

An
Bord
Pleanála

Pembroke Road Association
C/O Siobhan Cuffee
57 Pembroke Lane
Off Raglan Road
Dublin 4

Date: 18 July 2022

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

Dear Madam,

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

Tel	Tel	(01) 858 8100
Glaao 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

57 Pembroke Lane, Off Raglan Road, Dublin 4
www.pembrokeroadassociation.ie

July 11th 2022

To: The Secretary,
An Bord Pleanála
64 Marlborough Street
Dublin 1

AN BORD PLEANÁLA	
11 JUL 2022	
LTR DATED _____	FROM _____
LDG- _____	
ABP- _____	

To: Board at An Bord Pleanála (Strategic Infrastructure Division), 64 Marlborough Street, Dublin 1, D01 V902.

Re: **Case reference: HA29N.313509.** <https://www.pleanala.ie/en-ie/case/313509>

Please find 4 items comprising our joint submission:

- 1.) Submission from The Upper Baggot Street Traders and the Pembroke Road Association re Bus Connects Proposals for route 14
- 2.) The Newton report as submitted to the NTA January 2022
- 3.) A dossier of letters from members of the Pembroke Road Association.
- 4.) A cheque in payment of Euro 50.00 to cover the cost of the observation.

A receipt is requested please to the above address,

Sincerely,

Michael J. Quinn
On behalf of The Upper Baggot Street Traders Association

Stephen Caffrey
On behalf of The Pembroke Road Association

AN BORD PLEANÁLA	
11 JUL 2022	
EDG- _____	
ABP- 313 509-22	
Fee: € 50.00	Type: _____
Time: _____	By: <i>HAAD</i>

Submission from

The Upper Baggot Street Traders
and the **Pembroke Road Association**
to **An Bord Pleanála**

re: **Bus Connects Proposals for Route 14**

Belfield/Blackrock to City Centre Core Bus Corridor Scheme

11 July 2022



The PRA has existed for almost 50 years to enhance and safeguard the unique qualities of The Pembroke neighbourhood

Many conversations and a lot of consultation with a broad range of residents have been undertaken by the PRA in the last 3 years. We represent a 'broad church' from mothers of young children to the frail elderly who live in and around Pembroke Road/Baggot Street.

Together with the Upper Baggot Street Traders we believe that we have formed a good understanding of the requirements of the Neighbourhood for the post Covid era.

The Historic Pembroke Neighbourhood

The historic Pembroke neighbourhood is bounded by Merrion Square to the north, Northumberland Road to the East with the Dodder River to the South and Leeson Street forming the boundary to the West.

The historic Pembroke Neighbourhood was first laid out by the Pembroke designers on the Georgian side of the Canal and expanded across the Grand Canal throughout the 19th century. The elegant layout was designed along the principles of the 'Beautiful City ' movement and is recognized in international urban design thinking as an exemplar model of urban layout. The tree lined streets and sightlines provide public space of the highest quality.

The Pembroke Neighbourhood of Georgian Dublin took a hit in the mid 20th century with many fine houses being used as offices only. Currently in the weekly planning lists issued by Dublin City Council we can see house after house and month by month returning in use as family homes.

The post Covid urban world is a pattern of working from home and multigenerational family homes. The Pembroke Neighbourhood provides this opportunity and a return to its well established 19th century use in line with most other European cities of quality. The urban high street of Upper Baggot Street provides many professional and service needs of the greater district and this reputation is essential to the well being of an urban core.

The imposition of bus parking along the periphery of Merrion Square in the heart of GEORGIAN DUBLIN is an utterly deplorable piece of heedless thought

This is one of the top treasures of GEORGIAN urban space in Dublin. Every tourist who visits Dublin comes to look at Georgian Dublin. It is imperative that it can be enjoyed WITHOUT walls of buses. It is an elegant tribute to the craftsmen of Dublin in the 18th century whose skills built it. Merrion Square and the Georgian streets leading from it to Fitzwilliam Square are invariably promoted by Tourism to highlight Georgian Dublin.

Surely the buses can be kept moving to avoid parking up for breaks in Merrion Square? Would Tourist Interests permit this to happen in Rome or anywhere else?

There are other ways to sort this out.



5.15pm, Wednesday 6th July 2022: 11 parked buses on perimeter of Merrion Square
– view to Pepper Canister Church & to Leinster House

Pembroke Road and Baggot Street are busy with pedestrians before and after matches and concerts

Upper Baggot Street is the focus for convivial gatherings before and after matches and concerts in the Aviva Stadium and the RDS Ballsbridge. Frequently a capacity crowd of 60,000 people are in and around Pembroke Road midweek as well as at weekends. Baggot Street and Pembroke Road together form the processional and celebration route to Lansdowne Road. Merry groups spill out from the pavements onto the road and jam the footpaths.

Pembroke Road from Waterloo Road junction to 'The kiosk island' is thick with pedestrians of all ages who throng the footpaths before and after any of the frequent events.

Baggot Street/Pembroke Road together are well known to thousands of spectators and supporters who come from all over Ireland and abroad to attend frequent international matches.

Why destroy an established tradition of festive convivial pedestrian crowds along Baggot Street/Pembroke Road?

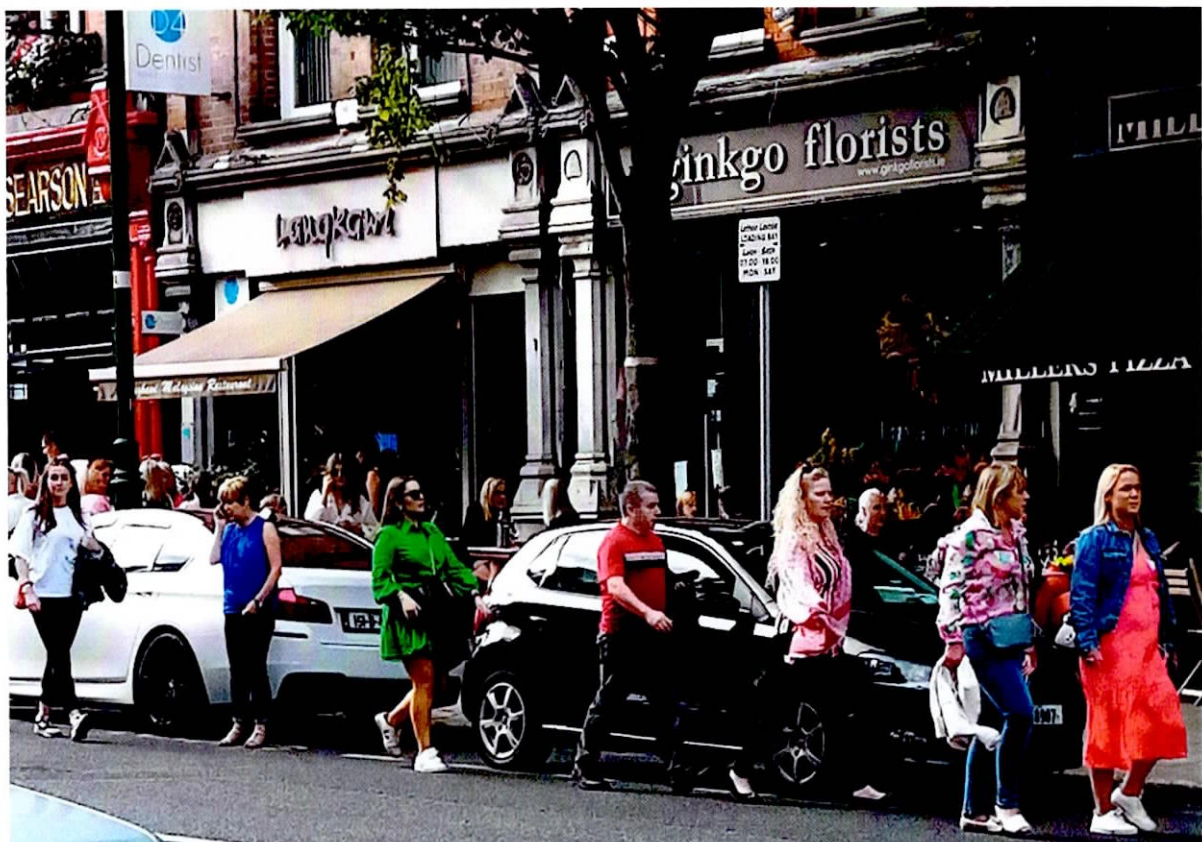


Baggot Street/Pembroke Road is an essential and intensely well used segment of the key route for Dublin celebrations and festivities

The well established traditional festive route stretches through Dublin from Croke Park to Parnell Square to Leinster House and Merrion Square and on to Baggot Street and Pembroke Road.

Upper Baggot Street forms the 'high street' and the central spine of the Pembroke Neighbourhood. The Royal City of Dublin Hospital (Baggot Street Hospital) will soon be returned to use as a public building and as the focus of the long established shopping and commercial Street that provides specialist city centre services in the layer above the street level shops.

An ever increasing number of nearby residents and office workers rely on Upper Baggot Street as a destination to walk to for daily shopping and dining. This is in line with ALL of the aspirations of the 15 minute city that Dublin City Council aspires to uphold and enable.



In 1916 the Sherwood Foresters took THE MOST DIRECT route into town from Dun Laoghaire and marched along Northumberland Road to Mount Street Bridge

The bridge at Lower Mount Street is a flat modern twentieth century bridge.

There is little traffic at Lower Mount Street. Even on a Sunday very few pedestrians wander around. Trucks and cars use Haddington Road to travel East/West.

Why not continue to use Northumberland Road/Lower Mount Street as a principal bus route into town?



An Lár / City Centre sign direction to Northumberland Road

The direct route from Belfield (UCD) into city centre is along the dual carriageway through Donnybrook and onwards via Morehampton Road to Leeson Street and St. Stephen's Green

These roads are the traditional routes into town from the south. Why not use these roads and leave Pembroke Road /Baggot Street available for use as a safe pedestrian route?

The walk along Baggot Street and Pembroke Road is the traditional celebration route to matches and concerts before and after. It is well known to all the many, many tourists who come as spectators who come from all over Ireland and from abroad to international events

WHY abandon the traditional direct route into the city centre?

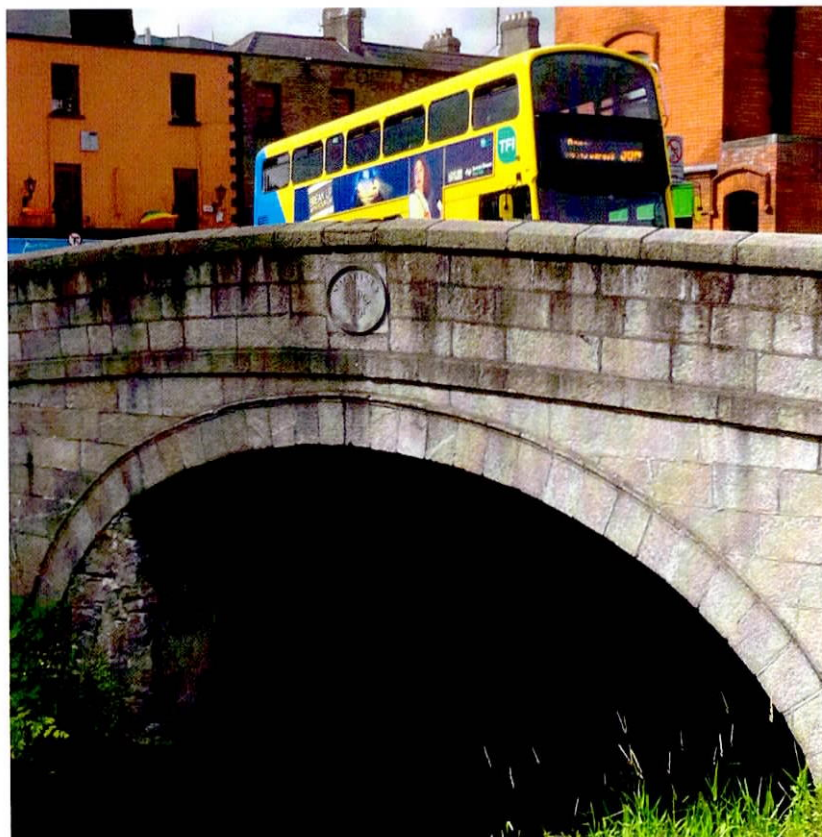
The Macartney Bridge

The 1791 Bridge links Lower Baggot Street and the Georgian City with Upper Baggot Street and the glorious delight of the Royal City of Dublin Hospital and the flanking range of 1890s shops.

There is a need for a level wheelchair friendly/walking with a small child way across the Canal.

Our suggestion is that an additional flat pedestrian bridge would be thrown across the Grand Canal from Mespil Road to Wilton Place. It would be a lifting bridge to permit boats to pass through.

An international Design competition would find an elegant 21st high quality and distinctive solution for all who need a safe and level passage across the Canal.



Supporting buttress under Macartney Bridge. Built 1791.

Huband Bridge



View up the Grand Canal to Macartney Bridge

Two CPOs are proposed by Bus Connects

a) At Macartney Bridge.

b) At 1-11 Pembroke Road

a) Re: Proposed Changes by Bus Connects to Macartney Bridge.

It is exactly thirty years ago since an OPW Canals and Waterways Strategy concluded that the variety of specialist structures associated with the canals 'have a significant heritage value.'

These include 'earthworks, bridges and culverts, towpath locks, lock-houses, weirs, spillways and sluices, harbours, dry docks' and other structures.'

The Baggot Street Bridge/Macartney Bridge complex with its granite walls and coping stones, its associated railings and their plinths as well as the ramped towpaths contain all of this and epitomise the essence of late eighteenth century engineering in the heart of the south city where it survives.

This is a stroke of good fortune, which should be celebrated as an inspiration and a piece of engineering excellence from another age.

Is Macartney Bridge to be venerated and preserved for the future?

What about *'the restriction of vehicular traffic... so integral to the heritage of the waterways'* highlighted by the OPW consultants thirty years ago and their advice that: *'new encroachments onto waterways property should not be allowed.'*

Or have the Government, the OPW and the Heritage Council changed their minds?

b) Re 1-11 Pembroke Road.

THREATENED VIOLATION OF THE RAILINGS AND SHARED PLOT OF LAND AT NOS 1, 3, 5, 9 and 11 PEMBROKE ROAD

The curtilage of the unique terrace of protected structures is defined to the front by a shared plot of land bounded by iron railings on granite plinths.

It is vital that the railings and plinths of properties 1-11 on Pembroke Road be retained in the positions they have enjoyed for two centuries. To remove them, even temporarily, to break their line or to alter the existing gateways would be to violate the historical and spatial identity of the Pembroke District.

The railings in question are an integral part of the buildings and the plots that they front. They are as old as the Georgian buildings and were forged by Dublin craftsmen and erected on kerbs cut and laid for them. To remove them at all would be to destroy the visual and spatial integrity of a district that they have helped to define and characterise.

The railings cry out for sensitive cleaning and repainting without recourse to sandblasting or wire brush scraping. They don't have to be taken down or removed to allow of this conservation approach. The surviving iron is robust enough to be conserved *in situ* and doesn't have to be replaced.

The Pembroke Estate ideal of planting trees in shared communal spaces means the trees at the fronts of the plots cannot be allowed to be sacrificed or moved.

Bus Connects show only two trees on their layouts. There are at least 10 mature trees and several saplings in good health growing on this plot of land. This is a significant.

The owners of the relevant plots will work together as custodians of a shared place to keep it intact with entrances addressing Pembroke Road only, and as a delight to all passers by.

Shoddy Notices

A lamentable lack of display of Notices to the General Public about proposed DRASTIC CHANGES.

The ONLY two public notices displayed to do with the vast changes that are to be put in place by Bus Connects are small AND in tiny typeface on the railings of Pembroke Road and Wilton Place and are about the CPOs only.

The notices are:

- a) Poorly displayed,
- b) The language is obscure and murky for public understanding.
- c) There are NO clear easily legible layouts on display at any of the significant junctions that will be affected dramatically by these proposals.

None at the kiosk island junction, Raglan Road junction, Wellington Road Junction, the Waterloo Road Junction, the Mespil Road / Haddington Road junction, the Wilton Place / Herbert Place junction, Eastmoreland Lane / St. Mary's Road junction with Baggot Lane and at or any indication of how the traffic in Pembroke Lane and Baggot Lane will be handled.

- d) The two tiny notices of CPOs at the Grand Canal and at 1-11 Pembroke Road make no explanation of why or to what purpose they are required.



Notices at height of 110cm above pavement level, Pembroke Road

Those who live and work in the historic Pembroke neighbourhood need good well informed notice boards to explain each and every change at each and every intervention and junction.

This approach is clearly out of order under The Aarhus Convention of the European Community.

Currently ANY individual property is obliged to put up a clear notice that is easily visible explaining in detail their intentions when they submit for a planning permission to widen a gateway/ put on a glass porch/ tamper with historical details on a listed building.

The Bus Connects application is an application to change and destroy the Historic Pembroke neighbourhood by STEALTH.

