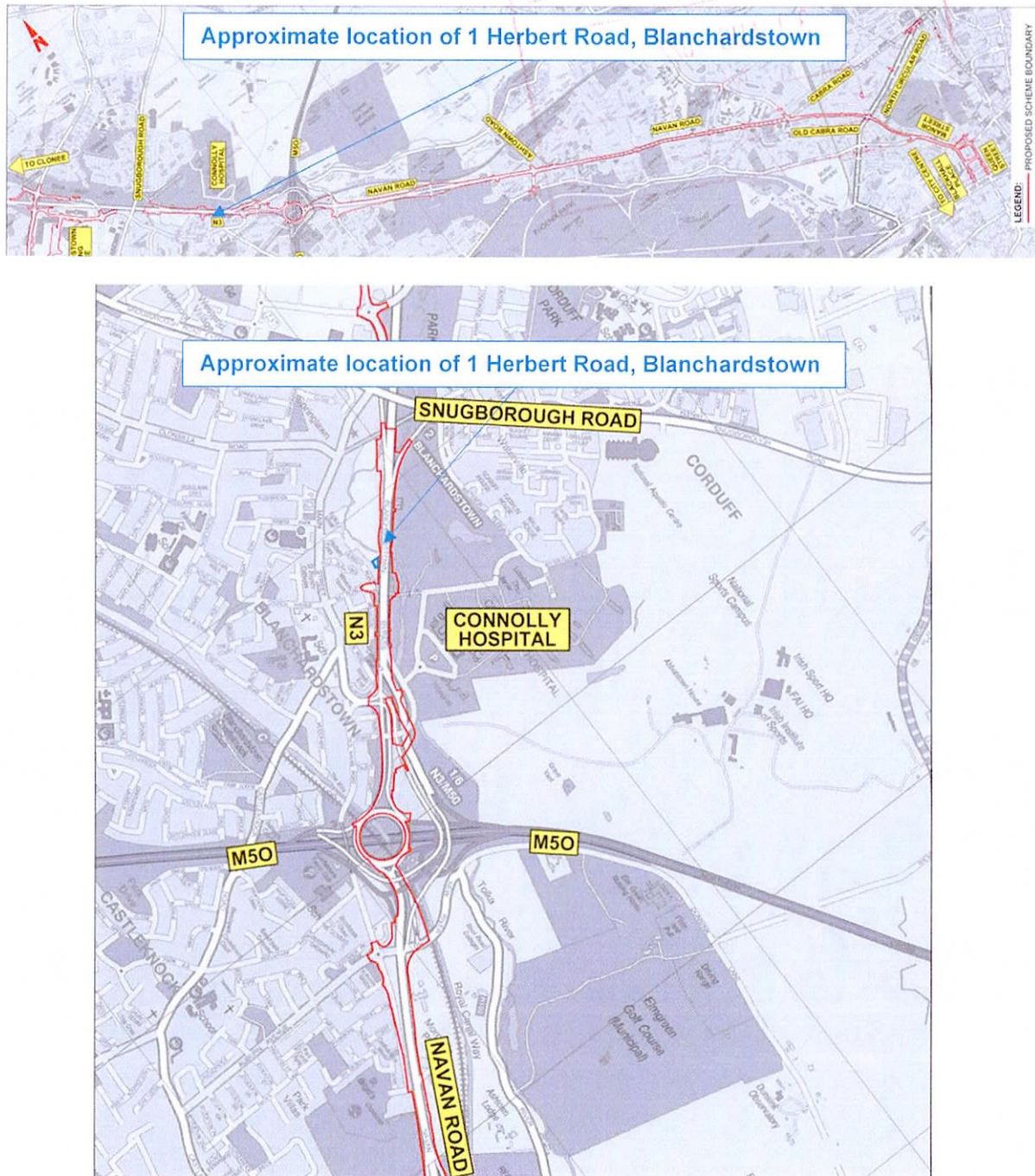


Figure 1.0 Extracts from the proposed scheme boundary illustrating the location of our client's site (blue outline) relative to the intended route option.

