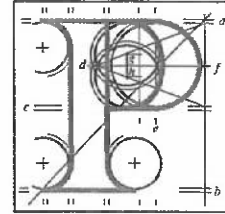


Our Case Number: ABP-314610-22



An  
Bord  
Pleanála

Griffith Avenue and District Residents Association  
C/O 108 Homefarm Road  
Drumcondra  
Dublin 9

Date: 22 November 2022

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

Dear Sir / Madam,

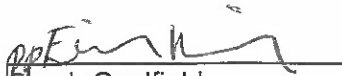
An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

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

It has been noted that your letter included comments regarding a separate and unrelated application which is currently before the Board. The Board will contact you under separate cover in relation to this.

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  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

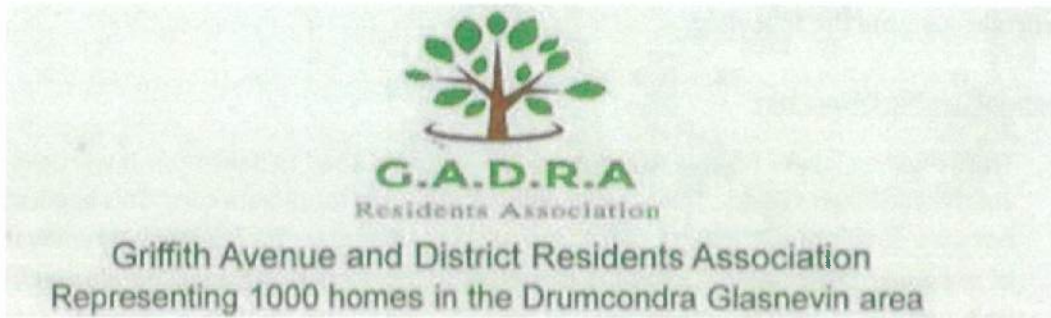
Tel  
LoCall  
Fax  
Website  
Email

(01) 858 8100  
1890 275 175  
(01) 872 2684  
www.pleanala.ie  
bord@pleanala.ie

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902





## **GADRA Submission on Ballymun to City Centre CBC**

### **SECTION 1 - Executive Summary**

GADRA represents a group of residents that are in the unique position of having two major infrastructural projects impacting them - Metrolink and BusConnects. Indeed, despite our extensive lobbying, the NTA have proceeded to consult on both projects simultaneously, challenging the capability of residents to review the vast amount of documentation associated with both projects and to input in a meaningful way.

As context we note that GADRA were mandated by our residents at the outset to protect our area from any negative impacts arising from the two projects, and have been further mandated to protect the trees within our area by all legal means, should the NTA proceed with their plan to destroy any the mature trees within our area.

GADRA have attempted to engage with the NTA throughout this process, with little result.

GADRA have attempted to ensure that all residents are included in consultation but have found aspects of the consultation process to be unfair, non-transparent and not inclusive.

GADRA are requesting a "***Do Nothing Until Metrolink is Operational***" approach so that the positive impacts of Metrolink can be factored into any subsequent CBC proposal. This is not the same as the "Do Nothing" as referenced in the EIAR section 2.4, as the "Do Nothing" scenario does not take into consideration the impacts of an operational metro on our area. MetroLink will have impacts, both during the construction and operational phase, that will impact directly on the section of this CBC from Ballymun Road along Mobhi Road to Botanic Avenue. To plan such a radical diversion within this area while building a metro directly along this route is premature. While a "Do Nothing" approach on other CBCs may be just that, there is no option in doing nothing on the Ballymun CBC, given that the NTA are planning to build a MetroLink in our area. The proposed CBC runs directly above tunnels - unless the NTA do not plan to build the Metro. Section 3.2.5.1 refers to the MetroLink supplementing the CBC, but we cannot see in any of the documentation an assessment of this CBC route with an operational metro in place. We agree an operational Metro does not negate the requirement for residual bus needs, but note that it is the orbital routes that need to be developed to feed into this Metro line, not a bus route directly on top of it.

In particular we note the following:

### **Permanent Traffic Diversions**

- Traffic will no longer be able to travel north via Mobhi Road to Ballymun - it will have to divert via the Old Finglas Road. This is a diversion of over 2km for private cars. This application does not give details of this diversion or the impacts of their plans for permanent removal of rights of vehicular traffic in an eastbound direction on Mobhi Drive and northbound traffic on Old Ballymun Road. GADRA object to this application until such impacts have been assessed.
- Cars travelling south on the Ballymun Road will no longer be able to turn left on to Griffith Avenue, but instead will be diverted via the “gyratory” to turn right around the triangle - we still cannot work out the full implication on cars trying to access our area with the gyratory. GADRA did ask for examples of a similar existing plan anywhere in Ireland UK or Europe, but the NTA did not supply one to us.
- There is a loss of right of way on Mobhi Drive. There will be a permanent loss of the access to East bound traffic – the impacts of this have not been included in the EIAR.
- The Old Ballymun Road beside the Met Office will be closed to through traffic completely – it will be access only. We object to this until the impacts of this closure is included in EIAR.

### **Right of Way**

The NTA state that there are only three losses of right of ways along the whole route - however, we note that two of them occur within our small area, as detailed above.

### **Footpath Issues**

- The footpath on sections of Mobhi Road will be reduced to 1.8 meters, which is below the recommended standard as confirmed by the NTA. We believe that this is not aligned to the Climate Action Bill 2021
- The use of Island Bus Stops throughout this plan necessitates Bus passengers alighting from a bus will have to cross a cycle track to reach the footpath (Section 4.6.4.5.1). We believe this to put undue danger of passengers with a disability and to be contrary to Disability law. Given the numbers of students alighting from buses at the same time and the gradient on Mobhi Road, we believe there are risks for both pedestrians, bus users and cyclists. It is not clear that the NTA pedestrian priority crossing points address this safety issue. We feel the project is flawed because of its heavy reliance on Island bus stops throughout, and we do not believe that NTA have shown in the EIAR how passengers with a disability will be able to alight a bus and access the footpath safely. We believe this needs to be addressed prior to granting this application.

### **Metrolink Impacts**

This CBC is directly above the Metrolink line and there is no evidence that the NTA have considered the impacts of each project on each other. These are two large constructions projects along the same area and there will be overlaps and disruption from both. GADRA do not believe residents should have to read both EIARs (Environmental Impact Assessment Report) and work it out for themselves. We believe this application is incomplete as the impact of the enabling works, construction and operational Metro have not been considered. Is it really the plan of the NTA to do all these works to dig them up again to build a metro? These projects cannot be assessed in isolation. And while Metro EIAR does include the impact of the Metrolink project on BusConnects, this BusConnects application does not and therefore we believe that the public are not in a position to make informed submissions.



