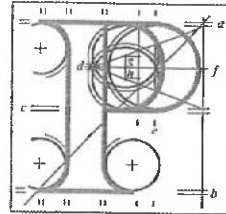


Our Case Number: ABP-314610-22
Planning Authority Reference Number:



**An
Bord
Pleanála**

John Deegan and Nóirín Finnegan
32 Saint Mobhi 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

32 Saint Mobhi Road
Glasnevin
Dublin 9.

Case Reference No. HA29.314610 – Ballymun/Finglas to City Centre Core Bus Corridor Scheme

15 November 2022.

An Bord Pleanála,

We make this submission as frequent users of public transport who have participated in the public consultation process until it was curtailed by the pandemic.

It has been difficult to navigate the Bus Connects application. The huge volume of online documentation could have been structured in a more accessible way, particularly as regards tracking changes to the original proposals. This is particularly important in these pandemic times when people are reluctant to attend offices to inspect physical documents.

It seems to us that there have been substantial and significant changes made since the public consultation process concluded, but these have been consigned to the obscurity of appendices where they have been difficult to find; nor has it been possible to discover the rationale behind, and justification for, many of these changes. This failure in clear and open communication fatally undermines the integrity of that process as residents cannot know for certain how these proposals affect them and their neighbourhood.

Cycles and scooters, powered or otherwise, have no place on a footpath. Automatically, the pedestrian is relegated to second place. On a daily basis in this area we witness and experience reckless conduct that shows disregard for the safety of pedestrians, including vulnerable individuals; as well as breaching traffic laws and rules of the road, e.g. failing to obey traffic lights, no lights displayed after dark etc. All of this threatens the safety of pedestrians, whether they be old or young, or visually, mobility or hearing impaired. Risk is aggravated by use of mobile phones or earphones while cycling, and failure to light up after dark. A white line down the length of a footpath is not going to solve any of these problems. In fact, it will create a sense of legal entitlement among those using these so-called cycle tracks.

We are unaware of any studies or data collection on the use of footpaths in this area. Was a pedestrian audit ever carried out to ascertain footpath usage? A physical audit of the footpaths does not appear to have been undertaken either to ensure that at all points there is sufficient space for both footpaths and cycle tracks and that both are properly segregated and not merely indicated by a white line.

It is our understanding that, in the movement hierarchy, pedestrians have priority and should always be considered first in any design. In this regard, Dublin City Council appear to require a 2-metre footpath width for pedestrians, as an absolute minimum, with pedestrians given priority throughout the route. Among the stated aims of the proposed schemes is the provision of "improved walking, cycling and bus infrastructure". However, walking seems to have lost its place in the hierarchy when it comes to implementation and both footpaths and cycle tracks, as proposed, are below the regulation widths.

The Preferred Route Option Report of 25 August, at 7.2.2, states that existing green verges with mature trees will be retained, and segregated 1.25m cycle tracks will be provided beside the footpaths on both sides of St. Mobhi Rd. However, the drawings in Appendix D (Arboricultural Impact Assessment Report) appear to indicate eradication of the green verges, presumably to create more space for cycle tracks. Besides damaging the streetscape and posing a danger to the root systems of the trees, this act of vandalism will not increase the width of the cycle track, as cyclists would have to cycle around each tree. In reality, they will ignore the additional track width between each tree and transgress onto the footpath and the verges will have been destroyed in vain.

We cannot comment on how it is proposed to segregate footpaths from cycle tracks in the absence of design proposals. As stated, the footpaths on St. Mobhi Rd. are insufficiently wide to accommodate regulation-width footpaths and tracks, so we would object strongly to anything less than the recommended widths. As for segregation, any ridge or raised barrier would be a trip hazard for all users and, in any case, could not be built across driveways.

It is virtually impossible during the day, because of the heavy volume of traffic, to reverse into one's own driveway. Therefore, residents have to drive straight in, making it necessary for them to reverse out. Currently, the full width of the footpath allows one to reverse slowly while keeping the oncoming traffic in view. Reversing directly into a cycle track on the existing footpath, with cyclists coming at speed in either direction (even if it is designated one-way only) will be an extremely hazardous manoeuvre.