2.0 Subject Site

The site to which this submission pertains is located on the northern side of Herbert Road in Blanchardstown. The site extends to approximately 0.0685 hectares and is occupied by a single storey cottage with associated front/rear gardens and yard area. The northern boundary of the site is comprised of a blockwork boundary wall with fencing atop. This boundary wall is subsequently adjoined by a steep bank of vegetation which separates the site from the N3 roadway.

Notwithstanding the dense nature of the vegetation which separates the site from the N3, the elevated position of the roadway relative to the site results in near-constant background noise generated by vehicular traffic on this roadway.



Figure 2.0 Street-view images of No. 1 Herbert Road illustrating the context of the site relative to the N3 roadway.

3.0 Bus Connects Proposal Relative to Subject Site

As per the documentation available at <https://blanchardstownscheme.ie/>, the Blanchardstown to City Centre Core Bus Corridor Scheme proposes the construction of a new bus lane adjoining the existing three-lane roadway operating along the N3 to the immediate north of our client's site.

This bus lane will be partially accommodated within the existing grass verge adjoining the roadway but will necessitate the further building up, reinforcement and stabilisation of the steep bank to the rear of our client's site and the provision of a new grassed verge. Associated finishing works, including the installation of a new noise barrier and the removal/planting of new vegetation will necessitate the further expansion of the land bank.

Additional works within the immediate area will comprise the extension of the existing support bridge to accommodate the new bus lane and the provision of a new bus stop on the N3 with associated pedestrian ramp/steps to Mill Road.

