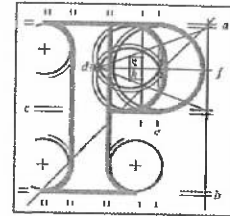


**Our Case Number:** ABP-314610-22

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Peter and Anna Dore  
92 Saint Mobhi Road  
Glasnevin  
Dublin 9  
D09 X0X4

**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 Catrfield  
Executive Officer  
Direct Line: 01-8737287

HA02 (Acknowledgement - No Receipt to Issue)

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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



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**Peter & Anna Dore**

92 Saint Mobhi Road  
Dublin 9  
D09X0X4

15th November 2022

**Board at An Bord Pleanála (Strategic Infrastructure Division)**

64 Marlborough Street  
Dublin 1  
D01 V902

**Re: Case Number HA29.314610 - Ballymun/Finglas Route of Bus Connects**

To whom it may be concerned,

**Introduction**

We write to you in connection with the above NTA proposals to improve commuting times from outer suburbs to Dublin City Centre by providing dedicated bus corridors and cycle lane routes leading into the City centre.

The purpose of this letter is aimed specifically at the stretch of Saint Mobhi Road between Botanic Avenue and Fairfield Road, ("**The Southern Mobhi Road Section**", "**The SMR Section**"), see appendix 1 for Google Maps image.

**Key considerations**

Firstly as a resident of Dublin and a daily cyclist I welcome the proposed aim and objective of the scheme, which is described as "*...to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.*" as per the *Environmental Impact Assessment Report (EIAR) Volume 1 of 4*.

The current section of the road currently contains 2 lanes for general traffic, 1 cycle track (southbound), 2 footpaths and lines of trees with grass on each side, please see Appendix 2 for a Google Streetview image of the general road layout. The proposal is to add a bus lane along the SMR Section plus insert dedicated cycle lanes on the footpaths - from a practical aspect this appears to be very optimistic with the use of current space, considering the actual width of the road. Technically 3 rows of vehicles may fit along the road, but from a practical sense this is very optimistic and will lead to accidents outside of rush hour times, when cars are moving at speed.

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Should the current proposed plan for the SMR Section proceed, this prioritises one aim (bus lane) at the expense of the others (pedestrians and cyclists). While ultimately benefiting private car users. The addition of the bus lane reduces the public buses, taxis and private buses using the general traffic lane, therefore allowing for increased car capacity in the general traffic lane. This is senseless in the fact that it acts as an incentive for more car users.

In relation prioritising bus users over pedestrians and cyclists, this is as a result of moving cyclists onto a narrow shared space with pedestrians. The SMR Section is a very busy section for pedestrians, especially with small children due to the local primary schools in the area and sports grounds.

Any morning of the week, whether weekdays or weekends, you will see parents with small kids on the footpaths, the kids are either in buggies, walking/wobbling or on children's toys (scooter, push bikes, etc.). To go ahead and insert the bike lanes on the footpaths will have a detrimental impact to those pedestrians and will lead to less pedestrians, which is the opposite to the aim of this scheme.

Personally I cycle everyday, I bring my young daughter on the back of my bike to creche on the way to work. When I have her on my bike I feel at my most vulnerable and I do not see the proposed plan as increasing our safety in any way, I see it as the opposite. You will be condensing pedestrians and cyclists onto a narrow space, where there is a greater risk of residents pulling out of their driveways and colliding with us. Under the proposed plan I will then ultimately be moving back onto the road less than 200 metres away.

As a cyclist you appreciate the additional risk from moving from a dedicated cycle lane to a shared cycle lane on the road, so again, this is adding more risk to my journey. It would be safer to have the cycle lane constantly alongside traffic, as this builds up awareness.

Consideration also needs to be given to the trees along the route and how the widening/reducing the grass verges will have a negative impact on trees which add to the character of the area and Dublin.

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## Summary

The SMR Section accounts for only 200m of the overall 11km plan; it impacts on 29 residential houses directly on the road, with a further 10 on Mobhi Grove. Plus several commercial properties.

The addition of a bus lane in this section will cost hundreds of thousands for little to no improvement due to the bottleneck between Fairfield Road and past Marguerite Road.

At the end of the SMR Section, it is proposed to have signal controlled priority lights for buses, as the width of the road between Fairfield Road and past Marguerite Road only allows for 2 general traffic lanes.

The signalled control priority lights should be reallocated to the corner of Mobhi Road and Botanic Avenue, this will ensure the section is still considered bus priority for the purpose of the overall scheme, while also saving hundreds of thousands in road works and improving the completion time of the construction stage.

