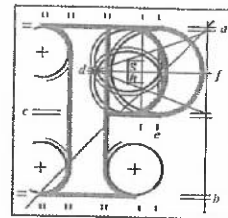


**Our Case Number:** ABP-314610-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Marie Sherlock and others  
Seanad Éireann  
Leinster House  
Kildare Street  
Dublin 2

**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)

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D01 V902	D01 V902





**SENATOR  
MARIE SHERLOCK**

Seanad Éireann,  
Leinster House,  
Kildare Street,  
Dublin 2

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.  
D01 V902

15<sup>th</sup> November, 2022

**Observation in respect of  
Ballymun / Finglas to Dublin City Centre Bus Corridor,  
Case Reference HA29.314610**

The BusConnects project has the real potential to improve our city, its urban villages and communities for the pedestrians, cyclists and public transport users who live in them.

In that context, it must be acknowledged that there are a number of important initiatives in the Ballymun/Finglas bus corridor.

In particular, the cycle path changes proposed for Mobhi Road, Mobhi Drive and Botanic Road are to be welcomed, along with the construction of the new bridge across the Royal Canal and the new underpass at Blacquiere Bridge. Furthermore, there are road and junction realignment and public realm improvements in Phibsborough that we very much support.

However, a number of the proposals fall short of existing safety standards which we detail below, and which we believe can be remedied with the attachment of special conditions in the grant of planning permission.

## **1) BusConnects and Metrolink**

The BusConnect project must not be considered in isolation to other infrastructural projects that are due to take place along the Ballymun Finglas Bus Corridor. In particular, the construction of the Glasnevin Metrolink station in Phibsborough will have a seismic impact on traffic flows in Phibsborough for a period of more than 4 years.

According to the Metrolink railway order application, the following is projected;

- Over a two year period where there will be in excess of 100 heavy duty construction vehicles such as ready mix trucks and tipper trucks entering or exiting the construction site on a daily basis.
- This will peak to just short of 180 vehicles during excavation works.
- Overall it is expected that the Glasnevin station will take nine years to build, and for six of those years the number of heavy duty vehicular movements accessing the site will average more than 50 vehicles per day.

Phibsborough is already subject to very serious levels of traffic congestion.

The Bus Connects transport modelling report in appendix 6.1, sub-appendix 1 shows some 49,000 junction turning counts through the Doyle's' Corner junction on a 24-hour basis.

The Bus Connects design for Phibsborough offers no initiative to constrain vehicular traffic passing through Doyle's Corner. Furthermore, the scale of the Metrolink works means that the Bus Connects plans will only be in place for a short period of three to four years before radical revisions to traffic flows to Phibsborough will have to take place.

## 2) Air Quality

Notwithstanding the pedestrian and cycle safety improvements along the proposed Bus Connects route, we believe the design of the overall focus of the Ballymun Finglas scheme is misdirected and flawed in failing to sufficiently address the chronic traffic congestion that goes through and is proposed for Phibsborough village.

We believe it is vital that special conditions are inserted into the grant of planning permission for Bus Connects that will ultimately reduce the flow of vehicular traffic through Phibsborough.

Our primary concern and motivation for this relates to the improvement of air quality for all those living, walking and cycling through the Phibsborough area.

It is also projected by the NTA that nitrogen dioxide concentrations will increase and not reduce due to the proposed Bus Connects changes. This has a significant health impact on pedestrians, cyclists and all those living in this community.

We believe the following are very serious grounds for radical revision of the Bus Connects plans for Phibsborough:

- The most recent World Health Organisation Air Quality Guidelines are not consistently used in the analysis provided, despite Dublin City Council being a signatory through the WHO/United Nations Environment Programme/World Bank BreatheLife campaign. These guidelines have been in place since September 2021, however the NTA data informing their study is instead based on older, less stringent guidelines on air quality.