**The needs and demands data is based on pre Covid surveys.
Post Covid needs and demands have changed across Europe.
The use of city centres, urban neighbourhoods and all forms of travel and work has changed.**

Upper Baggot Street is the vibrant commercial HEART of The Pembroke Neighbourhood

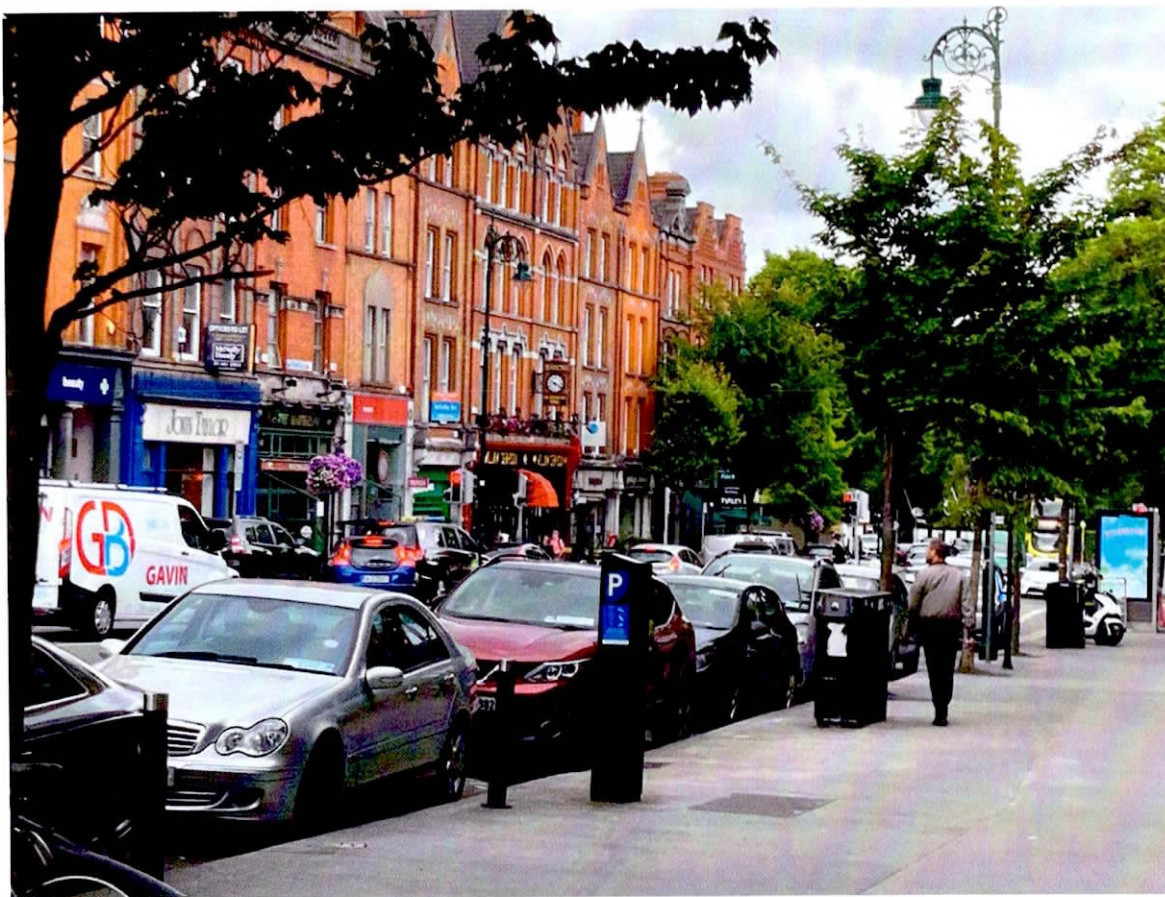
The Pembroke Neighbourhood has all the qualities of a thriving town. Baggot Street is and always has been the main street.

Towns throughout Ireland have substantially benefitted from traffic bypass and have flourished with main streets substantially devoted to local traffic together with on widely and easily available short term parking.

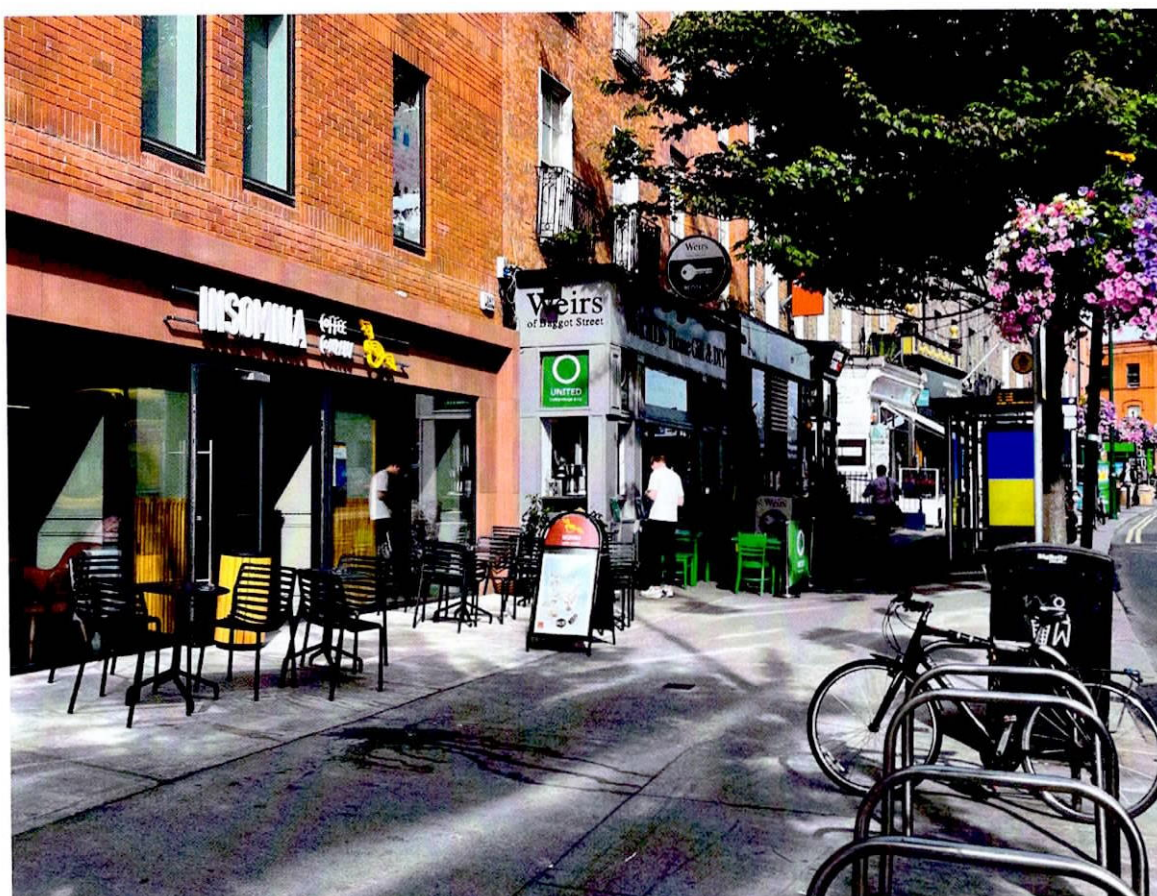
Short term Parking is absolutely necessary for the independent and specialist businesses

Deliveries/pick ups are required to each business constantly. Clients must be able to pull in for an appointment with health professionals and pharmacies without a long walk back and forth.

The Royal City of Dublin Hospital (Baggot Street Hospital) WILL return to use as a public space and as a focus to Baggot Street.



Upper Baggot Street shops to south of the Hospital



Cafés on Upper Baggot Street opposite the Hospital

The following Independent businesses and specialist services are located on Baggot Street and close by

Dentists
Locksmiths
Specialist Drycleaners
DIY hardware
Optician
Homeopath practice
Solicitor
Skincare Clinic
Yoga/Pilates
Mediation/communication professional services
Picture framers
Doctors
Betting shop
Specialist flower shop and a flower seller
Wine and cheese shop
Bookshop
Specialist Men's Clothing Shop with bespoke service
2 Specialist Print Shops
Butcher
Picture Framer
Stationary and Graphic Art Suppliers
Barbers
Hairdressers
3 pharmacies
Insurance broker
Betting Shop
A centre for individual health therapies and classes
Picture restorer
Architects
Supermarket and Convenience Shops

There are around 20 coffee/meeting places, which is a clear sign of the high level of social meetings that are taking place in an urban neighbourhood of many diverse activities. Countless independent activities create the commercial hub along the length of Baggot Street.

There are 4 Pubs in Upper Baggot Street/Pembroke Road, and dozens of cafes that all add to the fun, general conviviality frivolity that has always been part of Baggot Street.

The Local Area Health Centre

The HSE plans to locate a Local Area Health centre on Haddington Road in the City of Dublin premises across from the Car Hire. This is in keeping with the principles of The Pembroke Planners of the 19th century who set aside the land for the Hospital in the 1830s. The Health Centre will provide check up services for pregnant women, clinics for babies and toddlers, one to one consultations and physiotherapy and other health services both one to one and with groups.

This will increase the requirement for short stay parking, traffic calming and the need to create quiet zones. Elderly patients with mobility issues, pregnant women with small children will be frequenting Upper Baggot Street as a consequence of spending time before and after appointments in the Health Centre.

Ambulances will require pull in spaces.



The Royal City of Dublin Hospital
Upper Baggot Street

St Mary's Church on Haddington Road is the centre for local Catholic as well as the French, Polish and the Orthodox Ethiopian Church communities.

St Christopher's Primary School is struggling to meet the demand for school places. The complex of buildings on the church premises already hosts adult education and a Gael Scoil.

The Mercy International Centre on Lower Baggot Street is the Shrine and international HQ of the thriving and vibrant Mercy Order founded by Catherine Mac Cauley in 1823. The Young Irishman Thomas Davis lived a couple of doors away.

'The Street of Romance' stretches from Merrion Row, which leads on to Lower Baggot Street and onwards to the kiosk junction of Pembroke Road/Northumberland Road.

**This Baggotonia district is the area of Kavanagh's Dublin.
Upper Baggot Street is synonymous with Paddy Kavanagh.**

The poet Patrick Kavanagh's great poem, is sung in gatherings of all kinds all over the world.

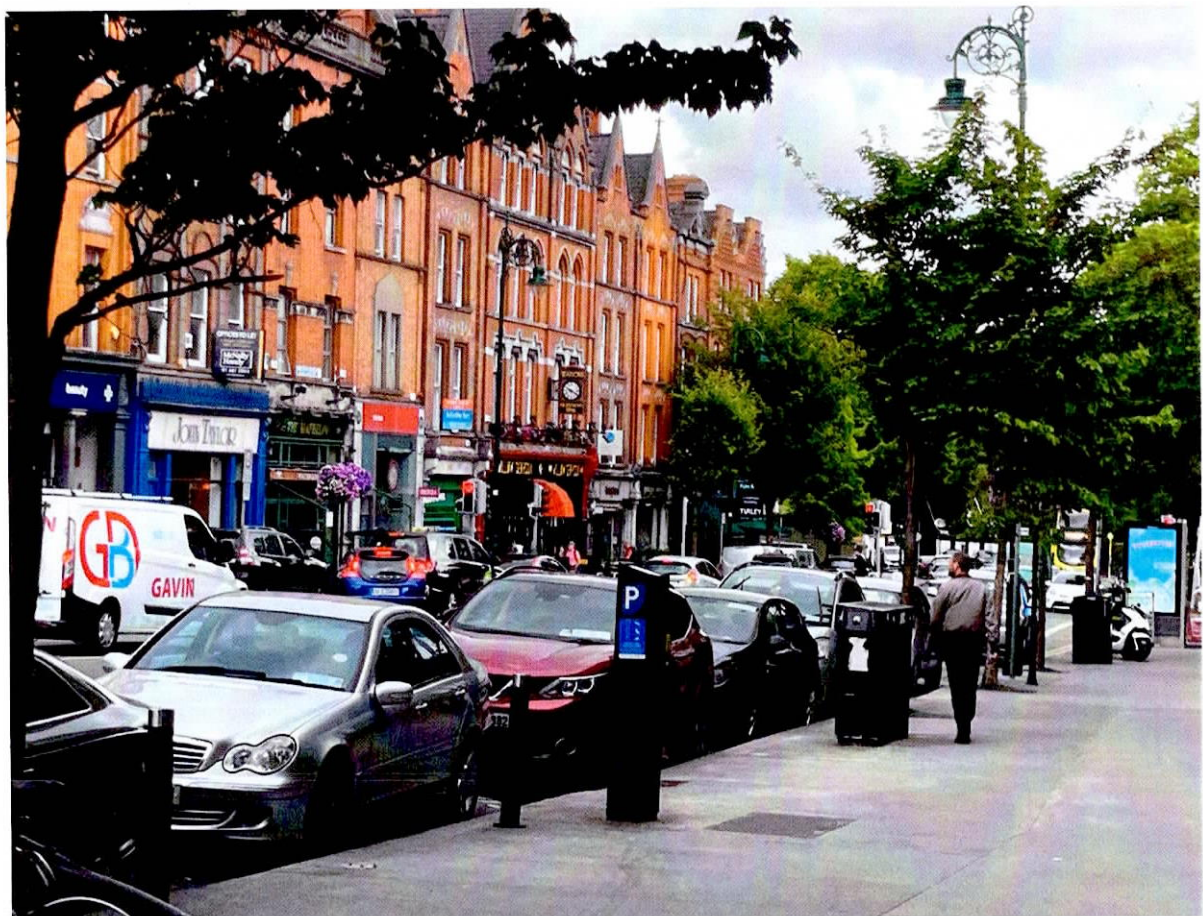
*'On Raglan Road on an autumn day
I met her first and knew
That her dark hair would weave a snare
That I might one day rue.
I saw the danger, yet walked along the enchanted way,
And I said' let grief
Be a fallen leaf
At the dawning of the day.'*

The short term car parking in Donnybrook is successful and well used, both in front of all the stretches of shops and in the adjacent residential streets

THIS IS A ROLE MODEL and should be COPIED in Upper Baggot Street.

Short term parking for clients/deliveries in Baggot Street and the streets leading into it is CRITICAL for the viability of the neighbourhood.

Unlike the city centre or any suburban shopping centres there is NO public multi-story parking available adjacent to Upper Baggot Street.



The surges of 60,000 visitors at the frequent Concerts and Matches are critical to the viability of many of the specialist activities in Baggot Street

Much of this activity is IN PERIL due to the Bus Connects proposals. HOWEVER our proposal: The Newton Plan will overcome many of the difficulties.

The pedestrian crossings and traffic islands should be retained for the safety of pedestrians at all times. The large green traffic island with the kiosk would be retained. It is a landmark.

The pull in parking can continue. Rapid transport AROUND the city centre will be located away from Baggot Street just over the Bridge with a rapid RAIL LESS LUAS taking a circular route around the City Core.

Buses will keep moving. Buses will substantially use Northumberland Road and Morehampton Road/Leeson Street. There is not requirement for buses to park in the city around Merrion Square or elsewhere if they keep moving outwards for breaks and driver's changes.

Upper Baggot Street will become a peaceful plaza for conviviality and the Neighbourhood centre will be vibrant. The Visitors to matches and Concerts and the international tourists will ENJOY their visit and want to come back.



Vistas and Sightlines of the historic Dublin streets

The more we consider the special and unique qualities of the Pembroke District the more we have become aware of the specific sight lines that serve to align the setbacks of buildings.

The sightlines are amplified by the placing of large deciduous trees at the edge of the pavements between the footpath and the road.

They are deliberately set in this position to provide shelter to the pedestrian from rain and sun and to provide a visual and privacy boundary between the historic houses (now listed) and the well designed streets of all of the Pembroke Neighbourhood. Together they form a pattern of elegant public and private space of benefit to all. The trees absorb air pollution and heavy downfalls of rain all of which are on the increase at this time.

The particular characteristic of Dublin's Georgian and late Georgian architecture is of stretches of terraces that front the streets and yet maintain a lovely individuality for each house in the details of building and scale. Almost all the houses along Pembroke Road are historic and were built in the mid 19th century by the Pembroke Estate from the kiosk junction onwards to Waterloo Road.

The Pembroke District was first designed in the 1860s and has steadfastly stood the test of time since then.

The Pembroke Archive detailing the work of the Estate has been returned to Ireland in recent years and is housed in the National Archives

Detailed scholarly studies are underway on all aspects of this mighty undertaking. Pembroke Road, Baggot Street and the hinterland of residential streets and lanes to each side of this urban spine were designed and laid out by the designers and planners of The Pembroke Estate.

The Pembroke Estate were far sighted developers of the time who placed the roads and the houses on the streets to the best advantage for all. It is a unique example of the wonderful 'Beautiful Cities' Movement of the mid 19th century..

The green island of the 'kiosk' dates from the Great Exhibition of 1908 in Herbert Park.

The park itself was a gift to the people of Ballsbridge Township from the Pembroke Estate.

The kiosk island continues to function as a rest on a crossing point around a busy traffic junction. It provides visual delight in a well known landmark of the 'kiosk,' particularly at match and concert times when crowds pour out from Lansdowne Road it provides a meeting place and a haven from the constant stream of taxis that are operating their own voluntary one way system to collect passengers after an event.

