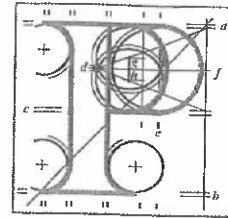


Our Case Number: ABP-314610-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

St Vincent's Basketball Club
St Philomena's Road
Glasnevin
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 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.

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.

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)

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

St Vincent's Basketball Club
St Philomena's Road
Glasnevin
Dublin 9

15 November 2022

RE: Ballymun/ Finglas to City Center Core Bus Corridor

An Bord Pleanála Case No. 314610

Introduction

St Vincent's Basketball Club in Glasnevin is one of the country's oldest basketball clubs. At our most recent AGM, we appointed a Climate Justice Officer, and in doing so became the first basketball club in the country to with climate justice programme. This programme focusses on the twin pillars of environmental sustainability and active travel. The following submission aligns with our principles of promoting active travel in our club and our community. Our members are frequent users of the area impacted by this bus corridor proposal and as such we have suggestions and comments.

Our statistics:

As part of our active travel programme, we have recently surveyed our members, and found that 58.3% use a private vehicle as their primary method of commuting followed by 24% who walk, and 16% who cycle. Almost 60% of our members live within 5km of our primary location in Glasnevin, and 74.6% live within 10km. The most important figure of our survey, is that 53.7% of people who use a car as their primary method of transport are deterred from cycling due to the lack of safe, segregated, and connected cycling infrastructure.

Our active travel programme targets increasing the number of people who use active travel as their primary mode of transport. The primary group of cyclists, highlighted in the study "Four Types of Cyclists" by Dr Jennifer Dill, is the Interested but Concerned Cyclist, which accounts for 50-60% of cyclists. As you can see, our figures support this conclusion. The Interested but Concerned cyclist "will only cycle if provided with

high-quality safe and comfortable cycle routes. Will only comfortably mix with low levels of traffic in intentional low speed environments.” This is the group of cyclists that infrastructure programmes, such as BusConnects must cater to.

General Comments

In consultation with other active travel groups in Dublin, we have assessed the proposed Ballymun/ Finglas to City Center Core Bus Corridor, and have the following general comments on this proposal:

1. There is not enough provision for safe, segregated and connected cycle routes. With specific reference to the locality of St Vincent’s Basketball Club, there is a lack of cycle route from the Royal Canal to the River Liffey. This is an important route with Church Street and Constitution Hill providing the primary artery for our members travelling from the city center, Stoneybatter, Smithfield and parts of the north inner-city.
2. It is imperative that buses and cyclists are not in using a shared space. There is no logic for an individual on a bike to be sharing a lane with a 30 ton bus. This is a deterrent to potential cyclists, and presents an immediate danger to current cyclists. Cycle lanes should not be disrupted by bus stops, and a bus stop island, with provision for a continuous cycle lane should be provided for in any case where this might occur.
3. We should never be implementing programmes that provide for shared space between pedestrians and cyclists. Footpaths must at all times be reserved for pedestrians and people with mobility issues, never for bikes. Currently, the Finglas Road has shared space for cyclists and pedestrians in both north and south bound directions. We would support the creation of a two-way segregated cycle lane from Finglas into Phibsboro.
4. The design proposal needs to include prioritisation for cyclists at traffic signals and junctions. This can be done through protected cycle lanes at junctions, prioritisation of cyclists on traffic signals, and priority boxes ahead of general traffic at junctions and signals.
5. There needs to be adequate buffer zones between cycle lanes and general traffic, one of the priorities regularly highlighted by the RSA and NTA in their road safety campaigns. With much of this route being in a speed zone over

50km/h, adequate provisions need to be made to protected cyclists along this route.

