

Paul Mahon
On behalf of South Georgian Core Residents Association
4 Fitzwilliam Street Lower
Dublin 2

Date: 18 July 2022

Re: BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme
Co. Dublin

Dear Sir,

An Bord Pleanála has received your submission in relation to the case mentioned above and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of An Bord Pleanála when they have been processed by the Board.

For further information on this case please access our website at www.pleanala.ie and input the 6-digit case number into the search box. This number is shown on the top of this letter (for example: 303000).

Yours faithfully,

pp. K. McGarrigan

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

BL50A

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Applicant:

Paul Mahon on behalf of:

South Georgian Core Residents Association

4 Fitzwilliam Street Lower, Dublin 2

Email: [REDACTED]

Board at An Bord Pleanála (Strategic Infrastructure Division)

64 Marlborough Street,

Dublin 1

Reference: Bus Connects – Belfield Blackrock Scheme

Case reference: ABP-313509-22
Dublin City Council

Date: 12/07/2022

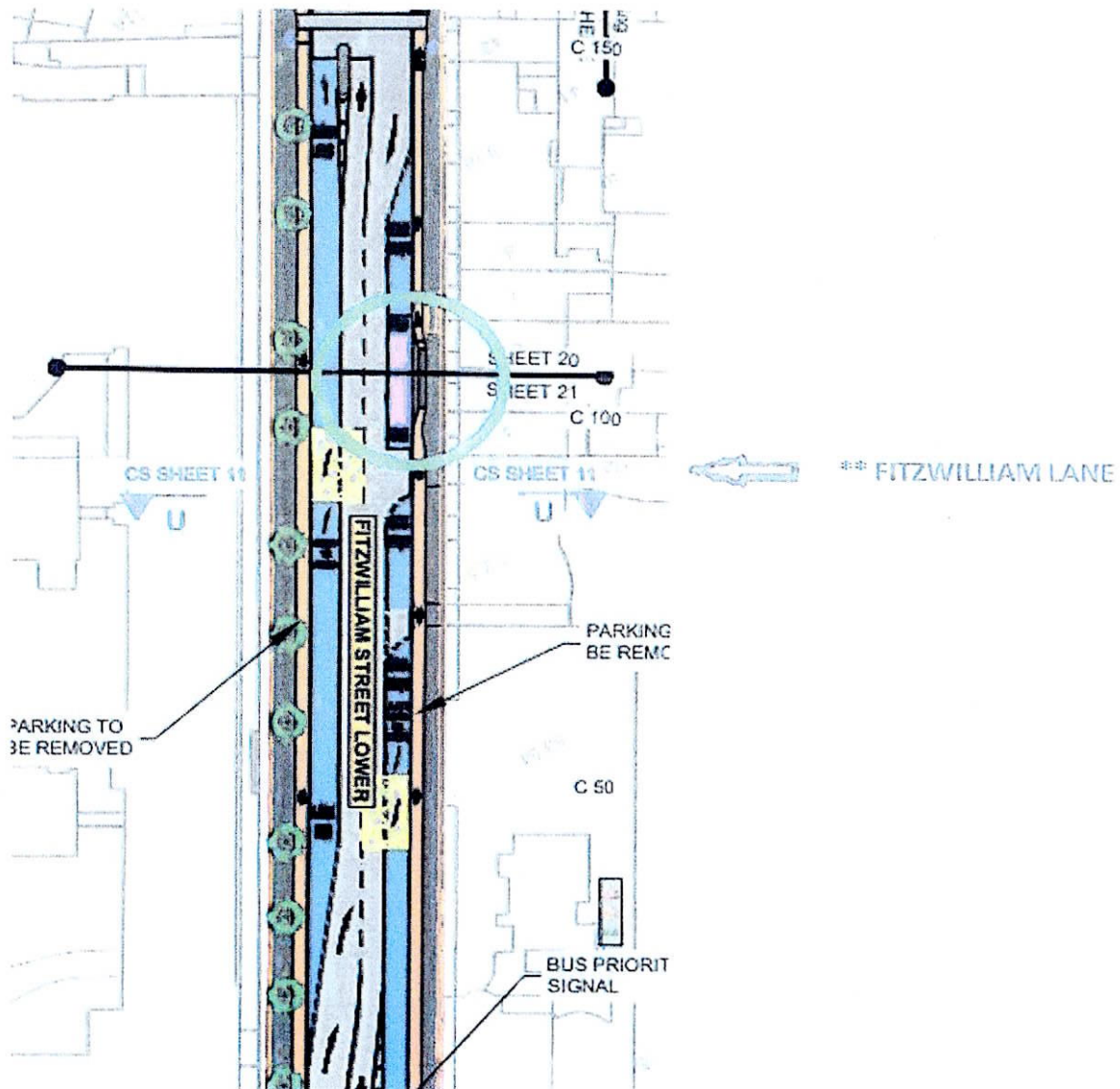
Submission / observations:

**1. Safety Concerns – Bus Stop re-location – Fitzwilliam Street Lower (Inbound)
– Blind Spot created**

The proposed new location for the new Bus Stop is at the junction of Fitzwilliam Street Lower & Fitzwilliam Lane.

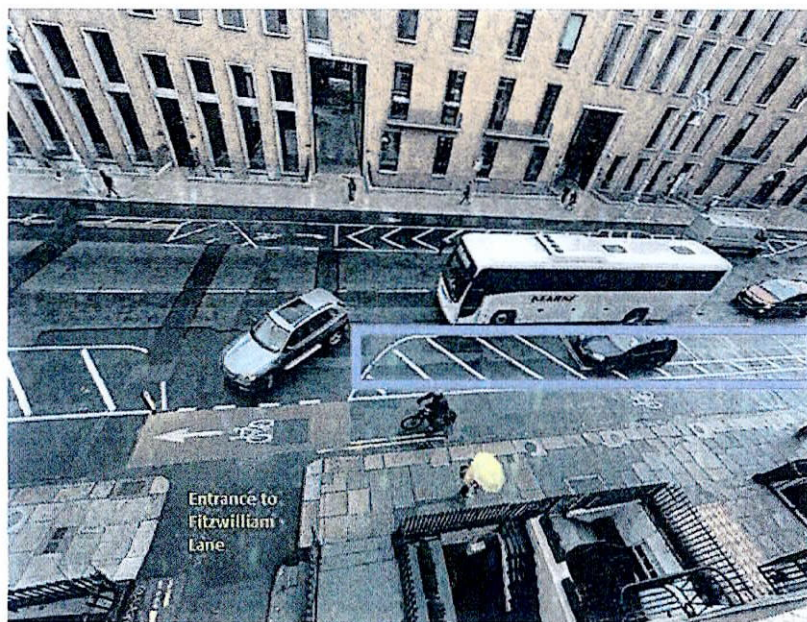
It is replacing the current no parking/chevron area which was installed to protect cyclists & pedestrians when the existing cycle lane was opened.

From Sheet 21 of 24 – Bus Connects General Arrangement Drawings:

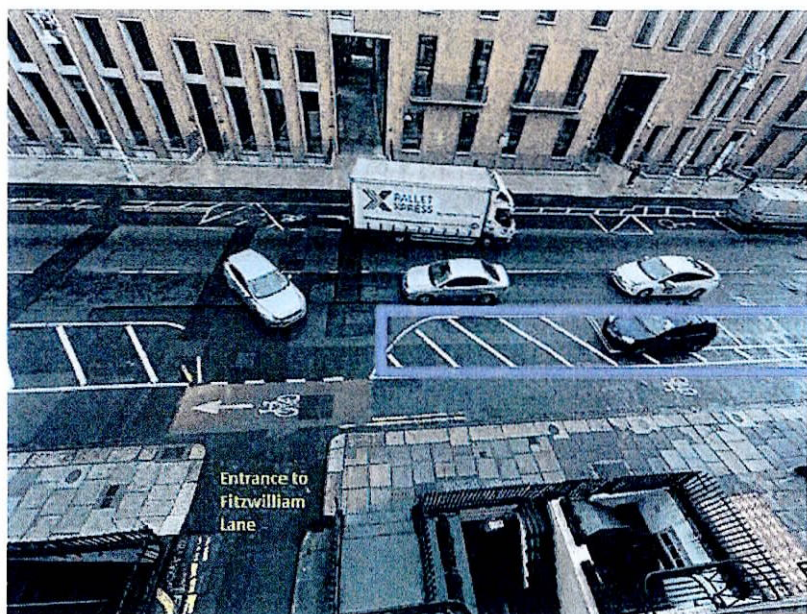


To quote the Road Safety Authority awareness campaign – *“if you can’t see the driver, the driver can’t see you”*

Below photos mark the Proposed Bus Stop location which would replace the current chevron no parking area (plus car spaces). This will create an extremely dangerous blind spot for traffic turning into Fitzwilliam Lane from car traffic in both directions when busses are stopped. Motorists will be unable to see both cyclists and pedestrians.