- Existing nitrogen dioxide levels in Phibsborough and Glasnevin are already very concerning, with EPA diffusion tube data from March 2022 showing a seriously high level of NO<sup>2</sup> within these areas – results consistent with pre-Covid data collected between 2017 and 2019. Despite this, the NTA’s chosen data includes findings from during the 2020 lockdowns in which huge numbers of vehicle emissions were temporarily removed from our streets.

Elevated nitrogen levels are increasingly linked with increased risk of cancer, lower bone density and resulting health complications, including dementia and early death.

The BusConnects modelling is based squarely on the assumption that all modal shift targets will be met by the time the scheme is completed: this would include a number of future transport projects being completed before 2028, including several on which work has not even begun. Even under these assumptions, it is troubling that the current plans do not envisage an improvement in air quality for Phibsborough: rather, a slight to moderate “adverse impact” is anticipated at several points, including the R101 North Circular Road Junction with Phibsborough Road.

- Even with BusConnects completed and in place on schedule, there is no projected improvement in air quality for these areas until 2043, and this estimation is subject to increased usage of electric vehicles which will themselves add to congestion on what are already very busy roads. Should electric cars not make up a majority of vehicles on the road by 2043, these already shaky targets for improved air quality will simply not be met.

We believe that far, far more needs to be done in the here and now to safeguard the health of local residents. That an ambitious scheme to expand public transport usage could actually worsen air quality in some areas is a deeply unwelcome outcome, and the NTA should substantially revise their proposals with data that meets the WHO Air Quality Guidelines as a starting point to developing proposals which protect and improve the health and environment in Phibsborough and other traffic-heavy areas affected by this plan.

### 3) Specific concerns regarding the proposed works in this transport scheme include:

#### (a) The impact of the St Mobhi Road restriction on Botanic Road and adjoining areas:

The northbound road restriction at the northern end of Mobhi Road will generate several unnecessary adverse impacts for Botanic Road, and specifically for the stretch alongside the Botanic Gardens. It is highly regrettable that a timed bus gate was not contemplated, given the traffic flows that the Bus Connects plan is seeking to address are principally related to the peak traffic times on Mobhi Road in the evenings.

Already, this particular stretch of Botanic Road endures high levels of congestion, both when the Botanic Gardens are particularly busy and when they are not. The curved

characteristic of the road means that visibility is limited and road conditions are dangerous if vehicles travel at speed. There is a concern this will be exacerbated with the proposed filtering of northbound traffic through this stretch of road.

No speed reduction measures have been put forward in the proposals for this stretch of road, nor any other traffic mitigation measures. It is vital that speed reduction measures are implemented should the bus gate measure proceed on Mobhi Road.

**(b) Substandard width of cycle lanes on Prospect Road:**

We welcome the attempt to introduce a segregated cycle lane along Prospect Road, thereby linking cycling access from Glasnevin through to Phibsborough. However, there is a serious concern about the sub-standard width of these lanes and the safety of passage in these lanes alongside heavy traffic. The two-way cycle lane at Prospect Road is 23% narrower than the recommended cycle lane widths.

**(c) Lack of cycleway segregation along Royal Canal Bank cycle path:**

Royal Canal Bank has been designated as the primary cycle route through Phibsborough and yet there are three significant shortfalls in its design.

- (i) While this route is intended to be a “primary cycle route”, the path features none of the standard characteristics of a safe cycle lane. There is a no continuous segregated cycle lane proposed and cyclists are expected to share the road with vehicles.
- (ii) The route has been identified for “quiet street treatment”- yet there is no indication in the design about how an increase in the volume of cyclists will be accommodated in the absence of a segregated cycle path. There appears to be inconsistencies between the map NCIDD-ROT-GEO GA-0304 XX OO-DR-CR-0013 and the text in chapter 4, section 4.5.3.5, where it appears to suggest northbound-only traffic operation along this stretch. However, this is not reflected in the maps.
- (iii) Furthermore, and unfortunately, it appears that no survey data was collected by the NTA on the traffic flows along this stretch and therefore the designation as a safe shared road between cyclists and cars is not backed up with any evidence.