**Na Fianna Trees**

Section 17.4.1.3.2 – The NTA plan to remove the existing mature boundary conifers from the Na Fianna Boundary (shown above). To remove these mature trees is not aligned to the Climate Action Bill 2021 and makes no environmental sense given that the removal of these trees is to facilitate a Bus Lane that the same NTA claim in their Metro submission only removes 4 seconds from a bus journey on Mobhi Road (Metrolink EIAR Volume 3 9.6.1.2.4).

DCC have not given details of the diverted traffic routes, which means that we as residents are currently unaware of the potential environmental impacts of these diversions.

During the enabling works and construction phase of Metrolink, the eastern pavement on Mobhi Road and southbound Bus Lane will be closed - the EIAR in Metrolink states that this closure will only add 4 seconds to a bus journey along Mobhi Road (section 9.6.1.2.4 table 9.88 Volume 3 Chapter9) and the NTA describe the impact of the closure of this bus lane to be 'Imperceptible' (Table 9.88 Metrolink EIAR). This leads us to ask again why radical changes are required within our area for only a 4 second decrease in Bus Journey time. During construction the Metrolink EIAR Table 9.91 refers to 'the removal of the Southbound footway' - as a pavement is neither 'south nor north' bound we have clarified that the NTA intend to close the Eastern side footpath completely for over 9 months and there will a be complete loss of the cycle way for at least 6 months during enabling works (9.6.1.2.4.3 Metrolink EIAR). Furthermore, following enabling works the footpaths will be reduced to 1.5m East and 1.6m West - both of which are below recommended widths (Table 9.91) and again not aligned to the Climate Action Bill 2021.

The NTA states that there will be an increase in HGVs using this route. We feel this will be unsafe for pedestrians who will have to cross over and back to access schools. Furthermore, the use of this route will be almost impossible for those residents with a disability and our many elderly residents.

Table 9.92 EIAR Metrolink states that during construction (8 years) there will be no cycle lane southbound, and Section 9.6.1.2.4.4 explains the impacts during enabling works. During the Enabling Works associated with Griffith Park Station, there will be a moderate level of disruption caused to cyclists in the area. The existing infrastructure includes a northbound contra-flow off-road cycle lane on the east side of the road, while the cyclists southbound use the existing bus lane. The cycle lanes here will be changed during both phases of the TTM. The northbound cycle lane will be removed entirely as well as the southbound bus lane, which is used by southbound cyclists. The west side of the road will be transformed into a shared footway and cycle path with a minimum width of 2.3m and a proposed toucan crossing to the north of the works will allow for a safe crossing. Where cyclists may not wish to use this infrastructure for this short section, cyclists will have to share the general traffic lane (with general traffic and buses) which will have no segregated infrastructure.

The EIAR for Metrolink states that access to the schools will be maintained but we ask ABP seriously to consider this section of the CBC closely and separately to the rest of the CBC which can proceed as applied for. However, if the benefits within the our area arising from the CBC include only a 4 second improvement to a Bus Journey from Albert College Park to Botanic and the introduction of a cycle track, which the NTA in the Greater Dublin Cycleway 2013 had already positioned on Walsh Road (already closed to through traffic, making it a safe quiet street), but these benefits result in the decrease in pavement width to substandard levels, the loss of more than 12 mature conifers within Na Fianna, as well as multiple mature trees along Mobhi Road, overall we would question whether the overall cost versus benefit stands up to scrutiny.

Given that walking and cycling through Mobhi Road will be difficult and hazardous during the 8 years of construction, we are asking that ABP does not proceed with this section of CBC until after Metrolink is built and is operational. Furthermore we ask that ABP recommend that the NTA, along with DCC, look at diverting cyclists down Walsh Road and into Griffith Park, with two designated North /South and East/West cycleways in the park joining up at the new Metrolink Station. The school children accessing the four schools directly impacted with access from Mobhi Road could also be directed away from Mobhi Road to walk via Walsh Road and Griffith Park to enter the back of the Scoil Caitriona playing pitch and access the schools and Na Fianna safely. The use of wardens and walking and cycling trains could be utilised here to prevent children and cyclists having to interact on limited pavements with no protected cycle tracks, and HGVs along with the dust and noise on their daily commute to school and sports. We really feel that the health and safety of these young commuters must be of paramount importance and we do not feel the current applications deals with this in an adequate way. To omit the impacts of Metrolink on the CBC is disingenuous, dangerous and has led to an incomplete EIAR. The NTA did not consider this in the EIAR and when we asked Mr Hugh Cregan NTA as to why they were not using Walsh Road for the cycle way, given the NTA had already identified it as suitable and their preference – he replied that *'Cyclists don't divert'*. We feel it is an unacceptable approach not to explore this option, and we would say the application is incomplete without its inclusion. The NTA did not explore any other viable options where these clearly do exist. The number of trees that the NTA plan to remove within our area will be detrimental to the area for years to come, and until the NTA and Bus Connects have a fleet of electric buses fuelled by green energy, the removal of these trees to facilitate diesel/petrol buses is not in keeping with the essence of the Climate Action Bill.



**Na Fianna Trees**

We would also appeal to ABP to refuse permission for the removal of trees from with Na Fianna until after the Metrolink is constructed, so that these mature Trees can perform their duty as carbon sinks and help mitigate for residents some of the negative impacts of construction through noise dust light shading and carbon sinks – 17.3.4.1.2. These conifer trees, because of their maturity and height, will assist in buffering Homes along Mobhi Road as a natural barrier.

We request that this section of the CBC is delayed until after construction of the Metrolink is complete because to do otherwise will have a more serious impact on the area.

GADRA have major concerns regarding the appropriateness of spending significant sums of taxpayer's money on a CBC that is running directly above a planned Metro line, as we believe value for money has not been adequately demonstrated by the NTA vis-à-vis this corridor.