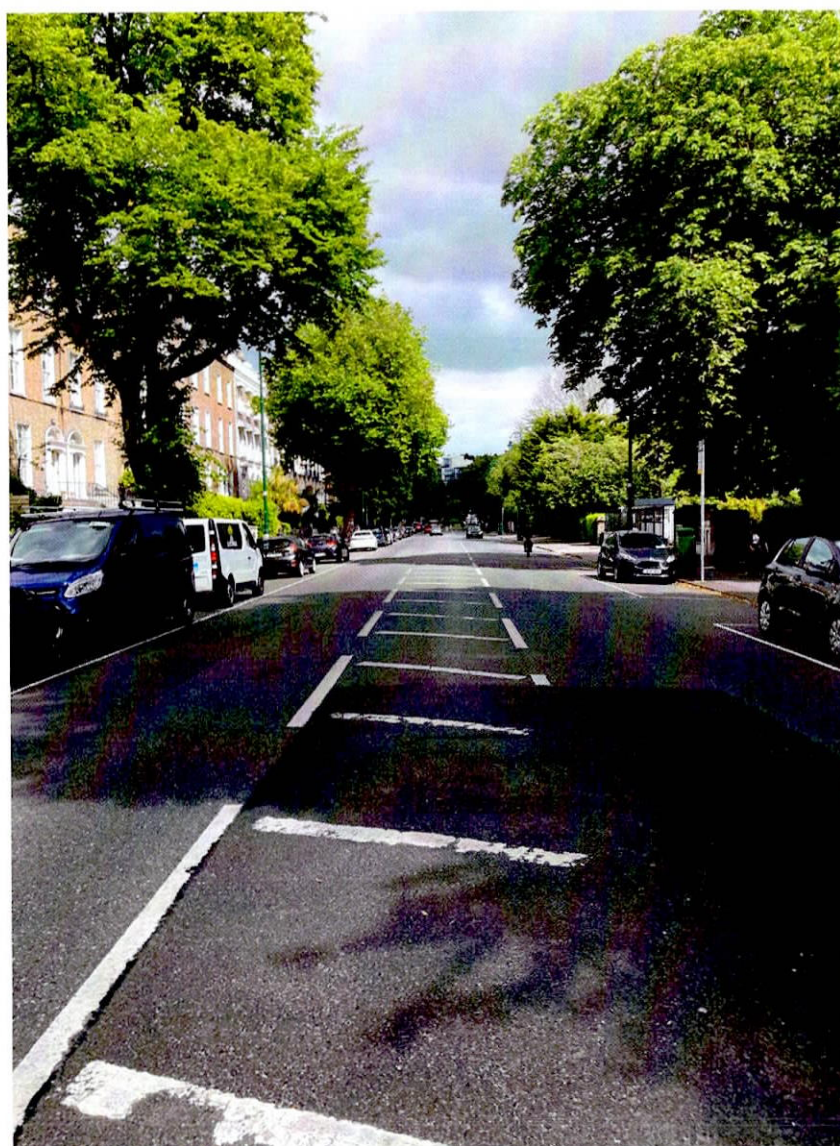
The tree lined streets with setbacks are a significant and compelling design at a time when the idea of the healthy city was being explored on both sides of the Atlantic. It was known then, and we are rediscovering it now that trees absorb bad air pollution, provide visual screening, and shelter from rain and sun, and give bio diversity corridors to wildlife within the city.

The house on the RHS side of Pembroke Road as you walk towards Macartney Bridge form a continuous terrace facing south. Along the LHS as you walk towards Baggot Street there is a feature of a gentle crescent layout set of magnificent paired houses with generous garden setbacks, amongst which are the 4 Turner designed houses of 55, 57, 59 and 61 Pembroke Road.

When the leaves fall from the trees it is clear that Pembroke Road and its gentle and gradual incline is leading the eye and the traveller onwards to the significant crossing point of the district: the Macartney Bridge that links Upper and Lower Baggot Street since the time of the completion of the grand project of the Canals in the 1790s when the Pembroke district extended its foot print out from inside the Canal to the Dodder River.

Pembroke Road makes a gentle curve to mount the hill at the Macartney Bridge. Clearly the bridge is a destination. Once achieved as cyclists and runners know well, there is the delight of level ground on the far side of the Canal.

The preservation of the sight lines is of paramount importance.



Vista looking south on Pembroke Road

The Alternative: The Newton Report

THE NEWTON PLAN

The Pembroke Road Association together with the Upper Baggot Street Traders Association have already put their names to a submission by Tom Philips Associates Planners of The Newton Plan to the NTA in January 2022. Bus Connects proposals **can only be assessed** by comparison with an alternative.

The Newton Plan is included in this submission.

The alternative choice of route for Buses etc. in Upper Baggot Street/Pembroke Road is to travel along Northumberland Road. It is **signposted as the direct route to the City Centre**. They will cross the Grand Canal at Mount Street Bridge, a flat and wider 20th century bridge than historic Macartney Bridge. Northumberland Road is the preferred route of the commercial Air Coaches. Northumberland Road is thinly populated and is not used by crowds attending matches and concerts. Northumberland Road has substantially less pedestrians crossing from one side to the other throughout the day. Northumberland Road is not a shopping street with a requirement for constant pull in short term parking. Northumberland Road has substantially less residents than Pembroke Road and has a safe direct walking route to the shops of Upper Baggot Street along St Mary's Road.

The Newton Plan provides for a transport plan linking the neighbourhoods of Dublin in an orbital system in the same way as the M50 and the South /North Circular Roads were designed to do.

With this system someone working in Tallaght Hospital does not need to travel into the City Centre if they live along the Merrion Road. They can travel around the city centre to reach the hospital.

It provides a solution to the city centre bus traffic by removing all buses from parking up in the city centre.

The Buses KEEP moving instead of parking and they KEEP moving OUT to uncluttered space further out of the City Centre for drivers breaks and change over's.

It will provide a more fluid traffic movement.

It is cost effective as it links existing public transport and joins up the Luas and Dart lines.

The Pembroke Neighbourhood and the Newton Plan for all Dublin Transport.

Luas type transport technology has changed in recent years so that fixed rails on level ground are no longer needed.

The Newton Plan proposes that the Luas from St Stephens Green would be extended along Lower Baggot Street and turn before The Macartney Bridge along Herbert Place to the Docklands.

This would form part of an Inner Circular Luas link – which is called the Grand Link or 'G'Link – on the South side of the City from Docklands to Fatima Mansions and the St. James' Hospital and Heuston Station.

Diagram of Orbital/Circular Line 'the Great Link' or 'G-Line' follows.

G-LINK (GREEN/GREAT) BLUE LINE 5K

LINKS UP ALL SYSTEMS

BLANCH

FINGLAS

AIRPORT

DOCKLANDS STN.

O'CONNELL ST

CONNOLLY STN

THE POINT

MACKEN ST. BR.

BAGGOT ST. BR.

BAGGOT ST.

ST STEPHENS GR

FATIMA

ST. JAMES

HEUSTON

LUCAN

LUAS CITY ORBITAL

Main Benefits

All Dublin centre areas within walking distance of a rail or Luas line.

Accommodates all arriving at Dublins three rail stations and bus station.

Maximises bus use, reduces congestion, Makes city more accessible especially for users with a disability.

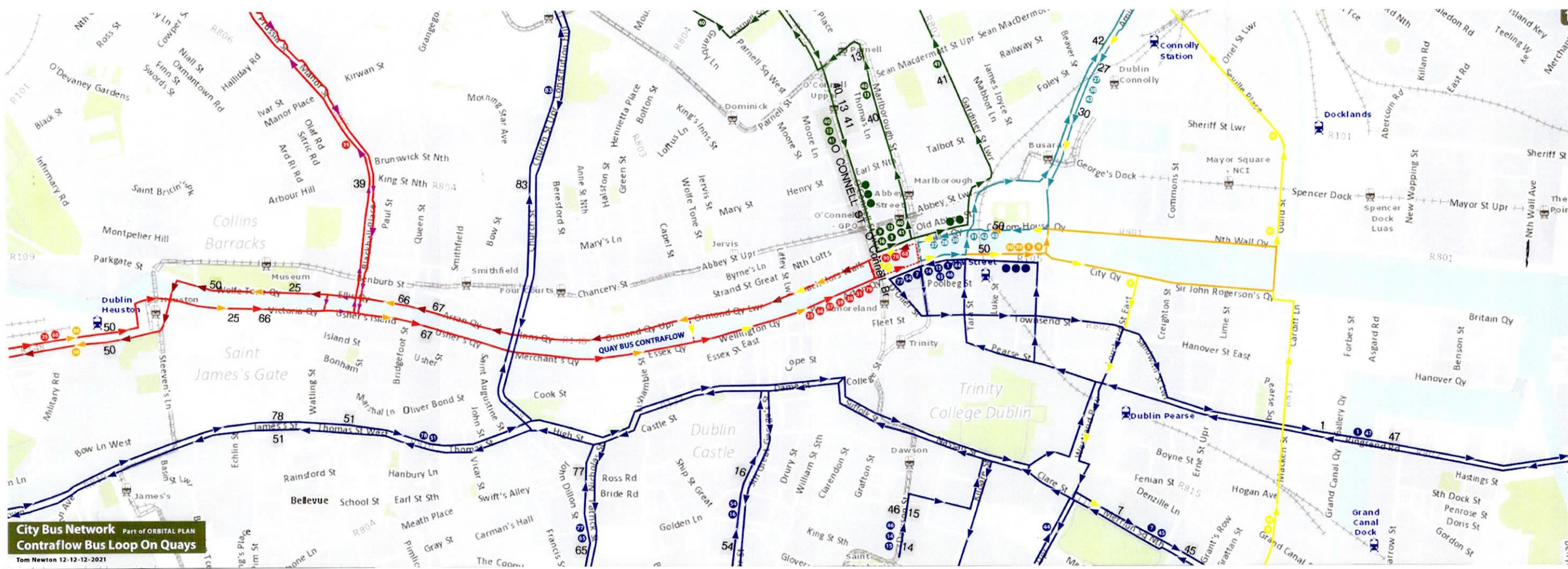
RED LINE

RATHFARNHAM

GREEN LINE

FUTURE LUAS LINES

TN 2000



City Bus Network
Contraflow Bus Loop On Quays

Tom Newton 12-12-2021

23 St. Mary's Road
Ballsbridge
Dublin 4

An Bord Pleanála
Strategic Infrastructure Division
65 Marlborough Street
Dublin 1

ABP Case Reference: **HA29N.313509**

Re: Bus Connects - Corridor 14: Blackrock - City Centre

The proposed new plan for this route means an intensification of traffic through Pembroke Road onto Upper Baggot Street which must then contract to cross Baggot Street Bridge. The consequence will be traffic congestion where, largely, none exists. This is considered 'progress' to achieve the elusive goal of a shorter commute time. Running a service 24/7 through a residential conservation area at the frequency proposed is little short of vandalism. There has to be another way - to access this area there is Morehampton Road, Waterloo Road, Northumberland Road as well as Pembroke Road. There is a Dart service not to mention another route along the sea front. Choosing one road for this 'super bus' is too much.

Do We Need It?

Dublin Canal Cordon 2017 statistics 7am to 10am

As published by Bus Connects, 70% of commuters use sustainable transport, with 50% of those on public transport with just under 30% using a car. Most cities would be happy with this statistics. Further, after June01 and until September, with Colleges and Secondary Schools closed, traffic ameliorates significantly and this pattern is repeated at Christmas, Easter and Half-Terms. So, for approximately 4 months of every year traffic is less on Dublin commuter roads. In the remaining 8 months of the year on both Saturdays and Sundays there is little or no commuter traffic in this area and there is a relaxed and almost country-like vibe. The pattern of work is changing with employees demanding to work at the very least part of the time at home. Entitlement to sick leave will rise to 10 days in 2026, and there are demands for increased maternity/paternity, mental health leave, etc. So, it is clear that there will be less commuting to work in future.

Heritage

Maccartney Bridge was built in 1791. Also in 1791, Richard, Viscount Fitzwilliam gave Thomas Carroll, Esq. permission to build a 4-storey building at 21 Upr Baggot Street. John Taylor's map of the environs of Dublin, published in 1816, shows very clearly that the development of the northern side of Upper Baggot Street had progressed significantly beyond the junction of Eastmoreland Place. (Indeed, Baggot Street Hospital was established in 1830 from a row of houses already built.) The northern side of Pembroke Road was fully developed by the early 1830s. Effectively, Upper Baggot Street and Pembroke Road were an extension of the Georgian core. The Bus Connect plans do not recognize the architectural significance of this area - there is a CPO at 1, 3, 5, 7, 9, and 11 Pembroke Road and again at Baggot Street Bridge/Wilton the impact of which is not detailed. On the current Development Plan our part of the Pembroke Estate was scheduled to become an Architectural Conservation Area.

Culture

Dublin is designated a UNESCO City of Literature and has been given that designation for a reason. Dublin is a city where we often feel the presence the city's writers. It is a city perhaps more than any other that has been imagined by its writers. There are some places where we are more aware of the

writers than others. Here along the Grand Canal and Baggot Street the area is alive with writers: John Banville, Leland Bardwell, Beckett, Behan, Elizabeth Bowen, Joyce, Patrick Kavanagh, Brendan Kennelly, Thomas Kinsella, John Montague, Paul Durcan, Colm Tóibín, Brian O'Nolan, Sheridan Le Fanu, etc., etc. Many artists lived or worked in this area: Patrick Scott, Patrick Pye, Patrick Hennessy, James Le Jeune, Louis Le Brocqy, etc., etc. We need to try to hold what inspired them. Turning this area into a bus corridor will destroy that intangible atmosphere.

Parking

DCC's Planning Officer, John O'Hara in his earlier submission to the NTA said 'that the removal of on-street parking under the plans, particularly in residential areas where there is a reliance on such parking, is "problematic". 'The availability of car parking, albeit communal and on street, is a deciding factor particularly for families and people with disabilities as to whether or not to live in the city,' 'Designers should seek to limit removal of on street parking in areas where residents are reliant on the same'. 'Where it is proposed to remove car parking, viable alternatives should be proposed. **The NTA is reminded that it is a policy of DCC as set out in the current development plan to preserve on street car parking as a resource for the city.**' Remember that the parking is essential for activities that traditionally take place in this area at both the Aviva and the RDS, when many people visit the area from other parts of Ireland, and abroad. It maybe our backyard, but it is also your backyard.

Traders

The lack of parking will hit the traders in their historic terrace shops very hard and we may lose several of them. Weirs set up on Baggot Street in 1885. As outlined, its beginning was in 1791 when permission was given to build at 21 Upr Baggot Street. John Taylor is 50 years on Upper Baggot Street. Grants, our Chemists, Craft Cleaners, Miller's Pizza, the Langkawi, etc. are also long time traders and there are many businesses, of which you may not be aware, that have offices above those on the street. **If you cannot stop, you won't shop.**

Moving the bus-stop from Craft Cleaners to Miller's Pizza and the Langkawi makes no sense other than it seems designed to narrow the road to restrict car movement. Both restaurants have street tables due Covid.

The Bus Priority signal at Baggot Street Bridge is likely to create a tailback of cars waiting to cross the bridge, and if the buses run every 4 minutes will each one clear the street in that time frame?

Loss of Amenity

From St. Mary's Road it seems that our main access/egress will possibly be Northumberland Road. We will only be able to use Waterloo Road late evening/early morning. Many of our journeys will be longer as one side of Pembroke Road is cut off from the other side. Displaced traffic will take an environmental toll - increased air and noise pollution. Pedestrian traffic is affected - the mid Pembroke Road pedestrian sanctuaries are to be eliminated and the road can only be crossed safely at Upper Baggot Street or at Northumberland Road. This is designated a 'Residential Conservation Area' but with buses operating every 4 minutes through the area it will become more like Clanbrassil Street losing its attractiveness.

If BusConnects should go ahead in its current form it will change life for us significantly, and not only for us but all along this route. Some Bus Stops are being eliminated. Save 5 minutes on your bus journey, but you'll need an extra 10 minutes to walk to your Bus Stop - this is not people friendly. The people most affected by the new travel routes will be the car-reliant elderly and disabled residents who may be cut off from care. It will be mainly women, time-poor, working, trying also to shop, do the school run, feed a family, transport children to after-school activities, etc. It will not be the middle-aged, mainly male cycling enthusiasts. Nutley Avenue will change completely losing trees and gardens. So, who is BusConnects to benefit?? We do not see overlaid buses in Baggot Street. I am at a loss to see where the benefit is. Traffic congestion is a fact of life and will occur on certain days and certain times somewhat randomly for no known reason no matter what. It can happen

because of an accident or due to weather. Grid-lock is the real problem and it is rare outside of the M50 and even then occasionally.

Please take onboard our concerns. **There is an obligation with infrastructure to be aware of its local consequences.** This is not a 'desktop operation' for us. These are the street we walk for exercise to visit our neighbours, do our shopping and walk our dogs - don't throw us under the Bus!



Susan McCarrick

Susan McCarrick



Robert Walsh
3 St Mary's Road
Ballsbridge,
Dublin 4
July 9th 2022

To An Bord Pleanala
Dublin 1.

Dear Sirs,

I wish to make a submission regarding the proposed new traffic management system arising from the Bus connect plan in the Upper Baggot Street, and St Marys Road area of Dublin 4.

If this plan was to be granted planning permission :

1. it would result in traffic chaos in St Mary's Road, which is at present a residential street , by causing additional traffic to begin using the street as a form of "RAT RUN " , such traffic having been prevented from using Pembroke Road and Upper Baggot Street .
2. The proposed plan would clearly change the existing means of access of the residents of St Mary's Road to their private dwellings .
3. The NTA Oireachtas Liaison undated reply to an enquiry made by JIM O' Callaghan – TD to them on the 3 rd June 2022 shows that the plan has not adequately addressed the concerns of the residents of St Mary's Road , where it states that

" access to/ and egress from St Mary's Road will remain from Pembroke Road AND Haddington Road - when in reality the only access to St Mary's Road from Haddington Road is by a narrow lane known as Eastmoreland Lane. There is also a Narrow lane from Haddington Road to St Mary's Road at the side of the School, St Christophers with over 800 students which would be a clear safety hazzard, and not at all suitable.