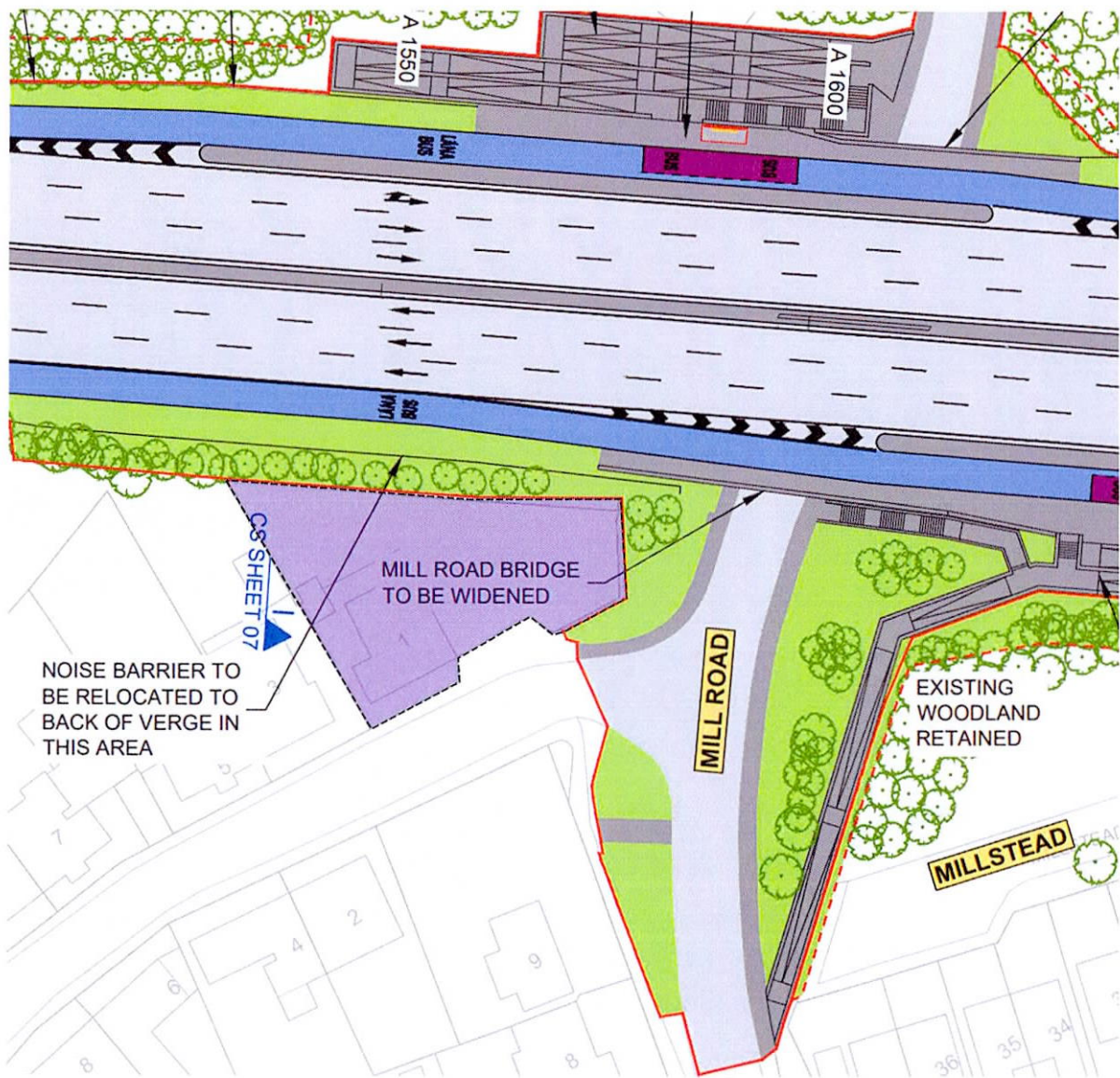
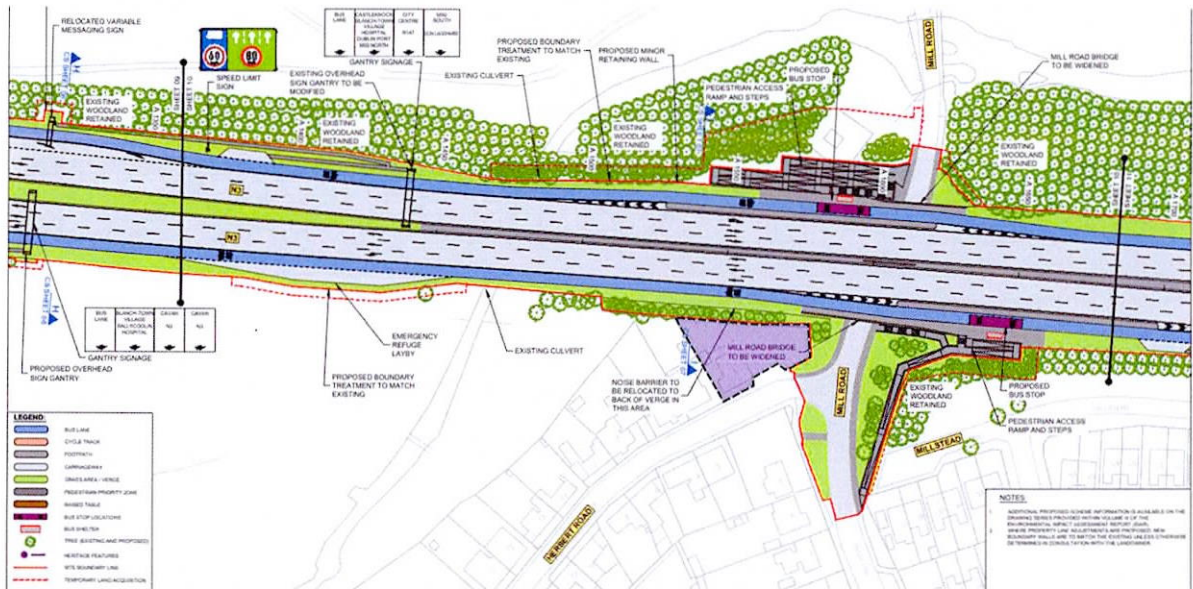


Figure 3.0 Extracts from Sheet 10 of the General Arrangement drawing illustrating the proposed works relative to our client's site (purple fill).

