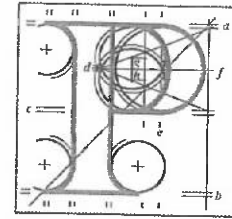


**Our Case Number:** ABP-314610-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Dublin Commuter Coalition  
C/O Jose Feljin  
5 Abbeyfield  
Killester  
Dublin 5

**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)

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
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Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902





Dublin Commuter Coalition  
5 Abbeyfield  
Killester  
Dublin 5

ABP case ref: 314610

## **BUSCONNECTS BALLYMUN/FINGLAS CORE BUS CORRIDOR SCHEME**

### **Who we are**

Dublin Commuter Coalition was established in 2018 as a voluntary advocacy group for public transport users, cyclists, and pedestrians in Dublin and surrounding counties. The Coalition acts as a unifying voice for commuters in these areas so that they may express their concerns, their hopes, and their vision of a Dublin that works for all users of sustainable transport.

We strongly support the BusConnects Core Bus Corridors project, and we are glad to see the more than three years of public engagement finally result in a planning application. We believe this project has the potential to be a catalyst for greater usage of public transport and active travel along the route.

### **Enforcement**

There are bus and cycle lanes, bus gates, bus priority lights, and turn bans for general traffic proposed in this scheme. The success of these measures relies entirely on the legal usage of roads by drivers. Existing bus lanes, bus priority lights, bus gates and turn bans are abused every day in Dublin due to the near-zero level of enforcement. However, there is no provision for enforcement cameras proposed as part of this project. Without a plan for camera enforcement, the effects of the

improvements proposed in this scheme will not be seen by bus users, rendering the core mission not achieved. We strongly urge the NTA implement effective measures to secure the protection of bus lanes from illegal use.

## **Bus lane operating hours**

We strongly believe that all proposed bus lanes and bus gates should be operational 24/7. We believe this will have the following benefits:

- More achievable and reliable bus journey times
- Easier to enforce as there are no time specific allowances for private vehicles
- Highlights priority of public transport over private transport, leading to higher adoption from users
- In the absence of segregated cycle lanes, 24/7 bus lanes offer cyclists safer road space with less traffic

## **Junction design**

The primary junction design proposed by the National Transport Authority, the 'Dublin-style' junction (Figure 1), was designed by the NTA and does not follow international best practice in junction design. When compared to the proven Dutch junction, the NTA's design poses a greater risk of left-turning drivers colliding with cyclists. Additionally, the unusually large crossing distances for pedestrians' priorities driving over active forms of travel, contrary to best practices. The few existing examples of this NTA design in Dublin has been widely regarded as unsafe. We request that the NTA use Dutch-style junctions (Figure 2) throughout the project.