It is also clear that Baggot Lane would become another "rat Run"

These lanes are not at all suitable for large volumes of traffic there are considerable safety issues, and one of my key concerns is the access of St Marys Road residents to their private properties.

Conclusion

It is my strong belief that there is no CLEAR traffic management system for the residential roads and lanes that will be strongly impacted by these plans, I would like to see sight of said plans before works proposed commence.

My contact details are by post at the above address or email on [REDACTED]

Yours sincerely,



Robert Walsh

Eamon O'Farrell,
49 Pembroke Road,
Ballsbridge,
Dublin 4, D04 KX21

8th July 2022

Case Reference: HA29N.313509

Submission to An Bord Pleanála on Bus Connects

This proposal, and the damage to the local environment, will have a serious, and damaging impact on my local area.

There has been an almost complete lack of engagement by Bus Connects with the local community, in direct contravention of the Aarhus Convention.

This convention is noted in Irish, and EU law. <https://www.gov.ie/en/publication/b3b1a-aarhus-convention/>

It is hardly surprising that Bus Connects is ignoring the Aarhus Convention, since if they were to meet its requirements and engage with the local community, their plans would be exposed as ill thought, impractical and destructive of an area of Dublin of outstanding historical importance. An area which has been recognised by UNESCO. <https://whc.unesco.org/en/tentativelists/5523/>

Baggot Bridge/McCartney Bridge

McCartney Bridge, known colloquially as Baggot Bridge was constructed in 1791. Obviously it wasn't designed for the volume of traffic proposed by Bus Connects. A CPO Notice, inaccessibly posted on a bicycle path adjacent to the bridge, suggests that Bus Connects are planning to alter this bridge. They haven't revealed these plans, and they haven't carried out a detailed analysis by Structural Engineers.

Aviva Stadium

When matches or concerts are held in Aviva Stadium, thousands of people traverse Pembroke Road. Bus Connects haven't carried out any independent safety analysis of their scheme.

Pembroke Road crossings

Local residents will no longer be able to cross to the opposite side of Pembroke Road. This will have a detrimental impact on the quality of life of the substantial elderly population.

Passenger Studies

Bus Connects have failed to carry out any updated independent analysis on prospective passenger numbers on this route. This is particularly bizarre considering the changes in working practices since Covid 19. They have also failed to reconsider in light of the Government's announcement on Dublin Metro.

Bus Connects have suggested that this route will be in demand from the proposed Maternity Hospital. It seems unlikely that maternity cases will generate sufficient demand for a bus every 3 minutes.

Again, they haven't accounted for Dublin Metro.

Merrion Square

This proposal will turn Merrion Square into a Bus Depot, meaning that the Square will no longer be usable as an amenity as it is today.

The same mentality tried to turn Temple Bar into the "Central Bus Station", a campaign that they waged from the 1970s until July 1987. It is stunning that they have now turned their attention to Merrion Square, and are willing to destroy such a unique resource.

Parking and Local Businesses

Whilst I don't need to park on Upper Baggot Street to shop in the wide range of stores, people travelling from further don't have any other option. Removal of parking will result in the closure of many of these businesses, further damaging the fabric of the local community, and the lives of those business owners and their staff.

Many Thanks

A handwritten signature in black ink, appearing to read 'Eamon O'Farrell', with a stylized, cursive script.

Eamon O'Farrell

Adele O'Connor
49 Pembroke Road
Ballsbridge
Dublin 4 D04 KX21

8th July, 2022

Case reference: HA29N.313509.

BUS CONNECTS

Or disconnects as would appear to be the case!

I write, not only as a resident, but as somebody who regularly passes along and through Pembroke Road / Baggot Street as a pedestrian and a cyclist. I am extremely concerned at the above proposal.

First and foremost, this idea was conceived Pre-Covid. There appears to be no recognition that work / travel habits have changed considerably. Prior to Covid, evening rush hour traffic would have been backed up all along Waterloo Road – this is no longer the case. There has been a big shift towards Remote Working. There is simply not nearly the level of car traffic as before Covid. Similarly, the buses that travel along Baggot Street are not that full.

Where is the Demand Analysis for this project?

What engagement has there been with the local community? It would seem it has been minimal, if any. This is in direct contravention of the Aarhus Convention. The majority of those who will be directly impacted by this ill conceived plan are unaware of the impending devastation of the local area – thus, it's not surprising that there has been so little, if any engagement.

For any traffic coming along Merrion Road towards the City, the most direct route is to continue along Northumberland Road. This is not new news, The Sherwood Foresters used this route in 1916. As per the current street signage at the junction of Pembroke Road and Northumberland, it indicates that 'An Lar' is 'straight ahead'. The bridge over the canal at the junction of Mount Street is far better equipped to deal with heavier levels of traffic than Baggot Bridge / McCartney Bridge, a bridge dating back to 1791. This bridge is of historical significance and very much part of the overall fabric of the area. The red-brick buildings at the Baggot Street Upper side of the bridge have been wonderfully preserved. The CPO signage erected along Wilton at Baggot Bridge is so neatly tucked away that I hadn't noticed it until it was pointed out to me – and I cycle along that route several times a week.

Another major concern is the fact that it would seem that under the current proposal Merrion Square will be used as a Bus Depot. This is inconceivable for such a unique Georgian Square. Merrion Square has been recently enhanced and is a wonderful resource for all. A number of years ago, the Baggot Street / Merrion Square environs were being considered as a UNESCO World Heritage Site – under the current proposal, it would be like the N11 with a Bus Depot at the end.

Apparently one of the reasons given for the above proposal was 'easy access' to the proposed new National Maternity Hospital at Vincent's Hospital – how many pregnant women actually take a bus to such appointments? If any do, it is hardly enough to merit such disruption to the environs of Pembroke Road / Baggot Street / Merrion Square.

The proposed removal of parking along Baggot Street will be detrimental to the local businesses - not only those immediately visible at street level, but the many business which operate above. The loss of these businesses will be a loss to the local community.

I simply don't understand the need for such wide-ranging disruption to the locality. There is already a No. 39A bus between UCD and Baggot Street – why the need for another bus route, when the current route is never full?

Apparently there will be 'Enhanced walking' opportunities. I can't see how this will be possible, in fact, it will be detrimental to pedestrians...

The 'Aviva' Stadium (or Landsdowne Road to many!) attracts upwards of 50,000. Since the easing of Covid restrictions it has been great to see 'live' events taking place at Aviva. Has any consideration been given to the very large number of pedestrians who walk to / from the stadium from Baggot Street?

Finally, I write this in the week when the Dublin Metro was announced on Tuesday 5th July – what consideration has the above project been given in relation to the Metro?

I strongly urge you to re-consider **Case reference: HA29N.313509.**



Adele O'Connor

SUBMISSION TO AN BORD PLENALA

RE; CASE HA 29N. 313509 NTA PROJECT

FROM; JUNE LAMBERT, J.P. 9 PEMBOKE LANE DUBLIN.4

INTRODUCTION.

I am not fully familiar from the proposal with the full rationale behind this proposal, but my position is that we all want what is best and what actually works, for the city of Dublin, and in this case, Georgian Dublin, a heritage site of the highest order. not just architectural but cultural . This is to be considered for Unesco, protected status, along with other aspects of Georgian Dublin, and would acknowledge a period important to Irish history. Pending in the next year or two. Residents Associations have worked so hard for decades to preserve as much as possible of the Georgian heritage, and history attached.

With so much competition for such large expenditure, it needs to work, and be proven so. Fullest information and costings, up to date maps, critical path networks, and cost-benefit analyses all important. There must be a necessity to improve what is not working, in order to make it better. So what is not working?

FOR CLARIFICATION.

Baggot st bridge with proposed 2 cycle lanes, and 2 traffic lanes taken largely by buses, will be not functional. Huge jams will result.

Bus gates- not explained. This affects a large number of local population

Single right lane (mainly for buses) from Pembroke to Waterloo road, whilst no access straight ahead. Huge jams will result.

'Improving public realm of village'. Exactly how is this envisaged? No parking. Reduced business activity etc. Huge traffic jams and cycle lanes both sides for the handful of cyclists. A host of 'ghost' mostly empty buses, as exist now.

How does traffic flow now? Not bad at all.

Parking proposed all taken away, and 2 or 3 disabled spaces, and loading zone- not acceptable.

What does temporary purchase mean, of 1,3,5,7,9,11 Pembroke Road mean? The proposal, stated no acquisitions.

Have the businesses not suffered enough during the pandemic? Many of them nearly lost their livelihoods, and are struggling.

The 15 minute journey time save is not proven, and price paid too high.

Trees- it is so good to hear that most of these will not be removed. These are essential for aesthetics and to absorb pollution.

Traffic flow.

The odd tweak, and left turn is feasible, but implications for residents must be very much considered.

We can testify to the existing number of ghost buses going up and down Waterloo Road, and the small numbers of people getting on at rush hours. Certainly very few Belfield students. Polluting, damaging, and hugely loss making to Dublin Bus. Can the State afford to underwrite such loss of resources?

Car parking and commercial activity.

By taking away too much car parking, the proposal discriminates against older people, local population. People will block our gates on the laneways. These laneways will become rat runs, and even more dangerous than now, and they are already heavily laden with Aviva traffic. Dublin City Council would want to promote the area, including the variety of good restaurants etc. This kind of tourism is important. Cultural tourism with nice pubs coffee shops and restaurants to enhance. Boutiquehotels. The Lansdowne hoteletc.

CONCLUSION.

John O'Hara City planning Officer has correctly indicated a number of problems with this particular proposal, namely parking, and impact on historic structures etc. I ask that the most serious consideration is given to everyones' points, because we may never get the chance to be UNESCO listed in the future, once buses, or light rail tracks appear etc, and that would be sad. We are a country suffering at the moment, after the economic shutdown. Priorities are everything. Thank you for your attention.

June Lambert

9
7
22

Matthew O'Farrell,
49 Pembroke Road,
Ballsbridge,
Dublin 4, D04 KX21

8 th July 2022

Case Reference: HA29N.313509

Submission to An Bord Pleanála on Bus Connects

My main objection to the proposed UCD-City Centre Bus Connects corridor is whether there exists a sufficient reason to undertake a project that will have such a significant effect on the relevant area.

The Bus Connects proposal is supposedly a part of Project 2040. This is important because whilst in the "Why does Dublin need a core bus corridor network" of the bus connects proposal, it mentions the population growth in the capital in the coming years combined with the low-density housing in commuter areas necessitating new bus corridors.¹ This does not match with the section in the Project 2040 proposal on how at least 40% of new housing is aimed to be in existing built-up areas.² Are the departments of housing and transport not aware that they both seem to be outlining different futures for Dublin? What's more, Project 2040 also outlines a proposal where population growth is more evenly dispersed throughout the entire country, rather than being focused mainly in Dublin. Is there a reason Bus Connects is diverging from the compact growth idea laid out in the same project it is meant to be a part of?

There seem to be other ideas in the Bus Connects proposal that don't seem to be consistent with other points laid out in the same proposal. The first of these is that the Bus Connects proposal will lead to an "enhanced walking infrastructure". This seems out of place given that only a few lines later there is talk of improving bus speeds, something that as a pedestrian who regularly walks out along the N11 between Donnybrook and Belfield, I can attest to only leads to one waiting for minutes at a time to cross the road. Hardly something that is good for pedestrians. Surely if the goal is to improve the city for pedestrians, removing buses from the road is the way to go? On top of this, the years it will take to construct the new bus corridor will require many roadworks to be undertaken which again will not be beneficial for pedestrians. Masquerading Bus Connects as being for the benefit of pedestrians seems rather disingenuous.

The final point that I found when examining the material on the proposal was the difference in time frame with regards to the clean fleet of buses that will be availing of the new corridors. If the Bus Connects will be finished circa 2027, that still leaves 8 years before Dublin Buses fleet will be one hundred percent zero-emission. Why is there such a long period where buses' potentiality running on non-zero emission power sources will be driving through the city center, if Bus Connects is meant to be better for the environment? Should Bus connects not wait until every single bus is zero-emission before a single piece of construction has begun? It is not as if a diesel bus is vastly more efficient than a diesel car as well because, as someone who regularly takes buses in the area, non-commuter buses regularly have only three or four passengers which are hardly vastly more efficient than a comparable car.

These are not rhetorical questions, I am generally puzzled and would appreciate answers, even if just for my own edification.


1

<https://busconnects.ie/wp-content/uploads/2022/03/busconnects-cbc14-ucd-to-city-centre-180219-fa-web.pdf>

2 <https://assets.gov.ie/7335/7692660a70b143cd92b1c65ee892b05c.pdf>

50 Wellington Road
Ballsbridge
Dublin 4
D04 X4P5

30 June 2022

An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1
D01 V902

Case Reference HA29N.313509

To Whom It May Concern,

As a local resident, a walker and a non-driver, I wish to register my opposition to the proposed BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme as it affects Pembroke Road on the grounds that there is no point facilitating more vehicles entering the centre of Dublin when it is already choked with traffic.

The centre itself should be pedestrianised as much as possible. Perhaps the planners should study the Luas-style system in Bordeaux which has made travelling around the city very easy and pleasant.

The priority should not be more bicycles, which are a menace to pedestrians and will only ever be used by a dedicated minority; rather we need to encourage the mass of people in the city centre to walk more or use reliable and frequent public transport rather than cars.

What is needed is a radical re-think of future growth in Dublin, encouraging development out of the centre.

Above all, we must protect historic (e.g. Moore Street) and Georgian Dublin which are not only vital parts of our heritage but also of economic importance in respect of tourism.

Yours sincerely,

A handwritten signature in black ink that reads "Elizabeth Murray". The script is cursive and fluid, with the first name and last name clearly legible.

Elizabeth Murray

50 Wellington Road
Ballsbridge
Dublin 4
D04 X4P5

30 June 2022

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

To Whom It May Concern:

As a local resident, I wish to register my opposition to the proposed Bus Connect plan (Case Reference HA29N.313509) as it affects Pembroke Road on the grounds that there is no point facilitating more vehicles entering the centre of Dublin when it is already choked with traffic.

What is needed is a radical re-think of future growth in Dublin, encouraging development out of the centre, which should be pedestrianised to the extent possible (certainly between St Stephen's Green and Parnell Square). The development of public transport has to be integrated into a holistic vision of a new, living city and not just an endless recarving of the existing road network which ultimately does little to create new capacity or relieve the current, severe congestion. Alternatives to road use must be urgently considered.

Our priority should not be more bicycles, which are a menace to pedestrians and will only ever be used by a dedicated minority; rather we need to encourage the mass of people in the city centre to walk more rather than using cars.

We should encourage sufficient densities of development to make public transport more viable. We should also encourage building on vacant sites such as those on Bridgefoot Street, which is close to existing transport hubs.

Yours sincerely,



Paul Murray

50 Wellington Road
Ballsbridge
Dublin 4
D04 X4P5

An Bord Pleanála (Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1
D01 V902

30 June 2022

Case reference: HA29N.313509

To Whom It May Concern,

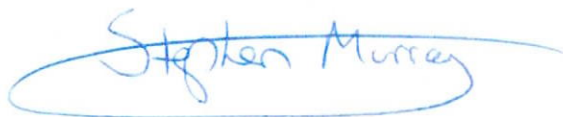
I am in opposition to the BusConnects Belfield/Blackrock to City Centre Core Bus Corridor Scheme in regard to Pembroke Road and Upper Baggot Street, a road that runs perpendicular to my own road of residence, Wellington Road.

I am a pedestrian. I do not drive or own a vehicle and I usually walk to designations, requiring public transportation only when needed due to longer distances.

As I noted in my letter to the Editor in the *Sunday Times* (Ireland Edition) last Sunday ("Lost hope for Georgian glory", 26 June 2022), any hope for Georgian Dublin receiving UNESCO world heritage status has been jeopardised by Dublin City Council's decision to improve the recently-built historically inappropriate development on Fitzwilliam Street alone.

The compulsory purchases of a house garden at 1 Pembroke Road, Dublin 4, D04Y897 (1012(2).2d) and 11 Pembroke Road, Dublin 4, D04W9P (1013(1).2d), and a recreational plot of Ground alongside Grand Canal at Wilton Terrace/Baggot Street Bridge, Dublin 4 (1014(1).2f) alone will cause irreversible damage to historical railings, a garden and public land, that form part of the streetscape of historical Georgian Dublin.

Yours sincerely,



Stephen Oliver Murray

Case reference HA29N.313509

Submission to An Bord Pleanála on Bus Connects 27/06/2022 from Bernie Traynor 5 Pembroke Lane, Waterloo Mews, Ballsbridge, Dublin 4

There are several issues that affect my amenity arising from the plans for the proposed bus connects project in the area of Pembroke road, Upper Baggot Street and Baggot Street Bridge and Pembroke Lane, Pembroke Road, Lansdowne Road Dublin 4.

Lack of Room for Crowds from Concerts and Football matches:

Last week we had a 65,000 capacity Aviva crowd for the young girl's pop idol concert from the star Harry Styles. After the concert they poured out onto the footpaths, cycle lanes and the main roads leading from the Aviva towards Baggot Street.