## SECTION 2 - Disability Planning

GADRA support the "Hierarchy of the Street" as seen below, which clearly sets out Vulnerable Pedestrians at the pinnacle of the pyramid:



Hierarchy of the Street

The Terms of Reference for Bus Connects does not have as a priority the needs of the elderly or people with disabilities, either physical or intellectual, within our communities. It does not give priority to these groups as bus users either. BusConnects do not appear to have consulted directly with disability groups at the pre-design stage, but rather expects them to make submissions into the later stages of the process. This is a fundamental flaw of the project in our opinion, one which we already highlighted to the NTA, but they still have neglected to address. On our streets our public transport needs to be accessible to all and this right is laid down in both Irish and European laws and this right should not be forgotten in the NTA plans for cycle lanes and CBCs. This right supersedes all other users and people with a disability should not have to continually have to fight for their rights just because as Mr Hugh Cregan, NTA, states '*cyclists won't divert*'. In our view, this lack of consultation has led to fundamental flaws in the project such as the plans for Island Bus Stops, the multiple changes required to reach your destination which in some cases also require a passenger to cross multiple traffic lanes to reach their next bus stop.

Initially, the NTA proposed to establish discussion groups so that the visually impaired and cyclists can '*sort out the issue of island bus stops*'. This does not seem to us to be a reasonable or robust approach to respecting the rights of people with disabilities. We objected to this approach, specifically in the context that the **European Disability Strategy 2010-2020** identifies accessibility as the first area of action, and we do not feel that either disability groups or our elderly should have to lobby for rights that are rightfully protected under law. As Drumcondra is home to many schools and learning institutions for the visually impaired this is therefore a huge issue for our area and has not been addressed in the EIAR. We feel the road configuration is flawed by combining pedestrians and cyclist on shared pavements, rather than addressing this through reductions in speed limits which would make shared road spaces safer for all commuters, including cyclists, leaving pavements safer for use by pedestrians including disability groups and the very young.

The **Committee of the Right of Persons with Disabilities 2014:1 Article 9** looks at the travel chain and the ability to make the whole journey. We would feel that Whole-of Journey planning (seamless journeys for public transport users) is absent in this project, with many bus changes required within the Walker Re-Design Phase (Department of Infrastructure and Regional Dev 2017:4).

In addition, these principals are not adhered to in the NTA proposal for Island Bus Stops, which will require passengers to cross commuter cycle lanes to reach pavements. Wennberg and Hyllenius 2011:8-9:8-9 addresses these "*physical barriers on pavements*" as a barrier to accessibility. Yet in the Swords and Ballymun CBCs NTA plan it is proposed to install Island Bus Stops, together with Shared Pavements for pedestrians and cyclists and, furthermore it is planned to differentiate between the different uses on the pavement by a 'lip' on the path, which is has the potential to make the pavements more dangerous for all users (as per Mr Hugh Cregan, NTA).

All this when the **National Disability Inclusion Strategy 2017-21** clearly states that vehicular stops are to be immediately adjacent to kerbs.

### **SECTION 3 - Consultation Process**

#### **(a) Consultation Process - General**

GADRA would like to highlight the issues with the approach adopted to consulting on this proposal:

- Initial input on the project was online only in 2017 (survey). GADRA objected, along with Roisin Shortall, and lobbied to ensure postal submissions were accepted, albeit those residents had to pay postage, as NTA refused Freepost.
- In relation to consultation on the Redesign Phase, GADRA objected to the lack of an open day in our area and were successful in getting one (albeit very late in the process).
- GADRA placed during the network redesign stage books and related maps in our local libraries and requested that NTA do this throughout the city - we believe they did not act on our proposal. In relation to the current CBC application, the NTA have refused to place a hard copy of the application into the Ballymun Library stating that to do so was contrary to the statutory process - although the same NTA who are the applicants for Metrolink RO have placed a hard copy of the Metro application in Ballymun library. We feel that by not placing the application into the library, the NTA have denied our elderly residents access to information which directly impacts on their ability to participate within this process - which is



their right under Aarhus Convention that gives people the right to access information on environment and a right to participate in environmental issues. Indeed the Railway Infrastructure Act 2006 states that the applicant must in relation to the application -'deposit and keep deposited at such place or places being a place or places which is or are easily accessible to the public'. As we remain in a pandemic and our residents are elderly and this CBC is in, for part of it, a socially deprived area where access to online devices is limited therefore putting a hard copy into the library is essential and by refusing to do so the NTA have not, in our opinion, met the criteria of the convention or the act- See below responses to our multiple requests for this to happen and the NTA refusal

Sent: 11/2/22, 12:28 PM  
To: "info@gadra.ie"  
Subject: RE: CBC and Metrolink consultations at the same time  
Dear Ms Carty,  
We refer to your email of 9 October in relation to the placement of documentation on public display at Ballymun and Drumcondra libraries for the MetroLink project and the BusConnects Finglas/Ballymun to City Centre Core Bus Corridor project. Notwithstanding the response of Transport Infrastructure Ireland in relation to this matter, the position of the NTA in relation to the BusConnects project remains as set out in our earlier correspondence of 3 October for the reasons stated in that communication.  
Regards,  
National Transport Authority

Sent: Sunday, October 2, 2022 11:27 AM  
To: "info@gadra.ie"  
Subject: RE: CBC and Metrolink consultations at the same time  
Dear Ms Carty,  
We refer to your email of 20 September in relation to the planning consent application timelines for the Ballymun/Finglas to City Centre Core Bus Corridor (the "CBC Scheme") and the MetroLink project. The relevant documentation for the CBC scheme was made available for inspection and review - both online and in the offices of An Bord Pleanála and the NTA - from Tuesday 20th September, with 15th November being the closing date for submissions to An Bord Pleanála. In the case of MetroLink, the application documentation was made available for inspection and review - again both online and in various locations - from Thursday 29th September, with 25th November being the closing date for submissions to An Bord Pleanála. Concerns have previously been expressed about the need to have visibility of the details of both schemes in order to be able to have an overall view of the composite impacts. The overlapping publication of both the CBC Scheme application and the MetroLink railway order application, does allow for details of both schemes to be available when making a submission in relation to either project. Indeed, it is likely that in the absence of overlapping publication of these two schemes there would be criticism that people might not be in a position to appropriately make submissions on whatever scheme was published first. In relation to the costs of making a submission, the relevant fees are set by An Bord Pleanála - they are not set by the NTA or Transport Infrastructure Ireland (TII). It is also worth noting that people who may have part of their property included for acquisition as part of either scheme, are exempted from these fees in respect of any objection/submission they may wish to make in relation to such acquisition. In relation to your requested extension of the submission date for MetroLink, any such request for an extension needs to be made to An Bord Pleanála. Finally, we note the request to make the MetroLink and CBC Scheme application documentation available in hard copy in both Ballymun and Millmount libraries. The current public consultations are statutory in nature, meaning that they are prescribed and set out in legislation. Given the statutory nature of the process, hard copy documentation has only been placed in locations where the NTA and TII are in a position to ensure their availability. There have been judicial reviews of projects centred around allegations of non-availability of documentation at venues where they were meant to be available, and this is something that we wish to avoid. Accordingly, it is not intended to place hard copy documents in the two suggested locations. For completeness, documentation on both schemes can be inspected at the offices of An Bord Pleanála in Marlborough Street and the offices of the NTA in Harcourt Lane, Dublin 2. Additionally, the MetroLink documentation can be inspected in the Dublin City Council on Wood Quay, and in the TII offices on Parkgate Street. We hope that the above information clarifies the position.  
Regards,