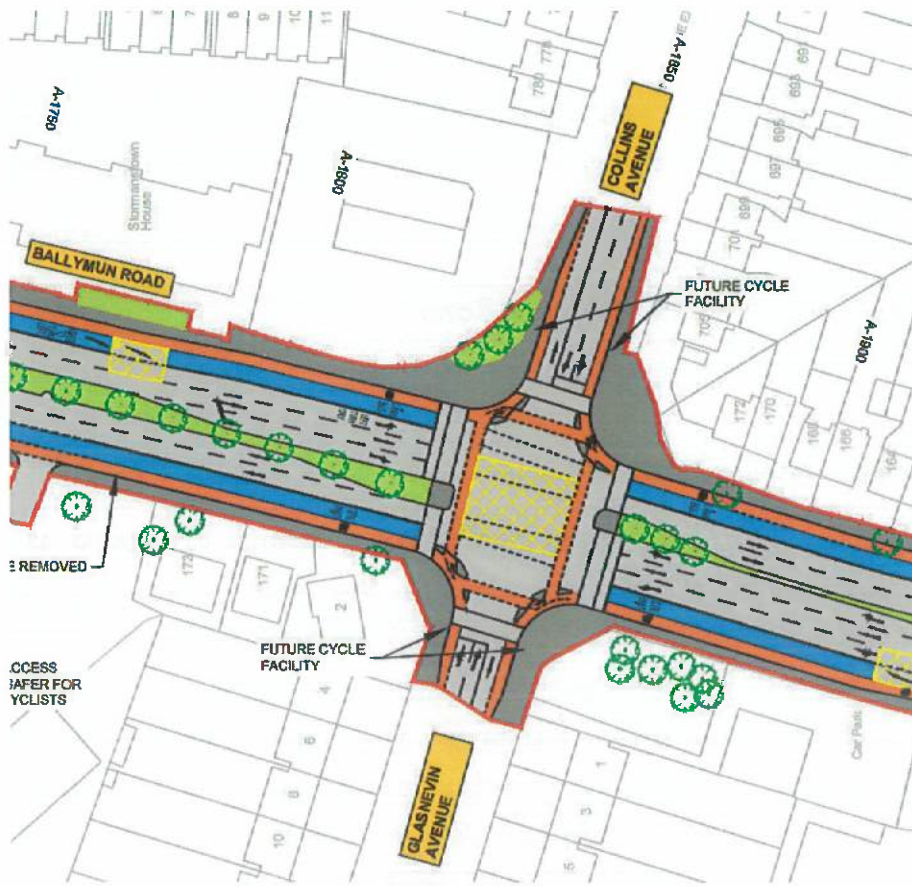


Figure 1 NTA's 'Dublin-style' junction on Ballymun Road

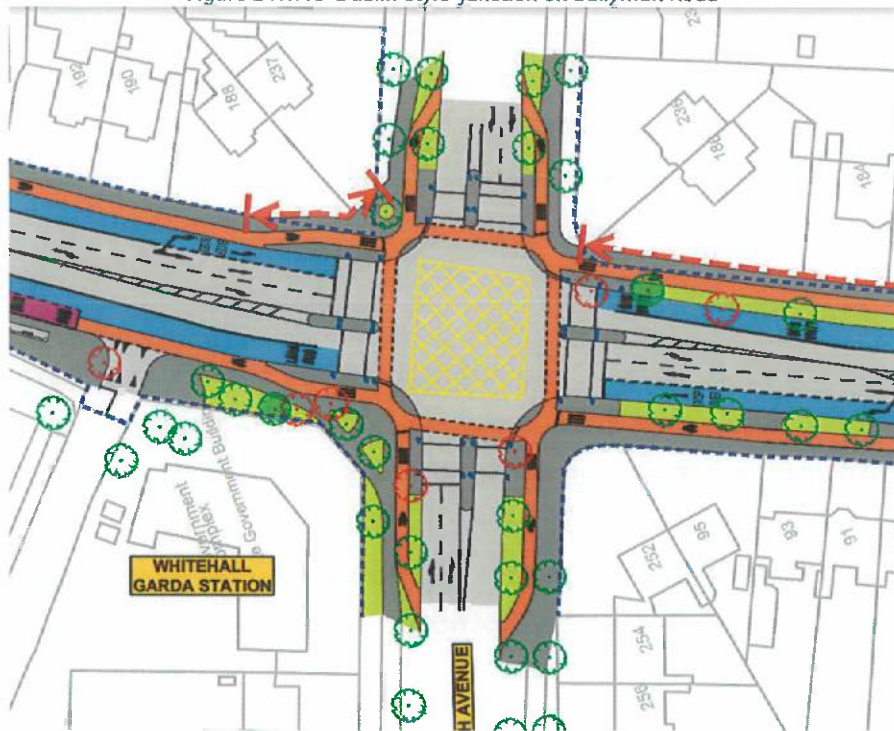


Figure 2 Dutch-style junction at Swords Road/Griffith Avenue from the second public consultation

Additionally, the following junctions provide no protection for cyclists at all and we request that they be redesigned to provide full segregation between cyclists and other road users:

- St. Pappin Road/Ballymun Road
- St. Canice's Road/ Ballymun Road

## **Pedestrian crossings**

There are examples of two-stage pedestrian crossings proposed as part of this scheme. These crossings drastically increase the time required for pedestrians to navigate junctions and crossings. Section 4.4.3 Junction Design of the Design Manual for Urban Roads and Streets states that "designers should omit staggered crossings in favour of direct/single phase crossings" and Section 4.3.2 Pedestrian Crossings states that "designers should allow pedestrians to cross the street in a single, direct movement" and that "where staggered/staged crossings currently exist they should be removed as part of any major upgrade works".