When they came up Pembroke Road, I spoke with some of them and asked them what they thought of the planned double bus corridor and cycle lanes planned for this area and one said "I bring tourist friends here because it's a safe and interesting part of the city and I would hate to see busses lining its main street".

Another said "Are you mad?" "This will ruin the atmosphere of these streets. I hope they won't do this". This is their heritage and what will be our legacy?

The crowd capacity post Covid for rugby matches is 52,000 people. Searsons pub and the Waterloo Pub have 1000 capacity for punters each there on post-match days with the spill over being catered for on the pavements.

As a resident of Pembroke I enjoy seeing young people outside enjoying the amenities of our city and having fun, God know they were restricted long enough. What will we leave for them to cherish? I want to see human and cultural connects in the area where I live and not bus connects.

Demand analysis?

I have often travelled back from town to Waterloo road and the bus has been empty. Where is the demand analysis that would prove that the demand is there for such bus corridors? It has not been furnished on any online communication that I have seen.

I would like to see the area of upper Baggot Street and Pembroke Road made into an informal plaza area with central outdoor bench style seating with tables having partial cover for people to meet, such as we see, in public squares which

are the public spaces for communities to meet up in villages in European cities and Pembroke Road pedestrianised and to see a diminution of all traffic in this area except for local access. Dublin received the 4th UNESCO city of Literature status in 2010 and the Baggot Street / Pembroke Street are sites for literature and culture similar to Dalkey and to have events like the book festival to bring residents and visitors into our village. We could have geo locator and QR code or an app that when you scan Patrick Kavanagh's statue or on the wall outside his house on Raglan road that bring you to a webpage to hear his poetry or hear a song or excerpts from the newsletters he wrote with his brother.

We have lost much of our Georgian streetscapes so let us not throw the baby out with the bathwater by losing the character, charm and culture and stature of this unique built heritage. The streetscapes and tree planting and layout handed down to us by the Earl of Pembroke whose vision laid out these fine street have stood the test of time.

Donnybrook village has seen a mass closing of many unique premises due to the traffic going through it. My area is one of the last remaining living intact villages where people want to live and rent property in spite of the sprawl of high depth and high rise IT procured buildings and office spaces that have been allowed to swallow up residential space. People live above the terrace of shops on Upper Baggot Street and we residents want to see more of them living here.

If the coffee shops, clothing shops and restaurants are forced to close because of poor planning decisions, other shops will not replace them. We may be left with charity shops taking their place instead. What is the purpose of a 15 min time saving going toward the city if it destructs the intangible heritage of this unique beloved area? We residents won't see this area destructed in the way being proposed because it cannot be replaced. It is precious to us. People travelling to Blackrock and Dunlaoire already have a dart train within walking distance so there isn't a need to duplicate this with busses. We want people living here not offices and embassies which are vacated at 6pm.

New Cycle Lanes both sides of Sean Moore Road Irishtown by NTA

Last Saturday 18th June 2022 I was driving two Chinese visitors down Haddington road towards Lotts road so that I could bring them to the South bull wall for a walk. I was faced with Haddington road which was at a standstill from the church to Lotts road so I turned up a side street to get to Eastmorland

place to head back onto Pembroke Road to see if the way to the Aviva might be less busy. It too was a solid queue.

This experience proved to me that if the planned Bus corridors go ahead in Pembroke road it will cause the congested traffic to divert into the narrow lanes away from the main roads like they did onto Newbridge Avenue that Saturday, which is really only one way. Also we do not want speed bumps put in then to fix that ensuing problem. It was a nightmare to think that was the effect of those cycle lanes. On the road to the toll bridge the traffic situation was a line of cars and trucks not moving forward with green lights unused. There wasn't one sign along the route to explain to the public why they could not use the public road.

The cause of this mess was the NTA cycle lanes that have been put in with huge ugly concrete blockades from Irishtown to the toll bridge roundabout. It is setting car owners against cyclists.

Even minimal rules for cyclists are not enforced. Many cyclists ride outside the cycle lanes on the canal. They don't stop at traffic lights. They don't have adequate lighting on the bicycles and by in large they don't wear reflective gear. A law needs to be passed to stop bicycles being manufactured without a headlight equal to that of cars.

I was on the toll route from Irishtown for 45 mins and sitting there and in all that time on a Saturday only two cyclists riding together side by side passed along that road. Have the NTA lost their minds? Meanwhile traffic lights go green and allow two cars to pass before returning directly to red. The orange safety light at traffic lights being dropped is a bad idea because people get frustrated at making almost no progress along say the N11 and they speed up to try and make the green light. Traffic lights should clear up to 15 vehicles in one direction before changing. The traffic lights should be synchronised so that three sets of traffic lights in a stretch of road remain green to facilitate people being allowed to progress on their way to collect their children or do their business without so much stress and waste of time.

For the 40,000 people who attend UCD daily I believe the current busses serve them well but that the route into and out of town could be served as in NYC busses and cars and bicycles could go into town just one way with busses on one side and cars and cyclists on the other side via the widest road which is Northumberland road and similarly back via Pembroke Road and Morehampton

road. People will need to cross to the next parallel street to get the return bus going in the opposite direction but it solves the problem without causing mayhem. This would create more available space.

Is there any city in the world that operates a four minute buss in any site comparable to Pembroke Road?

Landscaping issues

I do not wish to see more ugly triangular hornbeam trees like those now lining Herbert Park Road and Donnybrook road being planted in the Pembroke area. These trees are already blocking our views of the bus stops on O' Connell Street and they are spoiling the peaceful leafy Herbert park road I pine for the trees they took away. The least that should have been done was to replace them with large trees of a similar ilk. These lime and awful hornbeam trees make one feel like you're in an architects drawing or in a computer game set. They are vile.

A light rail alternative to bus and cycle corridors of the type being run in Chinese capitols id the answer that most people would accept. Whereby a rail is laid and lateral sensors guide the carriages would be the best solution to solving the bus connects and cycle lane debacle it is really lame to say "A project is a project" as the NTA have said to our resident who met them. I don't see any reason why we should wait until 2024 for this new non construction light rail method which is now available. The pollution alone from the rubber tyres on two lanes of busses is not wanted.

I think that transponders on delivery vans and zappers or code sensors could operate for local cars for residence to get access to their streets and homes.

There is a need to provide timed access say 20 mins for cars to do pickups for the pharmacy and deliveries to local businesses.

The majority of bicycles already choose to travel along both sides of the canal with very few non-commercial cyclists riding on Pembroke road. Cyclist on Baggot Street and Pembroke road are Deliveroo and Just Eat cycle deliveries.

In a democracy we rely on our statutory bodies to stand up for what they majority want and to prevent our treasured areas being denigrated from projects which are short sighted but which once installed will forever leave our area damaged and which ultimately are out of date and are unnecessary.

Many thanks for reading this submission.

Bernadette Ince for MPMLRBW 05-07-2022.

2 Heytesbury Court

Pembroke Lane

Dublin 4

Re Bus Connects

Case Reference HA29N. 31 3 509 Submission 29/06/2022
To AN Bord Pleanála

I, as a resident of Pembroke Lane Dublin 4, have reviewed the plans for bus corridor 14, and its implementation will significantly reduce my amenity.

I would like to demonstrate below that the proposed plan is;

- Ill conceived,
- has a negative impact of the streetscape along its route, which is of architectural importance to the city.
- affords a significant loss of amenity to the residents of the area.

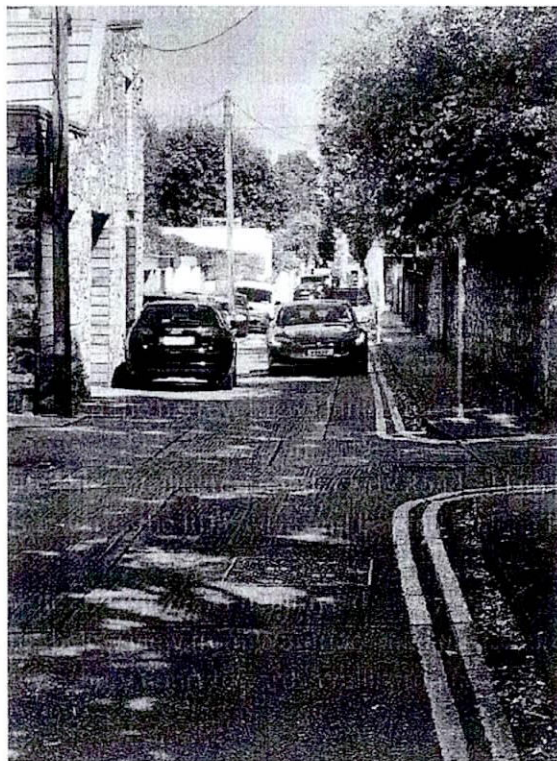
I request that the Bord rejects the bus corridor plan for route 14 as it stands from the Merrion Centre on Merrion Road to the city centre.

The plan is ill conceived because

- The bus- gate will create "rat runs" through the narrow mews lane streets as the traffic circumvents the busgate.

The most direct route to gain access to the " Wellington Road -Clyde Road – Elgin Road- Pembroke Road Area", and onwards towards the RDS Aviva and beyond is along Pembroke Lane, where I reside.

This lane is not suitable for heavy traffic and will result health and safety issues, access issues and loss of amenity.(see photos below view from Waterloo Road up Pembroke Lane and secondly from my property 2 Heytesbury Court towards Wellington Road.)



- It is intended on the plan to funnel all the East West traffic through Herbert park, as Elgin Road exit onto Pembroke Road at Roly's is to be eliminated.
The Park is separated into two parts by this road that is planned to carry heavy traffic. It seems illogical to alter traffic flows to funnel traffic through an amenity area, also creating both health and safety and loss of amenity impacts.

Bus Corridor 14 is routed through an area that is of architectural importance, and all planning grants on the Victorian and Georgian areas have had to take account of any potential negative impact on the important architectural vista. This vista has been preserved to this date. To drive a bus corridor through such an area will significantly detract from the vista of the today, making for long sterile avenues devoid of the original concepts that have been maintained up to now and currently make the area a favourable part of the city to live.

The bus corridor 14 is **not required**, from the Merrion Centre into the city. The DART line is in close proximity to the described route 14, and offers a very good alternative transport route. There are also cycle tracks planned for the coastal route and a bus corridor (bus and cycle) through Nutley Lane to the Stillorgan road and on into the city (bus corridor 13).

Bus corridor 14 cannot be justified against the significant negative impact on the streetscape of an area of architectural importance.

There is a duty of care imposed on any planning process to ensure that there is not a substantive loss of amenity to an area by the imposition of a proposed plan. The bus corridor 14 will result in a substantive loss of my amenity.

The area "Wellington Road -Clyde Road – Elgin Road- Pembroke Road Area" will be an area that will be extremely difficult access as it will be in close proximity to two bus corridors 13 & 14. This will make access for essential services such as maintenance and repair to properties difficult. This is manifest currently when there is a City Marathon. We are essentially locked in our properties. This will be repeated if both corridors are granted. We will become an isolated community.

Bus Corridor 13 and 14 are very close together as they enter the City in the Pembroke Area. The two together cannot be justified for the purpose of improved transport links. There is a need for one only. If there was only one route, access to the bus corridor routings would not be markedly reduced in the area (The length of Wellington Road 4 min walk). It is the routing out from the city that is important, and that is why Bus Corridor 14 is not justified from the Merrion Centre to the city.

I have set out above the arguments that indicate that Bus Corridor 14 is not justified in terms of design, architectural impact and loss of amenity to the area.

I therefore request that Bus Corridor 14 section from the Merrion Centre on the Merrion Road to the city centre is refused.

The omission of this section of bus corridor 14 will have no impact on the intended improved transport links with the city centre, but a significant affect on the architectural vista of the area, and the loss of amenity to the residents of the area.

Thank you for reviewing this document

Best regards



Paul Harrison

53 & 55 PEMBROKE LANE
BALLSBRIDGE
DUBLIN 4

July 6th, 2022

An Bord Pleanála
64 Marlborough Street
Dublin 1

**Ref: HA29N.313509 – BusConnects – Area Belfield/Blackrock to City
Centre Core Bus Corridor Scheme**

Dear Bord Pleanála

Re: Pembroke Road and Upper Baggot Street area

The Pembroke Estate

Pembroke Road is the site of the Battle of Baggotrath, where the Duke of Ormond, Lord Lieutenant of Dublin, was defeated by Oliver Cromwell's Roundheads clearing the way for Cromwell's arrival in Dublin on 15th August 1649.

Subsequently the area became the property of Earl Fitzwilliam who bequeathed his estate to his cousin the Earl of Pembroke in 1816. The **Fitzwilliam Estate became the Pembroke Estate**. The new Earl continued his cousin's building programme of elegant townhouses with the continuation of Lower Baggot Street over the Grand Canal via Baggot Street Bridge (the Macartney Bridge). His **architects and master craftsmen created Pembroke Road as an extension of the fine squares and tall houses with fine ironwork of eighteenth century Georgian Dublin** (the Georgian Core). The Pembroke Estate is one of the most coherent and comprehensive building campaigns of the nineteenth century. Its **graceful townhouses built alongside wide roads with green boundaries and tall trees are an exemplar of good town planning**.

The imposition of BusConnects on Pembroke Road and Upper Baggot Street **will destroy the viability** of this historic area.

Until recently, most of the houses on Pembroke Road had become offices or had been broken up into flats. In the last ten/fifteen years the houses have been returned to their well-established nineteenth century use as family homes. This has **revived the village atmosphere of the area and is most welcome**. Upper Baggot had become run down. Now new businesses are opening all the time and it has become a vibrant area.

If the old Baggot Street Hospital becomes a hotel as is hoped, it will further enhance the area where the 5* Dylan Hotel is thriving.

There is **no longer access from the rear lanes to the houses on Pembroke Road**. Gardens and coach houses have been sold for conversion into dwellings. Families must exit their houses through the front door on to Pembroke Road and, on the north side of the road, will be **directly adjacent to Core Bus Corridor B Spine bus route**. **Four major bus routes with buses in each direction every three minutes** plus the local Sandymount bus will be directly outside their houses.

Many young families who have moved into houses on Pembroke Road. **BusConnects will put children at risk.**

The houses in the Pembroke Road area have been bought by young families who chose the area as a pleasant, safe place in which to bring up children with plenty of **creches, schools, parks, shops, and restaurants**. All this **within a 15-minute walk of the city centre**.

This is an example of the ideal **'15-minute city'** that Dublin City Council wishes to create, nobody being more than 15 minutes away from all amenities.

Constant B Spine buses in both directions every three minutes, and the subsequent disruption of existing traffic routes, will destroy the quiet safe area in which parents have chosen to bring up their children.

Blocking Pembroke Road with the bus gate at Eastmoreland Place will cause huge disruption to the **nineteenth century road system with its many narrow back lanes**. The lanes, which are favourite strolls for dog walkers, young mothers with prams and safe routes for children going to school, will become **dangerous rat runs**.

Pembroke Lane, which narrows between Wellington Road and Raglan Road, has coach houses with nineteenth century stable gates opening directly into the traffic. It will be treacherous.

Cars and delivery lorries will turn right into Waterloo Road; then turn left onto Pembroke Lane to gain access to the traffic lights on Raglan Road to return onto Pembroke Road.

Traffic will back up at the lights at Raglan Road and Wellington Road. This aspect of the plan has clearly not been thought through.

It will cause traffic chaos.

No provision of pedestrian crossings the entire length of Pembroke Road clearly shows the comprehensive lack of planning and thought for residents on the bus routes.

Why have these bus routes been put through a residential area when a **good alternative exists?**

Northumberland Road's houses are further back from the road. It is still **mostly offices.** It has **no shops**, and it is a traditional route for buses into the city.

It leads straight into Merrion Square over a flatter and far more suitable bridge over the Grand Canal.

Why was this route ignored? If BusConnects goes ahead, it is not too late to adjust the **B Spine buses to go down Northumberland Road.**

The **existing bus lanes work well**, and bus journeys are fast if there are no interruptions.

In our view, existing **buses** and other traffic **would flow freely** and be safe with the ongoing **addition of cycle lanes**, the **upgrading of traffic pinch points***, the **synchronisation of traffic lights**, **better communication between buses and their depot**, **improved policing of yellow boxes** and a **crackdown on double parking of delivery vans.**

BusConnects is already out of date. The new post covid world has changed work patterns forever and there is simply **no necessity** to impose a **hugely disruptive bus system** on an area that will be **damaged forever** and **does not need it.**

It is quite extraordinary that the Blackrock to City Centre Core Bus Corridor runs parallel to the Dart line for all its length.

There **will be a need** in the future for a comprehensive **underground system** in Dublin. **Put the money and planning, already in place for BusConnects, into planning for that.**

BusConnects has put an **800-page 'explanatory document' online.** This is badly laid out, not searchable, poorly explained, **and does not show a comprehensive picture of what BusConnects is planning for the city and its environs.**

Signage on land being served with CPOs and TCPOs is equally poorly designed and hard to understand.

Please don't let this unwanted and unnecessary scheme go forward. It will kill the only recently revived Pembroke Road and Upper Baggot Street area.

Sincerely,

Esther Murnane, 55 Pembroke Lane Dublin DO4 V6K1

A handwritten signature in cursive script that reads "ESTHER MURNANE".

Dorinda Kavanagh, 53 Pembroke Lane Dublin D04 C6P3

A handwritten signature in cursive script that reads "Dorinda Kavanagh".