- GADRA have objected and continue to object to the approach where each CBC is being consulted on in isolation and the cumulative effects are not being explained.
- GADRA have also objected to the separation of Redesign Phase from the Infrastructure Phase. In our area hundreds of submissions were made to save the number 11 bus. We explained our elderly residents needs in relation to a bus service, and in many cases, their extreme reliance on this service, only to discover that not alone have the NTA decided to scrap the number 11 route through Homefarm Road, they furthermore plan to remove Stop 85 at the junction of Homefarm Road / Drumcondra Road in order to facilitate two bus stops along DCU campus – a move which further exacerbates the problem for our elderly and disabled residents.

### **(b) Consultation Process - Use of Community Fora**

GADRA have objected to the NTA using Community Fora as the only means of consultation. The Community Fora had no statutory basis and were without terms of reference until we insisted on them. The terms of reference that were ultimately provided gave no indication of how the views articulated at the forum would be consolidated, ranked or incorporated into decision making process. Despite this it was clear that they were part of a decision-making process. As evidenced by a decision to move from a preferred option of a one-way system to a two-way system with increased CPO requirements, all of which arose as a result of feedback from one such fora meeting.

The issue with the Fora is that they were not inclusive, as interested parties were denied access to attend unless they registered online, thus denying many of our elderly residents who wished to attend access. Again, we asked the NTA to allow for this but they refused.

In particular GADRA would also like to highlight the inappropriate cancellation of our Community Fora session. Mr Hugh Creegan, NTA, informed us at a meeting on 14th March 2019 that because the GADRA January Newsletter (which encouraged all residents with concerns to attend the forum meeting and to sign up to our text alert system), that he had concerns for the safety of his staff if the forum were to go ahead. Mr Creegan indicated that this was tantamount to a threat to him and his staff as thousands of people could attend. He indicated that if the forum went ahead, he would have to hire security. We found his statement insulting to our residents. We continually stated to the NTA that the area GADRA represents has the highest percentage of residents without cars and over 80 years of age in Dublin. These residents are not a threat to NTA staff they are simply bus users. Furthermore, the NTA/Bus Connects actually tweeted the dates for the Community fora themselves as well as putting them on their website. Despite the fact that BusConnects has over 2.5k followers on twitter the NTA took issue with our newsletter and wanted to deny us the right to text (<100) of our residents. It appears that NTA did not want the public to be informed of the issues and in particular seemed to want to counteract our efforts to inform our residents of the issues in relation to the Ballymun CBC.

We received this email from the Times which is actually how we knew the forum was cancelled:

**From:** "Sanz, Catherine" <catherine.sanz@the-times.ie>  
**Sent:** Friday, March 22, 2019 4:47 PM  
**To:** info@gadra.ie  
**Subject:** Re: Contact for The Times

Just so you know, the NTA have said that the fact that you cannot stand down the text-alert and that it was advertised in the newsletter, means "Arising from this the community forum event will be unable to proceed as planned."

We then requested that this meeting would be live webcast but that was refused - see below our request, which we believe was reasonable:

Sent: Fri 4/5/2019 1:48 PM  
From: "Griffith Avenue & District Residents Association"  
To: "Grainne Mackin", info@busconnects.ie, "Hugh Creegan"  
Cc: "paschal.donohoe@oireachtas.ie", "marylou.mcdonald@oireachtas.ie",  
"roisin.shortall@oireachtas.ie", "noel.rock@oireachtas.ie", "dessie.ellis@oireachtas.ie",  
"MaureenO'Sullivan", "joe.costello@outlook.ie", gary.gannon@socialdemocrats.ie;  
mary.fitzpatrick@outlook.com

Subject: Webcast Forum meeting

Dear Grainne

Following your decision to move the Ballymun CBC Forum from Ballymun to Harcourt Street and limiting attendees to 50 we are formally requesting that this forum meeting is webcast so residents who are not allowed attend or can not attend due to the distance are not denied access to information or an opportunity to participate and have an equal opportunity to influence change.

Kind regards  
John Webb  
Chair GADRA

The NTA offered as an alternative a meeting to a select group of individuals to be held southside. The NTA have obligations under the Aarhus Convention to facilitate public participation in decision making on major public infrastructure projects. Cancelling a forum on the northside of Dublin in a working-class area and moving it to the southside for a select group of invitees, is not meeting this obligation. Indeed, informing people less than 2 hours prior to the meeting that they could attend said meeting on the other side of the city showed a clear intent to restrict and select attendees. From a FOI request we note that excluding public representatives (e.g., Councillors) only 6 residents attended this meeting. Residents along the Ballymun CBC were entitled to consultation and not just information.

Since the NTA had stated to the press that they were cancelling the forum, GADRA felt that this maybe was an opportunity for meaningful open consultation to be put in place. We requested that meaningful consultation took place by means of a series of open days along the route with senior NTA members attending along with DCC officials and TII staff so residents can be fully informed. This did not occur.

GADRA have from the start raised the following issues with these fora:

- The fora were set up with no Terms of Reference
- They have no statutory basis and it is unclear as to how they feed into the process
- The Terms of Reference that were ultimately provided gave no indication of how the views articulated at the forum would be consolidated, ranked or incorporated into decision making process
- These Fora were not inclusive and the public were being denied access to attend unless they registered online thus denying any residents who do not for whatever reason have access to the internet.

