

An Bord Pleanála  
64 Marlborough Street  
D01 V902  
Dublin 1

<b>AN BORD PLEANÁLA</b>	
LDG-	056733-22
ABP-	313892 (H/A)
30 AUG 2022	
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By:	hugh

195 Blackhorse Ave  
Dublin 7  
D07 H9Y0  
29th August, 2022

**Ref No. ABP 313892 Blanchardstown to City Core Bus Corridor**

Dear Sir/Madam,

We have been resident in the Navan Road area since 1974 and are heavily involved with our local community group and sporting club namely Celtic/DCH Athletic Club. We feel it is important to lend support to the appeal being made separately by Navan Road Community Council whose submission which encapsulates all of the objections and fears within our greater community.

We enclose our fee €50.00. Please acknowledge receipt.

**We also strongly and urgently request, on behalf of our community, and many people who attended a 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.**

In general terms there appears to be support for 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 Pleanála (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 including our domicile Blackhorse Avenue.

We fully support the Navan Road Community Council's 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 negative consequences arising because of this project.

When the idea of a CBC was mooted some three years ago we are aware that a committee was formed to interact with the NTA to outline our positivity to the project but to also get fuller details and to outline concerns. This sub-committee met with the NTA on a number of occasions. The meetings were reported as being

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informative and constructive, with the NTA showing genuine interest in the issues raised. A specific example would be where, in the first meeting, the NTA indicated that the roundabout at The Halfway House Pub would be removed for the CBC. It was argued that this roundabout was an important visual sign for motorists that they were entering a built-up suburban area and should slow down. It was explained that speeding (and Garda records will support this) was and is a regular occurrence on the dual carriageway leading to the roundabout and that a removal of same would lead to a continuance through the heavily populated area along Navan Road. The NTA took these concerns on board and, at the next meeting on 13th February 2020, they assured all that the roundabout was to be retained within a signalised junction.

Alas that was to be the last meeting with the NTA as Covid intervened. Covid also hugely impacted on the ability of the sub-committee to meet. In recent times when attempts to re-engage with the NTA, they were either found to be unable or unwilling to facilitate. It was with frustration and some anger therefore when the plans for the CBC as submitted by the NTA to ABP became available. It was noted that the roundabout at the Halfway House was again totally removed in the latest maps, in spite of the NTA in 2020 agreeing that it be kept.

While we support the Core Bus Corridor Projects, we and many other communities want to have an enhanced, efficient, modern, and clean transport system.

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 as presently exists.

However, our support is somewhat conditional, as you will understand. There are many concerns with the possible negative impacts of this project on our community out of proportion to the benefits gained. We would like to engage with the NTA to resolve our concerns and to make this project a success.

### **WE ARE A COMMUNITY – NOT A MOTORWAY!**

As a community, Navan Road Community Council 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 5.30pm onwards to view the plans, with before/after pictures, purchased from the 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 on line only, disenfranchising those without internet, – Trinity Study 2019 'TILDA' on the impact on people lacking internet connection, and the disenfranchisement of all.

The Navan Road Community Council 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 are our elected public reps. – confirmed at our meeting as all our T.D.'s were away, as were several of our local Councillors. All were invited.

Before dealing 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 our 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 27years. 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 condition attaching to any grant of permission), 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.

### **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 along the Navan Road as far as the North Circular Road. We do not see an effort in the documentation to make our community one that has at its core the well-being of people and their economic lives. It appears that at least 150 street trees along the populated area of the Navan Road alone, will be removed to facilitate this project. There are also unquantified numbers of woodland trees to be removed.

There is an opportunity to replant street trees in properly constructed tree pits that will still allow for the provision of cycle, public transport, and car lanes. The technology for this is available in other countries, e.g., Denmark, France, Germany, Britain and indeed in Ireland. These large tree pits (and they will have to be large) will be constructed to current European standards, and 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 require 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.

### **PARK & RIDE FACILITIES**

Provide Park and Ride facilities at strategic locations such as the existing facility at Dunboyne Railway Station, with regular bus service, and/or regular shuttle buses connecting to train stations and City bus services. A comfortable enclosed shelter provided for the commuter waiting to make a bus connection, properly maintained and regularly serviced public toilets. Clean, safe and comfortable Café/Restaurant, with everything open at hours that will benefit the commuter.