4.0 Impact of Bus Connects Proposal on Subject Site

Having regard for the nature of the proposed works and the proximity of these works to our client's site, we would consider the Blanchardstown to City Centre Core Bus Corridor Scheme to present direct impacts to the residential amenity of our client's property and, by association, the value of this property. The following sections of this report will expand upon the residential amenity impacts which will occur as a result of the aforementioned scheme.

4.1 Visual Amenity

Given the limited nature of the general arrangement drawings available for review in connection with the subject scheme, our client has concerns in relation to the visual impact of the scheme arising both in relation to the extended N3 roadway and the new pedestrian infrastructure connecting the aforementioned bus stop to Mill Road. As presented on the general arrangement drawing, the scheme will result in the extension of the N3 roadway by 1 no. lane and the provision of a new grass verge separating the roadway from the land bank adjoining our client's site. The works will require the removal/planting of vegetation on the landbank along with the removal/replacement of the fence.

With regards to visual impact, the primary impact relates to the reduced separation distance between both the rear elevation and rear boundary line of our client's property and the N3. Noting the elevated position of the roadway relative to our client's site, it is assumed that the new fence, which effectively doubles as a noise barrier, will be constructed to match the height of the existing fence. Simply put, the relocated vegetation and boundary fence will be situated approximately 5m closer to our client's property than at present thus resulting in an oppressive aspect when viewed from our client's property. Moreover, it is considered that the relocated boundary treatments will present an undue overbearing impact which will make the rear garden appear more cramped and less open than at present.

Noting that the general arrangement drawings only show the proposed street sections as opposed to the existing and proposed sections, we would ask that the following comparison image is considered. This image clearly shows the reduced separation distance between our client's site and the N3 motorway which will arise as a result of the subject scheme.



Figure 4.0 Extracts of Sheet 10 of the General Arrangement drawing illustrating the existing situation (l) and proposed works (r) relative to our client's site.

The above image also illustrates the new pedestrian infrastructure linking Mill Road to the N3 motorway and the new bus stop. In the absence of more detailed drawings, our client would retain concerns in relation to the visual impact of the pedestrian infrastructure on the wider Mill Road streetscape. This infrastructure will be highly visible within the local area and, subject to design confirmation, could disrupt the quasi-rural aesthetic of the area.

4.2 Noise

Increased noise levels are considered to represent a direct impact arising as a result of the subject scheme. In this regard, it is unclear whether internal and external noise levels at our client’s property will remain compliant with the relevant standards set out in BS 8233:2014 ‘Guidance on Sound Insulation and Noise Reduction for Buildings’ and the associated provisions of both ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development (2017) and the Dublin Agglomeration Environmental Noise Action Plan (2018 – 2023).

The key objective of the Noise Action Plan is to avoid, prevent and reduce where necessary on a prioritised basis the harmful effects including annoyance due to long term exposure to environmental noise. Noise is characterised as ‘unwanted sound’ or ‘sound that is loud, unpleasant or unexpected’ and that can eventually cause disturbance, impairment or damage to health.

Activity	Location	07:00 to 23:00 Hrs	23:00 to 07:00 Hrs
Resting	Living Room	35 dB LAeq, 16 hour	-
Dining	Dining Room/Area	35 dB LAeq, 16 hour	-
Sleeping (daytime resting)	Bedroom	35 dB LAeq, 16 hour	30 dB LAeq, 8 hour
Working	Office	40 dB LAeq, 16 hour	-

Figure 5.0 Internal noise criteria for commercial and residential buildings as set out in BS 8233:2014.

