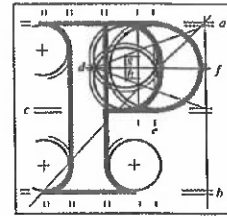


Our Case Number: ABP-317121-23



An
Bord
Pleanála

Róisín Shortall
Dáil Éireann,
Leinster House,
Kildare Street,
Dublin 2

Date: 12 September 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

Dear Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this 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,


Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

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ROISIN SHORTALL T.D.

From the outset I want to express my continued support for the BusConnects project. I have always endeavoured to constructively engage in the consultation process, as I recognise the value of this project to the city and for meeting our climate obligations. I believe that this major infrastructure programme presents a real opportunity to encourage people out of cars and onto bikes, buses and footpaths.

Decades of poor policy has incentivised the private car and left people with very few options to reduce their carbon footprint. BusConnects, along with MetroLink, present a real opportunity to remedy these policy failings, radically reduce car dependency and improve city connectivity. Achieving a modal shift from cars to public transport could greatly reduce the capital's congestion and offset the negative environmental impacts of our over dependency on cars.

There is no doubt that ambitious public transport projects will always produce unintended consequences and unforeseen problems. This is why the public consultation process is so important. It gives locals a chance to outline their perspective on National Transport Authority (NTA) plans, and inform the design based on the reality of living in their area.

From the beginning, the NTA has been generally amenable to local concern, updating and amending corridors to address many issues which were identified locally. However, some outstanding issues remain, and I have endeavoured to reflect the views of my constituents below.

Santry-Whitehall

This bus corridor will pass through the heart of Santry and Whitehall, an area undergoing substantial change due to a proliferation of high-rise developments. Some of these developments are under construction, others have yet to break ground, while some are under consideration by the relevant planning authorities.

Over the coming years these developments will bring huge changes to the area and substantially increase demand for public transport. It is paramount that the NTA remains cognisant of these changes throughout the construction of this corridor, and how BusConnects will interact with the high-density developments which will line the corridor. Issues such as the location of bus stops and ensuring new developments are adequately set-back must be kept under constant review.

While improved connectivity and increased bus capacity in Santry and Whitehall is welcome, these plans will do little in the way of public realm improvements. I believe this plan represents a missed opportunity to enhance the streetscape in Santry Village and Whitehall.

These bus corridors will exist within established communities so they should seek to enhance the urban environment. BusConnects could invest more in the public realm for Santry and Whitehall, to address the under provision of green spaces and trees. Covid-19 has shown the importance of the public realm and this should prompt the NTA to re-evaluate their designs in favour of a more people-centric approach to the streetscape.

Moreover, increasing the provision of appropriate and well-placed trees could play a vital role in helping air quality, particularly as this area has the highest harmful vehicle emissions in Ireland.

Cycling

In my submissions during the non-statutory public consultations, I repeatedly highlighted the Santry River Restoration and Greenway project and the need to facilitate greater connectivity between Santry Village and the Greenway.

It is very welcome that this project officially commenced in 2022 and is due to be completed in 2029. Although the design of this project has not yet been finalised, it will be imperative that the Greenway interacts with the bus corridor in a considered and safe way.

I note that the NTA included a reference to the potential greenway entrance on map 16 of 37 but provision for a safe crossing on Swords Road must be established. I accept that a toucan crossing is proposed but this must be designed with the future Greenway in mind.

To foster a cycling culture locally, particularly amongst local children and adolescents, a safe and relatively seamless cycle crossing must be facilitated.

Separately, the residents of Lorcan Road and Shanrath Road are concerned about these roads being used as 'quiet streets'. Locals feel that more could have been done to facilitate safe cycle lanes on Swords Road, through Santry Village. Not only would this positively add to the streetscape, if designed well, but it would remove the diversion for cyclists. It's widely expected that most cyclists will continue to use Swords Road despite the neighbouring 'quiet street'.

Coolock Lane

Residents of Oak View are very concerned about the proposed bus terminus for the new D4 route on the green space at the junction of Coolock Lane and the Swords Road. There is a serious problem with overnight parking of trucks and vans here and when these vehicles are picked up in the morning, the truck and van drivers' cars are left parked there all day.

These vehicles are very often parked along the kerb, obstructing visibility for residents of Oak View and customers of Centra coming from Coolock Lane.

Given these existing road safety issues, residents are very concerned about the impact of this new bus terminus.

These same concerns must also be addressed as part of the proposed construction compound.

Omni Traffic

There are major backlogs at the Omni Park Shopping Centre junction, and it is a very dangerous crossing throughout the day. Previously, locals suggested a land take from Omni Park SC to facilitate a longer dedicated traffic lane for northbound vehicles turning left into the car park.

Local residents also suggested creating a second access route in and out of Omni Park SC to ease pressure on the existing junction during early consultations.

It is regrettable that neither have been facilitated.

This issue is set to worsen very substantially with the high volume of new developments in the vicinity of the junction, chiefly a 12-storey development, for which planning has been granted, on the grounds of Omni Park SC.

Santry Avenue

I note that the junction of Santry Avenue and Swords Road is being amended but the basis for this is unclear. This change does not appear to be addressed in the planning documents, only the map.

According to the map, Santry Avenue will no longer have three lanes approaching the Swords Road. It is proposed that the slip road for northbound traffic will be removed, reducing it to two lanes.

There may be a legitimate reason for this but in the absence of one in the plans, I cannot understand why the slip road would be removed. This would only increase congestion on Santry Avenue.

Griffith Avenue

Since the introduction of protected cycle tracks on Griffith Avenue, there have been considerable problems. The cycle tracks are undoubtedly needed but Dublin City Council's execution of this project left much to be desired. This is evident by the poor usage of these cycle tracks.

An unintended consequence of the cycle track project has been increased congestion at the junction of Griffith Avenue and Swords Road. Unfortunately, it is my view that this considerable issue will not be addressed by the proposed plans for the junction.

Vulnerable Passengers

Once again there are concerns about inadequate consideration of the needs of older people and those with a disability, either intellectual or physical. There seems to have been very little direct consultation with disability and older persons' groups, given the frequency of dangerous crossings on this corridor.

The expectation that all bus users can easily walk to change buses, or cross busy junctions, shows insufficient understanding of the needs of older people, people with mobility impairments and those with disabilities.

These issues have been evident at every stage of the plan and consistently flagged with the NTA.

I do however acknowledge and welcome the addition of a pedestrian crossings at the Comet Pub but it is disappointing that the request for one at Santry Close has again been ignored.

I would appreciate if you could take the above points into consideration when designing the final iteration of this plan.

Kind regards,

Róisín Shortall

Dáil Éireann,
Leinster House,
Kildare Street,
Dublin 2