

Maura Moore & Joseph O'Reilly
106 Pembroke Road
Ballsbridge
Dublin 4
D04 W8H7

Date: 18 July 2022

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

Dear Sir / Madam,

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,


Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

BL50A

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106 Pembroke Road
Ballsbridge, D04 W8H7
Dublin 4



The Board at An Bord Pleanála
Strategic Infrastructure Division
64 Marlborough Street
Dublin 1
D01 V902

09 July 2022

Re: Objection to the Belfield / Blackrock to City Centre Core Bus Corridor Scheme (the Proposed Scheme)

Case reference: **HA29N.313509.**

We, the undersigned, object to the NTA Proposed Scheme as it relates to **Pembroke Road** where 106 Pembroke Road is our Principal Primary Residence.

In the first instance we draw your attention to The National Transport Authority (NTA) application under section 51(2) of the Roads Act 1993 (as amended) to An Bord Pleanála for approval in relation to a proposed road development consisting of the construction of the Belfield Blackrock to City Centre Core Bus Corridor Scheme www.belfieldblackrockscheme.ie. The application was made to An Bord Pleanála on 6th of May 2022. An application for confirmation of the associated Compulsory Purchase Order under Section 76 of, and the Third Schedule to, the Housing Act 1966 (as amended) was submitted to An Bord Pleanála on 13th May 2022.

It is with great dismay once again therefore that we must write (previously to NTA Busconnects) to voice our household's opposition as residents of Pembroke Road, in the strongest possible terms to the Proposed Scheme and routing via Pembroke Road as a proposed designated core bus corridor. If implemented, the Scheme will see Pembroke Road convert to a street similar to the cycle way along one side of Fitzwilliam Square (also part of the Georgian mile). In effect there will be footpath, cycleway, residents' cars, then buses and 'some' cars travelling on each side of the road. Buses will be travelling along the road *every 3 minutes*, with more than 100 buses per hour through a prime and prized heritage area of Dublin City, that is Pembroke Road.

We must question if officials/NTA Busconnects Executive have ignored our and other citizens/public and private bodies submissions from the various Consultative stages of the public engagement process. And specifically relating to the obvious environmental destruction coupled with mass industrialisation of residential neighbourhoods such as Pembroke Road part of the Georgian mile close to government buildings and St Stephens Green. The proposed impact on Pembroke Road and

Upper Baggot Street, if the Proposed Scheme in its current form is allowed to go ahead, would be catastrophic and irreversible and all for perceived short-term gain.

We, together with residents and businesses of Pembroke Road and Baggot Street traders are frankly horrified and aghast at the lack of foresight and might we say flawed NTA (and advisers) thinking underpinning the routing of the central spine/ core bus corridor Belfield/Blackrock to City Centre through Pembroke Road which if executed would result in a bus running in each direction along Pembroke Road every three minutes. And translating to more than 100 buses per hour through a prime and prized heritage area of Dublin City which also serves as a prime pedestrian gateway to some 60,000 sporting/ concerts/event goers at Aviva Stadium and the RDS as well as attracting significant numbers of international tourists who enjoy the heritage and ambience of the area on foot. This erosion of our culture and habitat with a core bus highway infrastructure cannot be deemed progress for our community or indeed for our capital and its citizens, nor is it sustainable.

Post pandemic, many large corporate entities/institutions (domestic and FDI) and SMEs in Dublin city and its surrounds have already embraced remote hybrid and agile working which government advocates and which with technology advances continues to embed. In this part of the city, **pedestrians and cyclists** are the dominant commuters which further erodes the design proposals of the Proposed Scheme which fall foul of technology trends, including car transportation facing massive disruption as an industry. It is our considered contention that the bus corridor network if implemented in its current guise will be obsolete within five years, if not earlier. And the **irreversible and brutal impact on neighbourhoods** such as ours will be a travesty of design and planning which is why you are seeing the extent of genuine opposition by concerned citizens and traders to the Proposed Scheme including current objections and observations to NTA Application to your Board.