Desirable & Undesirable Sound Levels for External Amenity Spaces	
Desirable	Undesirable
< 50 dB(A) L _{night}	> 55 dB(A) L _{night}
< 55 dB(A) L _{day}	> 70 dB(A) L _{day}

Figure 6.0 Desirable and undesirable sound levels for external amenity spaces as per the Dublin Agglomeration Noise Action Plan 2018 – 2023.

As stated previously, the relocated vegetation and boundary fence will be situated approximately 5m closer to our client’s property than at present. This factor, in conjunction with the elevated level of the N3 relative to our client’s site, will result in a permanently heightened noise impact to which, in the absence of a dedicated and site-specific comparative noise assessment, the rise in noise levels relative to the long-standing situation on site cannot be pre-determined.

In any case, it is considered reasonable to assume that existing noise levels arising due to the site’s proximity to N3 will be exacerbated to a degree that could compromise the health and wellbeing of our client and we would ask that this be taken into account.

4.3 Lighting

While adequate lighting is essential for a safe and secure environment, light spillage from excessive or poorly designed lighting is increasingly recognised as a potential nuisance to surrounding properties and a threat to wildlife. Insensitive lighting can cause what is termed “light pollution”. Light pollution is essentially wasted light. Light pollution can have a negative impact on biodiversity by affecting the normal diurnal patterns of plants and animals.

Whilst we note no change in the quantum/type of street lighting infrastructure within the immediate vicinity of our client’s site, it is submitted that this property will be impacted by severe light pollution in the interim period between the removal of existing vegetation and the planting/growth of replacement vegetation to mature stage where it can again provide similar screening from lighting on the N3 roadway. The resulting light pollution will be a nuisance to all surrounding properties and could prove detrimental to local wildlife.

