



Tara  
6 Charleville Road  
Phibsborough  
Dublin 7

19<sup>th</sup> August 2022

An Bord Pleanála  
Infrastructure Division  
64 Marlborough Street  
Dublin 1

**CPO: Blanchardstown to City Centre Bus Corridor, Case Reference: KA29N.313961**

A Chara,

As a home owner living on Charleville Road, Dublin 7 with young children my family and I strongly object to the proposed road changes in the Phibsborough and Stoneybatter area.

In particular the proposed one-way system for Charleville Road Map BE 0005 DM 0028 (only permitting vehicles to turn in from North Circular Road) on a number of grounds:

My husband and I are both Chartered Surveyors having worked in the Town Planning field, we object to the increase in harmful emissions that would be concentrated on this residential street by causing a rat-run and prolonged periods of congestion. Particularly as local roads have already or will be restricted access. We do not want to be living on a residential road filled with harmful emissions caused by traffic jams tailing the length of the road from the Cabra Road junction.

Sufficient research or collection of a true sample of data has not been taken. Particularly having concern for residents with compromised respiratory health, including children with asthma. Please note there is a Montessori school at 41 Charleville Road and the increase in traffic flow, traffic jams and their harmful level of emissions is completely unacceptable for young children's lungs.

Local homeowners should not be permanently compromised just to satisfy the requirements of the National Transport Authority's Blanchardstown Bus Corridor. Residents rely on their cars for medical appointments, transporting young children, mature drivers, medically vulnerable and those whose mobility or health means they can't use public transport to get to appointments etc. There are also disability blue badge holders living on the road. The running costs of a domestic vehicle are exorbitant and we want to be able to use our car to get around Dublin, when its necessary. The prolonged congestion at Hanlon's Corner, Doyle's Corner and Church Street is already unacceptable.

Dublin City Council should respect the maximum emissions levels permitted in residential areas according to the World Health Organization and authorized by the European Union. The EU permits an upper limit for NO<sub>2</sub> is 40 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ .) The concentration is generally exceeded in capital cities including Dublin. This is not acceptable and certainly would only increase on our neighbourhood road which is not designed to be rat-runs for heavy traffic.

As acknowledged in the Dublin City Council Climate Action Plan (CCAP) (2019-2024), the effects of climate change are already impacting Dublin City at a significant rate. With over 15% of the country's population living within Dublin City Council's administration area the NTA should be enabling the

changes for a low-carbon society without compromising the living standards on local community street like Charleville Road, St Peter's Road, Monck Place etc. The reduced cost of electric vehicles, driver incentives and availability of nationwide on-street fast e-charging points for electric vehicles should be prioritised as its success grows in London and other large UK cities for example.

The proposal to create a sharp left turning at the junction at St Peter's Church is physically not practical and creates a longer drive time for residents sitting in traffic at a filter lights. I also object to the Bus Connect measures proposed for St Peter's Road where there is a primary school. This should be subject to the "school zone" policy and reduce not increase dangerous levels of CO2 emissions near educational settings. The Bus Connects proposal contradicts this.

I am concerned about the impact of on street parking for visitors, delivery drivers, home healthcare providers and tradespeople. This will become a huge problem for residents living on the road.

We object to the inconvenience caused to access our garage in a laneway situated at the North Circular Road end of Charleville Road. Heavy traffic will prevent the ease of accessing the gated laneway we will have to 'hold up' the traffic flow to open the shared security gate (see photo). A number of Charleville Road and NC Road residents have vehicular rights of way to the lane. The same applies to garage access opposite in Annamoe Parade.

Local residents and I believe this 'consultation' process is underhand. I only discovered the public consultation and deadline by way of a concerned neighbour on a local WhatsApp group during our August holidays abroad! Deciphering the information on-line is exhaustive and very prohibiting, even for the most tech savvy.