***Pinch points in Pembroke Area that slow traffic:**

Pembroke Street junction with Lower Leeson Street
Waterloo Road and Morehampton Road
Wellington Road and Morehampton Road
Merrion Gates

15 Wellington Road,
Dublin 4.

22 June '22

To: An Bord Pleanála ,
(Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1, D01 V902

Re: Bus Connects, Belfield / Blackrock.

To Whom It Concerns,

I'm writing to express my concern about several aspects of the Bus Connects proposal in general and in particular how it affects my own area.

The primary concern of the proposal appears to be to limit the use of private cars in the city centre and suburbs. The Bus Connects plan to achieve more frequent and efficient public transport is admirable but the methodology seems akin to using a sledgehammer to crack a nut. No-one can dispute that we need to cut back drastically on our use of fossil fuels but electric and hybrid vehicles are becoming more and more the norm and there will always be people whose only realistic mode of transport is the private car, elderly, less abled and parents who have to get small children to and from school and afternoon activities; there should be room and ease of movement for everyone on the roads.

The notion of the '15 minute city' gaining traction with the powers that be

I would have preferred that instead of rushing headlong to a 'one size fits all' solution across the city, Bus Connects might have trialled small scale, local , targeted ideas to ease congestion and facilitate public transport. Such notions as giving priority to public transport inbound during the morning rush hour and reversing the rules in the evening.

We can see that buses in our area are full between 8am and 9am and again from 5pm to 6pm. Maybe in between peak times smaller vehicles could be used? Bus Connects assumes that public transport providers will have the resources to bump up the frequency of services as soon as the considerable infrastructure changes have been made.

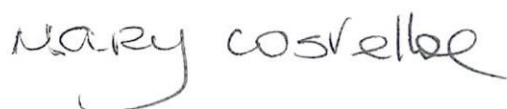
Has anyone the will to trial car pooling, or to do away with the thousands of car park spaces civil and public servants can avail of free of charge. Having a free car parking space at one's disposal is always going to encourage commuting by car. I am concerned that in the pursuit of the Bus Connects plan, hundreds of mature trees will be felled, gardens reduced in size and period walls and railings removed. I am not convinced that the plan is worth this huge loss to our neighbourhoods.

Finally I would like to point out how the imposition of the following aspect of the plan will result in the creation of a 'rat-run' on Pembroke Lane and the part of Wellington Road between Pembroke Lane and Pembroke Road

"Along Baggot Street Upper, it is intended to reduce the width of the existing carriageway. This can be facilitated through the installation of a Bus Gate at the western end of Pembroke Road with a short section of bus lane between the Waterloo Road and Eastmoreland Place junctions. Eastbound general traffic on Baggot Street Upper will not be permitted to access Pembroke Road and vice versa for westbound traffic on Pembroke Road. As a result of this, the general traffic movement of right-turning vehicles from Baggot Street Upper to Waterloo Road can be accommodated in a single right turn lane, permitting the removal of the existing straight ahead lane towards Pembroke Road. The proposal includes providing dedicated cycle tracks through the village while improving the public realm. Some loading and parking will be retained in the Baggot Street Upper village centre"

I am hoping that An Bord Pleanála will send the entire proposal back to the drawing board and suggest more innovative and imaginative solutions to Dublin's transport problems.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'Mary Costelloe'. The signature is fluid and cursive, with the first name 'Mary' written in a larger, more prominent script than the surname 'Costelloe'.

Mary Costelloe.

correspondence between Jim O'Callaghan & I



+

Mary Costelloe

Re: Bus Connects

1 message

Mary Costelloe

29 June 2022 at 19:02

To: Jim O'Callaghan <Jim.O'Callaghan@oireachtas.ie>

Jim,

Thank you for your prompt reply.

Your pessimistic reply makes me wonder who is running the country? Does the NTA have more power than the government you are part of?

Mary.

On Tue, 28 Jun 2022 at 15:39, Jim O'Callaghan <Jim.O'Callaghan@oireachtas.ie> wrote:

Mary,

Thanks very much for your email and I will read your submission to An Bord Pleanála about Bus Connects.

I hope they take on board your concerns but regrettably to date the NTA appear insistent on the Bus Connects plan. Some changes were made from the earliest proposals but since then they appear intent on installing corridors notwithstanding the impact it will have on trees and railings in our area.

I will try to use what influence I have to make sure that the character of the city and indeed Dublin 4 is preserved.

Best wishes.

Jim.

From: Mary Costelloe

Sent: Tuesday 28 June 2022 10:53

To: Jim O'Callaghan <Jim.O'Callaghan@oireachtas.ie>

Subject: Bus Connects

Dear Mr. O'Callaghan,

I'm attaching my submission to An Bord Pleanála expressing my concerns about the effects their current plan will have on our area. I hope you'll use your influence to make sure that the character of our neighbourhood is not destroyed in the admirable desire to make public transport more frequent and efficient.

Best Regards,

Mary Costelloe,

15 Wellington Road,

15 Wellington Road,
Dublin 4.

30 June '22

To: An Bord Pleanála ,
(Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1, D01 V902

Re: Bus Connects, Belfield / Blackrock.

Dear Sir / Madam,

I am dismayed to learn that the NTA's Bus Connects plans include huge changes to the Pembroke Rd./ Baggot St. area. I can't imagine that anyone would dispute the value that the architecture and layout of the public spaces of this area adds to Dublin as a whole. The neighbourhood has important links to the artistic, literary and even sporting history of our city.

Trees which have stood for over 100 years will be sacrificed in the implementation of this plan. This is an appalling prospect and in an era when we should be adding trees to our streetscapes it would be unforgivable.

In practical terms the NTA seems to be about to turn Pembroke Road and Baggot Street into a highway which will cut the neighbourhood in two proving difficult for businesses and shoppers alike. I can't understand why buses can't be routed along Northumberland Road instead of Pembroke Road.

This proposal was drawn up pre Covid, fewer people are now working 5 day weeks in offices in the city centre and surely the NTA should be reconsidering their plans?

You have it in your power to avert the disaster that is proposed by the NTA, please use it.

A handwritten signature in dark ink, appearing to read 'Diarmuid Barnes'. The signature is fluid and cursive, with the first name 'Diarmuid' being more prominent and the last name 'Barnes' following in a similar style.

Diarmuid Barnes.



SUBMISSION TO THE NATIONAL TRANSPORT AUTHORITY (NTA)

ON THE GREATER DUBLIN AREA TRANSPORT STRATEGY 2022-2042

THE NEWTON PLAN

TRANSPORT FOR DUBLIN

 **TOM PHILLIPS
+ ASSOCIATES**
PLANNING FOR THE FUTURE

Prepared for:

Prepared by:

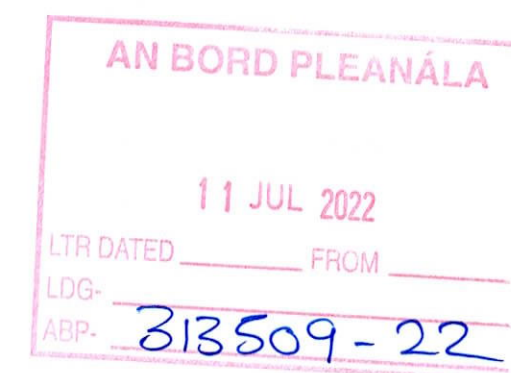
Tom Phillips + Associates
80 Harcourt Street
Dublin 2
D02 F449

t: 01 478 6055
e: info@tpa.ie
w: www.tpa.ie

Monday, 10 January 2022

CONTENTS

1.0	INTRODUCTION AND CONTEXT	2
1.1	ENVIRONMENTAL IMPACT ASSESSMENT – EXAMINATION OF ALTERNATIVES	2
1.2	DUBLIN CITY AND THE TRANSPORT PLAN	3
1.3	THE <i>NEWTON PLAN</i> SERVES TO ADDRESS SEVERAL TRANSPORT-RELATED CONCERNS.....	3
1.4	HIGHLIGHTS OF <i>THE NEWTON PLAN</i>	4
1.5	COSTS	4
1.6	DELIVERY	5
1.7	NON AUTOMATED MOBILITY (SEE ALSO SECTION 2.0 BELOW)	5
1.8	BUS	5
2.0	CYCLING AND PERSONAL MOBILITY DEVICES, PEDESTRIAN STREETS AND TAXIS	7
2.1	CYCLING, E-SCOOTERS, PEDESTRIAN STREETS, OPEN SPACES, FOOTPATHS (A2)	7
2.1.1	SAFETY	7
2.1.2	PRIORITY	8
2.1.3	SPACE	8
2.2	PEDESTRIAN STREETS.....	8
2.3	FOOTPATHS.....	8
2.4	OPEN SPACES	8
2.5	QUAY BUS CONTRAFLOW (QBC).....	8
2.6	TAXIS	8
2.7	PUBLIC CONVENIENCES (TOILETS)	8
3.0	PUBLIC TRANSPORT	9
3.1	BUS	9
3.1.1	“BACK TRACKING”	9
	COST	9
3.2	LIGHT RAIL.....	9
3.3	HEAVY RAIL – THE PROPOSED “MLINK”	10
4.0	NEXT STEPS	11
	APPENDIX A - THE <i>NEWTON PLAN</i> – A POST-COVID TRANSPORT PROPOSAL FOR DUBLIN	12
	APPENDIX B - DUBLIN CITY CENTRE BUS PLAN	13
	APPENDIX C - BUS SUPER ORBITAL.....	14
	APPENDIX D - 3 IN 1 BUS ORBITAL	15
	APPENDIX E - CITY BUS NETWORK – CONTRAFLOW BUS LOOP ON THE QUAYS.....	16



National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2
D02 WT20

Monday, 10 January 2022

[Submitted via: <https://consult.nationaltransport.ie/en/consultation/greater-dublin-area-transport-strategy>]

Dear Sir / Madam

RE: SUBMISSION IN RESPONSE TO THE DRAFT GREATER DUBLIN AREA TRANSPORT STRATEGY – THE NEWTON PLAN

1.0 INTRODUCTION AND CONTEXT

1.1 Environmental Impact Assessment – Examination of Alternatives

The Pembroke Road Association and the Baggot Street Traders¹ have retained Tom Phillips + Associates² to respond to the invitation by the National Transport Authority to comment on the *Draft Greater Area Transport Strategy (2022-2042)*.



¹ Michael Quinn, The Lansdowne Hotel, 27/29 Pembroke Road, Dublin 4, D04 X5W9.

² 80 Harcourt Street, Dublin 2, D02 F449.

Figure 1.1 Greater Area Transport Strategy (2022-2042). (Source: <https://www.nationaltransport.ie/wp-content/uploads/2021/11/NTA-GDA-Transport-Strategy-2022-42-15.11.21-FA-WEB-1.pdf>)

In this regard, we base much of this Submission on an alternate multi-modal transport solution that we trust will be considered under the Examination of Alternatives' section of the requisite Environmental Impact Assessment process, and of a Strategic Environmental Assessment (SEA) of key plans and projects.

Known as *The Newton Plan*, it was conceived primarily by Mr Tom Newton, an experienced former bus driver. (Figure 1.2 (and Appendix A).)

Mr Tom Newton and Ms Caitríona McClean³ would welcome the opportunity to discuss this proposal with the NTA GDATS' Team to clarify issues arising.

The Newton Plan looks across several transport modes including existing and proposed LUAS lines, existing and proposed heavy rail, and a proposed service road from the N7 to the M1.

It presents an integrated plan incorporating rail, LUAS, and bus, alongside a recognition and placement of walking and cycling as primary and environmentally harmonious modes of transport and embraces community, family and individual wellbeing.

This document includes the following explanatory plans:

1.	<i>The Newton Plan</i> – A Post-Covid Transport Proposal for Dublin	Appendix A (Figure 1.2)
2.	Dublin City Centre Bus Plan	Appendix B (Figure 1.3)
3.	Bus Super Orbital	Appendix C (Figure 1.4)
4.	3 in 1 Bus Orbital	Appendix D (Figure 1.5)
5.	City Bus Network – Contraflow Bus Loop on the Quay	Appendix E (Figure 2.1)
6.	Map Showing Road, Rail and Light Rail (existing and proposed)	Appendix F (Figure 3.1)

In our professional opinion, *The Newton Plan*, proposals remain consistent with the spatial planning policies and objectives of the *Regional Spatial and Economic Strategy (RSES)*, which itself is consistent with the *National Planning Framework* and updated *National Development Plan*.

Similarly, *The Newton Plan* delivers on the NTA's key Strategy Objectives of:

1. An enhanced natural and built environment;
2. A strong sustainable economy;

³ Tom Newton, Email: circletransport@gmail.com

Caitríona McClean, Email: cmaemcclean@hotmail.com

3. Connected communities and a better quality of life; and
4. Importantly, an inclusive transport system.

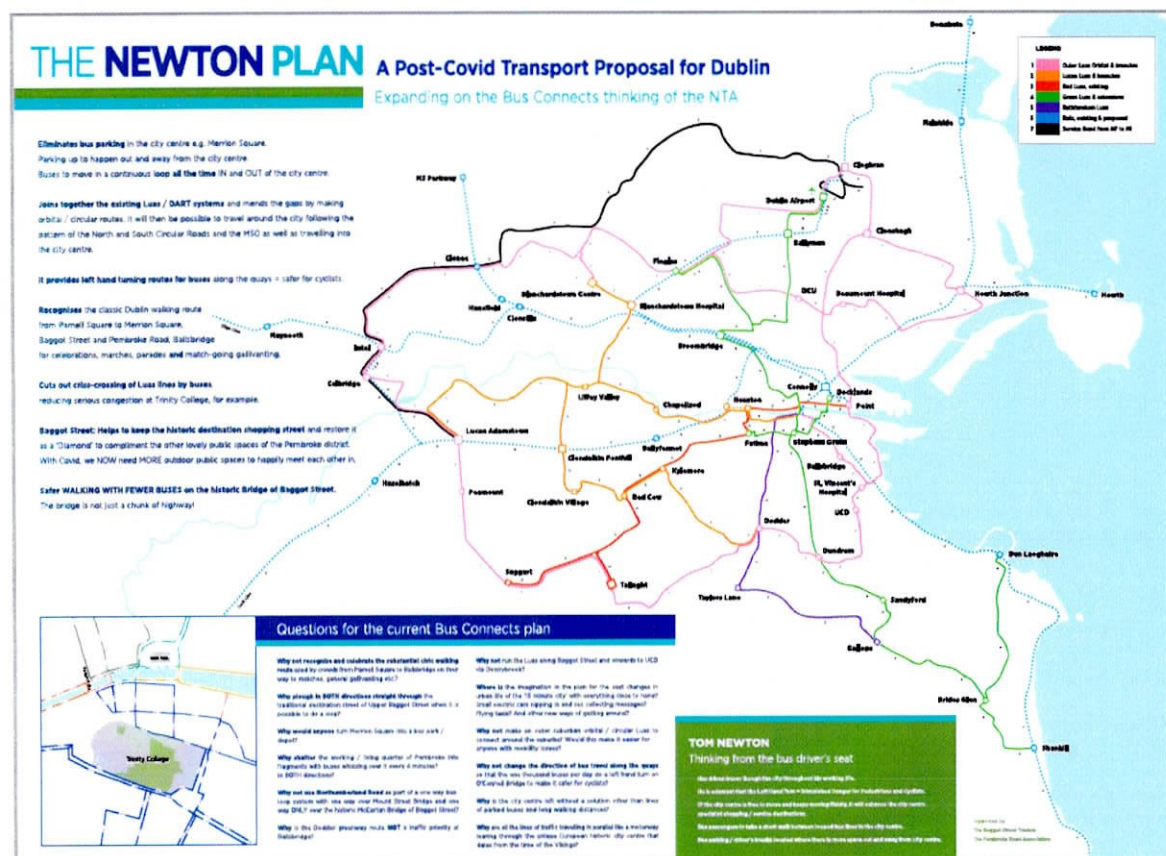


Figure 1.2: The Newton Plan. (Source: Tom Newton.)

Figure 1.2 (and Appendix A) present a graphic representation of the overall plan, illustrating the interface of multi-modal transport routes, with a particular focus on how buses traverse the City.

In our opinion, the most important part in any transport plan is the City centre, especially for buses.

With the City centre relatively compact in most cities, and with Dublin no exception, many more bus trips are needed to have any real impact on car reduction.

1.2 Dublin City and The Transport Plan

We submit that the City is not suitable to accommodate the number of buses that are needed under the present City layout. This results in the bus becoming the main cause of City congestion.

In an effort to address bus congestion, bus terminals were located effectively out of the city centre.

This causes three major problems for passengers with “Back Tracking”:

“Back tracking” is where passengers need to go back several stops to board their bus as when the bus arrives into the Centre there are no seats left. (see also Section 3.1.1 below.)

Full buses pass passengers along the route.

1. Buses become overloaded.

Three more problems are caused by bus:

1. Duplication results in major congestion problems.
2. Buses face more delays; and
3. Too many buses are located in the wrong place.

In addition, with this system, buses:

1. Block the LUAS network.
2. Reduce the space for cyclists; and
3. Prevent more streets from being pedestrianised and choke footpath space.

The City effectively becomes a massive bus park.

These problems make bus usage uncertain, uncomfortable, and unsafe.

Most of these problems can be addressed by the Quay Bus Contra (QBC) Loop that separates all modes of transport from each other.

