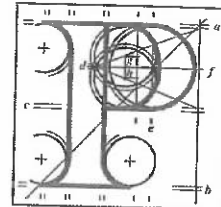


Our Case Number: ABP-314610-22



An
Bord
Pleanála

Kevina McGill
50 Dean Swift Road
Dublin 11

Date: 30 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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

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

14th November 2022

To:
An Bord Pleanála
64 Marlborough Street
Rotunda
Dublin 1
D01V902

From:
50 Dean Swift Rd
Wadelai
Dublin 11
D11 X5H2

AN BORD PLEANÁLA	
LDG-	<u>059117-22</u>
ABP-	_____
15 NOV 2022	
Fee: €	<u>50.00</u> Type: <u>card</u>
Time:	<u>10.05</u> By: <u>hand</u>

REFERENCE: STATUTORY PLANNING APPLICATION FOR THE BALLYMUN/FINGLAS TO CITY CENTRE CORE BUS CORRIDOR SCHEME. 314610 (CASE REF: MA 29314610)

To whom it may concern,

While aware of the need to improve public transport and to re-examine and redesign Dublin Bus Network, I wish to make the following observations on the statutory planning listed above in relation, in particular to **Section 2** of the proposed route for the **Ballymun** arm of the Core corridor especially as currently the bus is the only public transport available in our area.

A. Section 2

There appears to be little consideration in this application given (ch 6) to the traffic implications for the wider area around this core bus corridor: existing traffic problems were not addressed, potential problems have been ignored and there has been a failure to provide an evidence of environmental impact assessments conducted concerning noise, vibration, and pollution on bordering roads

Currently we have "rat run" a situation in our area (Hillcrest/Wadelai estates) for access to Ballymun rd R108. We have addressed this with DCC on several occasions and this situation will be greatly amplified by the proposals in the application due to:

1. The Closure of the right turn from St Canice's rd on to Ballymun (Ch 6)

This restricts local access to Ballymun rd R108 and will greatly increase traffic flow down St Pappin's rd: this was one of the concerns brought up by resident's early in this process and reassurance were given that it would not happen and indeed it was was not present in earlier versions of the preferred route. (Ch 6 Ref 19.117) but now it has reappeared.

2. North Bound Bus Gate on St Mobhi rd R108 (ch4 pg10)

It is proposed in this application to divert traffic at Hart's corner to R136 Finglas road and also to divert traffic along Botanic Road onto Glasnevin hill, Old Finglas rd and then in both cases onto Ballygall rd East and via Griffith Ave (eastwards) R102 to re-join Ballymun rd R108

This presents a wide range of problems for our area:

Firstly R135 Finglas road is already congested due a high volume of regular traffic which is compounded by the traffic generated by St Vincent's CBS school and due to funerals held at Glasnevin cemetery.

Botanic rd to Glasnevin hill is a narrow road containing a bend that passes the Botanic Gardens (that has a high number of visitors which will add to traffic congestion) and Glasnevin hill a steep hill so it is unlikely this route will be able to take the heavy stream of northbound traffic generated at peak times.

In addition here is also a multi-storey development planned at 54 Glasnevin Hill which will further slow on traffic flow at this site.

3. The closure of Ballymun road Northbound

The problems generated by the high volume of traffic diverted through this area will be significantly increased due to the proposed closure of Lower Ballymun Rd where it meets Glasnevin hill This needs to be re-examined and revised so traffic will be allowed to flow in a Northbound direction up Ballymun road.

4. The use of Griffith Ave Eastbound

In this proposal all rerouted traffic will end up on Ballygall rd East and be expected to rejoin Ballymun rd R108 northbound via Griffith Ave R102 (eastbound) but in reality it will use the neighbouring estates of Hillcrest ,Wadelai and St Canice's rd to travel in a east- west direction to access Ballymun road.

5. Additional traffic

In addition the proposal states (4.6.6.1) that there will traffic displacement due the Blanchardstown Core route eastward to the Ballymun section.