The following multi-stage pedestrian crossings are clearly inconsistent with the Design Manual for Urban Roads and Streets:

- Western Way/Constitution Hill (five stage)
- Arran Quay/Church Street (sheet 18)

Furthermore, many three and four-way junctions are missing pedestrian crossings entirely on one or more arms. These missing crossings mean a pedestrian may need to wait for three lights — or more in the case of two-stage crossings — just to cross the street and continue their journey. Section 4.4.3 Junction Design of DMURS states that "designers should provide crossings on all arms of a junction" and Section 4.3.2 Pedestrian Crossings states "designers should provide pedestrian crossing facilities at junctions and on each arm of the junction".



These junctions are clearly not in compliance with Design Manual for Urban Roads and Streets:

- St. Pappin Road/Ballymun Road
- St. Canice's Road/ Ballymun Road
- Prospect Way/Finglas Road
- Mary's Lane/Church Street (sheet 18)
- Church Street/Finglas Road (sheet 27)
- Wellmount Road/Finglas Road
- Finglas Road (sheet 28)
- The Griffith/Finglas Road (sheet 30)
- Ballyboggan Road/Finglas Road
- Slaney Road/Finglas Road
- Claremont Court/Finglas Road

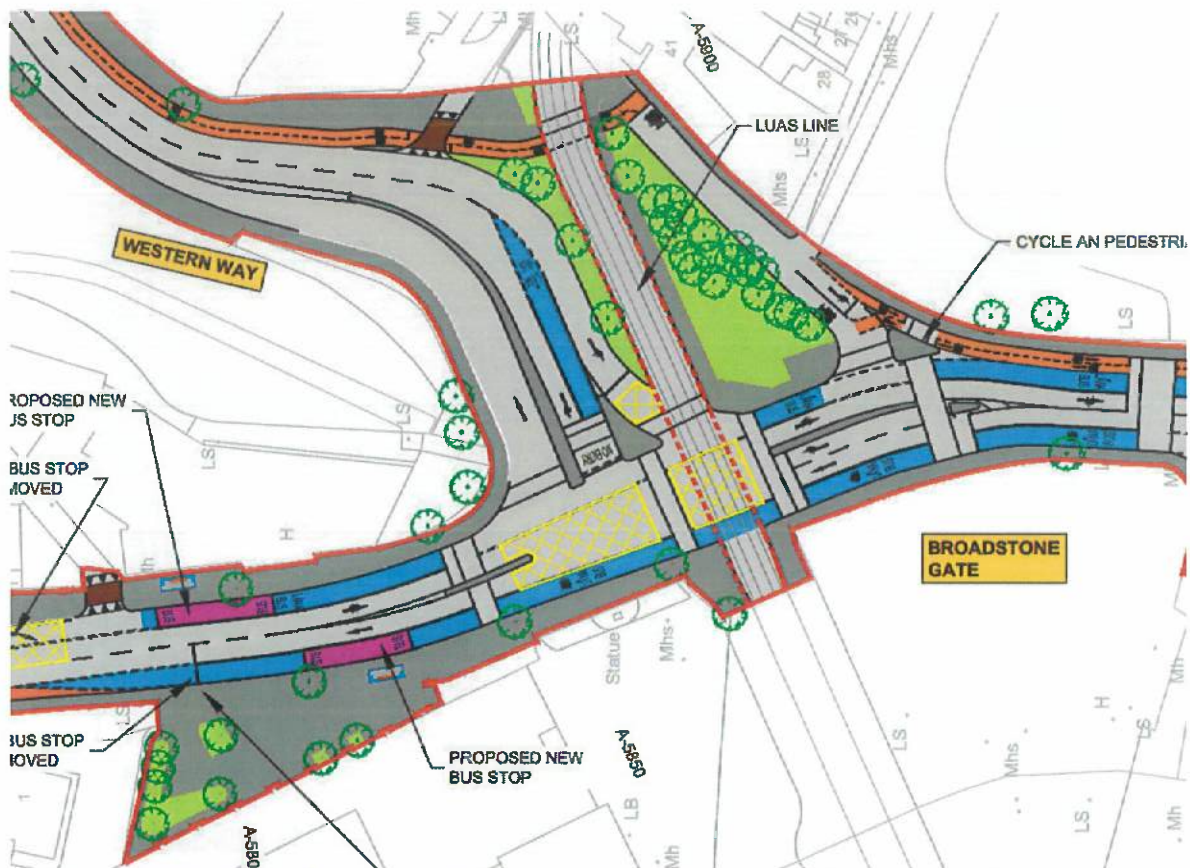


Figure 3 Junction between Phibsborough Road/Western Way/Constitution Hill with a five-stage pedestrian crossing

## Bus stop design

A major concern throughout the Proposed Scheme is the width of the bus stop islands that are proposed. Bus stop islands are crucial for the safety of cyclists and for encouraging all ages and abilities to use cycling infrastructure by removing conflicts between buses and bicycles. However, narrow islands place cyclists in conflict with boarding and alighting bus passengers.

