

Merrion Road Residents Association  
c/o Richard McDonald  
236 Merrion Road  
Merrion, Dublin 4  
DO4CT96

**Date:** 14 July 2022

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

Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. 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 in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

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

HA02A

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An Bord Pleanála  
Strategic Infrastructure Division

**AN BORD PLEANÁLA**  
LDG- 005 08179-22  
ABP- 313509-22  
**11 JUL 2022**  
Fee: € \_\_\_\_\_ Type: \_\_\_\_\_  
Time: \_\_\_\_\_ By: \_\_\_\_\_

Merrion Road Residents'  
Association  
c/o Richard McDonald  
236 Merrion Road  
Merrion  
Dublin 4 D04 CT96

Dear Sir/Madam,

The Merrion Road Residents' Association wish to lodge objections to elements of the planning application made by the National Transport Authority (NTA) in respect the proposed Blackrock to Merrion Core Bus Corridor (now incorporated into the Belfield/Blackrock to City Centre Core Bus Corridor Scheme)

The primary focus of the Residents' Association is the short stretch of road between Merrion Gates and Herbert Avenue/St Vincent's Hospital – generally sheets 10 and 11 in the relevant planning application documentation lodged with An Bord Pleanála refer.

This area represents the historic residential heart of Merrion village<sup>1</sup>. The Association consider that elements of the Proposal to be disproportionately destructive in terms of its impact on the Residential Conservation Area/Protected Structures – and made submissions in this regard under the Public Consultation Process.

#### NTA/Bus Connect Proposal at Merrion village

	NTA/Bus Connects Proposal
1. Road Layout Inbound	<ul style="list-style-type: none"><li>3-lane carriageway between the Merrion Gates Junction ceasing at the Elm Court Apartments.</li><li>Signal Controlled Priority (SCP) for inbound buses</li></ul>
2. Removal of Mature Trees	<ul style="list-style-type: none"><li>Destruction of all 4 mature trees inbound (3 Category A; 1 Category B).</li><li>Destruction of 2 mature trees outbound (1 Category A; 1 Category B)</li></ul>
3. Impact on Protected Structures	<ul style="list-style-type: none"><li>Compulsory take of part of front gardens of protected structures</li></ul>
4. Car Parking	<ul style="list-style-type: none"><li>Removal of existing car parking outbound</li><li>Provision of a 3-car parking bay outbound at Nos 266-270 Merrion Road</li><li>Proposed parking bay outbound south of Merrion Gates</li></ul>
5. Bus Stops	<ul style="list-style-type: none"><li>Removal of existing inbound stop (no 477)</li><li>Removal of existing outbound bus stop (no 423)</li></ul>
6. 1930s 'IMCO' seats	<ul style="list-style-type: none"><li>Removal and non-retention/no relocation</li></ul>
7. Telford Gate	<ul style="list-style-type: none"><li>Dismantling and Repositioning</li></ul>
8. Bloomfield Gate	<ul style="list-style-type: none"><li>Dismantling and Relocation</li></ul>

<sup>1</sup> Not to be confused with the Merrion Village Apartment complex opposite St Vincent's Hospital



As noted above, it is considered that elements of the Proposal are disproportionately destructive in terms of its impact on the Residential Conservation Area/Protected Structures. **The Association requests that An Bord Pleanála (i) take account of the following proposed solutions and observation as they relate to items 1-6 above and (ii) does not grant permission for the NTA/Bus Connects proposal for this section of the proposed Bus Corridor until the issues raised are fully reviewed.**

### **1. Proposed Road Layout Inbound**

The Residents' Association is strongly of the view that the proposed 3-lane carriageway inbound (together with the associated priority signalling for inbound buses) from Merrion Gates to the Elm Court Apartments should be continued beyond the Apartments to the nearby junction at Estate Avenue.

Such extension should:-

- Negate the need to remove at least three (3) of the four (4) mature trees targeted for destruction;
- Negate the need for any alteration to the existing boundaries of protected structures – thus leaving the current architectural consistency of the streetscape (particularly in terms retaining the boundary 'balance' of the protected Pembroke Estate cottages at 153 and 151 Merrion Road with those at 149 and 147) intact.

**This possible alternative was submitted to the NTA as part of the Public Consultation Process. While the point as raised was included Reports of the Public Consultation Submissions it was not specifically addressed in the NTA response.**

Given that the bus stop (no 477) on this section is to be removed, it is not considered that extending the 3 lane/bus priority section by a very short distance (Elm Court Apartments to Estate Avenue) would materially impact on traffic flows. (Indeed it could be argued that the provision of more 'bus priority' sections of road rather than completely separate bus lanes might encourage more city centre bound private motorists onto public transport.)