Plus ensuring the quality of commute for pedestrians and cyclists is not sacrificed for essentially increasing the capacity of car users.

Sincerely,

*Anna + Peter Dore*

Peter & Anna Dore

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## Summary of observations:

### 1. Width of Mobhi Rd between Botanic Avenue & Fairfield Rd

- The above mentioned section is currently servicing 2 general traffic lanes plus 1 dedicated cycle track (see appendix 2 for Google Street image).

#### Issue

- The width of the road is restricted by the mature trees which currently border and bulge onto the existing road, especially on the southbound cycle track.
- The addition of the bus lane will mean the space and clearance of cars along this stretch will be very narrow, considering the large vehicles (buses, HGVs, etc.) which currently pass the road will certainly lead to accidents.
- Footpaths are currently very busy with pedestrians, especially those with young children going to local schools and sports grounds, the reduced size of each footpath will have the risk of causing collisions between cyclists, pedestrians and residents driving out of their homes.
- The negative impact on pedestrians is contrary to the ethos of this overall scheme, it is sacrificing pedestrian safety for bike users, even though there is currently sufficient bike space on the road.
- Any road widening or footpath narrowing will most certainly have an impact on the mature trees. There will certainly be issues in relation to the roots of the 80/90 year old trees.

#### Recommendation

- Move Signalled Controlled Priority light from corner of Mobhi Rd and Fairfield Rd to the corner of Mobhi Rd and Botanic Avenue. This will still ensure bus priority along this 200m stretch of the road.
- Insert bike lanes on both sides of the road, on the existing road. This will significantly reduce any landscape and visual impact on Saint Mobhi Rd.
- As there will be no bus lane between Fairfield Road and Marguerite Rd, the lack of a bus lane on this stretch will not improve/disimprove current traffic flows, due to the bottleneck less than 200m up the road.
- Consideration needs to be given of the cost which would be incurred plus environmental impact.
- Consideration needs to be given to impact of the proposed works on the trees on the SMB Section

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## 2. Unclear about no right turn at corner of Botanic Avenue and Mobhi Rd

### Issue

- If the “no right turn” sign is from Botanic Avenue to Mobhi Rd - this means residents of Mobhi Rd between Botanic Ave and Fairfield Rd won't be able to turn onto the road to access their homes if coming from Glasnevin Hill direction directly, this will force more traffic on Daneswell Rd and Fairfield Rd, both narrow residential roads.
- If the “no right turn” sign is from Mobhi Rd (northbound) Botanic Avenue - this will cause more traffic to be funnelled down Daneswell Rd which is a narrow residential road.

### Recommendation

- Allow for access only - this means residents living along the SMR Section can still access their properties without increasing the traffic flow down Daneswell Road.

## Other Considerations

### 1. Metrolink

The proposed Ballymun to City Centre Bus Corridor runs by and large on top of the proposed Metrolink from the Airport through the City Centre. The timescale for the construction of Metrolink is 2035. The construction of Metrolink may eliminate the need for this Bus Corridor.

### 2. Safety of parents and children

There is a significant number of parents and school children walking along the footpaths along the SMR Section to nearby schools each morning. The mature trees along the road provide a level of protection for these pedestrians.

### 3. Indirect / unintentional destruction of trees

There are twenty mature trees which are 80 - 90 years old on the SMR Section. The trees provide shade and shelter to humans, birds and insects. They also provide a natural barrier between the road and footpath which improves the safety of pedestrians.

They're also an important part of the local streetscape amenity which encourages locals to walk as part of a regular exercise regime. Perhaps more importantly they absorb significant amounts of rain and ground water and evaporate that.

Given the immediate proximity of the Tolka River and the experience of flooding along Botanic Avenue in recent years, the potential indirect destruction of these trees will increase the risk of flooding in the future. Furthermore, this section of St Mobhi Road slopes downhill from Fairfield Road to Botanic Avenue and houses here have experienced subsidence in the past. Any indirect consequences to the trees will impact the roots, which would affect the foundations of the houses and have unanticipated negative consequences.

### 4. Local residents vs Rush hour commuters

The proposal for the SMR Section may result in cutting down the journey time for commuters to the city centre for a two hour period in the morning and in the evening for nine months of the year.

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However the 24/7 impact of the local residents also needs to be considered and balanced. The limited potential efficiency will undoubtedly have an impact for all humans and nature on a 24 hour cycle, for 12 months a year. The impact is tremendous and the erosion of the historical and architectural heritage of neighbourhoods, while jeopardising the health and safety of not only residents within some of these areas but the wider community, pedestrians and cyclists also.