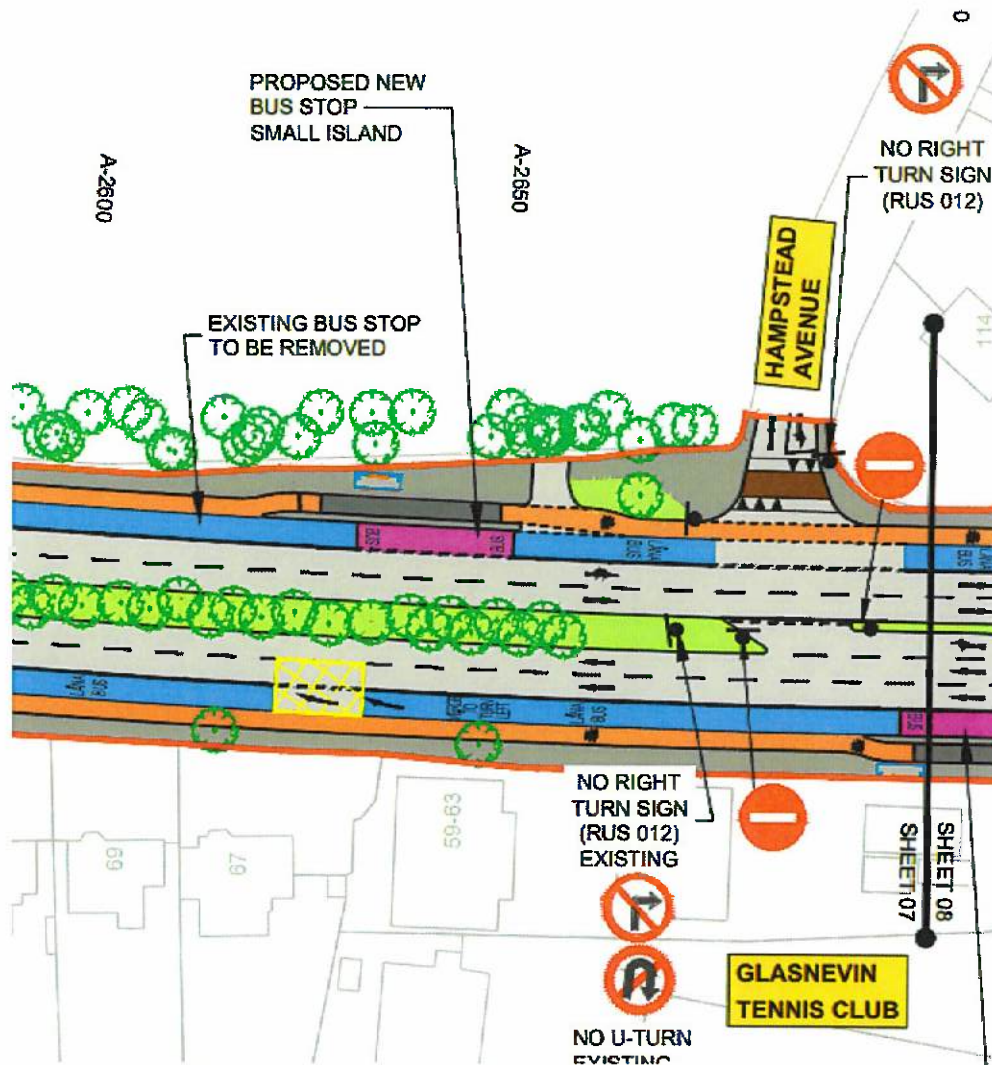


Figure 4 Bus stops with inadequate bus stop islands for cycling on Ballymun Road near Hampstead Avenue

We ask that the following bus stops be redesigned to provide adequate separation between buses, pedestrians, bus passengers and cyclists for everyone's comfort and safety:



- Northbound on Ballymun Road near junction with St. Pappin Road
- Both directions on Ballymun Road near Hampstead Avenue
- Southbound on Botanic Road near Fairfield Road.
- Northbound on Botanic Road near Marguerite Road
- Northbound on Finglas Road near Dalcassian Downs
- Southbound on Prospect Road near Prospect Road
- Northbound on Constitution Hill opposite Kings Inns
- Southbound on Church Street near Coleraine Street
- All along Glasnevin Hill and Botanic Road
- Northbound on Finglas Road near Church Street
- Northbound on Finglas Road near Wellmount Road
- Northbound on Finglas Road near Ballyboggan Road
- Southbound on Finglas Road near Claremont Lawns
- Southbound on Finglas Road near Prospect Way

## Bus stop location

There are some key trip generators and junctions where we believe bus stops need to be relocated:

- There should be a southbound bus stop located much closer to the proposed Northwood MetroLink station to allow for future bus connection provision
- There should be a southbound bus stop located closer to Santry Avenue