1.3 The Newton Plan serves to address several transport-related concerns

The Plan shows orbital LUAS and the rail component. *The Newton Plan* builds on what is already there and, we submit, vastly increases capacity at a relative cost being less than the intended NTA spend. It could be delivered within a much-reduced timeline to that proposed by the *Draft Greater Dublin Area Transport Strategy*.

In the context of climate change, anything beyond a ten-year timeline is ineffective.

The current Strategy operates on a twenty year plus basis, which is likely to be inadequate.

The Newton Plan is designed *inter alia* to preserve the integrity of community and respect the architectural beauty and scale of the City's heritage.

1.4 Highlights of *The Newton Plan*

Key points:

1. Orbital LUAS providing links with intercity rail at the Adamstown Hub - saving Dublin commuter time and allowing access to all parts of Dublin without requiring passengers to go to City centre first.
 2. Missing Link (see (M) in *The Newton Plan*) giving direct access to Dublin airport via rail to all mainline rail passengers including Belfast. This does not require tunnel digging or station change in the City.
 3. The return of the Baggot St tram.
 4. Pedestrian walkways direct from Ballsbridge to Parnell Square.
 5. The 'Glink' (G-Link) - vastly increasing LUAS capacity in Dublin City, solving congestion.
- This is a simple concept involving trams accessing St Stephen's Green now in both directions by adding a line from Fatima.
- Every second tram from Docklands loops back from Heuston via Fatima and St Stephen's Green.
6. Rail access to Dublin airport via all existing Dart lines.
 7. Greater efficiency in use of bus fleet by contra flow bus lanes on the Quays.

North, South, East and West bus routes turn around on the Quays to pick up more out-of-City passengers.

8. Higher priority and safety for cyclists on the Quays.

Summary of our concerns with the current DGDATS:

1. The NTAS suggests that the Lucan LUAS route is not feasible as it requires joining with the Red Line (existing) and there is insufficient capacity. The Newton Lucan LUAS goes via the N4.
2. There is no mechanism to address flaws in Bus Connects that leave people without access to a bus, with no mechanism for challenging these issues.
3. There is no provision for review of the positioning of the M50 toll. A Cost Benefit Analysis is overdue.
4. The need for over-and under-passes to separate local and through traffic on main archways has not been comprehensively identified and addressed. Addressing this would significantly alter travel time and reduce stress.
5. Land use under the GDATS Plan does not strive to meet the potential locally. The orbital LUAS network in *The Newton Plan* opens up wider potential fully facilitating the outer landbank corridor.
6. The *Newton Plan* preparation process identified concerns with the public consultation process that need to be addressed:
7. Locations chosen by NTA to hold consultations were not always on a bus route. This is a basic requirement.
8. The Environmental Impact Assessment process – particularly the requirement for a thorough examination of alternatives – requires that the views of the public are addressed comprehensively, rather than collated and presented as statistics.
9. Sensitivity to the aesthetics is required, including an examination of the effect of the location of bus termini on City architecture, and issues raised by communities in terms of their private property.

1.5 Costs

The Newton Plan is presented as a cost-effective alternative to the GDATS proposals:

1. Bus solutions involve a much more efficient use of the fleet. The Quays bus contraflow is virtually cost free.
2. The return from the Glink in *The Newton Plan* more than justifies the cost of less than 6km on roadway. No land acquisitions.
3. The missing link of approximately 20km requires 3km access through agricultural land.

1.6 Delivery

It is projected that *The Newton Plan* can be delivered in full within ten years.

The capital requirement is far less than projects proposed by the NTA. Each component of *The Newton Plan* in itself delivers stand-alone benefits as well as the benefits of the integrated system.

1.7 Non automated mobility (see also Section 2.0 below)

The Newton Plan gives priority to cycling and walking in the City. A by-product of the contraflow on the Quays is a new concept to make cycling (cycling family, e-scooters etc) safe at junctions where over 80% of cycling accidents happen.

Newton proposals:

- To encourage additional night-time haulage, lorries will be toll free between 20:00 hrs and 06:00 hrs on all motorways.
- Rail has a great potential to ease pressure on the roads. Night-time freight has competed with rail repair and maintenance on our main lines. *The Newton Plan* proposes opening the line between Athlone and Mullingar and opening a section of rail from Athenry to Claremorris.

These allow both maintenance and freight to operate at night without competing with each other. This requires agreement with cyclists to avoid using this greenway route at the bridges between 20:00 hrs and 06:00 hrs.

- Reopen the Rosslare line to Waterford for freight so that in the event of maintenance on the Dublin to Waterford or Dublin to Rosslare route, the alternative can be used.

The Rosslare to Waterford line will continue on to Foynes in Limerick as a major freight route. This is now a requirement because of Brexit, and Foynes is a deep port. *The Newton Plan* proposes this strategy rather than routing all the freight through Dublin.

- We are concerned that penalties and constraints are being imposed on car owners without providing adequate public transport solutions or any proposals facilitating the cost of periodic car hire to make it a realistic proposition.
- The positioning of the toll on the M50 is overdue for review and a cost benefit analysis is required of the consequences of alternatives.
- There is a need for under and over passes on main archway to be addressed under *The Newton Plan*. A glaring omission is the Palmerstown Junction, which causes serious traffic delays into and out of the City.

- *The Newton Plan* does not focus on penalties to dissuade car owners. The Newton orbital LUAS network is designed to attract passengers and reduce the real need for car usage.

- Dublin needs another orbital road (SR51 in *The Newton Plan*).

The functions of the road are to service the outer industrial land corridor, to ease congestion on the M50, and to reduce local rat running. Much of this road is already built, but the pace must be increased.

- Location is important to facilitate the completion of the Newton orbital LUAS. The required route is from the N7 to the M1 via Leixlip and Blanchardstown. The map in the Introduction refers. (See Figure 1.2 and Appendix A.)
- Location is important to facilitate the completion of the Newton orbital LUAS. The required route is from the N7 to the M1 via Leixlip and Blanchardstown. The environmental effect on the Liffey Valley is a vital consideration in the location of this road. The map in the Introduction refers.

There are issues with how this section is presented:

- The location of Park and Ride on the map provided is vague and difficult to discern.
- The next generation ticketing has not been justified in terms of costs and no cost versus revenue stream has been provided. Tendering for the equipment suggests the cost exceeds the potential revenue stream over the life of the equipment. We seek that the NTA publishes the relevant figures and facilitate public debate on alternative strategies – i.e. extending free travel.
- There is a lost opportunity regarding proposing incentives for use of low and zero emission taxis. There is no evidence that the NTA has been proactive in this regard.

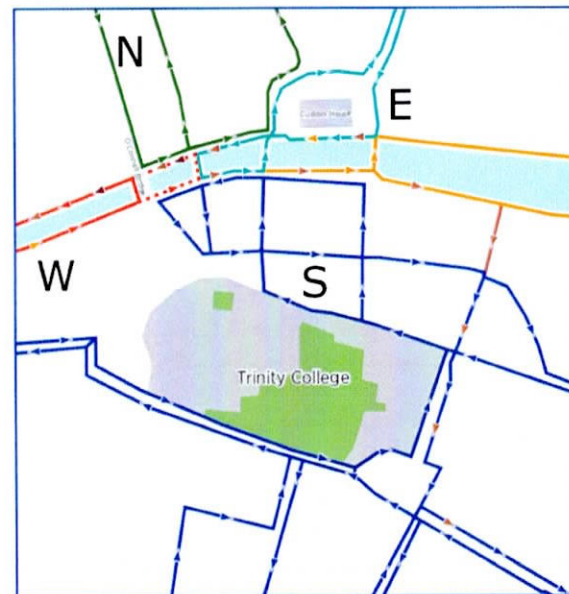
1.8 Bus

Under *The Newton City Centre Bus Plan* there is no need to heavily load all bus routes on a small number of streets, thereby negatively impacting residents and traders alike.

For example, under the NTA proposal the positioning of buses along Pembroke Road and Baggot Street is heavy, whereas Northumberland Road and Leeson Street would be under-utilised.

Figure 1.3 illustrates a proposal for the Dublin City Centre Bus Plan, illustrating a new city centre layout for the network.

Dublin City Centre Bus Plan



New city layout for bus network in the City Centre. Buses come into the city from North, South, East and West forming and interchange without obstructing each other, the Luas and other traffic flow. This creates a new safety concept (C.H.O.B) for cycling and cycling families (e-scooter) in the city centre. This concept allows many more streets to be pedestrianised without blocking traffic flow. This is made possible by the Quay Bus Contra-Flow Loop, on the quays, maximising road and footpath space. Making Dublin B.E.S.T for business, entertainment, shopping and tourism. This creates the ideal public transport interchange in the city centre. By getting the city centre right, the rest of the public transport network will fall into place. This can be done quickly at little cost, benefiting all areas and public transport users (Especially users who has a disability) with a highly maintained public convenience (toilets), an essential part of the plan to make the city centre great. No public transport plan will work successfully if we don't get the city centre right

TN 20

Figure 1.3: Dublin City Centre bus Plan. (Source: Tom Newton.) (See also Appendix B.)

Under the NTA proposal there is an absence of a City centre bus plan.

The Newton Bus Plan starts with the City centre and takes into account all other modes of transport which must be designed in parallel. A simple change on the Quays generates the improvements that are necessary to solve City congestion. The Newton contraflow is an essential component in a Dublin City transport solution.

Figure 1.4 illustrates a proposal for a Bus Super Orbital, with Figure 1.5 illustrating a proposal for a 3-in-1 Bus Orbital. It is synthesised as "where one route becomes many and joins up at Hubs, with a minimum of three routes".

Door to Door, D.E.W Loop O.N.E Orbital BRT Bus via M50

Bus
Super
Orbital

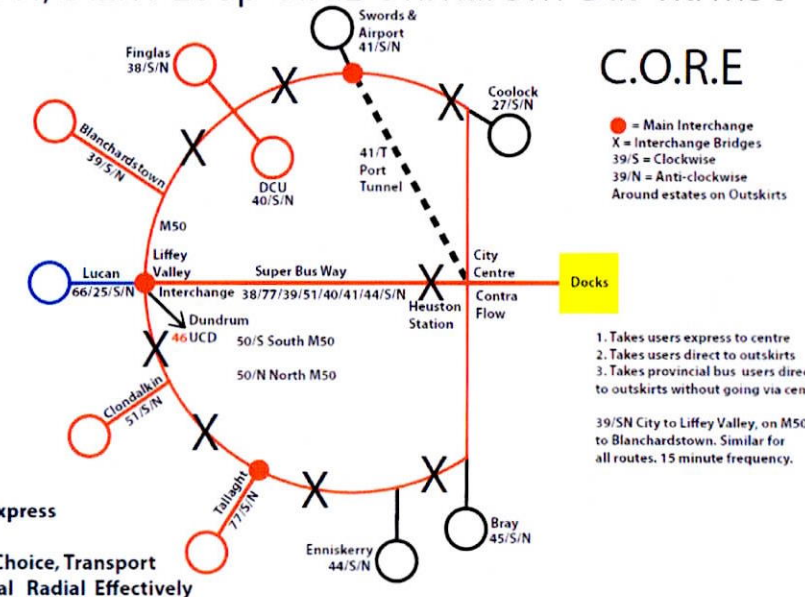


Figure 1.4: Dublin Bus Super Orbital. (Source: Tom Newton.) (See also Appendix C.)

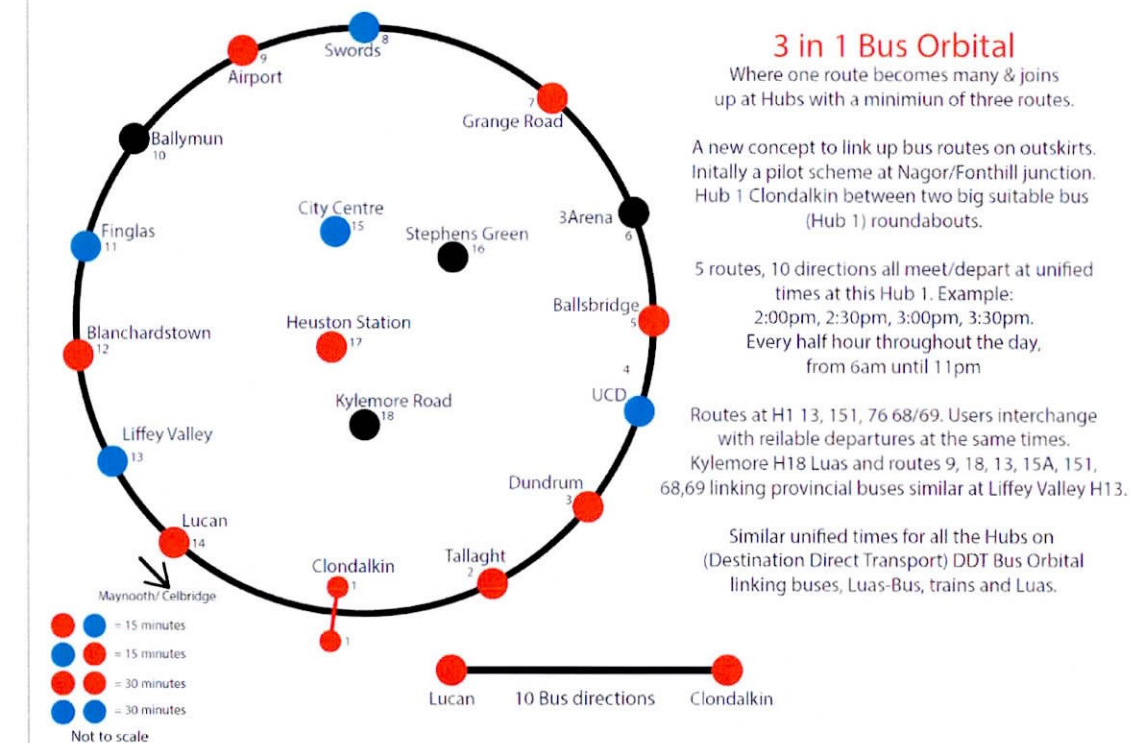


Figure 1.5: 3 in 1 Bus Orbital. (Source: Tom Newton.) (See also Appendix D.)

2.0 CYCLING AND PERSONAL MOBILITY DEVICES, PEDESTRIAN STREETS AND TAXIS

2.1 Cycling, E-Scooters, Pedestrian Streets, Open Spaces, Footpaths (a2)

Cycling will, in particular, the use of e-scooters will play a major role in car reduction.

It will form a vital component of a public transport solution. Under *The Newton Plan* the use of privately-owned e-scooters or public transport scooters will be used by passengers to travel the first and last kilometre to and from public transport in a given journey.

With car numbers and population increasing, with many cars do just over 2km per usage, measures must be put in place to reduce car movements and ease traffic congestion before the city reaches full gridlock.

Public Transport will play a major role in this aim, but it will fall far short without the cycling family. For the cycling family to do this, measures must be taken to encourage more cycling. Firstly, priority must be given to cyclists in city centre; they must have equal right to road space as all other users.

Safety is paramount in any cycling plan, mainly at junctions where over 80% of fatal cycle accidents happen. Cycle lanes will not be sufficient to meet the necessary demand of a transport solution.

The cycling mood is changing with more wanting to cycle, further encouraged with the aid of e-bikes, e-scooters, Dublin bikes and extra safe bike parking areas proposed. Public transport e-scooter 1st and last mile is the icing on the cake for cycling success.

It needs three vital ingredients for the cycling family to be successful as a vital mode in a public transport solution:

1. Safety
2. Priority
3. Space.

2.1.1 Safety

This is paramount; cyclists must feel safe. There are three big areas of concern for cyclists:

1. At junctions, where over 80% of cycle fatal accidents happen.

2. Visibility, due to large vehicles (bus), mainly not been seen by other motorists, other vehicles hidden from their view.
3. Where cyclists intend to go straight ahead, they can be in danger from vehicles turning left. Bus drivers have a problem with cyclists weaving in and out and having to cross cycle lane to access bus stops. The Newton Bus Concept has an inbuilt safety device to address these dangerous traffic problems. By operating bus on the Quays contraflow, this segregates bus from all traffic including cyclists (a big breakthrough). This allows for a new concept to make cycling safe, **Cycling Headway Orange Box (CHOB)**.

This is like a yellow box junction, colour orange before each traffic light on Quays up to a depth of five cyclists. It works as follows:

- A. Cyclists initially use the left hand side of road. When cyclists reach the red traffic lights, they pack into the Orange Box (motorist not allowed to stop on Orange Box). When the traffic lights go green, all move off in block holding control of traffic lanes. Motorists can't overtake due to 30km speed limit, cycle volumes and cycle priority. If motorists move as fast as cyclists, its fast enough. Buses are not blocking cyclists' view, or motorists are not hindered from seeing cyclists.
- B. This system makes cycling safe when going straight ahead from vehicles turning left.
- C. It eliminates dangerous blind spots for bus drivers and eliminates buses crossing cycle lane to access bus stops. This concept gives full priority for cyclists on the Quays.

The whole city benefits from the Quay Bus Contraflow.

