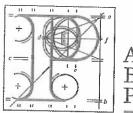
Our Case Number: ABP-314610-22

Planning Authority Reference Number:



An Bord Pleanála

Lesley Hewson and others
Prospect Architectural Conservation Area
C/O 6 Prospect Square
Glasnevin
Dublin 9
D09 W0F2

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 and oral hearing request (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.

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 on this matter in due course.

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)

Email



Date: 14th November, 2022

Name: Lesley Hewson, Lorraine Rooney, Alfreda Kavanagh.

Address: Prospect Architectural Conservation Area (ACA) c/o 6 Prospect Square, Glasnevin, Dublin 9, D09 W0F2.

An Bord Pleanala Planning Number: HA29.314610

Type of Dev: Strategic Infrastructural Development (SID)

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

Introduction

Prospect ACA is a enclave of some 115 houses and several hundred residents comprising Prospect Square, DeCourcey Square, Prospect Avenue, St. Teresa's Place and St. Teresa's Road that is bounded by Botanic Road, Finglas Road, Glasnevin Cemetery and the Botanic Gardens. Our access is limited to one road – a left hand turn off Prospect Way immediately before an extremely busy T-Junction where traffic can turn left (when moving northwards) onto Botanic Road, or right (southwards) onto Prospect Road. When leaving Prospect there are two options, the one outlined above onto Prospect Way and also along St. Teresa's Road leading out onto Botanic Road.

Broadly speaking residents are in favour of any measures that improve public transport and reduce fossil fuel and particulate pollution from road vehicles. Nevertheless, the contents of the above SID have raised concerns related to a number of new measures proposed in the planning application – these are outlined below. We seek to have those concerns included for consideration by the Board in whatever decision-making procedures, including oral hearings that may arise from the planning process in this regard.

Observations related to:

Ballymun/Finglas to City Centre Core Bus Corridor Scheme, July 2022 – Location Maps. Reference: BCIDD-ROT-GEO_GA-0304_XX_00-DR-CR-0012

The above map shows a new traffic layout along Prospect Way, upgrading the existing bus stop to locate it on a full island and building a two way cycle track behind the bus stop.

The junction of Prospect Way with the section of Prospect Avenue leading down to the ACA is already problematic for drivers and pedestrians and cyclists due to the difficulty of exiting Prospect Avenue in front of a bus lane and bus stop where vision is often restricted. The yellow box does not include the bus lane. Also the specific road markings suggest that you drive in the left carriage way, abutting the bus lane, as far as the junction at the entrance to Prospect Way to turn left.

This actually involves drivers having to literally stop in the middle of the road, while indicating left, waiting to see what buses (and more often than not other cars in the bus lane) proceeding along the bus lane and awaiting their signal that you can do a 90° turn in front of them while effectively holding up all the traffic behind you. On any other road such a manoeuvre would be deemed dangerous driving. However if you go into the bus

lane you risk being fined and this has happened to residents on numerous occasions. So you are faced with either a highly risky manoeuvre or a fine. There is NO other access point to the Prospect ACA. This junction is already problematic at best and dangerous at worst.

The proposed addition of a two-way cycle path is extremely worrying from a number of viewpoints.:

- Cars exiting Prospect Avenue to turn right onto Prospect Way will now also have to negotiate a two way cycle track with often unlit cyclists, scooters etc. moving at indeterminate speeds along it. Of course they are present on the road, but the depth of the area to be crossed before getting onto the road has now doubled approximately and it is to be expected that there will be additional vehicles to be observed and taken into account.
- Cars and other vehicles doing a left hand turn from Prospect Way into Prospect Avenue will now have to avoid buses and cars in the Bus Lane, but having crossed that will also have to stop most likely in front of a bus to ensure that they can see what cycles or other vehicles are using the cycle track before proceeding further. Again the issue of unlit bicycle and scooters travelling at speeds of 30kph or more will further complicate this manoeuvre.
- Pedestrians appear to be little catered for in this new plan as pathways are now becoming shared spaces for cyclists, rather than roadways that would be more appropriate to their speed. Pedestrians, and particularly elderly pedestrians of which there are many in this locality, will also have to negotiate the cycle track to cross the road at the Prospect Avenue/Prospect Way junction. The more advised crossing point for pedestrians at the junction of Prospect Way and Botanic and Prospect Roads are to be removed with no indication of what will replace them if anything.
- On the section of Prospect Avenue that runs southwards from Prospect Way to Hart's Corner there is no indication of whether there will be any changes to the traffic flow. Clarification is required.
- The working of the bus priority signal and its impact on pedestrians and local traffic is difficult to gauge from this plan and needs further clarification.
- Currently residents of Daneswell, the estate on Botanic road opposite the
 Junction with Prospect Way have to carry out an dangerous manoeuvre,
 crossing the road from Prospect Way directly in front of oncoming southbound
 traffic on Botanic Road to access this, as yet incomplete development. Further
 traffic directions need to be put in place to take account of this ongoing issue.
- The cycle track coming northbound along Botanic Road where it meets with the cycle track exiting Prospect Way appears to cross over the carriage way for northbound traffic turning left from Prospect Way onto Botanic Road. Yet there is no indication of traffic lights or priority at this junction. Furthermore the cycle track turning left from Botanic Road cycle track onto Prospect Way cycle track appears to be 'subsumed' by the main carriageways at this junction. Howe will this work in practice?
- How will elderly people, those with disabilities, parents with young children, and even younger people often with their heads firmly located in their phones) distinguish the footpath from a cycle track. Experience of the cycle track along Drumcondra Road is a cautionary one due to the speed at which the cycles and scooters travel along it. It is already too easy to step into the line of a bicycle when simply moving aside to make space for another pedestrian coming towards you. Measures to delineate the pedestrian pathway from a cycle track that go beyond painting the path surface a particular colour are required for long term safety of these tracks where space is confined such as in Dublin city.