We are also worried about the increased noise levels associated with the directed one-way traffic coming from North Circular Rd 24/7 as heavy commercial vehicles, emergency services, Garda vehicles and cars will intensively use Charleville Road, particularly if using Google Maps or other navigation APPS for directions, which is exactly what happened in UK residential areas in similar situations.

I feel this consultation is purposely excluding the elderly, Landlords and tenants who don't know about this consultation but make up the majority of stakeholders in the Phibsborough and NC Road area. They are unaware of the implications of Bus Connect changes and the importance of their views is being totally denied. There was no obvious Notice on Charleville Road. This process is purposely prohibitive especially at a cost of €50 per submission and the need to be able to navigate the volume of information on-line.

Our inner-city communities stand to lose the most by concentrating traffic into historic residential roads, with plans to chop down hundreds of mature trees and carve up private front gardens to make way for wider roads. With the purpose of accommodating even more empty busses and ticking climate target boxes, NTA are forcing the emissions problems on to private residents in our local community.

I also wish to stand by and include the concerns put forward by our local Senator and our group of concerned local residents who deciphered these complicated proposals. We make these following observations:

## 1) No Public Consultation on the new changes – there must be an Oral Hearing on the impact of these changes.

There are three road restriction changes proposed in the CPO application for the Blanchardstown Bus Corridor, none of which were set out in any of the proposed designs issued for public consultation since the Bus Connects project commenced in 2018.

The final preferred route was the result of three separate and rigorous stages of consultation since 2018 and yet none the three proposed restrictions appeared in the [final preferred route](#) publication dated March 2022.

A number of changes were negotiated at a local level with resident's groups, in particular **Annamoe Road and Annamoe Terrace** (ref. BI) residents and their efforts to ensure their road does not become a "rat run," arising from the displaced traffic from the Old Cabra Road are to be welcomed and supported.

Concerns were raised by **Monck Place** (ref. BF) residents directly with the senior management of the NTA about their road, however this was in the context of another road change in the Grangegorman area and not any changes arising from the Blanchardstown Bus Corridor. The extent of the proposals set out in the NTA's CPO application to ABP for Monck Place do not reflect the changes requested by residents from that area at the time.

Furthermore, it appears that the concerns expressed directly to the NTA by local residents about the impact on Fassaugh Avenue, Fassaugh Road and Connaught Street have gone unheeded. The adverse impacts arising from the closure of the Old Cabra Road to general through traffic will now be exacerbated by the new changes.

In that context, the NTA has been inconsistent and arguably unfair in its dealings and responses to concerns raised locally, it has failed to attempt to resolve all major local adverse effects, it has created new problems while addressing problems elsewhere and in that context it is vital that an Oral Hearing takes place for the ABP assessment of the Blanchardstown Bus Corridor.

## 2. Concern about the marked rise in Traffic flows and the associated safety impact from the new changes

These specifically relate to Connaught Street, St Peter's Road, the junction at St Peter's church, Fassaugh Avenue and Fassaugh Road with additional concerns for **Charleville Road**, Dowth Avenue and Cabra Road.

Restricting general traffic from the Old Cabra Road coupled with the no through access southbound on **Annamoe Terrace and Annamoe Road** plus **no southbound access to the North Circular Road from Charleville Road** (ref. BE) means that all Cabra to Stoneybatter traffic will now be displaced as far as **St Peter's Church junction in Phibsborough or to Skreen Road and Blackhorse Avenue.**

Furthermore, southbound traffic from Glasnevin to large parts of residential areas in Phibsborough and along the North Circular Road will now be displaced off the Phibsborough road, onto Connaught street, St Peter's Road and onto the junction at St Peter's Church in order to access the NCR.

A number of serious concerns arise:

- 1) **Connaught Street now has to deal with displaced traffic coming from two opposing directions- southbound traffic from Cabra and southbound traffic from Glasnevin.** Dramatic increases in

traffic flows are forecast (discussed below) and yet there are no mitigating measures put forward to protect vulnerable road users such as cyclists along Connaught street.

