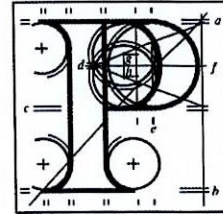


Our Case Number: ABP-313892-22



An
Bord
Pleanála

Brendan Heneghan
88 Parkmore Drive
Terenure
Dublin 6W
D6W X657

Date: 21 July 2023

Re: Bus Connects Blanchardstown to City Centre Core Bus Corridor Scheme
Blanchardstown to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

AA02

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Brendan Peneghan

88 Parkmore Drive

Terenure

D6W X657

An Bórd Pleanála

11 July 2023

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
12 JUL 2023	
Fee: €	Type: _____
Time: _____	By: <u>post</u>

Blanchardstown your ref 313892-22

Dear Bórd

The attached are my comments on the NTA submission dated 31 January 2023. I have already in responses on other corridors noted my concerns at the very tight timetable (8 June to 12 July) for comment and the lack of an extension as requested by me. I have also noted that these documents contain no acceptance by NTA that any comment in the submissions (125 in this case) have any merit, but rather they have used it to further underpin their case, now having the knowledge of specific points raised. I do not propose to go through these issues at length again.

I have the following specific comments, in no particular order

Ashtown roundabout p278

I remain of the view that these is a far better case made for the retention of this, than the argument of NTA seems to be unspecified improved pedestrian and cycling facilities and bus priority being better achieved. My central view on roundabouts is that at the least NTA should make a clear case for their removal. In this case their arguments are flimsy and local resident groups are far clearer as to their retention.

Both John Hiney for Kempton Residents Association and Navan Road Community Council make a very strong case that the roundabout slows down the traffic. This clearly would not be achieved if motorists are speeding to get through on a green phase (no matter what the speed limit is). This would be a big negative for pedestrian and cyclists. The Kempton residents say this will have "a negative environmental and aesthetic impact and make the Navan Road and the junction at Kempton less safe". The Navan Road Community Council express anger and frustration at the flip flop by NTA on this issue, despite agreement that it be kept. They ask instead for controlled crossing points for pedestrians and cyclists at this junction. The maps and illustrations March 2020 in Appendix M Supplementary information p43 and 44 show this. I think they should be given permission for what is there. I believe the community groups are much better placed to speak to this than some people sitting at desks in Iveagh Court.

The following additional observations apply.

There seems to be no reference to DMURS here, cited (incorrectly) in other cases as the basis for removing roundabouts. I believe this implies that this roundabout is acceptable under DMURS.

The alternative measures to slow traffic cited seem to be 60 to 50 km speed limit reduction, a marginal reduction in lane width and two carriageways to one with median eliminated. The last point is simply not correct as map 21 of 40 shows only one straight ahead lane and no median. I think this roundabout is a very good example of a roundabout which is very effective to slow traffic but NTA want to eliminate (the Spawell one is another given the heavy speed enforcement on the city side of it).

I think it mangles the English language to describe the difference between the photos on page 279 and 280 of their report as "a minor neutral change to the character of the view". Even after the 10-15 years post completion referred to on page 279, there is a full on view of the office block.

Phibsborough page 277

I remain of the view that all of the measures affecting Phibsborough should not be permitted due to the inadequacy of the notices. The Roads (Schemes) Forms Regulations 2008 require a "brief non technical description of the proposed road development". The newspaper notice has 24 lines of text including 14 bullet points. It would have been very easy to add words such as "associated traffic management measures at junctions in Phibsborough". It is difficult to see how the NTA could be "satisfied that the description used meets this requirement" p277.

It is all very well to say that "it is not currently possible to facilitate access for local residents only by private vehicle as the current regulations is based on restricting classes of vehicles". NTA have said at meetings that there needs to be legislative change to facilitate their schemes and there is no sense of any commitment on their part to lobby for and obtain a legislative change to this effect. They should so commit given the inconvenience they propose to cause to residents. I believe (provided there was adequate notice and consultation, which there has manifestly not been) you could allow these bans subject to such a legislative change for locals being made.

Traffic modelling page 275

The reply wholly ducks the issue of the different figure provided in this document and the Ballymun/Finglas document. This is directly relevant here given the concerns expressed by groups such as the Cabra Park Residents Association, Connaught Street Residents Association and Leinster Street North Residents Association among others which directly relate to projections of traffic. It seems wholly inappropriate that you should allow NTA get away with no explanation of which are the right figures for particular streets where there are cogent representations, given that they have entirely different numbers in two applications.

The administrative error page 271

There was a very serious omission in this case with Figures 6.1 to 6.12 being omitted from the dedicated website, which NTA were obliged to have. I note that when I made my submission there

were 115 submissions, which seem to pre-date the extended deadline. There seem to have only been only 10 further submissions. No explanation is given whatever of how the administrative error occurred (there are now 3 such examples across 9 corridors). I remain of the view that it is not safe to proceed with applications where there are material administrative errors and that the correct course is to re-start the process.

Prussia Street Traders

I suggested in my submission that an obvious solution here would be to time limit the Prussia Street bus gates. I note that the Prussia Street traders in their submission set out "the existential threat to their businesses, which all indications are will fail or be severely adversely affected if the application is permitted to proceed in its current form" They set out the enormous environmental effects of journeys increased by up to 4.5km. Tesco back up these assertions. While they do not seem to suggest time limits; this is clearly suggested by their neighbours in Aughrim Street Residents Association who suggest 7am to 10am and 4pm to 7pm Monday to Friday.

Because NTA have gone for massive overkill on the hours of operation of bus gates, they have not analysed by reference to traffic surveys whether there is a case for 7am being 6am, which is something I believe is merited having regard to my analysis of traffic counts in other areas. My read of these bus gates is that they are 24/7 365 days of the year, the most stringent proposed in the scheme so far.

I don't propose for sheer lack of time to comment on other issues in the response except to say that I don't agree that their consultation process was Aarhus compliant and I note they say nothing about my assessments of the time taken by a full cross city bus journey.



Brendan Heneghan