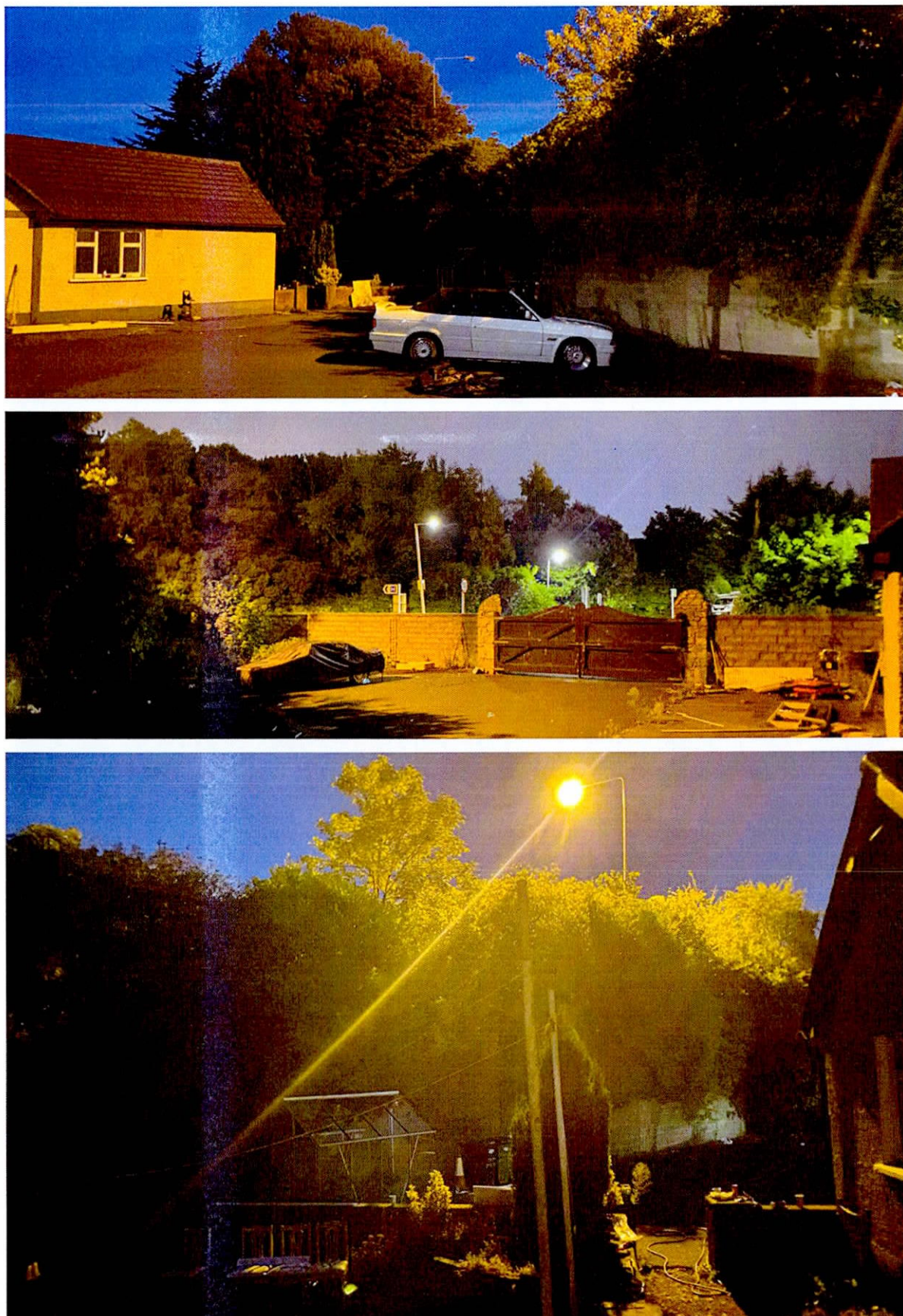


Figure 7.0 Images illustrating existing light pollution into our client's site. This pollution will be exacerbated by the relocation of boundary treatments and vegetation to the detriment of our client's amenity.

In similar manner to the above conclusion in relation to noise impacts, it is considered that the extent of light pollution arising as a result of the necessary works could compromise the health and wellbeing of our client and we would ask that this be taken into account.

4.4 Vibrations

It is considered that the extended N3 roadway will impact our client by virtue of vibrations arising from vehicular movements. With vehicular movements taking place in closer proximity, c. 5m closer, to our client's property it is submitted that such vibrations, in conjunction with increased noise levels and light pollution, could further compromise the health and wellbeing through loss of sleep and we would ask that this be taken into account.

4.5 Development Plan Policy

Having regard for the previous sections of this report, it is considered clear to see that the subject proposal will compromise the residential amenity of our client. In this respect we would note that our client's site is zoned, under both the current – Fingal Development Plan 2017-2023 and the draft – Fingal Development Plan 2023-2029, RS 'Residential'. This zoning provides the following objective which must be considered for any development on/adjoining such sites:

'Provide for residential development and protect and improve residential amenity.'