- 2) **Displaced traffic flows are being actively routed in front a primary school on St Peter's Road.** St Peter's National School is only marginally stepped back from the road and the NTA's proposed changes completely undermine the "school zone" measures taken by Dublin City Council to protect school users.
- 3) **Fassaugh Avenue, Fassaugh Road and Cabra Road will take on additional traffic arising from the changes on the Old Cabra Road, yet no mitigating measures are proposed such as continuous segregated cycle lanes.** There are four schools (three primary and one secondary) located on or just off Fassaugh Avenue, yet no protections or mitigating measures have been put forward for active road users arising from increased road traffic flows.
- 4) **Road safety impact due to the lifting of the no-right turn and no-left turn at St Peter's church junction.** There are serious concerns about cycle safety arising from the proposed changes at this narrow V shaped junction. Already three lanes of eastbound traffic and two lanes of westbound traffic merge at this junction. There will be increased eastbound traffic flows due to the Old Cabra Road changes on top of the 25,864 east/west daily vehicular movements at Dalymount (EIAR Vol. 4 of 4) and it is very difficult to see how vehicular traffic will cleanly manoeuvre this v-shaped junction. Questions arise about compliance with best practise in junction traffic management.

### 3. Modelling

We have serious concerns about what is published in the Impact Assessment report set out in [Appendix A6.4](#).

- 1) **Failure to use the appropriate baseline in estimating future impacts.** The baseline used for the published modelling results is not based on current traffic flows but on a Do Minimum scenario for 2028. The 2028 scenario includes a number of future transport projects which have yet to commence or be completed and there is no guarantee they will be completed by 2028 with the consequent impacts on traffic flows in the area.

In that regard, it must be argued that the baseline is artificially deflated and that the estimates under a "Do Something" scenario do not reflect the extent of the impact of the proposed bus corridor.

Furthermore, the absence of a baseline build on current traffic flows precludes local communities from assessing the impact on their area from the Bus Connects changes. As we noted at the start of this submission, we very much support the overall aims of BusConnects, we want to see a significant traffic modal shift in this city and in our communities, however failure to publish modelling that compares the current situation with future traffic flows does not present a comprehensive picture of the changes to the communities concerned.

- 2) **Flawed classification system of the impacts which sees areas forecast to experience an 80% increase in traffic flows being described as a "low impact" change.** In appendix A6.4 of the EIAR, Impact Assessments, the following are estimated when comparing a "do minimum" with a "do something" (ie BusConnects) scenario at PM peak hour:
  - A 80% increase in hourly traffic flows at the junction of Connaught Street and Shandon Crescent,
  - A 55% increase in hourly traffic flows at the junction of Fassaugh Ave and Dingle road,
  - A 64% increase in hourly traffic flows at the junction of Fassaugh Ave and Bannow Road.

Each is described as having “not significant” effect and “negligible” impact.

Furthermore, there is an estimated 70% increase in peak hourly traffic flows at the junction of Connaught Street and St Peter’s Road. This was described as being a “low impact” with “moderate” effect. It appears that only areas that are forecast to experience increases in traffic volume to beyond 85% of road capacity are classified as having any impact at all.

In effect, the classification minimises and deliberately downplays the traffic impacts arising from the proposed changes and this is simply inappropriate both for vulnerable road users but also for those living in these areas.

Overall, local residents and I believe the impact of the new and additional changes introduced at the CPO application stage for Bus Connects must be subject to an Oral Hearing at An Bord Pleanála. Unfortunately, the late addition of the changes set out above has significant adverse consequences for particular parts of our community and should not be approved without addressing all of the concerns set out above.

Is Mise le Meas,

Mrs Miriam Gill MRICS

Photo: Charleville Road - Ease of access required to garages on private laneway running behind N.C Rd houses and Charleville Road terrace. Annamoe Parade has similar rear access Right of Way, to the housing opposite and to homes on N.C Rd.

