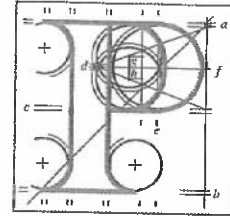


Our Case Number: ABP-314610-22

Planning Authority Reference Number:



**An
Bord
Pleanála**

Brendan Heneghan
88 Parkmore Drive
Terenure
Dublin 6W
D6W X657

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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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
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BALLYMUN FINGLAS SCHEME no 314610

An Bórd Pleanála

15 November 2022

64 Marlborough Street

Dublin 1

I wish to make a few observations on this scheme. It is disappointing that despite this being the last date for submissions, there is not a single observation on display on your website to give some indication of local views on issues.

Time savings

As seems standard with all of these projects now, the time saving stated consistently on all of the brochures issued on the consultation is vastly in excess of the time saving indicated by charts when the planning application is submitted. On page 131 of chapter 6 EIAR Table 6.64 the inbound time saving at peak ex Ballymun on an inward journey seems to be about 5 minutes; the outbound saving is even more modest at 3.1 minutes. The March 2020 consultation on page 12 inferred that the current journey time was 45 minutes and the BusConnects journey time would be between 20 and 25 minutes or a saving of 20 to 25 minutes. I do not think that any major inconvenience to residents should be contemplated when weighed against a 3 to 5 minute saving. It is noted that the 45 minute claimed in the consultation is in excess of the maximum journey time (39.3) indicated anywhere in Table 6.65.

Church Street

It is noted that under the BusConnects proposal the E buses will leave the corridor at Western Way. All that will be left on Church Street are a relatively unimportant 23 and 24 service with a proposed 3 services an hour each. These follow very circuitous routes through Finglas/Ballygall and are unlikely to be used by anyone in a hurry. There appears to be no justification for bus measures on Church Street as suggested by sheet 16, 17 and 18 of the drawings supplied.

It would seem far preferable that you use the road space on Church Street to provide continuous cycle lanes to the North Quay rather than the intermittent cycle lane evident from drawing 18 on substantial sections of Church Street. This is particularly so given that cycle lanes are omitted on large stretches of Phibsborough Road.

There is a complete lack of joined up thinking by all the authorities. The closure of Capel Street 24/7 has moved a lot of traffic from the largely non residential Capel Street, to the very residential Church Street. Church Street now gets built back very badly resulting in extra strain on the Smithfield area. If

Church Street is unnecessarily compromised to facilitate 6 buses an hour that otherwise follow very circuitous routes, that will cause even greater problems.

St Mobhi Road

I think in examining these plans where traffic bans are proposed you should distinguish between those which largely have the effect of stopping cars driving to the city centre and those which are in the suburbs and create a lot of inconvenience to residents. I am broadly supportive of bans and restrictions on routes which largely are only relevant to traffic which is city bound. Particularly in the light of minimal time savings, routes in the suburbs with significant inconvenience to residents should only be allowed if at all at peak times.

The plans are very difficult to follow but it seems to me that traffic can travel southwards on Mobhi Road at all times. However northbound traffic cannot exit Mobhi Road, but it seems from map 8 that this restriction will only apply between 16,00 and 20.00 seven days a week. I cannot see any reason for applying this on a Sunday or bank holiday (that may well be justified for bus lanes where there is a lane available to other traffic). However subject to that, what is proposed seems to an outsider a reasonable balance. It does not seem to stop people from Harts Corner to Mobhi Road accessing their own properties in the evening rush and the only inconvenience seems to be the ability to travel northwards towards Ballymun.

What seems far more problematic is the proposal illustrated on map 20 to make a section of Ballymun Road adjacent to Church Avenue one way. If I am correct in my interpretation of the arrangements on Mobhi Road, the only inconvenience to residents on that section of Ballymun Road is that they will have all the outbound traffic in the evening peak; this is an inconvenience suffered by many city residents in either the morning or evening peak. Indeed some of them will find this 24/7 one way causes issues for them.

The suggested route northbound to get from Botanic Road to the top of Mobhi Road adds considerable length to the journey which clearly gives rise to much greater fuel consumption. Environmentally this proposal seems completely nuts. Therefore I think it should not be permitted.

I don't believe that adequate notice has been taken of the fact that the areas to the north served by the Mobhi Road corridor will have a "super duper" public transport infrastructure in the form of both metro and the E spine. If public transport has any prospect of displacing cars, there could not be a better system to encourage switching. I believe that many of the cars will be displaced here anyhow and that the crude road engineering around Mobhi Road and Ballymun Road is pointless.

Interaction with Blanchardstown Corridor

In my submission on that corridor, I noted that there is both very little thought and very little consultation on issues that have a significant impact on residents in Phibsborough. Further it would seem they have to pay two fees to make an effective submission, because they likely need to make a submission on both corridors. Further as I pointed out the traffic modelling produces inconsistent results. I think you should not permit any major changes in Phibsborough and should instead direct

further consultation and intergrated traffic modelling which reflects the combined effect of both corridors. Only after this is done should traffic changes in Phibsborough be considered.

The modelling issue is can easily be seen by comparing the PM traffic map on page 162 of chapter 6 of the Ballymun Finglas Scheme ("BFS")with the figure 6.8 map for the Blanchardstown scheme ("BS" – the initials are unfortunate but co-incident). I have challenged these types of maps in the course of the poor consultation process on the basis that they should clearly show the width of the lines so that one can assess the additional cars projected for a road. A couple of examples

On Phibsborough Road, the BFS forecasts a decrease in traffic of maybe 200 to 400 passenger car units. The equivalent map on the BS scheme forecasts increases of 100 to 400.

On Connaught Street/Faussagh Road and Avenue, the BFS map shows an increase of 200 to 300 passenger car units but petering out once the railway line is crossed. In the BS map the increases seems to be 600 to 800 passenger car units for the entire stretch as far as Ratoath Road.

The BFS map shows an increase in traffic for parts of Ratoath Road. By contrast the BS map which would seem to be a more logical place to look if you live there shows no impact.

Similarly the BFS map shows a decrease in traffic on Whitworth Road, which no doubt would encourage residents there not to be too bothered in making a submission now. However if they looked at the BS maps they would see that an increase is pencilled in to the extent that it is labelled P6 as a point of concern.

It is simply impossible that any of these maps represent any reality given that they have contradictory views on traffic on the same roads.

Other points

I would re-iterate my general concern that the process did not observe the Aarhus Convention and that consultation was inadequate. Further the third consultation on this scheme estimated 56 trees to be removed; the planning application could do with a clear statement on the number of trees affected. I note once again the phenomenon of moving bus stops, where there has been no consultation whatever, except if one can read very complex maps.

Brendan Heneghan

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