6. Effect of Metrolink

There is no reference in this document to effect on Core bus frequency or on traffic flow of the construction of the Collins Ave Metro station that will remove one side of Ballymun rd (southbound) from use during construction, but is likely to divert even more traffic through our estate and down St Pappins rd.

The text on pg 8 of this report (see attached Appendix 1) misrepresents the information received from the public. The pie charts provided show the text of the question the public were asked: if people agree with the idea of a spine strategy "**being explored further**" but the text presented by the NTA ~~text~~ says people agreed "**with pursuing the spine strategy**" Subtle but important difference in the two wordings!

First round public consultation Meetings were then organised for each Core route, the Ballymun core was in the Axis and very well attended.

When the first redesign was posted on NTA websie on 22nd October 2019 it stated the following;

"NTA has produced local brochures for each of 29 areas in the bus network, in both Irish and English. The brochure gives details as to what bus services will be provided for people in the particular area, along with a local map and details of the consultation process.

All brochures are available on the www.busconnects.ie website, **but every household and commercial property will receive a copy of the relevant brochure for that area. That's a total of 650,000 brochures. Delivery of those brochures begins today, and will be completed for all areas of Dublin within 15 working days."**

None of these brochures were to delivered to houses in our area, I rang the NTA on 8th of November 2019 to report this and despite the fact they took my name and address- still no brochure- The closing date for submissions was Tuesday 3rd December 2019 which was 6 weeks and this was too short a window for people to comment especially when they were are not in possession of the information in the brochure and therefore are not aware of the proposals being put forward, so people had no opportunity to go and see the maps ask questions and put in submission This was a widespread problem though the city for other core routes as well.

Public meeting were held in **Hotels** (in eight locations for two days in each (total 16 days) none of which were very accessible to our Ballymun/Finglas area- our one was in the The Alex Hotel, 41-47 Fenian St, which is not even on a direct bus route for us!

- as this was a redesign of the whole network for Dublin it would surely have been better to have one day public meetings in 16 locations all over Dublin and especially in areas like our own that only has one form of public transport - the bus

When I put this to an NTA representative – I was told " Its all on the website" which is common response throughout this process. This very unfair especially

From the above points it is evident that the aspect of our estates will be changed by a constant heavy traffic flow and increased congestion, which will impact on our quality of life and that of our community. There will be decreased local access to amenities and particularly to local schools and it will be fact be more dangerous for older or younger members to walk or cycle through their estates. It will be even more difficult to exit our own houses and estates and in addition the proposed 49 bus route (replacement for the 9 11, 13 buses) which is routed southbound down St Pappins rd will end up bound up in traffic jams and unable to keep to its time table.

B. Section 4 (ch 4 pg27)

This proposal states that this Ballymun core bus corridor will terminate at the junction of R148 Arran Quay/Ormond Quay, currently our bus services 4,9,11,13,and 155 all pass through O Connell Street in the city centre. Arran Quay/Ormond Quay are not in the city centre it is a 1.2 km - 15 mins walk (google maps) to O Connell bridge. The core bus routes are supposed to improve commuting times and the commuting experience, it is not addressed in this proposal how ending up on Arran Quay instead of O Connell St is an improvement in service. There is no doubt that the more links in the commuter chain the longer the journey will be if the NTA want more commuters as they claim to use public transport they will not achieve this with longer commuter times.

Interchange opportunities to other transport links are addressed in 4.6.6 but most of the bus routes mentioned are due to be scrapped, the Metrolink and Dart+West wont exist for a few years and the interaction with the Green and Red Luas lines will be difficult at peak times and will add another link to the commuting chain.

Many redevelopment projects are referenced in 4.6.6.1 and 4.6.6.3 but their impact on this core bus route and on bus frequency is not specified.

The safety of commuters at Arran Quay/Ormond Quay in the winter evenings or at night has not been addressed in this proposal it is not a desirable area to access to obtain a bus home.

C. Comments on Public Consultation process re Ballymun Core Bus scheme

BusConnects is a new system for the whole of Dublin city but it has failed from the outset failed to engage in proper public consultation.