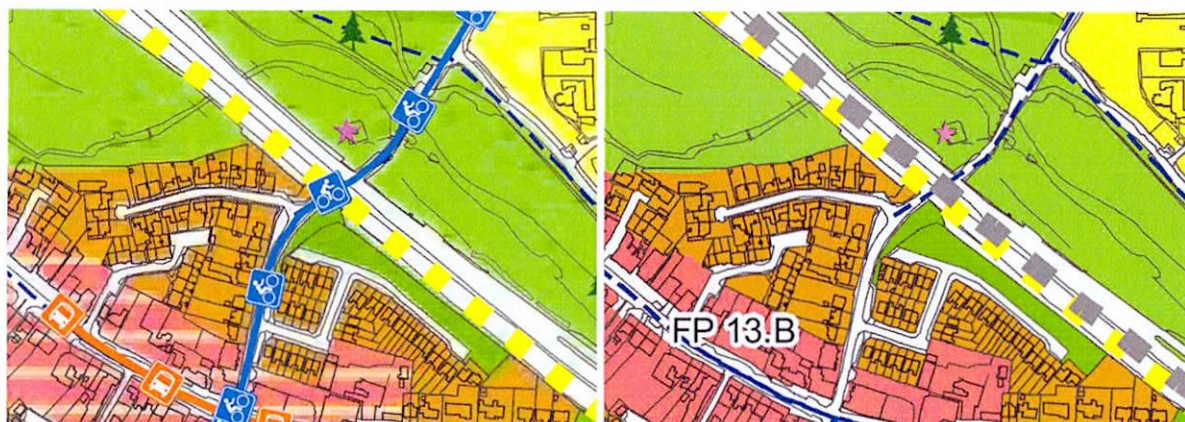


Figure 8.0 Extract from Sheet No. 13 'Blanchardstown South' of the current – Fingal Development Plan 2017-2023 (l) and the draft – Fingal Development Plan 2023-2029 (r) illustrating our client's site (as indicated) subject to the provisions of the RS 'Residential' zoning objective.

As per the provisions of the current development plan, the vision for lands subject to the RS 'Residential' zoning objective is to ensure:

'that any new development in existing residential areas has a minimal impact on existing amenity.'

It is considered, as presented above, that the Blanchardstown to City Centre Core Bus Corridor Scheme will have significant impact on the existing residential amenity of our client by virtue of undue visual impact, noise and light pollution and vibration effects. It is thus considered that the subject scheme neither protects nor improves the residential amenity of our client's property and, as such, is non-compliant with the provisions of the RS 'Residential' zoning objective. As a final point for assessment, we would consider the subject scheme to be non-compliant with the following objectives of the Fingal Development Plan 2017-2023:

Objective LP01 Require that the design of lighting schemes minimises the incidence of light spillage or pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on neighbouring residential or nearby properties; visual amenity and biodiversity in the surrounding areas.

Objective DMS86 Ensure boundary treatment associated with private open spaces for all residential unit types is designed to protect residential amenity and visual amenity.

Objective NP03 Require all developments to be designed and operated in a manner that will minimise and contain noise levels. Objective NP04 Ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013). Objective NP05 Ensure that development complies with the NRA's design goal for sensitive receptors exposed to road traffic noise or as updated by any subsequent guidelines published by Transport Infrastructure Ireland.

5.0 Devaluation of Property

The proposed works and the associated visual, noise, lighting and vibration impacts will lead to a loss in the value of numerous properties in the immediate area. This is of particular concern to our client has invested substantially in their existing property to provide a high standard of accommodation for their family. The amenity and accordingly the value of numerous properties on Herbert Road will be seriously impacted upon by this development.

6.0 Mitigation & Compensation

Having regard, for the identified issues which will compromise the residential amenity of our client's property at No. 1 Herbert Road, Blanchardstown, it is considered reasonable that the National Transport Authority (NTA) engage directly with our client in relation to identifying appropriate mitigation measures to ensure the adequate protection of residential amenity at this location.

In the absence of comprehensive mitigation measures to prevent undue visual, vibrations, lighting and noise impacts arising as a result of the subject scheme, our client would seek compensation to offset potential impacts to the monetary value of their property.

7.0 Conclusion

In conclusion, the undue visual impact, the vibrations, the significant increase in noise pollution and light pollution when combined all clearly render the Blanchardstown to City Centre Core Bus Corridor Scheme as non-compliant with the proper planning and sustainable development of the area as it relates to our client's property at No. 1 Herbert Road.

It is considered, for the above reasoning, that the subject scheme will be detrimental to the residential amenity of our client's property and will unduly compromise the value of this property. In this regard, we would herein confirm our client's willingness to engage with the National Transport Authority (NTA) to identify suitable mitigation measures to ensure the adequate protection of residential amenity at this location. In the absence of comprehensive mitigation measures, it is considered reasonable that appropriate compensation be afforded to our client.

We trust that the Board will have regard to the contents of this submission in relation to the wider public consultation process on the Blanchardstown to City Centre Core Bus Corridor Scheme.



Kevin Hughes MIPI MRTPI
Director for HPDC Ltd.