### **OLD CABRA ROAD**

There is a proposal for a Bus Gate on this road. Whilst this would seem to be a positive idea, the consequences of it may be to create new issues on at least four narrow roads in our area – Blackhorse Avenue, Baggot Road, Nephin Road, Screen Road. Motorists and other road users will use these roads to take short cuts (also known as "Rat Runs") onto and from Blackhorse Avenue. This will result in congestion, danger to the young, the old, the disabled, pedestrians and cyclists and who must navigate narrow and busy road areas.

### **NEW CABRA ROAD**

It is proposed that all vehicular traffic use this route into and out of the City. At present, many people in our area try to avoid the 38A Bus service from Ashtown

onwards, as its route is along New Cabra Road, where on a daily basis it comes to a stop, sometimes as far back as Clarkes Bakery area, and moves along slowly till it is well past Phibsboro, with 3 traffic light systems in place at the tailback area.

On the way back from the City, on a daily basis, the 38A Bus -destination Tyrrellstown comes to a stop at the Berkeley Road junction with NCR, for a minimum of 3, sometimes 4 traffic light changes. There is also a tail back along NCR down to Dorset Street. No. 122 from Ashington, with our Navan Road area, also uses New Cabra Road, via Cabra, but does not come out of City via Berkeley Road.

### **ENHANCING THE ENVIRONMENT OF OUR AREA**

The proposed works to create the new Core Bus Corridor and the enhanced cycle lanes are welcome. There are however, two potential negative outcomes arising from the Core Bus Corridor works.

1. There will be an inevitable reduction in tree numbers and in many locations, as already mentioned above. There is a current deficit of street trees due to previous infrastructure works – we have dealt with this above, see Utilities. This then impacts on the health of the community as well as the environment of the area.
2. The works that will be necessary to undertake the construction of new cycle and pedestrian path infrastructure will, as outlined in the NTA proposed works, necessitate the undertaking of remedial work in front gardens. We understand that this work will necessitate the rebuilding of the boundary walls and railings.

### **TRIPLE GLAZING**

As confirmed in the Media earlier this week, residents abutting the new runway at Dublin Airport have been awarded a Grant of approximately €20,000 each 'to facilitate the insulation of their homes against night noise from the airport'. It is equitable therefore that we request a condition in any permission granted that a similar grant be proposed for all the homes along Navan Road (approximately 220) who will have to endure increased and consistent noise pollution levels all day long, as well as certain hours throughout the night with the new night time bus service.

### **MOBILITY AND DISABILITY**

It is vitally important that this significant cohort be fully protected should in any permission granted. Government policy dictates more and more inclusion of minorities and there is no doubt that the elderly and those with even minor disabilities, of which there are many in this area, will be seriously affected. There is an issue concerning cycle lanes running inside bus lanes especially at bus stops where passengers will have to alight across cycle lanes in the face of speeding bicycles and electronic scooters.

### **Proposed Island Bus Stops along Navan Road from Parkway to NCR**

This 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 making it dangerous and harder to see an oncoming bike or scooter, electric or manual.

**The major Bus Stops which we have concerns are**

1. Parkway out from town.  
1000 school children attend new Edmund Rice school.
2. Ashtown Grove/Daughters of Charity, in/out.  
Provide services to persons with intellectual disability using buses to bring clients on trips to Blanchardstown Centre.
3. Our Lady Help of Christians Church, in/out.  
1700 school children attend surrounding schools.
4. Nephin Road. Declan's College Cabra, in/out.  
650 school children attend St Vincent's Special School.

**SUMMARY**

1. We support the principle of the CBC.
2. We support in principle the improved traffic flow plans for the entire area.
3. We strenuously object to the removal of the roundabout at the Half Way House as stated above
4. We strenuously object to the removal of so many trees along the Navan Road and the consequential impact on the streetscape, noise pollution levels and their contribution to the general mental health of residents.
5. We strenuously object to the compulsory purchase orders of gardens along the Navan Road which will result to up to 80% of some gardens being removed.
6. We object to the Bus-Gate plan at Old Cabra Road which will have the effect of throwing traffic unto Blackhorse Ave via a number of narrow streets i.e. Glenbeigh Road, Skreen Road an Nephin Road.
7. We strenuously object to the effect the plan will have on the elderly and disabled in the community and the access for carers, meals on wheels, doctors and medical staff calling to their homes as well as social visits from loved ones.

Indeed there will be a significant effect on the almost 3000 school children accessing their places of education along the Navan Road.

Church goers will also be seriously affected by the ensuing restrictions on parking.

In conclusion we earnestly request that further consultation by the National Roads Authority takes place with the local communities and that an Oral Hearing is held before any final decision is made.

  
Deirdre Nagle and Dermot Nagle