PROPOSED BUS STOP



Proposed Bus Stop

The existing Inbound Bus Stop on Baggot Street Lower is in a safer location away from concealed busy traffic junctions. It is also more central to commercial businesses and on a wider street. Safer for both cyclists and pedestrians.

On the other hand, Fitzwilliam Lane / Fitzwilliam Street Lower junction is an extremely busy access road, servicing:

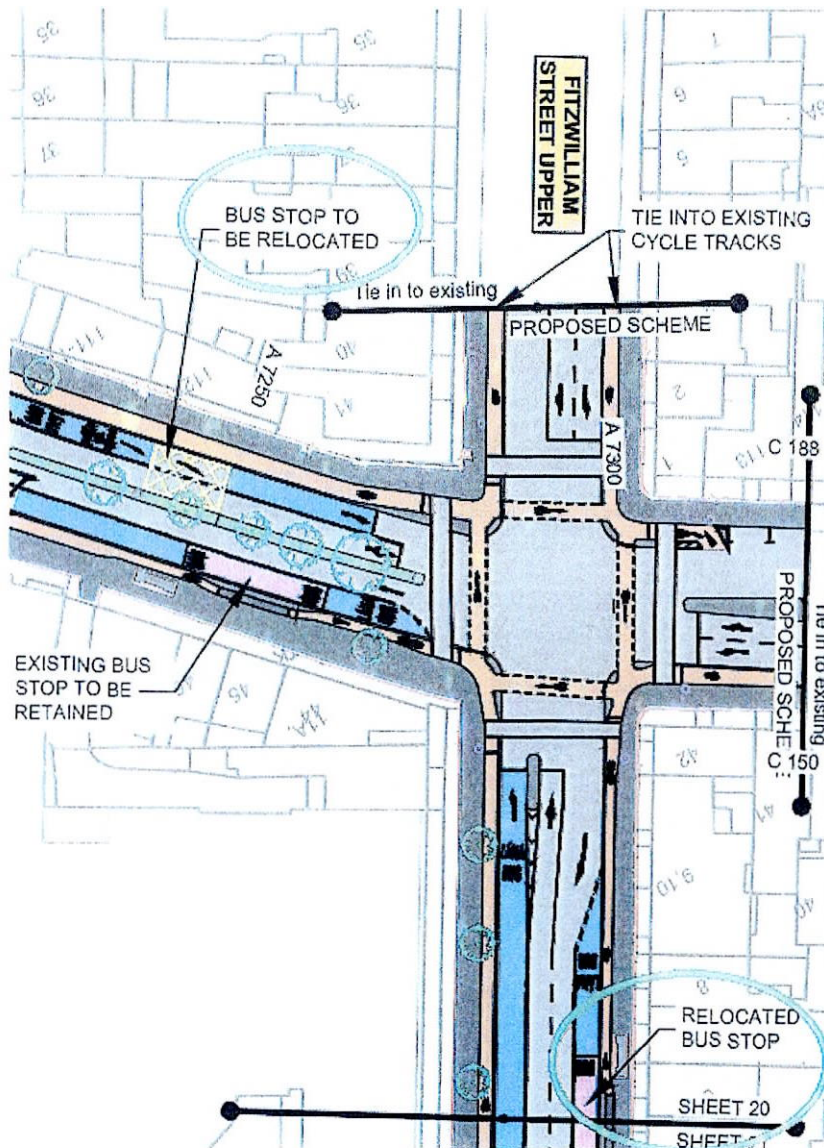
- a. ESB/Electric Ireland Multistorey Car Park
- b. Surface Car Parks – multiple private office car parks
- c. Merrion Hotel Car Park
- d. McGrattan's Bar
- e. Taxis – popular route for taxis
- f. Loading – commercial access to multiple offices & businesses (rear of Baggot Street Lower & Merrion Square South)

Current Normal Traffic:



In addition the new location on Fitzwilliam Street Lower creates a greater distance from the nearest pedestrian crossing – which is counter to the reports own recommendation of having bus stops located as near as possible to pedestrian crossings for the safety of commuters.

