

31 Skreen Rd

Dublin 7

D07 P6Y4

29 August 2022

Submission in respect of BusConnects Dublin – Blanchardstown to City Centre - ABP 313892

To whom it may concern:

We are writing to you as residents impacted by the above proposed development.

There are many grounds that we believe the planning application should not be approved in its current form. We have set these out briefly below:

- Consultation – the NTA has not interacted appropriately or allowed the public to make representations on this scheme. A cursory, ineffective process ran by the NTA prior to the Covid restrictions was interrupted. The Planning permission submitted varies in many respects from that set out as part of the process. This does not provide an appropriate opportunity for individuals to make representations on the proposed scheme.
- The traffic and other assumptions appear to be based on a number of other transport infrastructure upgrades being complete. It is demonstrably unclear when some of the other infrastructure projects on which the analysis set out in the proposed scheme is based will take place. It is not unreasonable to assume that some of these upgrades may never be undertaken or completed as envisaged in the current scheme. This would appear an inappropriate basis for a decision to undertake this development.
- The traffic analysis appears to be based on pre Covid pandemic data. The shift to remote working has clearly influenced traffic movements – both in terms of volume and profile of journeys. This situation continues to evolve and the data on the impact of the changes in traffic movements cannot yet be fully bedded down. Using data that is now defunct or at least partially historic cannot lead to an informed planning decision. An appropriate interval to

collate normalised post pandemic travel data is required to properly inform a planning decision.

- Community travel – the overwhelming focus of the analysis performed is on commuter travel. The level of redirection of local car travel associated with some of the proposed traffic routing changes does not appear to have been considered in any meaningful way. The proposed changes will make journeys that would currently take local people several minutes will now require total redirection along narrow congested routes. The bus transport set out in the scheme will not provide an adequate alternative for a significant proportion of local car journeys particularly involving care for other parties. The local community interacts with locations in Phibsborough, Stoneybatter, Smithfield and Glasnevin and not just the city centre. Any form of non bus transport to Stoneybatter and Smithfield will be totally compromised by these proposals. Existing bus access to Phibsborough and Glasnevin will be hampered by these proposals due to the deliberate additional congestion on New Cabra Road.
- The proposals call for the removal of parking spaces in several areas (e.g. Prussia St) without providing an appropriate rationale/ relative to the significant volume of new residential and commercial development that is underway in these areas. The fact that this is a large scale infrastructure project does not mean that such basic steps can be omitted given the interest of stakeholders.
- Quality of information – the structure of the data is such that it is difficult for third parties to determine the impact of the proposals. The search function on the website <https://blanchardstownscheme.ie> appears to have been purposefully limited. It does not provide a reliable basis for results e.g. a search for the word 'bus' results in 6 results, two of which are in the website disclaimer – see Annex 1. Is this a credible approach to planning consultation or information provision?
- The planning drawings provide detail on the scheme itself but not on the knock on implications for other routes where traffic will be diverted. At best this means the approach is incomplete in terms of the ability for stakeholders to consider its impact.
- The proposal does not seem to deal with evening traffic congestion as outbound car traffic merges with bus lanes.
- The assessment of the impact on the users of the Phoenix Park which is a crucial amenity of national and international significance is totally insufficient.

Overall this planning scheme seems to be poorly conceived and rushed for the sake of demonstrating 'progress' on an infrastructure scheme. This haste appears ill founded and unwise and does not provide an appropriate basis for consideration of a multi-year scheme of such scale and national significance. The assessment of any scheme of this scale needs to be done properly and with due regard for the public, the communities impacted and knock on implications. There has been no contact, consideration or interaction with a wide variety of stakeholders. It requires further review and discussion not a 'by the numbers' engineering assessment. We respectfully recommend that it should be declined.

Yours sincerely

Submitted online therefore bears no signature

Séan MacAmhlaigh & Dara Cassidy

Annex 1 – demonstration of website search functionality

Search results for "bus"

bus



Showing 6 results

[Appendix H – Bus Stop Review Report](#)

[/wp-content/uploads/sites/6/2022/06/Appendix-H-Bus-Stop-Review-R...](#)

[Appendix P – Bus Interchange Design Statement](#)

[/wp-content/uploads/sites/6/2022/06/Appendix-P-Bus-Interchange-De...](#)

[Appendix A10.2 Economic Impact of the Core Bus Corridors](#)

[/wp-content/uploads/sites/6/2022/06/Appendix-A10.2-Economic-Impa...](#)

[Appendix A10.1 – Schedule of Commercial Businesses](#)

[/wp-content/uploads/sites/6/2022/06/Appendix-A10.1-Schedule-of-Co...](#)

[NTA – Privacy Notice for BusConnects Dublin Impacted Properties](#)

[/wp-content/uploads/sites/6/2022/06/NTA-Privacy-Notice-for-BusCon...](#)

[Website disclaimer](#)

[/website-disclaimer/](#)

...these sites. National Transport Authority Dún Scéine Harcourt Lane Dublin 2 Údarás Náisiúnta Iompair Dún Scéine Lána Fhearchair Baile Átha Cliath 2 Publications: info@busconnects.ie General enquiries: info@busconnects.ie Freephone Number: 1800 303 653...