- Only electronic communication was accepted - no postal applications which ruled out many of our residents
- DCC were not present at these meeting to answer questions relating to the surrounding roads where the diverted traffic is intended to go.
- The NTA have limited all organisations, regardless of the size of the organisation or the number of people represented, to just one representative per organisation. For GADRA, one representative to represent over 1000 homes meant putting a ridiculous onus on an individual volunteer to disseminate the NTA's information. The NTA, as a publicly funded organisation with a publicly funded consultation process remit, should not have simply refused to allow residents to attend these Fora if it was to be considered a true consultation process.

### (c) Consultation Process - Private Engagements

The NTA then proceeded to consult privately with other small group of residents and again excluded the wider community from these talks. Subsequently it appears the NTA make decisions based on these private engagements without recourse to the wider affected community. Rather than engaging with the full community along the Ballymun CBC the NTA held three private meeting in their Southside offices, which were by invitation only. The invitation was extended by means of an unsigned letter, was limited to residents only along Mobhi Road. All of the impacted residents on the local access roads and surrounding areas were specifically excluded (see below).

### **MOBHI ROAD MEETING WITH NTA ON BUSCONNECTS**

A number of residents have approached the NTA to request a meeting to discuss the specific concerns for **Mobhi Road** regarding Bus Connects.

The NTA have agreed to facilitate a specific meeting with residents who live on Mobhi Road, in groups with a maximum of 20 individuals per meeting. They have provided the following dates for the group meetings which will be held in the National Transport Authority offices, Dún Scéine, Iveagh Court, Harcourt Lane, Dublin 2, D02 WT20.

#### **Dates:**

- **Monday 20th May 6.30pm to 8.30pm**
- **Tuesday 21st May 6.30pm to 8.30pm**
- **Wednesday 22nd May 6.30pm to 8.30pm**

Please contact the NTA at [mobhirdres@busconnects.ie](mailto:mobhirdres@busconnects.ie) by 10am on Monday 20th May, to book your place at a meeting. When you email please provide a contact name and address as these meetings are specifically for residents of Mobhi Road.

As places are limited and the meetings are happening next week the meeting slots will be filled on a first come first served basis. The NTA have indicated that if the demand exceeds these three dates they will facilitate a small number of further meetings.

The NTA will be represented by key senior Project Directors of the BusConnects Infrastructure Project.

Just to remind you that all submissions must be in with the NTA by Friday 31<sup>st</sup> May 2019.

**Unsigned Letter**

Again, this does not satisfy the NTAs obligation under the Aarhus Convention to consult publicly and indeed the outcomes arising from these private meetings that will impact on the surrounding roads will therefore we believe be subject to challenge. These 'invite only' meetings for homeowners on Mobhi Road have resulted in an agreement with them in relation to closing off Mobhi Road to Northbound cars. In particular these meetings and decisions have resulted in negative material impacts for residents on Stella Avenue. GADRA objects to the private meetings which result in negative impacts on the excluded residents.

Residents on Mobhi Drive also had a private meeting, which resulted in the decision to close Mobhi Drive to East bound traffic. Only twelve/fourteen houses were consulted in this decision.

A further private meeting was held with residents of the Old Ballymun Road resulting in an agreement to close off their road to through traffic.

This is not public consultation in any true sense of the word. GADRA did raise issues with the above at the time in an effort to address the lack of transparency and lack of involvement of affected parties. See email below as an example:

Sent: Thu 1/30/2020 3:45 PM  
From: "Griffith Avenue & District Residents Association"  
To: "Grainne Mackin" Cc: "paschal.donohoe@oireachtas.ie", "marylou.mcdonald@oireachtas.ie",  
mary.fitzpatrick@outlook.com, joe.costello@dublincity.ie, gary.gannon@socialdemocrats.ie,  
neasa.hourigan@greenparty.ie, "Christy.burke@dublincity.ie"  
Subject: mobhi drive plans

Dear Grainne

It has been brought to our attention that the NTA have circulated five options for Mobhi Drive to address 'parking issues' to a small group of residents. Indeed, we have been told that the twelve houses on Mobhi Drive will be making a decision as to which of these options they favour, with the intention that this would be the option further developed by the NTA. These options will all have issues for the surrounding roads. This targeted approach to the residents of Mobhi Drive follows on from a similar engagement with residents on Mobhi Road where NTA agreed a preferred position directly with the residents. We feel our residents are being negatively impacted by these privately negotiated deals and we continue to object strongly to the NTA negotiating privately with one small road without informing the wider community and allowing full community participation. We are unable to see these options on your website nor where the public are being asked to participate in this present consultation. Could you please direct us to link on your website/forward these options to us, so that we and our residents may participate in this early consultation along with the residents of Mobhi Drive. We have had confirmation from DCC that they are not playing a role in the development of this proposal. This would seem contrary to your stated position at all public fora where you have indicated that NTA do not have responsibility for any of the roads surrounding the CBCs. Could you please confirm if the NTA are now assuming responsibility for all surrounding roads, parking on same and diverted traffic routes

No response to this.

#### **(d) Consultation Process - Businesses**

NTA also has stated in its position that it does not engage directly with businesses and expects that they will engage with BusConnects via the open days. However, it DOES engage with some larger businesses (e.g., Omnicentre) giving them priority over the many small business that are core to the culture and ethos of a local area – many of whom stand to lose significantly under some of the proposed options.

### **(e) Consultation Process - Involvement of all Relevant State Entities**

Dublin City Council, who will retain responsibility for all roads surrounding and leading on to the planned CBCs, have not been part of the public consultation to date. Consequently, residents (including ourselves) are unable to make informed submissions as we are without full information regarding the plans to address the consequences of these plans on surrounding roads. NTA needed to include DCC in the public consultation process so that the traffic plans, road enhancements and safety issues on surrounding roads can be factored into discussions and any follow-up submissions. To proceed without this information is serious flaw in the consultation process to date.

NTA have stated throughout the consultation periods that all enforcement issues on the CBC and issues with traffic and safety on surrounding roads and diverted traffic are beyond their remit. We believe that for a meaningful and effective consultation process, what was required was that all state agencies involved in the delivery of this project available and present at all consultation open days for the benefit of all residents.

### **(f) Consultation Process - During COVID**

In August 2020 the NTA proceeded with another round of consultation online in level 5 restriction and still limited the numbers who could attend to one per organisation - even though the technology was available to open this online up to the residents the NTA refused. As we were in level 5 restrictions no residents association with over 1000 home could disseminate the information – this is and was the responsibility of the NTA yet again they restricted access to consultation. We again requested that this meeting was opened up but NTA refused

### **(g) Consultation Process - Use of CPO Meetings**

GADRA have objected to NTA counting the 'one on one 'meetings' on CPOs as consultation meetings as, by the very nature of CPO, it is a compulsory process. We have requested (March '19) that NTA in writing explain how the 'one on one' meetings feed into the process – we have not received this information.