At present, the section of Royal Canal Bank between the canal and the new cycle underpass, takes three distinct flows of vehicular traffic; staff exiting Mountjoy prison, cars exiting the North Circular Road to take short cut to access Phibsborough Road, plus car movements from those living along that stretch of Royal Canal Bank.

There is a considerable volume of vehicular traffic exiting the prison on a daily basis and while there is a No Through Road marking at the top of Royal Canal Bank, it is ignored by many using the route as a northbound short cut to the Phibsborough Road.

Failure to design a safe and standard cycle lane along the Royal Canal Bank plus the failure to accommodate a cycle lane along Phibsborough Road means that there is an

subject failure by the Bus Connects project to promote and facilitate safe cycling through the Phibsborough area.

**(d) Removal of loading bays**

The proposed removal of loading bays in the proposal is short sighted and at odds with any ambition to minimise illegal parking within urban villages. It stands in direct contrast to what should be happening: the introduction of more loading bays in the city, particularly in a busy commercial area like Phibsborough.

There is a proposal put forward to remove the loading bay in the area between St Mobhi Road and Hart's Corner, which is already home to a number of commercial customer-facing premises which rely on deliveries. There is an additional proposal to remove five out of the current eleven loading bays located in Phibsborough between Prospect Road and Western Way.

This will cause problems in cycle lanes where businesses have no space to unload vans, leading them to instead block the cycle lanes.

**(e) Containment of future rat runs: Whites Lane off Phibsborough Road**

There are no proposals at Whites Lane off the Phibsborough Road to mitigate rat running to Berkeley Road. The Blanchardstown Bus Corridor plan will lead to Monck Place and various roads around Phibsborough being closed to through traffic, which will displace cars and lead to other rat runs developing. These need to be anticipated and blocked. In particular, we ask that White's Lane is block to through traffic.

**(f) Community safety at underpass at Blacquiere Bridge**

The cycling underpass at Blacquiere Bridge is a very welcome development. In order to ensure the safety of cyclists, pedestrians and the local community , we ask that sufficient lighting be put in place on a 24-hour basis.

**(g) Special conditions attached to Broadstone Pocket Garden**

Recent work undertaken by Bus Éireann at Broadstone Garden has been most welcome. It has transformed a dumping ground into a planted area with native trees. We welcome any plan to open up this area for the benefit of the local and passing commuters, however certain key measures are absolutely necessary if this area is to function as per the plan set out in the transport scheme.

This site has been the source of considerable nuisance to neighbours in the past due to anti-social behaviour, litter and dumping. We ask that a special condition be specified as part of the grant of planning for the framework plan for the development of the site; that this will be agreed with Dublin City Council, and that a plan for its management and maintenance also be put in place. This should include lighting and sufficient bins, as there is a general lack of bins in this area already which is leading to a litter problem.



#### 4) Ecological concerns

We believe there should be an Ecological Management Plan developed to ensure there is proper ecological oversight and protection in particular for the Royal Canal which is a delicate urban ecosystem.

It is important to have oversight for the ecology of the area for the duration of the construction by DCC biodiversity or another agency to ensure care and attention to detail on standards. It is also important to reinstate as much as possible for diversity at the completion of the construction phase.

Phibsborough Village Tidy Towns has created a biodiversity garden alongside Mountjoy Prison car park that is important for both its volunteers and nature. Broadstone has allotments and hives that are very important to the local community. The Ecological Management Plan should also outline how access to these spaces will be managed during the construction phase of BusConnects, along with ensuring ongoing protections for these spaces.

Yours Sincerely,

Senator Marie Sherlock, Great Western Square, Phibsborough

Cllr Declan Meenagh, Killala Road, Cabra

Brendan O'Rourke, Shandon Park, Phibsborough

Christina Casey, Rathdown Road, Phibsborough