From Sheet 21 of 24 – Bus Connects General Arrangement Drawings:



In summary, the moving of the inbound bus stop from Baggot Street Lower to Fitzwilliam Street Lower creates many safety issues with no benefits, therefore should not proceed.

2. Footpaths

[a] Bus Stop re-location

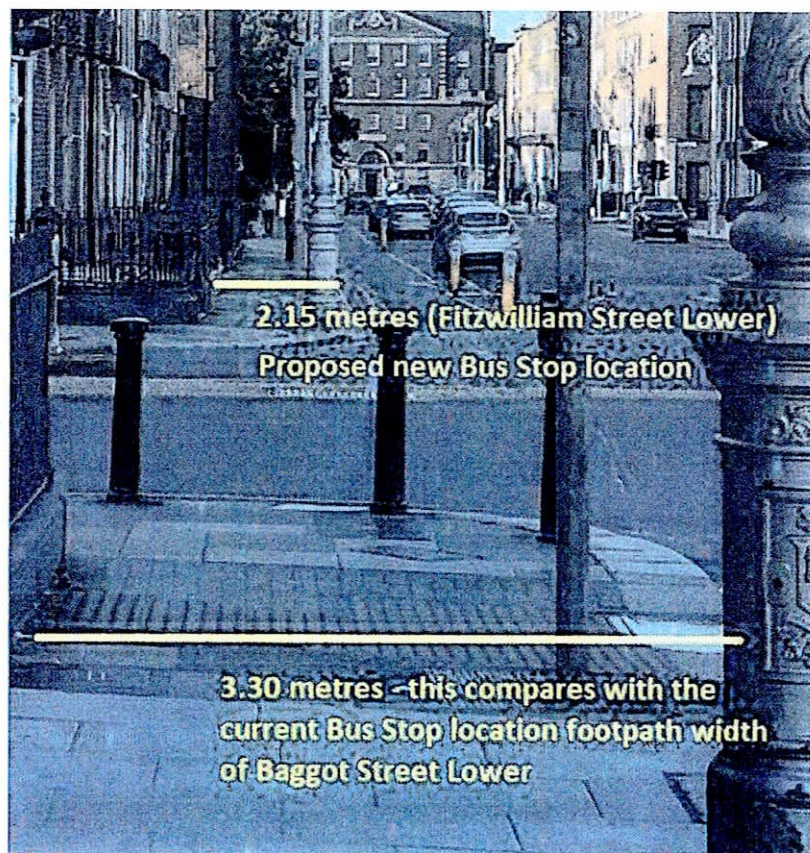
Current Inbound Bus Stop - Lower Baggot Street footpath width: 330cm

Proposed relocated Inbound Bus Stop – Fitzwilliam Street Lower footpath width: 215cm.

This is over 1 metre narrower and one of narrowest footpaths in the area. The street itself is too narrow to widen footpaths and allow for all the planned traffic lanes.

Remembering this street plan is to have 2 car carriageways, 2 bus lanes, 2 bicycle lanes and the 2 existing pedestrian footpaths – removing all parking.

Fitzwilliam Street Lower is less suitable than the current location of Lower Baggot Street for commuters to wait for buses as it will obstruct pedestrians.



[b] Narrowing of existing footpaths

The proposed narrowing of Baggot Street Lower footpaths should be avoided again for the safety of pedestrians. This is a very busy pedestrian area, with many large office blocks including Department of Health and nearby ESB HQ along with the local primary school Scoil Chatriona.

The city streets have been benefiting from wider footpaths introduced during Covid. This would be a backward step.

Baggot Street Lower also forms part of the extremely busy pedestrians routing to the Aviva Stadium from the city centre/Luas. On both match days and concert nights this street see footfall hugely increase. Any narrowing of pavements on this route could cause safety concerns to pedestrians overflowing onto the cycle and bus lanes.

DCC and NTA themselves record the footfall of the Baggot Street/Wilton Terrace route given its prominence as part of their monitoring of Dublin's main streets. (Using their PYRO-Box counters 24/7) These records confirm its popularity with continued high footfall, particularly from 7am to 7pm weekdays with an average hourly high of passer-by's being recorded of 600/700 an hour on weekdays. On event days in the area, these passer-by numbers can double.