### **(h) Consultation Process - Concluding Remarks**

GADRA have openly said since to the beginning of this process that all residents who wish to attend fora should be allowed to do so. Public representatives had been advising residents to circumvent this by inventing community/dog walking groups etc and register as same in order to be able to attend. As an association we would not and did not encourage residents to be involved in anything other than in an open and transparent way. The NTA is a publicly funded company who is not allowing the public to attend public consultations!! We will continue to encourage residents to engage in all stages of this process.

## SECTION 4 - Design Considerations

### (a) Cycling Infrastructure

With an operational Metro we agree with that in relation to demand management (3.2.7) enhanced safe cycling infrastructure is required, but we feel the use of the Quiet Street treatment in our area is more appropriate. Section 4.6.3.3 states *'Diversions of proposed cycle facilities on to quieter parallel routes, to avoid localised narrowing of cycle tracks on the main CBC route, is to be considered in the context of the CBC route being listed as a primary cycle route as per the Greater Dublin Area Cycle Network Plan. These diversions, however, may also be considered where appropriate cycle facilities cannot be provided along the CBC route without significant impact.'* These are called Quiet Streets due to the low volume of only local general traffic users travelling at low speed and are deemed to be suitable and safe for cyclists sharing the roadway with the general traffic without the need to construct segregated cycle tracks or painted cycle lanes. The Quiet Street Cycle Routes would involve appropriate advisory signage for both the general road users and cyclists. We feel that in the Mobhi Road area this approach should have been considered. The use of Walsh Road, which is now closed to through traffic following the DCC Drumcondra filtered permeability plan 2018, would be most appropriate. This street was designated as part of the Greater Dublin Cycleway 2013 and should have been used with a designated link to the Metro station via Griffith Park (as suggested in our submission to Metrolink EPR). This would have allowed for the footpaths on Mobhi Road to be of the NTA minimal standard at least, instead of the planned 1.8m in this project (Section 4.4.2.2 table 4.7) which is below recommended guidelines. To reduce the footpath width to below recommended standards on a road that serves a nursery, two primary schools, one secondary school and a college, in addition to its being used as a route to three other schools going southwards, and other schools' routes to the east and west of Mobhi Road and seem to be contrary to the Climate Action Bill 2021.

#### Bin Day Mobhi Road



We also ask that you consider the impact of bin day in our area which means there will be virtually no footpath at all!

Access by bike to the two primary schools and nanori could have been via a wide shared space. Many parents need to bring their child on a bike or scooter plus another child in a buggy and often a dog with them on their commute to school and the NTA are proposing to reduce the footpath size for them! This does not seem to be prioritising the needs of pedestrians as per the Climate Action Bill 2021. A shared space would also avoid the need for island bus stops along Mobhi Road and the conflict and danger this introduces for vulnerable bus users.

As evidenced in the EIAR, the impact within the area we represent, in relation to both the short- and long-term impacts, are all negative. Within section 2, residents are being asked to support changes that will have a long-term negative impact on the area, while also accepting years of construction works on MetroLink along the same route plus losing a significant section of their park for a MetroLink Shaft. GADRA are requesting that the CBC section from Ballymun Hampstead to Botanic is postponed until the impacts of an operation Metrolink are realised.

## **(b) Island Bus Stops**

GADRA finds this CBC project flawed due to its reliance on Island Bus stops which we believe to be dangerous and contrary to disability law. These island stops will make the bus network more challenging for all passengers with a disability and make it dangerous for passengers who are visually impaired. The bus service which is publicly funded cannot make it more difficult for our elderly, disabled, and very young residents. Section 2.2.1.2 states that the GDA Transport Strategy (NTA2016a) seeks to *'Provide a safer, more comfortable and more convenient walking environment for those with mobility, visual and hearing impairments, and for those using buggies and prams'*. We feel this aim has not been satisfied and believe that Island bus stops make the street scape more difficult for those the NTA should be protecting most. We also feel that these Island bus stops will make the cycle lane dangerous for the commuter cyclists. In the context that the GADRA area is home to many educational settings for the visually impaired, when GADRA met with NTA on March 2019 we asked which bodies the NTA had consulted as pre-design stage in relation to the widespread use of Island Bus Stops. Mr Hugh Creegan indicated that the NTA had a visually impaired Board member whom they had used as their point of reference. GADRA are requesting full consultation with disability groups on the important design of these stops.

According to Section 4.6.4.5.1, a pedestrian priority crossing point will provided to enable pedestrians accessing the bus stop area. Part-time signals will enable controlled crossing. Visually impaired pedestrians may call for a fixed green signal when necessary and the cycle signal will change to red. The cycle track will narrow from 2m to 1.5m for single file cycling through the bus stop, as overtaking is not required in this area. As Mobhi Road already has below recommended widths in cycle track and pedestrian pavements (refer section 4.5.2.2) and noting that there will be large numbers of school goers alighting at the same time at these stops, and the steep gradient- we suggest that this is a dangerous situation. Add in any bus commuters with a visual disability and this becomes unworkable.

Section 4.6.4.5.2 indicates that where space constraints do not allow for an Island Bus Stop, that an option consisting of a Shared Landing Bus Stop Zone is proposed. It is designed to reduce conflict between cyclists and stopping buses by ramping cyclists up to footpath level where they continue through the stop. The cycle track will also be narrowed when level to the footpath and tactile paving provided to prevent pedestrian / cyclist conflict. We do not see this as any better or safer. The only safe solution for our area is the use of Section 4.6.4.5.3 Inline Bus Stops and we are requesting that ABP make it a condition of this application that Inline Bus Stops are used in our area.

This conflict points could be avoided by use of Quiet Street treatment as discussed previously.

## **(c) Other Matters**

GADRA also note:

- The NTA make claims in all their literature and advertising campaigns posters print and in media interviews about the improvements that the CBCs will bring to journey times. These claims appear to have been made without traffic impact assessments or trialling e.g., no trialling of option A in the Mobhi Road area. Indeed, when asked for an example of where a similar system to the current planning application with its gyratory model and long northbound diversion, is working in the country, the NTA were unable to give an example in



Ireland or UK. We note that in the Metrolink EIAR the closure of the Bus Lane on Mobhi Road only adds 4 seconds to a bus journey!