## Bus stop separation

The optimum separation between bus stops is 400m metres. This balances speed while ensuring commuters in the catchment areas do not have excessive distances to walk. Bus stops closer together result in increased dwell and journey times.

There are several locations through the Proposed Scheme where bus stops are much closer together. For example, between Collins Avenue and Griffith Avenue there are 4 bus stops per direction in a 1km stretch.

## Bike parking

Chapter 4 Proposed Scheme Description does not state where bike parking will be located in the Proposed Scheme, nor does it appear in the general arrangement drawings.

Objective MTO14 of the Dublin City Development Plan 2016-2022 states that “it is an Objective of Dublin City Council to review availability of bicycle parking facilities at neighbourhood centres with a view to addressing any shortfall through provision of Sheffield-type bicycle parking in the immediate vicinity as required.”. Removal of these facilities would be against Objective MTO14 of the Dublin City Development Plan.

## Cycling detour

Ideally the segregated cycle lane along the royal canal bank should be created AND cycle lanes should be maintained through Phibsborough. The plan to remove cycle lanes on Phibsborough Road doesn't align with the GDA Cycle Network Plan. Phibsborough Road is a primary cycle route. Under MetroLink and DART+, the busiest interchange in Ireland is planned in Phibsborough and yet this area will have no cycling infrastructure.