3. Bus Shelters – South Georgian Core

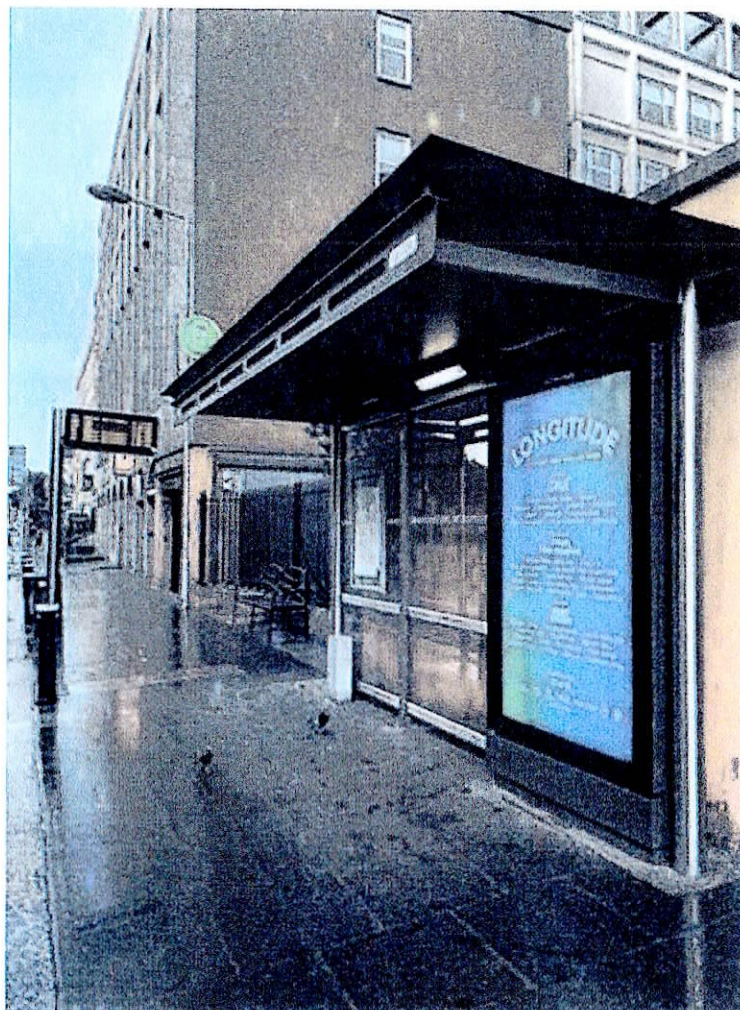
Previously Bus Shelters have not been used in the South Georgian Core, particularly fronting Georgian Buildings.

Two shared landing bus stops are now proposed in the plan:

- a. Fitzwilliam Street Lower - Inbound
- b. Baggot Street Lower – Outbound

These are entirely inappropriate to historical Georgian Dublin.

We in the SGCRA are trying to remove inappropriate street furniture and signage in the South Georgian Core. Their installation would be a regressive step aesthetically.



4. The Georgian Mile – South Georgian Core

Buses (particularly double decker) and Bus Stops should be avoided along the famous Georgian Mile.

Adjacent streets like Mount Street Lower and the current routing of Baggot Street are more suitable alternatives than routing this high frequency bus corridor down this historic street (frequencies of up to every 3 minute).

The infamous mile long red brick Georgian streetscape will be greatly impacted visually with the movement and in particular stopping of such a high volume of buses.



The Environmental Impact Assessment Report (EIAR) did not take this into account when comparing their N1 and N2 options of the alternative route via Mount Street rather than Baggot Street.