- The NTA ran a campaign in which they are stated improvements to journey times as facts without producing any of the necessary data to show these claims to be true. Many of the savings alluded to in the NTA literature and presented at their information days could be achieved by cashless payment system and ticketing systems. In a major infrastructure project of this size and cost the NTA cannot base its claims on aspirations and concept without the relevant data.
- The NTA refer throughout to Bus Journey times (6.2.5.2.3.1) rather than Whole Journey times as is best practice.
- It is our opinion that NTA ran an Advertising Campaign and not a Consultation Process which they were legally obliged to do. If believe this CBC project is fundamentally flawed as it does not take into account the most recent Irish research in this area (Carroll, Caulfield & Ahern 2019). The findings in this study demonstrate a marked inelasticity of commuters to react in response to improvements made to the level of service of cycling, while on the contrary exhibiting high levels of elasticity to changes made to pedestrian infrastructure. Outputs from model scenarios found that pedestrians in the Greater Dublin Area were most sensitive to the policy incentives tested. The results highlight that investing in pedestrian infrastructure would be a more worthwhile investment in order to encourage a modal shift to walking for commuting trip purposes. There isn't even a pretence of investment in walking infrastructure under this plan instead we are seeing a reduction of space allocated for pedestrians.
- Residents have been asked to make submissions on the Ballymun CBC without full information regarding plans for the construction traffic from the construction of the Metrolink station box and access, traffic/parking during the operational phase of Metrolink. Although we have been told that the NTA are monitoring the impacts of each project on each other we cannot see any evidence of that in the EIAR. Indeed, the EIAR of the Metrolink was not available for two weeks at the start of this consultation. Residents are having to read through two EIARs to work out the impacts – The NTA should have included a chapter in this application detailing the impacts of each project on each other which will be considerable and the majority of the public are unaware of this currently. This needs to be addressed prior to granting either order.
- The safety issue for our area can be addressed immediately (without any need for An Bord Pleanála involvement) by simply reducing the speed limit on this section along Mobhi Road to 30kmph, by appropriate use of bus and bike priority traffic lights, cashless fares, and with improvements (not reductions in pavement widths). The bottle neck that arises closer to the City Centre has not been adequately addressed in this plan to date
- We do not believe that the NTA have given due consideration to the needs of residents/bus users with a disability either intellectual or physical and whose rights are being ignored despite of these rights being enshrined in law.
- The NTA designated Walsh Road as the cycle route in the Greater Dublin Cycle Network 2013 and closed this road off to traffic in 2018 to facilitate safer cycling among other reasons and we are asking why this route is not being implemented for commuter cyclists thus eliminating the need to reduce pavement size on Mobhi Road.

#### **(d) Alternatives Considered**

NTA presented just two options to Residents. One, which was unacceptable to everyone, would have resulted in the loss of all mature trees along Mobhi Road and a CPO of gardens along the eastern side

of Mobhi Road. The other option, which is currently the subject of this application, results in major impact on the local community, involves a one-way system diverting all northbound traffic, including residents accessing their homes, via the Finglas Road or up Botanic Road past Botanic Gardens who then must use Botanic Avenue or Mobhi Drive (small local access roads) and the use of a gyratory system. GADRA have requested an example of comparable system that has been successful anywhere in Ireland or the UK. NTA have not supplied any to date, telling us that it has not been trialed in Ireland. We feel the option of diverting cyclists to Walsh Road has not been considered.

Other issues that have not been addressed are lack of access to Stella Avenue, with residents only being informed verbally at the Ballymun Open Day that they will not be allowed turn right into Stella Avenue going northwards to access their homes, in order to prevent others 'rat running'. Indeed, Stella Ave residents have not been afforded the same access to consultation as Mobhi Road residents who have had three meetings with the NTA senior management team. To have excluded these residents makes this consultation process completely unfair and shows clear disadvantage to these residents.

Residents living on the Eastern side of Mobhi Road will have to cross three lanes of traffic, all moving at different speeds, in order to gain access to their homes, making this both difficult and dangerous for them and they will find it dangerous to exit their homes by car.

Traffic on Homefarm Road will increase as commuters use it to go North/South including potential rat running via the small island roads.

The diverted traffic will have to use Botanic Avenue for local access -these are small roads totally unsuitable for this purpose.

BusConnects engineers stated at an Information Day in Ballymun that spoil from the construction of the Station box at Homefarm Pitch will head north via Mobhi Drive which is a narrow residential road. But this has not been clarified in this EIAR or in Metrolink EIAR.

## **SECTION 5 - Current Planning Application**

During construction of Metrolink the NTA state in EIAR Metrolink Section 17.4.3.1.3 (St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner) - we would draw specific attention to:

*The baseline townscape is of high to very high sensitivity and construction of the Proposed Scheme will involve changes across and along the majority of a historic road corridor running through primarily established residential suburbs. The Construction Phase will involve demolition, excavation and construction works to kerbs, road carriageways, junctions, surfacing and parking, verges and adjoining open spaces, utilities, drainage features and the removal established tree and other planting (especially at Na Fianna and Home Farm Football Club sports grounds), and the removal of short sections of existing road boundaries (at Na Fianna and Home Farm Football Club sports grounds and at the former Player's Factory). The construction works will be wide ranging along the road corridor and will result in substantial alterations along limited sections of the existing streetscape character. While the construction works will not alter the existing townscape character along this section of the Proposed Scheme, they will detract from the visual presentation of this character, especially at a localised level, and will impact on the character of the streetscape. The magnitude of change*

*in the baseline environment will be high. The potential townscape / streetscape and visual effect of the Construction Phase is assessed to be Negative, Very Significant and Temporary / Short-Term.*

*The impact during construction will be very significant and construction likely to last 9 months 5.10.3 to be followed with very significant impacts of Metrolink construction of station box would make life for residents within the area intolerable*