Another potential alternative would be to have back-to back bus lanes in opposite directions along this inbound/outbound stretch of the Merrion Road (similar to what is being proposed between Ailesbury Road and Shrewsbury Road) with the objective of ensuring no destruction of healthy mature trees and no impact on the original boundaries of protected structures between Herbert Avenue and Merrion Gates.

**The Association requests that An Bord Pleanála require NTA to examine the options outlined above - and if the NTA is not persuaded as to their merits, it must demonstrate how the proposed solutions would be seriously injurious to the functioning of the Bus Connects project.**



## **2. Removal of Mature Trees**

The current Proposal requires the destruction of all four (4) mature trees between Merrion Gates and Estate Avenue (inbound) and for the destruction of two (2) mature trees in the vicinity of No 266- No 270 Merrion Road (outbound). This is a very short stretch of road through a Residential Conservation Area. As such these mature trees - which have good 'crowns' - enhance the residential environment both visually and in the context of bird/wildlife, carbon absorption etc.

**Mature Trees - Inbound:** As noted above, it is considered that the extension of the 3 lane/bus priority layout inbound from Elm Court Apartments to Estate Avenue would obviate the need to destroy at least 3 of these 4 very mature trees. It is noted that all of the trees are categorised in the Bus Connects planning application as being of Category A or Category B (i.e. good, healthy high-quality specimens).

**Mature Trees - Outbound:** The destruction of two (2) mature trees - both classed as good, healthy, high-quality specimens (1 Category A; 1 Category B) - is apparently being proposed in order to facilitate the provision of a 3-car parking bay. A parking bay in this location should be sized so as not to impact on the mature trees.

Note: Some alternative proposals regarding the provision of car parking are included under section 5 below.

**It is requested that An Bord Pleanála require the NTA to address the options/issues outlined above with a view to devising a formula that does not entail the destruction of six (6) mature and healthy trees in a very short stretch of road to the detriment of the Residential Conservation Area and the local environment.**

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## **3. Impact on Protected Structures**

Any change to the existing boundaries of Nos 151 and [153 Merrion Road](#) would compromise the architectural symmetry of the Estate Avenue (formally Estate Cottages) enclave of protected structures. Originally Nos 147-153 Merrion Road were numbered 1-4 Estate Cottages. The proposal creates a mis-alignment between the boundaries of Nos 153 and 151 and that of Nos 149 and 147. This point was raised in the context of the Public Consultation Process but not specifically addressed by the NTA

As noted above, it is considered that the extension of the 3 lane/bus priority layout inbound from Elm Court Apartments to Estate Avenue would obviate the need for any alteration to the existing boundaries of protected structures - thus leaving intact the current architectural consistency of the streetscape (particularly in terms retaining intact the boundary 'balance' of the protected Pembroke Estate cottages at 153 and 151 Merrion Road with the 'sister' cottages at 149 and 147).

**The Association requests that An Bord Pleanála reject the proposal to compulsorily acquire and alter the boundaries of Nos 153 and 151 Merrion Road.**



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#### 4. Bus Stops

The Proposal requires the removal of both the existing inbound stop (no 477) and the existing outbound bus stop (no 423) from the historic residential section of Merrion village.

The new outbound bus stop for residents will therefore be to the south of Merrion Gates ( a repositioning of the current no 424 Bus Stop).

Crossing the Merrion Gates junction southbound is extremely dangerous for pedestrians given the combination of both right and left turning traffic from the Merrion Road and outbound traffic from the Strand Road. In the case of the latter, pedestrians are further hampered by a bend in the road/line of sight/speed of traffic.

In addition to the safety aspect it is to be noted that under the current NTA proposals there is a significant distance between Bus Stop No 422 (opposite St Vincent's Hospital) and the proposed repositioned bus stop no 424 to just south of Merrion Gates. This would appear contrary to the '*best practice guiding principles*' cited by NTA/Bus Connects in relation to the consistent spacing of bus stops – particularly when such extended spacing is through a residential area.

**In the context of pedestrian safety, it is requested that An Bord Pleanála enquire from the NTA whether it is feasible to place an outbound bus stop in or around Nos 266-270 Merrion Road - i.e. instead of the proposed 3 car parking bay and subject to the retention of the two mature trees. The original outbound bus stop (in the 1960s) was in fact in this location (not the current position of Stop No 423). If this is feasible, then the proposed stop to the south of Merrion Gates may not be required.**

#### 5. Car Parking

It is noted that existing parking along the outbound lane (that currently facilitates between 12-15 vehicles) is to be removed to be replaced by the provision of a 3-car parking bay adjacent to Nos 266 - 270 Merrion Road

The provision of this car parking bay at the expense of the destruction of two healthy, mature trees was raised with NTA/Bus Connects during the public consultation phase. In response it was indicated that '*in the case of parking bays on the outbound side of Merrion Road, replacement trees are proposed for any loss of trees*'

This misses the point – at least in this location. The parking bay should be sized so as not to impact on the decades' old mature trees – which are healthy and with good 'crowns'. Such destruction for 3 cars is disproportionate. Replacement trees cannot be 'like for like'

The parking bay should be reduced to a 1- 2-car bay if this would negate the need to destroy the two mature trees.



