

# NAVAN ROAD COMMUNITY COUNCIL

[www.navanroad.com](http://www.navanroad.com)

navanroadcc@gmail.com

Chairperson:  
Patricia Dunleavy,  
10, Glendhu Park,  
D07EA44

Treasurer:  
Colette Timmons  
  
Park Road,

An Bord Pleanala,  
64, Marlborough Street,  
DUBLIN, 1.

44 Kempton Avenue  
Navan Road  
Dublin 7  
D07F6X4

30<sup>th</sup> August, 2022.

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

Dear Sir/Madam,

I write on my own behalf and that of Brian O'Hanlon of 17 Kempton Avenue, Navan Road , Dublin 7 to object to the proposed Blanchardstown Bus Corridor. Our objection and observation are based, inter alia, on the following

We enclose our fee €50.00. Please acknowledge receipt.

**We request, on our behalf, and the 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.**

We support the Core Bus Corridor Project. Nevertheless, we do have concerns about the possible negative impacts of this project on our Navan Road Community.

Our submission to An Bord Pleanala (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.

We wish 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, nor will we tolerate a negative consequence arising because of this project.

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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

However, our support is not at any price. There are many concerns with the possible negative impacts of this project on our community. We would like to engage with the NTA to resolve our concerns and to make this project a success which works for the benefit of our community and our city.

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

The specifics of our submission are -

### **ASHTOWN ROUNDABOUT**

The Ashtown Roundabout denotes the entrance to Dublin City and is an important, distinctive feature of our area. We are totally opposed to its removal. We propose traffic and pedestrian signalling of the Ashtown Roundabout and retention of the trees.

The roundabout acts as a boundary between the dual carriageway which has a higher speed limit and the Dublin City area. It acts to slow down the traffic to suitable speeds. The four way junction proposed would not have the same effect. We acknowledge the need for controlled crossing points for pedestrians and cyclists at this junction but feel this can be done without the removal of the roundabout and the fine stand of pine trees.

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## 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 right along the Navan Road as far as Cabra Cross. We do not see an effort in the documentation to make our community one that has at its core the well-being our community.

We have identified at least 150 street trees to be removed to facilitate this project. There are also unquantified numbers of woodland trees to be removed.

**IF OUR STREET TREES ARE FORCIBLY REMOVED**, against the wishes of the majority of our community there should be a **condition** that they are replaced by an equal or greater number of mature street trees, planted in properly constructed tree pits, that will still allow for the provision of cycle, public transport, and car lanes. These large tree pits (and they will have to be large) should be constructed to current European standards 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 demand 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.

An alternative solution, **which would save a large number of trees and would be of major benefit to the local community**, would be to remove the outbound bus lane from Nephin Road to Kempton Estate. Our studies indicate that this would have a very minor impact on traffic times given the new proposed junction layouts along this stretch of road. This will only reduce the total bus lane length by approximately one kilometre. **A PRICE WORTH PAYING!**

## PARK & RIDE FACILITIES

To encourage commuters to move from car to public transport, it is imperative that proper, secure, safe and free park and ride facilities are provided for the commuter belt at current bus and rail transport hubs. These must be of an appropriate size. Shuttle services should be provided to link outer park and ride facilities to the proposed improved bus network.

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## **OLD CABRA ROAD**

There is a proposal for two Bus Gates on this road.

Whilst this would seem to be a positive idea, the consequences of it may be to create new issues on the surrounding road structure e.g. Blackhorse Avenue, Baggot Road, Nephin Road, Skreen Road. Motorists and other road users will use these roads to take short cuts onto and from Navan Road. The resulting congestion will have a huge impact on residential access, emergency services and deliveries on residential quiet ways. A further consequence will be the migration of traffic via the quiet ways onto Blackhorse Avenue which is not suitable for increased traffic. **As a condition** we propose that a detailed traffic analysis, to ensure the design is suitable, should be undertaken before implementation.