The population of Dublin city is 1,450,701 (CSO, 2022) the NTA have stated that they based their initial plans on a response from 11,000 people (0.75%) pg8 of their initial report.*

This was based on an on line survey send to a random selection of registered leap card holders- which immediately excluded customers paying cash, OAP and those with disabilities and on social welfare -the population who most rely on the bus services.

* Ballymun to City Centre Core Bus Corridor
Emerging Preferred Route
Public Consultation FEBRUARY 2019 4.

to older people, who don't have access to computers or the net and to those who cannot afford data or network connection- it represents a form of discrimination.

A second round of public consultations was due to take place in March 2020 but due to Covid-19 this and a third consultation in November 2020 were cancelled and took place virtually and online. During the pandemic everyone was very concerned and worried-trying to stay safe, in lockdown, schools were closed, working from home, bus frequency and capacity were reduced traffic was non-existent – surely not the best time to have a public commuting survey! It is also very difficult to view all the material effectively on line and there is no provision for explanations or questions and of course the web is no available to all.

Since the lifting of government restrictions no attempts have been made to have open public consultations before submitting planning therefore most people are unaware of the changes being made and the implications that are going to affect their everyday life.

While I understand why this planning proposal has to be so detailed, the language and maps are very technical and need explanation yet nobody from the NTA was available to address local resident's groups and even local representative had difficulty getting information and maps. NTA had not provided a copy of their proposal for public viewing when I visited your offices.

Dublin Bus has recently run ads on their bus relating to good customer behaviour but at no stage in this process have they run ads explaining Bus Connects or inviting the commuting public to take part in the consultation process.

For the above reasons I feel the the NTA have not engaged in appropriate public consultation before submitting this proposal. IF THEY HAD I AND OTHERS WOULD NOT HAVE TO PAY TO HAVE OUR OBJECTIONS HEARD.

With Thanks

Kevina M. Gill

Kevina Mc Gill

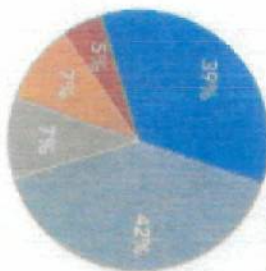
Public Response to the Strategies Was Overwhelmingly Favourable

The NTA carried out an initial public consultation on the general principles of the bus network redesign in June 2017. An online and paper survey seeking public input on Strategies 2 and 3, and more generally on the willingness to interchange, was answered by almost 1% of the population of Dublin, a very high rate by the standards of public transport surveys.

The overwhelming majority of over 11,000 respondents strongly favoured the strategies presented. 87% agreed with pursuing the spine strategy, and 85% were positive about the orbital strategy. 81% agreed that it is reasonable to ask people to change buses if it gets them to their destination sooner.

Following on this positive feedback, WTA decided to proceed with the development of this plan, based on the strategies outlined above.

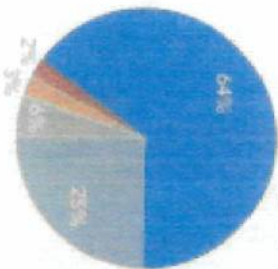
"We can ask people to change vehicles (buses or trains) once during a trip, if those people reach their destination sooner."



Total Responses	
4,634	Strongly Agree
5,039	Agree
828	Neutral / No Opinion
323	Disagree
578	Strongly Disagree

NTA Public Survey (June - Aug 2017)

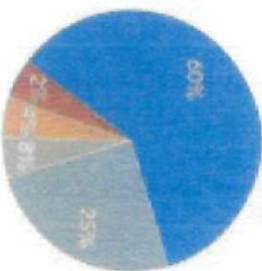
Do you think this idea (consolidating radial service into spines) should be explored further?



Total Responses	
7,321	Definitely
2,891	Possibly
710	Neutral / Not Sure
336	Probably Not
241	Definitely Not

NTA Public Survey (June - Aug 2017)

Do you think this idea (reallocating some radial service to orbitals) should be explored further?



Total Responses	
6,860	Definitely
2,992	Possibly
948	Neutral / Not Sure
381	Probably Not
158	Definitely Not

NTA Public Survey (June - Aug 2017)