#### 5. Other options to tackle traffic Congestion

Given the limited urban road space available for all users irrespective of the mode of transport used, measures are required to reduce the number of private cars competing for this road space with cyclists and public transport. There needs to be a clear plan detailing how you will incentivise road users to opt for public transport, rather than expecting long delays as the frustration point, which forces private car users to use public transport. This is not an appropriate expectation, considering the current traffic levels, with people happy to sit in traffic.

Real consideration needs to be given to how the Government reduces car spaces in the city (potential Benefit-in-kind "BIK" tax implications) for daily commuters and potentially introducing a congestion charge (camera at all bridges over the canals).

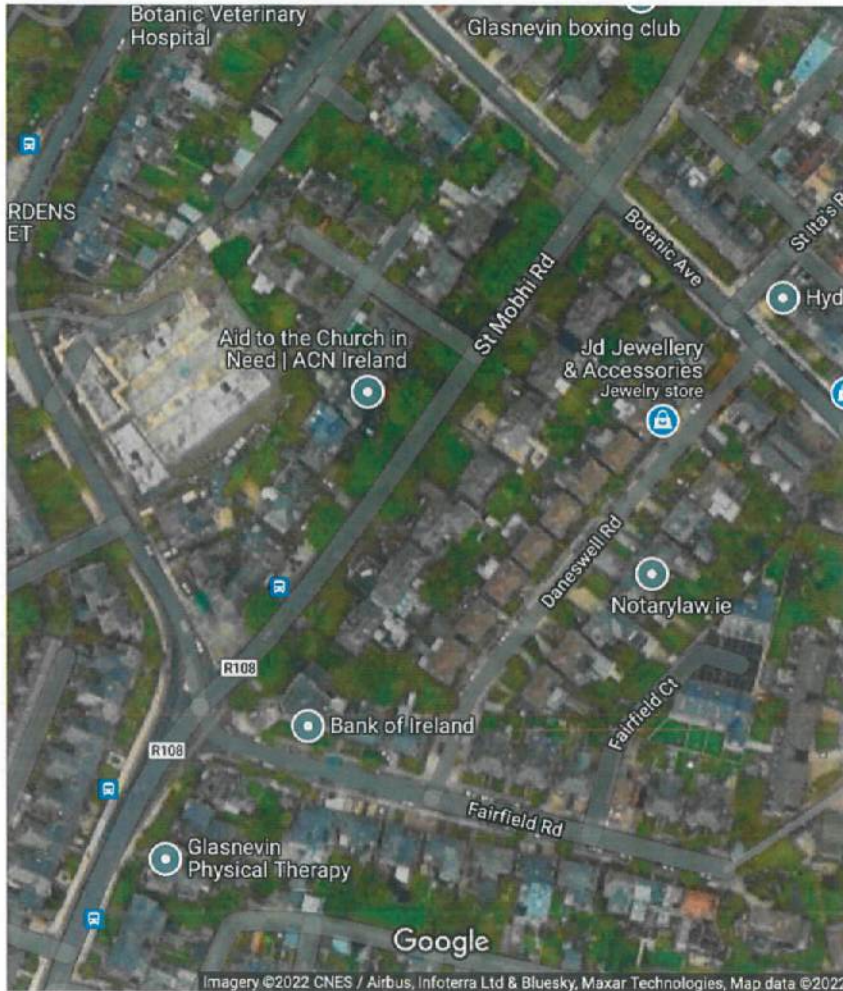
Given the success of both the plastic bag levy and the Bike to Work incentives we recommend that congestion charges and BIK rules for high density urban areas be trialled before any decisions are finalised on these drastic bus corridor proposals.

#### 6. Linking existing bike routes

A cycle route could be accommodated in Griffith Park which could link up to an already operational and effective cycle route on the Drumcondra Rd. This could reduce the number of cyclists having to share road space with vehicles city bound from Botanic Avenue to Cross Guns Bridge. Allowing cyclists direct access to the city, either by the road or via the Royal Canal.



Appendix 1: Map image of the stretch of road between Botanic Avenue and Fairfield Road, along Saint Mobhi Road (“The Southern Mobhi Road Section”, “The SMR Section”)



Appendix 2: Streetview image of the stretch of road between Botanic Avenue and Fairfield Road, along Saint Mobhi Road (“The Southern Mobhi Road Section”, “The SMR Section”)



Appendix 3: Junction of Mobhi Rd and Botanic Avenue - looking northbound