Consideration could be given to having additional 1 or 2 car parking bays positioned on the outbound route between No 246 – 264 Merrion Road if feasible (without impacting on existing mature trees).

Furthermore it would appear that an additional parallel parking bay could be provided on the inbound side of the Merrion Road in front of Elm Court Apartments as the bus stop (no 477) will be removed and there is a significant grass verge to facilitate a new footpath around any new parking bay. The adjacent mature tree should not be impacted and the current line of sight for those exiting Elm Court Apartments should not be adversely impacted given the removal of the Bus Stop (and if the parking bay is made as 'deep' as practicable).

**The Association requests that An Bord Pleanála require the NTA to address the options/issues outlined above with a view to revising the proposal so as to retain the two healthy mature trees while also potentially providing for additional parallel parking (even in circumstances where the proposed bay at Nos 266- 270 was repurposed as a Bus Stop – see preceding section 4,)**

## **6. IMCO Concrete Seats**

The 3 'built-in' concrete benches were part of the IMCO cleaning and dying works on the Merrion Road. The extension of the original building by the construction of a steel framed stair tower encased in concrete and glass (English Architect Oliver Percy Bernard) represented one of the most interesting buildings to be erected in the 'international style' in Dublin in the 1930s. As with so many buildings of note in Dublin, the IMCO 1930s building was demolished rather than being conserved.

While the benches are recognised of being of '*local interest*' in the NTA/ Bus Connects documentation, they are not identified for retention or relocation in the current proposal.

It is considered that these benches should be retained - ideally in their current location but if that is not feasible in a suitable adjacent location (with a suitable information stand showing photos of the IMCO building).

**The Association requests that An Bord Pleanála reject the proposal to remove and destroy the 'IMCO' benches and that the NTA be asked to either retain them in situ or identify a potential suitable site for their relocation within the general area of the old IMCO complex.**

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## **Conclusion:**

It is appreciated that the Bus Connects project is extremely complex with many competing elements/interests. Seeking to retrofit bus and cycling infrastructure into constrained urban areas will give rise to changes to the status quo.

However it is also considered that established residential communities and their immediate long-established environments must be accommodated to the greatest extent possible - and their interests balanced against the 'ideal' if one was simply looking at a public transport scheme in isolation - e.g.



is target of 100% cycle lanes really proportionate if it is at the expense of existing homes, very mature trees, amenities etc. - would 90% - 95% be that detrimental? Would more 'bus priority' traffic signalling sections along routes into the city centre (particularly within the Dublin City Council area) potentially encourage a proportion of existing private motorists to switch to the public transport system?

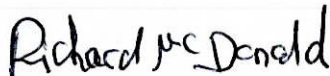
The Association is of the strong view that the impact of the NTA proposal on the Residential Conservation Area, protected structures and natural environment along the short stretch of road between Merrion Gates and Herbert Avenue – i.e. historic Merrion village - is disproportionate and destructive. Specifically:-

- the proposed destruction of healthy mature trees in the heart of Merrion village is to the overall detriment of the residential area – not only impacting on the character of the community but also destroying bird/wildlife habitats (and potentially impacting on traffic pollution mitigation without the trees to sequester carbon dioxide/ emit oxygen).
- the proposed changes to the existing boundaries of Nos 151 and [153 Merrion Road](#) would compromise the architectural symmetry of the Estate Avenue (formally Estate Cottages) enclave of protected structures. Originally Nos 147-153 Merrion Road were numbered 1-4 Estate Cottages. The proposal creates a mis-alignment between the boundaries of Nos 153 and 151 and that of Nos 149 and 147

**The Merrion Road Residents' Association requests that An Bord Pleanála consider the issues/suggested solutions outlined in sections 1- 6 above in their consideration of the NTA/Bus Connects Planning Application as it impacts on Merrion village.**

**Most specifically An Bord Pleanála is asked to consider the extension of the proposed 3-lane carriageway inbound from Merrion Gates to the Elm Court Apartments (together with the associated priority signalling for inbound buses) beyond the Apartments to the nearby junction of Estate Avenue as it is considered that this would enable at least three mature trees to be saved from destruction and obviate the need to alter the boundaries of protected structures.**

Yours sincerely



Richard McDonald

Merrion Road Residents' Association

11<sup>th</sup> July 2022

**MERRION ROAD RESIDENTS' ASSOCIATION**

**SUBMISSION TO AN BORD PLEANÁLA RE: NTA BUS CONNECTS**

**Merrion Gates – Herbert Avenue**

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MERRION DUBLIN 4

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