*Operation Phase (permanent phase) has negative Moderate and Long-Term impacts within our area-17.4.4.1.2 St. Mobhi Road and Botanic Road from Griffith Avenue to Hart's Corner The baseline townscape is of high to very high sensitivity and the operation of the Proposed Scheme will involve substantial changes along sections of the existing historic road corridor through established residential suburbs. These changes will be most pronounced along R108 St. Mobhi Road at Na Fianna and Home Farm Football Club sports grounds, where the existing boundary will be set back and mature trees will be removed leaving a noticeably more open aspect, and likewise at the former Player's Factory on R108 Botanic Road, where the boundary will also be set back. There will be the provision of some replacement street tree planting. South of the River Tolka on the western side of R108 St. Mobhi Road, a row of five existing street trees will be removed for road widening and new street trees will be planted along the road. Replacement tree planting will reduce effects over time as they mature. However, due to the size of trees lost this will occur over the long-term. While the Operational Phase of the Proposed Scheme will not alter townscape character along this section of the Proposed Scheme, it will alter streetscape character through changes in property boundaries, loss of trees and vegetation and through general standardisation and localised widening of the road corridor. The magnitude of change in the baseline environment will be medium / high. The potential townscape / streetscape and visual effect of the Operational Phase is assessed to be Negative, Moderate / Significant and Short-Term, becoming Negative, Moderate and Long-Term.*

NTA also state that there will be loss of trees in EIAR BUSCONNECTS Section 17.4.4.2.5.1 (St. Mobhi Road / Na Fianna / Home Farm Football Club)

*The operation of the Proposed Scheme will leave a direct impact on sections of existing high sensitivity verges (with mature trees) along R108 St. Mobhi Road and at the junction with R102 Griffith Avenue, most notably in the loss of six early-mature / mature street trees adjacent to the road and several large conifers within the curtilage at Na Fianna and Home Farm Football Club sports grounds. Although these conifers provide a visual benefit to the streetscape, they are of variable condition and overshadow existing adjacent street trees and their Environmental Impact Assessment Report (EIAR) Volume 2 of 4 Main Report Ballymun / Finglas to City Centre Core Bus Corridor Scheme Chapter 17 Page 47 removal will allow better establishment of the street trees. There will also be the provision of replacement street trees. The magnitude of change will be high.*

GADRA feel that the loss of these trees needs to be avoided and could be avoided by use of Quiet Street Treatment as discussed previously. The loss of trees, two at the entrance to Hampstead Ave, three between the Rise and Griffith Ave and two London Planes outside Na Fianna, as well as all the mature trees inside the Na Fianna boundary and along the Homefarm Club boundary is just too many – given that there are alternatives to avoid this that NTA did not consider.

GADRA note in Chapter 19 the risk to electricity and water with some likely outages as the proposal interacts with utilities and expect that if diversions are required that this is flagged in advance with residents. Given the age profile of our residents, we highlight the risks associated with this.

GADRA did not see evidence that the upcoming EirGrid works have been assessed or considered.

Chapter 21 discusses the Cumulative impacts and the impacts of Metrolink on the project. Given that TII have stated that NTA made the decision to run the CBC and Metrolink consultations at the same time and that TII had no input into that decision we are not confident that any overlap will be dealt with, so we are requesting conditions to be put on the application that protects residents from the accumulative effects of both projects in the same area. We note that NTA have not even included the position of the Metrolink Intervention Shaft in Albert College Park within the maps Sheet 7/32 A M01 and note section 21.3,1,1.

*Based on the aim to coordinate between the Proposed Scheme works and other major infrastructure projects and major projects which are proposed along the route, or in the vicinity of the Proposed Scheme, no likely significant cumulative effects are predicted on traffic and transport over and above the effects of the Proposed Scheme in isolation which are reported in Chapter 5 (Construction) and Chapter 6 (Traffic & Transport).*

Consultation during construction in relation to Human Health NTA state in Section 22.9 Table 22.7 that the Mitigation for adverse psychosocial responses to the Construction Phase will include providing the public with sufficient information to enable people to plan their days, journeys and activities around the construction works and take control of their options to some extent.

*The NTA will manage and take responsibility for community liaison and engagement. This will include timely communication to the local community on the planned works activities, timings and traffic management. A point of contact will be provided by the NTA where residents and other interested parties may have their concerns and queries addressed. This will help allow for any shift workers to make arrangements when works are likely to be close by their premises. These requirements are set out in the CEMP.*

Given the precedent the NTA have set to date by refusing to hold open days in our area, holding closed meeting with invited guests only and limiting numbers on zoom meetings, refusing to put a hard copy of the application into the local library, we object to this and request that it is a condition that independent body be given the responsibility for community liaison with penalties incurred for delay in information being disseminated to residents.

We have concerns about the protection of the Surface water drainage system from the temporary construction compound B2 detailed in table 22.9 section 22.11 and would have concerns that the height of the wall being sufficient.

## **SECTION 6 - Concluding Remarks**

GADRA are requesting a “Do nothing” option until Metrolink is operational and the remaining issues not addressed by a Metro are clear. This is the only CBC being placed directly on top of a Metro, and we would query why a commuter would choose not to use the faster Metro and rather opt for a slower CBC instead. We ask that the current CBC proposal be deferred until the positive impacts of the proposed Metro can be accessed and factored into any subsequent CBC proposal. We do not support

options that create rat runs and diverts traffic to our surrounding roads. We do not support non inclusive consultation.

GADRA request that consideration be given to our proposal with regard to the actions below which do not require ABP approval while we wait for an operational Metrolink. These include:

- Prioritise the needs of Elderly, Disabled and very young residents in all areas.
- Buses on the CBC must be 100% electric and charged with green electricity
- Postpone the loss of mature trees in our area until construction on Metrolink is completed (loss of carbon sink)
- Divert cyclists to Walsh Road during construction of Metrolink
- Use of Walsh Road as cycle way
- Divert access to schools via Walsh Road and Griffith Park for Health and safety reasons
- Reduce traffic speed to 30kmph along the named CBC through our area, thus eliminating the need for commuter cycling specific lanes that will reduce the footpath space for pedestrians and school kids on scooters, bikes on their way to school
- Incentivise public transport by further reducing fares.
- Install priority bus and cycle traffic lights
- Introduction of a Cashless Fare approach
- Insist real time information is accurate with no phantom or disappearing busses

None of these proposals require An Bord Pleanála approval and can be implemented immediately.

Overall, we must prioritise Metrolink first

Finally, we note that this submission was completed without access to independent expert advice which GADRA repeatedly have asked for given the two infrastructural projects both directly impact the same road as NTA are planning to put a CBC directly on top of a Metro. The impact of each must be taken in to consideration on each other and without expert advice this is not possible for the general public. So ABP must do that themselves when considering this application, for not to do so would leave both processes open to legal challenge.

R. Carty  
Secretary  
GADRA

(Home address -108 Homefarm Rd Drumcondra Dublin 9)

**GADRA**  
**November 2022**