Now that we can ascertain bus arrival times on our phones, and when the improved services are implemented, we will be spending less time standing at bus stops. Consequently, there should be even less need for bus shelters. The existing bus shelter at The Rise does not adversely impact on any residential or visual amenity as it is placed against a high wall and the houses beside it are on high ground and are not, therefore, overlooked. The proposal to locate a bus shelter between Nos 34 and 36 St. Mobhi Rd. will give rise to negative visual impact and increase street clutter as well as denying access to the residents to maintain hedges and railings. It will also adversely affect their residential amenity, privacy and property value; restrict the footpath width; and make it extremely difficult to enter and exit their driveways. No design details are given and, thus we cannot comment on whether there will be illuminated advertisements, additional signage etc. However, we see that bus shelters attract litter and anti-social behaviour and are, therefore, an undesirable addition

to the streetscape and neighbourhood generally. The existing disposition of bus stops is satisfactory. However, if any changes are permitted, we consider it imperative that verges and trees are reinstated where bus stops are removed.

It would appear to us that there is excessive removal of high-value trees, particularly at Glasnevin Boxing Club, Scoil Caitríona, Na Fianna, Coláiste Caoimhín and St. Mobhi Rd./Griffith Ave. junction. "Our" tree between Nos. 30 and 32 St. Mobhi Rd. is marked for removal and replacement on the grounds that it is in poor structural condition. As we're not tree surgeons we cannot challenge this, but we need to be assured that it will be replaced quickly, preferably by a semi-mature London Plane, to be consistent with the overall planting along the road. We value our trees highly. It is a great source of joy for all of us to see the beautiful canopy of trees from either end of the road and we want to keep it that way.

We note in particular that there are apparent discrepancies between the Arboricultural Impact Assessment Report, Appendix A (Tree Schedule) and the drawings in the same appendix. The drawings show more trees for removal than are listed for removal in the Schedule. Which is correct?

The acquisition of land at Scoil Caitríona, Na Fianna CLG and Home Farm grounds to accommodate a double cycle track is excessive, disproportionate and, in reality, unnecessary given that a cycle track is proposed for both sides of the road. Similarly, the acquisition of land at Coláiste Caoimhín for the same reason is also unnecessary. Coláiste Caoimhín is a protected structure, Ref. No. 7746 on DCC's Record of Protected Structures. This protection extends to land lying within the curtilage of the structure, including the boundaries. However, if the proposed land acquisition is permitted, this protection must be respected.

It is not at all clear how the operation of a bus gate at the St. Mobhi Rd./Griffith Ave. intersection can be enforced. If it cannot be enforced, the envisaged improvements in traffic flow cannot be realised.

We understand the rationale for the proposed ban on cars making left turns into Griffith Ave. East from St. Mobhi Rd. when travelling south. However, the alternative route proposed diverts traffic right onto Ballymun Rd. at the triangle, making it two-way, and then turning left into Griffith Ave. East, necessitating the removal of traffic islands, recently installed at considerable expense, for the creation of on-street cycle tracks that are barely used and taking more healthy trees and green space from that particular stretch of road. It should be noted that these recent changes have caused huge delays to traffic travelling north on St. Mobhi Rd.

We are concerned that, if An Bord Pleanála grant the application with conditions, there will be no further opportunity for residents to have input to any subsequent decisions as to the design of bus stops and shelters, cycle tracks etc. Therefore, in all the circumstances, an

oral hearing is required to bring clarity to this process. We also request that An Bord Pleanála Inspectors and officials visit our area during normal working hours to observe the situation on the ground.

This submission is made on behalf of the undersigned and our neighbour, Brian McCormack, 45 St. Mobhi Rd. He is particularly concerned that footpaths are sufficiently wide to accommodate his walking frame and assistance dog safely.

John Deegan & Nóirín Finnegan