There are two major issues with the proposed royal canal bank cycle track:

1. There is shared space for pedestrians and cyclists on the North Circular Road underpass – this is a terrible idea and will inevitably lead to conflicts.
2. It is not accessible. It shouldn't just be a cycle track for people passing north south through Phibsborough, it needs to also be a cycle route that it accessible to people living on the east and west of it, and there appears to be no efforts to connect the cycle route with people living on/off Connaught St, around Shandon, on/off Whitworth Road, around Avondale/Great Western Square, or simply on Phibsborough Road. There should be cycle lanes on Whitworth Road, but as can be seen on Sheet 13 there appears to be no plans to install them.

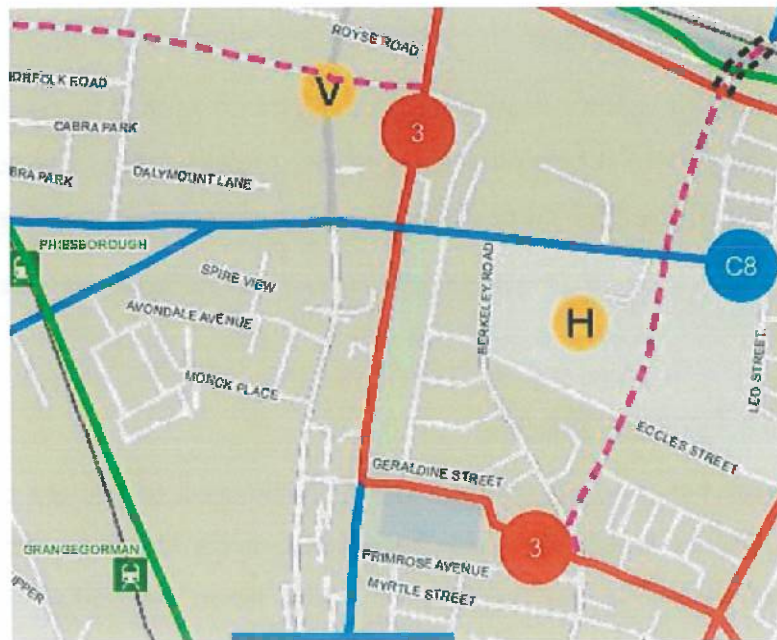


Figure 5 GDA Cycle Network Plan

## Missing cycle lanes

It is important that cycling infrastructure is coherent and fully connected. However, cycle lanes are either missing or incomplete in the following locations.

- Southern end of Church St (Sheets 17/18)
- Southbound on Ballymun Road (Sheet 20)
- Southbound on Botanic Road (Sheet 22)
- No cycling provision at all parallel to Finglas Road (Sheets 23-26)

## Missing bus lanes

We believe the following lanes need to be turned into bus lanes:

- One of the two lanes on the southbound exit ramp into Finglas Village
- The northbound lane turning left onto Wellmount Road from Finglas Road needs to be flagged as a bus lane to prevent it filling up with private vehicle traffic leaving the bottom of the village

## **Mobhi Road bus gate**

We fully support the implementation of a bus gate on Mobhi Road. The bus gate will allow for bus priority whilst retaining most of the mature trees. The current lack of northbound bus priority on Mobhi Road results in delayed, unreliable and bunched buses.

## **Width of Ballymun Road**

There is an excessive amount of road space dedicated to private cars on Ballymun Road which could be used for wider footpaths, cycle lanes or wider grass verges. Please consider reducing the number of traffic lanes on Ballymun Road between Northwood and Griffith Avenue to improve the overall public realm for public transport and active travel users. This is especially important given it's the future location of three MetroLink stations and will have much higher footfall once open.

We are pleased to see some progress made on parts of Ballymun Main Street with the removal of a general traffic lane in each direction. We ask however that this space not be used for on-street parking which currently does not exist. We would like to see the proposed new parking replaced with planting thereby creating more space for pedestrians on the footpath. We would also like to see the removal of the median which is inappropriate for this urban street.