Good governance and **transparency** are a requirement of all pillars of society, government, business and community. Yet from the outset there was no public announcement by the NTA of the proposal to destroy neighbourhoods, historic property, villages, communities by removing boundaries, trees, gardens of protected structure, etc. Impacted residents and businesses alike only learned in 2019 by hearsay of cbc bus corridor proposals from those whom NTA reached out to engage with on compulsory purchase proposals.

We urge the Board of An Bord Pleanála to respect and accept that citizens and business aka 'communities' such as ours (Pembroke Road Association and Baggot Street traders) continue to have well founded grave concerns for their local neighborhoods which require a radical further scoping of the national 'one size fits all' strategic infrastructure solution for problems that cbc Busconnects proposes to address, as a key consideration into independent decision making by An Bord Pleanála regarding the Proposed Scheme.

We must reiterate that we fail to see any merit or pragmatism in designating the core central spine of Pembroke Road as proposed under the NTA Application and the negative impact for the local community of residents, heritage and tourism of the area and traders' sustainability are enormous. The direct route from UCD into Stephen's Green is also the traditional route of Donnybrook/ Leeson Street. Why not continue this established pattern? Upper Baggot Street is intact as a 'high street,' and works, as it always has, as the central spine of the Pembroke Neighbourhood. Moreover, the most *direct* route into the city centre from Blackrock and Dun Laoghaire is along Northumberland Road as history dictates.

Finally, we would like to emphasise that the Proposed Scheme and the specified cbc Busconnects design for Pembroke Road of having the cycle lane between the footpath on each side of Pembroke

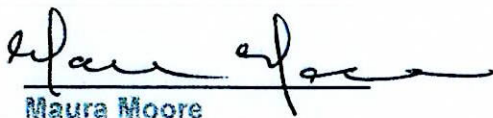
Road and adjacent car parking next to the bus lanes is not only not fit for purpose, but it is hazardous to both road *and* footpath users and is seriously misguided for the following reasons:

1. It makes it totally unsafe for car owners (residents) and visitors to get to their vehicles due to what is expected to be a constant stream of bicycles between the footpath and the car parking lane. All over the city - along the canal for example - there is proof of how fast unfettered cyclists can travel.
2. Cyclists have no reason to slow down or stop to allow people, especially those with small children, shopping etc, to access their cars on Pembroke Road. Indeed it is impossible for cyclists to do so as there will be other cyclists coming up behind them.
3. The dedicated cycle lane(s) on either side of the road will undoubtedly also be used by riders of electric bikes, electric scooters, etc, which go even faster than ordinary bikes.
4. Throughout the city of Dublin, cyclists show scant regard for other users or for Rules of the Road. Often they do not stop at red traffic lights. They rarely stop at pedestrian lights presenting huge risk to pedestrians. Indeed, across the city it is common to meet cyclists on pavements which present great risk of personal injury to pregnant women, small children, the disabled, partially sighted and the elderly.
5. At night there are literally thousands of cyclists on the roads of Dublin without lights. It is unusual if at all to witness Gardai take cyclists to task for any breach of the Rules of the Road.
6. This Scheme puts the demands of cyclists over all other road users and leaves the most vulnerable on our street - mothers, babies, small children, disabled drivers, the elderly as well as commercial clients and residents who wish to access cars parked on the road - at great risk of injury.
7. Finally, as can be seen from its implementation already on Fitzwilliam Street etc, the parked car line up away from the pavement looks atrocious, totally spoils the Georgian streetscape and is a deplorable model that is counter heritage in a designated heritage area of preservation.

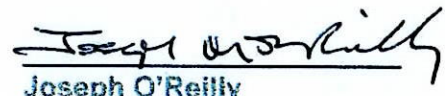
For these and all of the reasons set out in our observation /objection herewith, we argue the Proposed Scheme must not be allowed to proceed in the proposed format as it patently does **not** satisfy its aim or purpose 'The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in the Dublin region, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor.'

Thank you for your attention.

Sincerely,


Maura Moore

Date: 11/07/2022


Joseph O'Reilly

Date: 11.07.2022