- What measures will be in place to ensure that electric bicycles and scooter observe speed limits – indeed what limits apply to cycle tracks in shared spaces such as those being mooted in Bus Connects where pedestrians and cycle tracks share the pathways.
- The means by which pedestrians can negotiate these new structures on this junction is unclear at present and of great concern to residents, many of whom do not own cars at all and depend on their ability to access businesses and services locally on foot a 15 minute city. Greater clarity is required and proper consultation should take place with local residents taking into account the real demographic makeup of this area before any plan is approved. While new infrastructure encouraging increased public transport and cycleways is to be lauded, it should surely be a transport system that does not provide advantage for some sectors of the community at the expense of another. By this, we would cite the fact that many elderly people already curtail their use of public footpaths in this Glasnevin/Phibsboro due to the fact that they feel unsafe given the number of bicycles and scooters already accessing pathways and travelling without due regard to the fact that they are meant to be on the road, but are actually sharing the space with other more vulnerable users.

Ballymun/Finglas to City Centre Core Bus Corridor Scheme, July 2022 – Location Maps. Reference: BCIDD-ROT-GEO_GA-0304_XX_00-DR-CR-0011

Our observations on this section of the Ballymun/Finglas Bus Corridor follow the same themes as those outlined above.

- Businesses located on Mobhi Road and Botanic Road at the Junction with Fairfield Road will now become more difficult to use for the elderly and disabled in particular to access, due to a cycle track running within feet of the their doorways. Elderly people cannot be dropped off or collected by car at the pharmacy and hairdressers and pick-ups and drop offs at the dry cleaning business will be problematic.
- More broadly, where pedestrian priority zones are mentioned, it is unclear as to what this entails and therefore how effective they will be. NOTE: there is no mention of pedestrian priority zones where significant numbers of often vulnerable pedestrians are mooted to cross with cycle tracks at junctions such as Prospect Way as outlined above, and also on this location at Mobhi Road and further along the Corridor on Prospect Road outside the doctor's surgery on the corner of Lindsay Grove where cycle tracks pass within feet of these services. Further consideration is required to how these cycle tracks work in extremely busy, diverse locations as present evidence in this locality tells us that cyclists are no more likely to be aware of pedestrians than drivers are.

Ballymun/Finglas to City Centre Core Bus Corridor Scheme, July 2022 – Location Maps. Reference: BCIDD-ROT-GEO_GA-0304_XX_00-DR-CR-0008

The Traffic Diversion Route away from St. Mobhi Road for northbound through traffic which will be diverted away from St. Mobhi Road by the proposed Bus Gate at the Griffith Avenue junction raises concerns for the following reason:

• The alternative route will be designated from Hart's Corner at Phibsborough along the Finglas Road. The route will continue along orbital route R102 via Old Finglas Road, Tolka Estate and Griffith Avenue to join the Ballymun Road over a

distance of 3.3km. This represents an increased length of 1.5km when compared to the existing direct route along St. Mobhi Road. While this might not seem a great distance when travelling by car, the level of priority given to traffic travelling along this section of Griffith Avenue to turn left on Ballymun Road is problematic at present, with large single file queues of cars building regularly on the road as the traffic lights give time for only 3-5 cars to get through the junction with Ballymun Road at present. With a significant increase in traffic being diverted to this route it hardly seems necessary to point out that any improvements due to the diversion away from problematic areas that has been cited in this Scheme will be cancelled out by the traffic jams accompanied by increased fuel use along with air and particulate pollution. Further thought to the balance of traffic movement at this junction needs to be addressed before any increase in the volume of vehicles takes place along this route as it is already very imbalanced.

Ballymun/Finglas to City Centre Core Bus Corridor Scheme, July 2022 – Location Maps. Reference: BCIDD-ROT-GEO_GA-0304_XX_00-DR-CR-0013

Issues are as follows:

- The proposed bridge widening to allow for the inclusion of a two-way cycle track and a new bus stop located on Prospect Road between the junctions of Lindsay Grove and Whitworth Road is a significant engineering project of itself. Will this bridge widening be carried out as a permanent feature and survive the Metrolink works as it is already noticeable that road resurfacing and other works in the area will be ripped up during Metrolink. The use of public money in this regard is of concern.
- The new bus stop that will be located on the wider bridge has no further information as to its use. If it is for Bus Eireann buses to drop people off at the Glasnevin Station due to be built for Metrolink, then the need for people to load and unload baggage at this location right in front of a major junction onto Whitworth Road would be of concern as it would cause needless delay. This would still apply if it were moved to the existing bus stop location. Perhaps some further information might be forthcoming as to the use for a second bus stop at what is a very busy intersection.
- The issue of a two-way cycle track passing directly by the doors of multiple businesses and a doctor's surgery has already been raised, but is again of particular concern on these extremely busy pedestrian pathways. How the cycle track will be delineated from the pedestrian pathway and potential speed limits for electric cycles, scooters and other vehicles using this track is of particular concern.

Miscellaneous

• What is meant by public realm improvements in the context of Botanic Road and environs? The exact works are not specified.