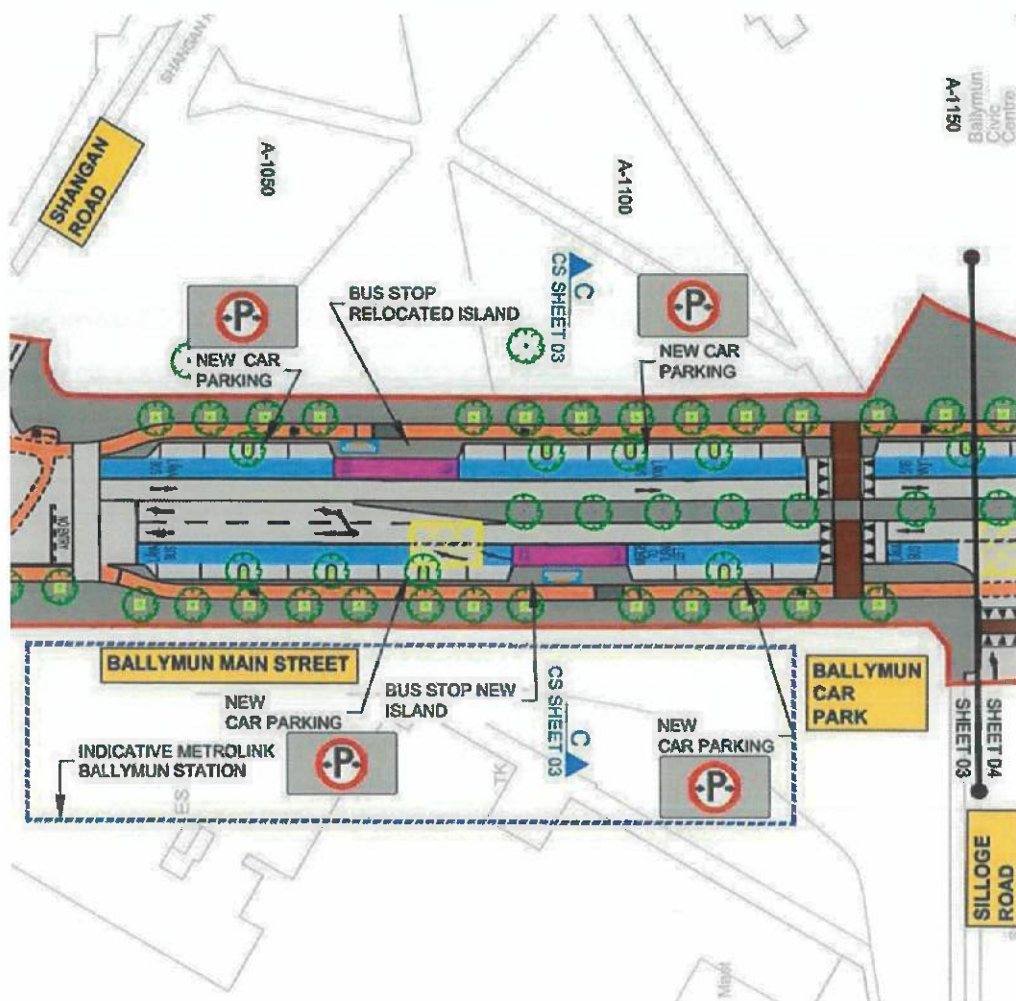


Figure 6 Ballymun Main Street

## Doyle's Corner

The Phibsborough Road and North Circular Junction is a key interchange between the E spine and O Orbital Route. In addition to these routes, several other radial and commuter routes operate through Phibsborough. We believe that through private car traffic should be removed from Phibsborough Road through a bus gate at Doyle's Corner. This would allow bus priority, wider footpaths and new cycling facilities and would alleviate traffic and pollution in this highly dense residential area with low car ownership and large numbers of pedestrians and cyclists. The removal



of existing cycle lanes from Phibsborough Road is regrettable and avoidable if car traffic is removed.

### **Claremont Lawns green space**

We object to the removal of green space from the public park at Claremont Lawns/Finglas Road for the construction of a car park. This is contrary to every local and national policy.