6. The provision of Cyclops junctions would add further protection to cyclists, who would not be crossing junctions at the same time as motor traffic, and avoiding the left-hook collision, as was seen today on Summerhill street in Cork, and is frequently reported on throughout Dublin and the country. We are not in favour of the NTA's proposed junction design which is used across the various BusConnects Corridors which allows for cyclists to be going straight through junctions at the same time as motorists turning left. This would obviously increase the number of left-hook crashes. We would favour internationally proven and functioning junction designs as opposed to reinventing the wheel with designs that put cyclists in danger. We favour Cyclops junctions or Dutch junctions, both which have a long and proven history of successfully reducing collisions between cyclists and motor vehicles at junctions.
7. We advocate for increased width of cycle lanes to accommodate the increasing number of cyclists using cargo bikes, tricycles, mobility scooters and handtrikes. Cycle lanes should be a minimum of 2m wide, and if there is a two-way cycle lane, there needs to be adequate space for safe overtaking. The Greater Dublin Area Cycle Network Plan highlights the necessity of 2.5m width, and this is a proposal we fully support.
8. We support the campaign Love30 and believe that a 30km/h speed limit should be in place throughout the Finglas road, Mobhi Road, Phibsboro Road, Doyles Corner, Constitution Hill and Church Street sections of the proposed core bus corridor.

Specific and localised concerns:

1. One of our primary concerns surrounding this proposal revolves around the provisions for Phibsboro and Doyles Corner. There are no provisions for protected cycling infrastructure at either the Doyles Corner junction nor the Phibsboro Road/Connaught Street Junction. These particular examples contradict the statement that these junctions are "*in compliance with the BusConnects Preliminary Design Guidance Booklet with respect to pedestrians, cyclists and buses.*" In this proposal, there is no provision for

segregated cycling infrastructure through Phibsboro village, one of the highest density areas of the north city, with some of the most important commuting routes for the greater Dublin area.

2. We cannot support the plan for Phibsboro village in its current form. Doyles corner is one of Dublins busiest junctions, and Phibsboro is a Key Urban Village according to the Dublin City Development Plan. Phibsboro is always backed up with car traffic, and is a danger zone for cyclists and pedestrians. The current proposal does not make any ammendments for this, and in fact essentially promotes the use of private vehicles through the village centre. The proposal should priotise cycling and walking infrastrucure as well as segregated bus lanes. Building effective infrastructure here will reduce the need and dependency of people to use cars and promotes sustainable transport methods.
3. We have a large number of members who travel between Na Fianna GAA club, and St Vincent's Basketball Club. The current Ballymun Road/Mobhi Road/Griffith Avenue junction is very poorly designs, and allows for a high level of confusion amongst drivers which increases the risk level for cyclists. The whole design of this junction should be reevaluated with design priority given to active travel methods of transport. The standards of cycle routes along Mobhi Road and towards Botanic Road are below standard, and need to be improved. There needs to be a specific bus corridor, with a separate segregated cycle lane from Mobhi Road to the Royal Canal, with filtered permeability at the Prospect Way and at Bothar Gharraith Na Lus.
4. While we welcome and support the cycle route via Royal Canal Bank, we do not think it should be implemented as a substitute for cycling infrastructure through Phibsboro itself. This cycle way diverts cyclists from motor traffic, but also restricts their access to all of the facilities in the village. This cycle way should definitely be built but in addition to infrastructure through Phibsboro village itself.
5. Rothar, a local bike shop, has been very vocal about the concerning levels of air pollution throughout Phibsboro as a result of motor traffic. As approximately 28% of our members use this area to commute, we want the area to have reduced levels of pollution in order to promote the use of sustainable transport methods. Recent surveys, and air quality tests have

placed Phibsboro above WHO limits for clean air, this needs to be addressed though this proposal.

6. The Finglas Road is the primary road for many of our members travelling from Fingals, parts of Fingal and Meath. The current cycling infrastructure is sub-standard and shares space with pedestrians throughout large sections of the route. From the St Margarets Roundabout to Glasnevin and further on to the Liffey, there needs to be provisions for safe cycling infrastructure, and increased public transport services. Much of this route prioritises car traffic over sustainable transport and a huge modal switch is required to both protect commuters, and meet our climate targets.

Conclusion:

We are in favour of the Ballymun/ Finglas to City Center Core Bus Corridor but not in its current format. There are many changes, considerations and improvements to be made to provide residents and users of this route with safe and efficient sustainable transport options.

We are in favour of an oral hearing on this proposal and are happy to further discuss our submission and concerns if necessary.

