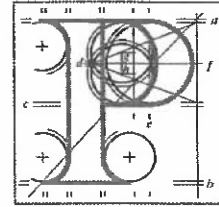


Our Case Number: ABP-314610-22



An
Bord
Pleanála

Cabra Park Residents Association
C/O Samir Eldin
33 Cabra Park
Phibsboro
Dublin 7

Date: 22 November 2022

Re: BusConnects Ballymun/Finglas to City Centre Core Bus Corridor Scheme
Ballymun/Finglas to Dublin City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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

If you have any queries in the mean time, please contact the undersigned. 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

HA02 (Acknowledgement - No Receipt to Issue)

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Riomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

An Bord Pleanála,
Strategic Infrastructure Division,
64 Marlborough Street,
Dublin 1,
D01 V902

8th November 2022

RE: Bus Connects: Ballymun/Finglas to City Centre Core Bus Corridor Scheme

Dear Sir/Madam,

On behalf of the Cabra Park Resident's Association, Cabra Park, Phibsboro, Dublin 7, I wish to make the following observations in relation to the above-mentioned scheme.

There is much to commend about this plan and we are particularly pleased to see the public realm improvements being proposed for Phibsboro including the improvements around Cross Guns Bridge and the underpass at Blaquiery Bridge. We also welcome the planned improvements to both the bus and cycle networks which many of our residents rely on to get around.

There is one major misgiving though that we feel needs to be articulated. There would appear to be insufficient provision for cyclists travelling southbound on the R108 to be able to safely cross to west Phibsboro. This means that any cyclist coming from the Royal Canal Greenway or from the direction of Glasnevin would need to either have the confidence to cycle in the middle of the lane from Whitworth Road to Leinster Street in order to turn right, or to cross three lanes of traffic to turn left onto Munster or Connaught Street. Whilst an experienced cyclist could probably do this, this is a sub-optimal situation for any child returning from a social cycle on the greenway or one of the many schools or sports fields in Glasnevin. In an era when active travel is being encouraged for school age children, as well as other inexperienced cyclists, this would appear to be a major flaw in this proposal.

The same issue exists in the current road layout with the result being that many cyclists use the pavement from Cross Guns Bridge to Leinster Street. It may be prudent to formalise this situation by providing a contra-flow from the Greenway to Leinster Street on the western side of the R108. Failure to address this issue satisfactorily will result in the current practice being continued and will put cyclists in conflict with pedestrians on that stretch.

Other general comments on the proposal are as follows;

- **Biodiversity** - Although the plan includes an element of new planting, this is relatively modest. We would suggest that pockets of pollinator friendly planting should be included wherever feasible. An example of this could be narrow strips in between the existing trees in the pavement of the R108 between Connaught Street and Cross Guns Bridge. Likewise, there is a large section of new pavement proposed next to the Bridewell Garda Station at the corner of Church Street and Chancery Street with no proposed planting at all. This is a missed opportunity and any areas like this should be planted. This would increase

biodiversity whilst also increasing safety by stopping parking on pavements and increasing separation between the pavement and the roadway.

- **Paving** - New stone/concrete paving is being proposed from Monck Place to Connaught Street and from Leinster Street North to Hart's Corner. This will lead to a small stretch of non-stone paving from Connaught Street to Leinster Street (and from Devery's Lane to Royal Canal Bank on the eastern side of the road). It will also mean that one side of Leinster Street has high quality paving and the other side has the existing poured concrete paving. In the interest of ensuring a uniform appearance of high quality urban realm, it should be a requirement that these pavements are upgraded by way of a condition. Likewise, the section of paving at Doyle's Corner and the Old Bank should also match the proposed paving beside and opposite it.
- **Quiet Treatments** - The quiet cycle route from Cross Guns Bridge to Constitution Hill is a great addition and is very welcome. However, it should be noted that this is a social route and not a commuter route. Commuter cyclists will follow 'desire' lines and go straight down the main route. Therefore it should be clearly marked that the bus lanes are also cycle lanes. This also relates to our earlier point that the residents of Cabra Park will need to cycle on these bus lanes to and from our homes.
The quiet cycle route/treatment from Constitution Hill to the quays ends abruptly on Charles Street. In order for this route to be a viable alternative route for cyclists, the scheme needs to be extended to show how it will be tied into the cycle route on the quays. At present it appears that the quiet route ends in conflict with a narrow one way section which would be inherently unsafe.
- **Universal Accessibility** - The cycle connection from Royal Canal Bank to North Circular Road needs to double up as a route for pushchairs and wheelchairs. It is currently not possible to access either the linear park or the library from the North Circular Road with a pushchair or wheelchair.
- **Enforcement** – There are a number of existing bus lanes in Phibsboro. Unfortunately this does not stop car drivers from using bus lanes. The existing bus lane heading north from the junction with Leinster Street North all the way to the Finglas Road is a perfect example of non-compliance and has a steady stream of cars in the bus lanes. To make matters worse, cars using bus lanes tend to speed in order to pass through the lanes undetected. In order for this scheme to be successful some form of enforcement, such as the use of CCTV or ANPR, will be required.

As was stated at the outset, we are supportive of the proposal in general. Nevertheless, we believe that if the points outlined above are taken on board, it will help to deliver the best possible scheme for what will be a generational change to the streetscape of Phibsboro and other affected areas.

Yours sincerely,

Samir Eldin
33 Cabra Park, Phibsboro, Dublin 7
On behalf of the Cabra Park Residents Association