## **ASHTOWN GATE/ CASTLEKNOCK ROAD**

The proposal to implement a “no right turn” from Castleknock Road into The Phoenix Park and also onto Blackhorse Avenue (Inbound) would appear to be counterproductive to a proper traffic plan. This would have a major negative impact on local residents and commercial premises on Blackhorse Avenue. **As a condition** we suggest a detailed traffic and health and safety analysis at this busy junction. Please note a similar situation occurs at the junction of Ratoath Road and Swilly Road.

## **CABRA ROAD**

With the proposed closure of the Old Cabra Road it is inevitable that inbound traffic will migrate to the Cabra Road. This will hugely impact on the Navan Road, the Cabra Road, North Circular Road and Phibsborough. These roads and their junctions are already at over capacity. There is no provision in the BusConnects proposals to deal with this problem. **As a condition** a detailed traffic analysis is required.

## **CPO'S & NOISE AMELIORATION**

Residents are very unhappy with the process, explanations and communication they have received from NTA as to why their property is being taken temporarily or permanently. As previously discussed (TREES SECTION) the removal of the outbound bus lane from Nephin Road to Kempton Estate would have a major impact on the amount of CPO's necessary.

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**As a condition** an audit should be undertaken on the CPO BusConnects process which appears to have been very unsatisfactory for our residents.

We note that grants for noise reduction have been awarded to residents adjacent to the new runway at Dublin Airport. **As a condition** similar grants should be made available for noise reduction to impacted residents along the Navan Road.

## **DISABILITY**

**A condition** should be contained in any permission granted, that our Government Statutes on the rights and legal obligations to represent people with disabilities is honoured, e.g. relating to bus stops/dangers from cycle lanes intruding on the stops/bicycle racks erected in a dangerous fashion to become a danger to people with visual difficulties.

## **CORE BUS CORRIDOR & DART+ WEST**

It is unclear from our non-professional perusal of the copious documentation in both these current proposals, what liaison, if any, is taking place between both applications, and their applicant, on the effects on our area and the wider Dublin 15 area from both plans.

We can see no evidence that BusConnects has taken the passenger movements and traffic impacts from Dart+ West into consideration. Nor can we see any indication that further studies have been made to take into account the changes in traffic and passenger demographics post Covid. **A condition** should be that a fresh evaluation of the BusConnects project should be made in light of current impacts.

## **ISLAND BUS STOPS**

The proposal for Island Bus Stops 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 to board or alight from a bus making it dangerous and harder to see an oncoming bike or scooter electric/manual.

The major Bus Stops which we have concerns for are:

1. Parkway Outbound. Circa 1000 school children will attend in future the new Edmund Rice School.
2. Ashtown Grove/Daughters of Charity (DOC) in/out – DOC provide services to persons with intellectual and physical disabilities using buses to bring clients on trips to Blanchardstown Centre, the local library, swimming pools etc
3. Our Lady Help of Christians Church
  - Boys and Girls Primary Schools Circa 1000;

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- St. Dominic's College Circa 800;
4. Nephin Road. St. Declan's College Circa 650 in/out.

**A condition** is required to provide detailed analysis that the design is suitable for bus stop capacity.

## **BICYCLE STANDS**

We have concerns that the bicycle stands are too close to bus stops and areas where they will cause serious obstacles to all pedestrians and bus passengers particularly the visually impaired.

**A condition** is required to provide detailed analysis that the design is suitable for these locations.

## **CONCLUSION**

We thank you for considering our submission. The proposals as they stand, particularly the removal of our street trees, would have a devastating impact on our locality, environment and our residents.

While we support the CBC Project we feel that, as proposed, there are many flaws as outlined above. We strongly feel that, had our meetings with NTA continued over the last years, we could have arrived at a mutually agreed position to the benefit of all.

We feel that an Oral Hearing will allow us to further explain and flesh out our proposals. We would welcome same.

Yours faithfully

Paul O'Leary

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