Environmental Impact Assessment Report (EIAR) Volume 2 of 4
Main Report

JACOBS
ARUP SYSTRA

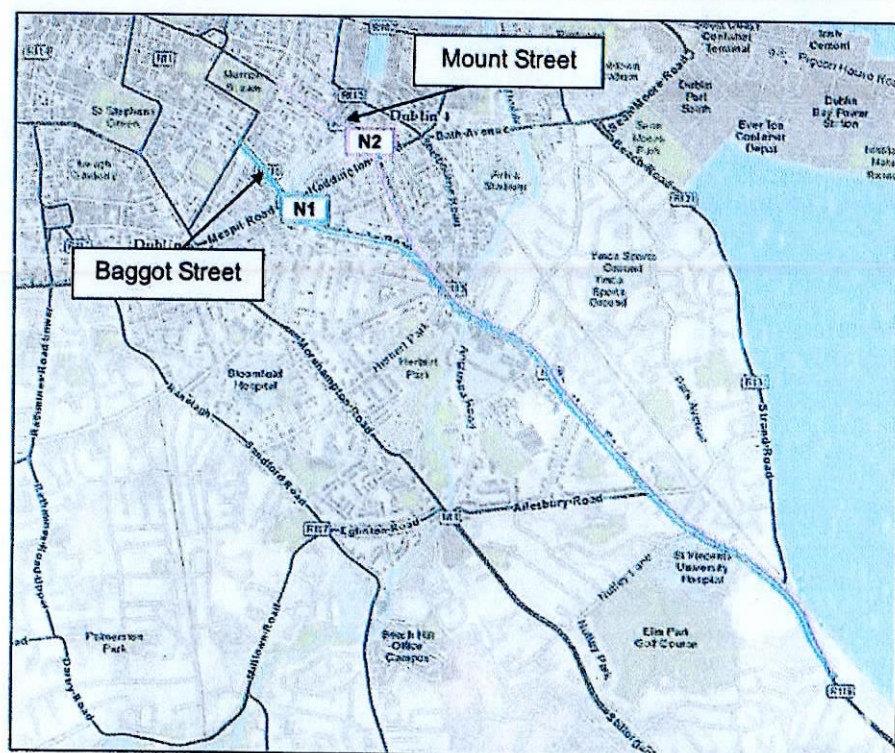


Image 3.9: Sub-section SAS1 Route Options extracted from 'Dún Laoghaire to City Centre Core Bus Corridor Options Study - Feasibility and Options Assessment'

"15.3.5.1 National Monuments There are no national monuments or sites under preservation order within or in the vicinity of this section of the Proposed Scheme."

This fails to recognise the historical and architectural significance of the South Georgian Core and the Georgian Mile. Indeed, it violates DDCs own city plan.

The Dublin City Development Plan has zoned this area so Z8 Georgian Conservation Area.

Land-Use Zoning Objective Z:8

To protect the existing architectural and civic design character, and to allow only for limited expansion consistent with the conservation objective.

This has not been reflected in the EIAR and if taken into consideration, the N2 Mount Street route would be more suitable.

Also taking Mount Street route would eliminate the requirement to narrow the existing footpaths on Baggot Street, an existing busy pedestrian route.

5. Road Layout – Dual Carriageway style routing

Below is the 4 x 2 layout that Bus Connects has created as the standard layout for the entire route.

The Environmental Impact Assessment Report (EIAR) did not consider the option of dividing Buses or Cycling on alternative routes. They have created a highway of all modes of transport been routed on a single route.

“During the Emerging Preferred Route stage, identification of alternative cycle routes separate to the core bus corridor emerging preferred route were not considered appropriate for this scheme as they were proposed as part of each of the route options identified.”

We feel this creates far too much pressure on one single route and therefore the roads selected are unfairly taking the burden of traffic.

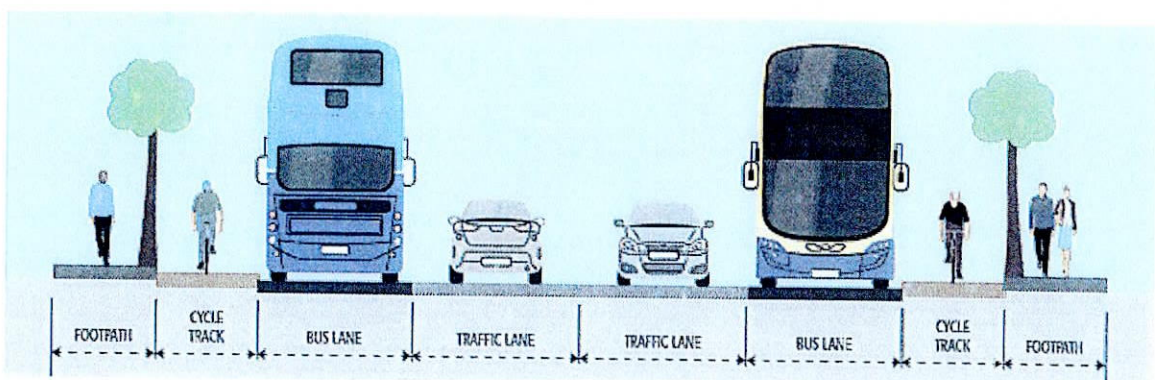


Image 4.8: Typical BusConnects Road Layout (PDGB)