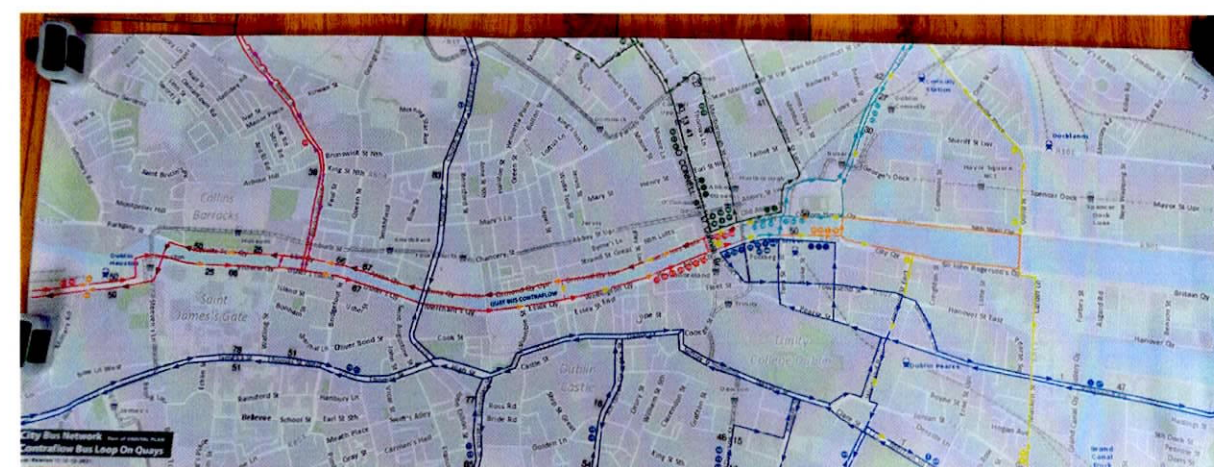


Figure 2.1: City Bus Network – Contraflow Bus Loop on the Quays. (Source: Tom Newton.) (See also Appendix E.)

2.1.2 Priority

For cyclist to have any real impact in car movement reduction, they must have equal priority with all other transport modes in the use of road space and not be confined to cycle lanes only, as many areas or streets have not enough of space for a cycle lane and overcome the problems of the disappearing cycle lane. Cyclists will have priority in bus lanes within two kilometres of the city centre, (OCB), already in operation. Cycling will have full city priority in *The Newton Bus Concept*.

2.1.3 Space

It is important to have sufficient space for cycle use, especially with the influx of e-scooters. For the cycling family to have any real effect in containing car movements, it will have to increase by over fourfold. The signs are good, with a major cycling parking area proposed at Heuston, public transport E-scooters, new bus, and rail ideas to promote more e-scooter use and now space on Quays to accommodate them in a safe way. It also addresses the problem of cycle lanes overloading.

The main area for cycling is within five kilometres of the City centre. To make cycling and e-scooting feasible and safe, it would be necessary to put new measures in place.

Firstly, full priority must be given for cyclists within this area on a par with all other modes of transport.

There is sufficient space in Heuston Station and The Phoenix Park for thousands of cyclists. The three-point turning and Quay Contra for bus will greatly aid and encourage more cycling and e-scooter use. The layout of the bus network in the rest of City is safety designed to encourage more cycling and e-scooters.

2.2 Pedestrian Streets

The Quays' Bus Contraflow (QBC) loop provides more opportunities to pedestrianise more streets with a pedestrian way from Parnell Square to Ballsbridge via O'Connell Street, Westmoreland Street and Grafton Street (already pedestrianised), St Stephen's Green, to Baggot Street. Talbot Street is also pedestrianised.

2.3 Footpaths

The Quay Bus Contraflow (QBC) makes room on the footpaths. Bus passengers now use the footpath on the Quayside. Business passengers use the footpath on the building side. The new interchange reduces junction crossing.

2.4 Open Spaces

The Quay Bus contraflow (QBC) maximises the use of more open spaces. It allows the Civic Plaza to function and it creates a City centre public transport interchange and space for a river plaza with many commuters/passengers interchanging transport or meeting in this area.

2.5 Quay Bus Contraflow (QBC)

The QBC has many advantages and heart or engine of a bus solution. It separates buses from LUAS; it allows all modes of transport to use the City and can double bus use without adding to traffic congestion. If the Quays are wide enough for two lanes of traffic to run in parallel, in our opinion, they are wide enough for contraflow, as two vehicles meeting each other need less space to pass one another.

2.6 Taxis

Taxis are adequately accommodated for with measures for their benefits including access, short cuts and taxi stands.

2.7 Public Conveniences (Toilets)

Public toilets are essential part of *The Newton Plan*, highly maintained and staffed.

3.0 PUBLIC TRANSPORT

3.1 Bus

Buses are the workhorse of a transport solution. They are flexible and serve across a wide-range of communities – including residential communities.

However, several problems have arisen over the years (despite improvements in the bus service) that make public transport unattractive as a method of transport.

3.1.1 “Back Tracking”

This is a relatively new problem, but now very significant, mainly in the City centre.

The term “back tracking” is used to describe where a passenger needs to go back further along the transport route (i.e. several earlier bus stops) in order to secure a seat on that bus route.

This situation has arisen as a direct result of the relocation of the City bus terminals outside the City centre. This, so called, “back tracking” adds to bus overcrowding and passengers being stranded along the route as buses are full, thereby preventing them from taking on more passengers.

Another problem for bus passengers is the long time it takes buses to meander around residential housing estates. This increases journey times, particularly for passengers whose journeys begin/end at either end of the bus route.

Interconnection/Cross city connections

Passengers wishing to travel by bus where there is no direct route must take two or more buses to reach their destination – this adds to journey time, wait time, seat availability uncertainty and capacity issues.

Capacity - Crowding and/or Overloading

All these problems can be addressed if public transport is designed with passenger satisfaction in mind.

The Newton Transport Plan (Bus) addresses many of these problems.

Cost

This Plan can be cost neutral with a small (additional) toll on the M50 as this would benefit everybody with sufficient people using public transport, leaving ample space for car users and reduced traffic congestion.

3.2 Light Rail

The NTA proposal does not appear to facilitate the LUAS.

Light rail must be designed in an orbital fashion to achieve maximum potential.

The NTA proposal unfortunately uses a radial system which benefits people unequally and assumes all passengers’ destinations is the City centre. This adds to cost and travel time.

The Newton Plan includes an orbital light rail.

A further difficulty with the NTA proposal is that the Lucan route proposed by the NTA is not feasible as it joins up with the existing Red Line, but there is insufficient capacity on that line.

The Newton Lucan LUAS is routed along the N4.

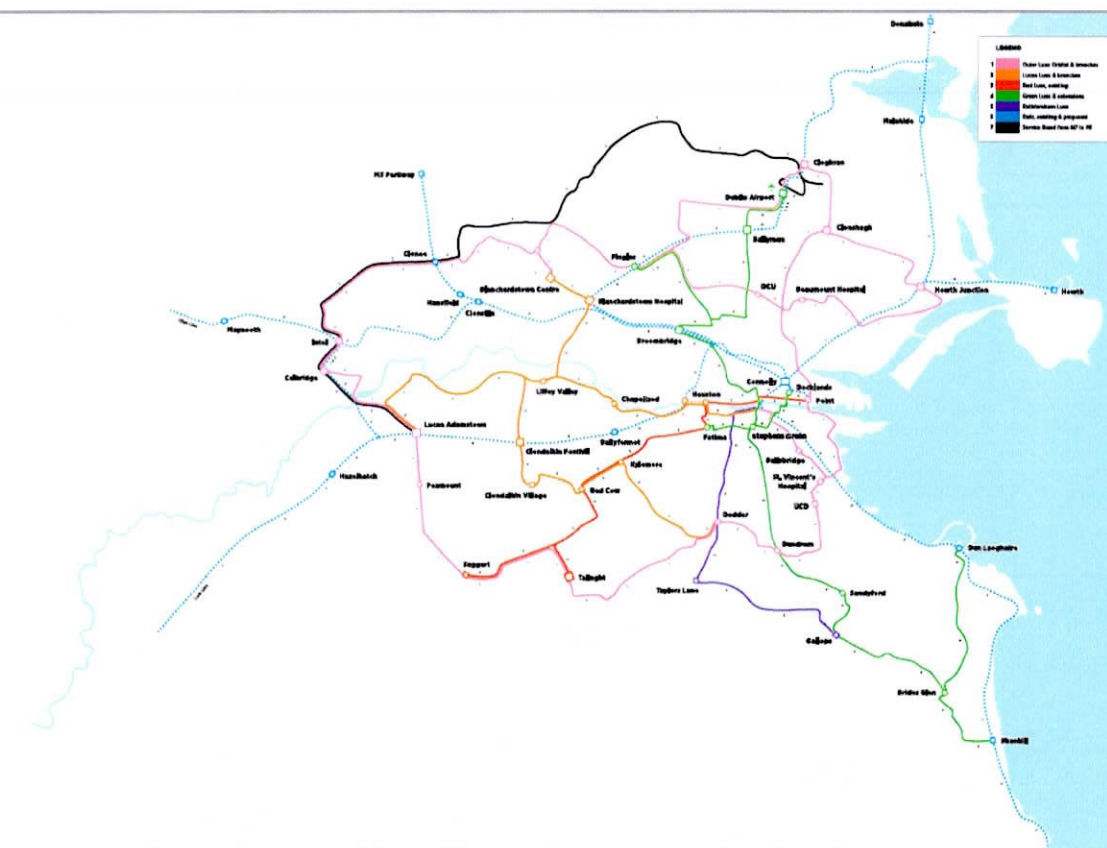


Figure 3.1: Map showing Road, Rail and Light Rail. (Source: Tom Newton.) (See also Appendix F.)

3.3 Heavy Rail – the proposed “Mlink”

Mainline rail in *the Newton Plan* is a very important component in the overall rail connectivity plan for all Ireland. *The Newton Plan* speaks to the Shared Ireland Initiative as well as responding to Climate Change.

The Missing Link (Mlink) identified in *The Newton Plan* is a vital link to make this happen. This involves twenty kilometres of additional rail line from Castleknock to join the Belfast line at Donabate.

The Adamstown/ Lucan rail station plays a key role in linking mainline trains with the orbital LUAS to the outer Dublin area on the one hand, and on providing rail links to Dublin airport from all over Ireland including Northern Ireland.

4.0 NEXT STEPS

We trust that these proposals will be taken into consideration in the finalisation of the *Greater Dublin Area Transport Strategy 2022-2042*.

We would welcome the opportunity to meet with the NTA Team to discuss the proposals and to clarify any issues arising.

I would appreciate a notice of acknowledgement of receipt.

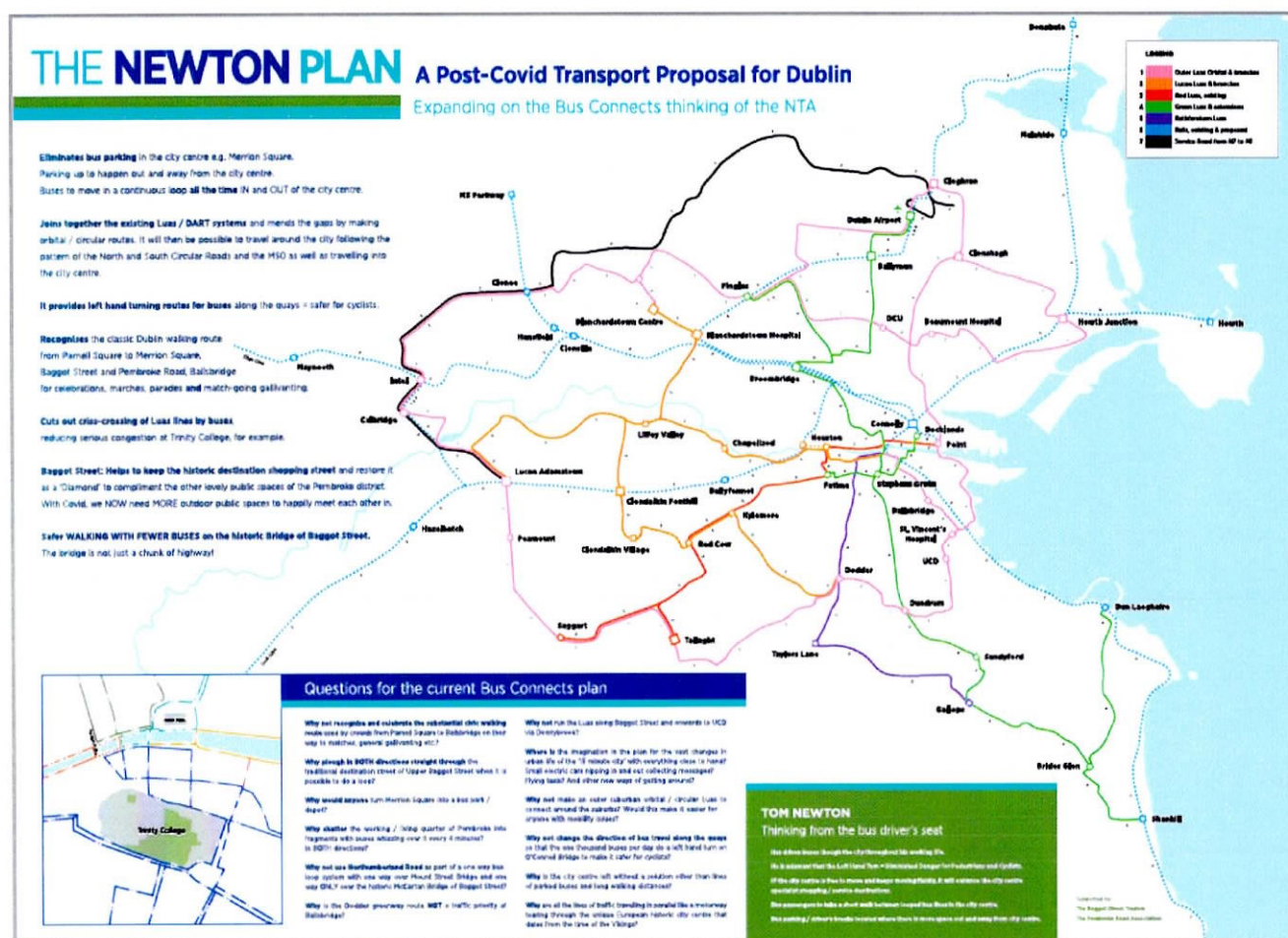
Yours faithfully



Tom Phillips
Managing Director
Tom Phillips + Associates

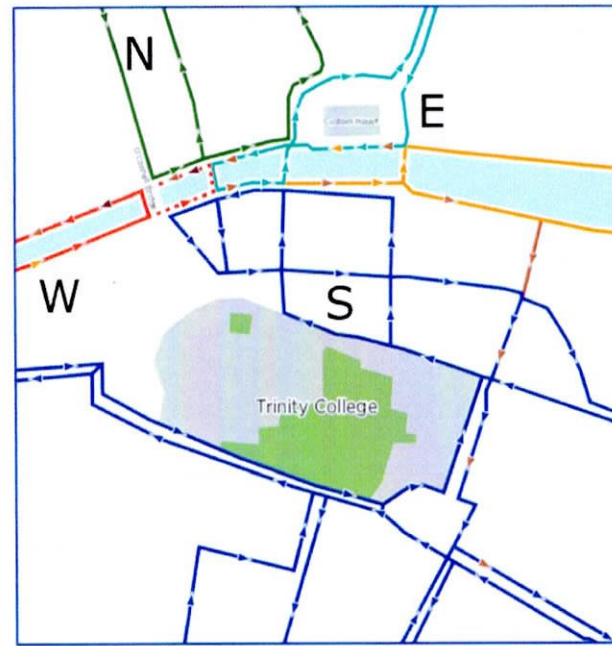
Encl.

APPENDIX A - THE NEWTON PLAN – A POST-COVID TRANSPORT PROPOSAL FOR DUBLIN



APPENDIX B - DUBLIN CITY CENTRE BUS PLAN

Dublin City Centre Bus Plan



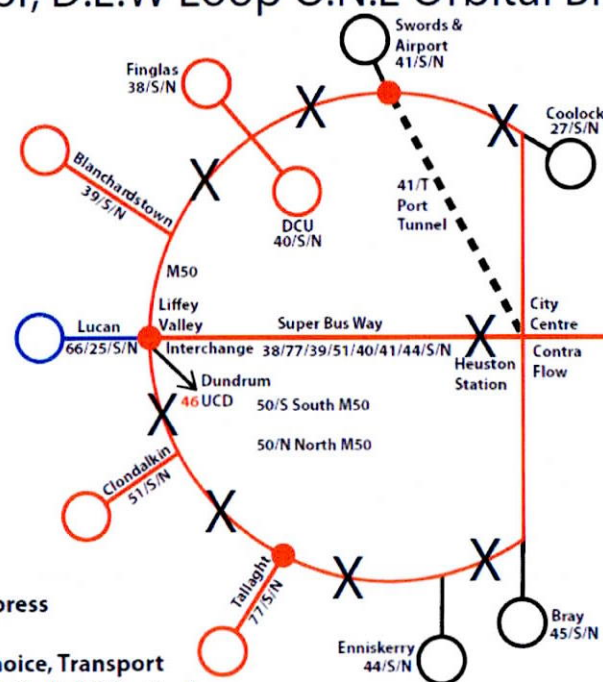
New city layout for bus network in the City Centre. Buses come into the city from North, South, East and West forming and interchange without obstructing each other, the Luas and other traffic flow. This creates a new safety concept (C.H.O.B) for cycling and cycling families (e-scooter) in the city centre. This concept allows many more streets to be pedestrianised without blocking traffic flow. This is made possible by the Quay Bus Contra-Flow Loop, on the quays, maximising road and footpath space. Making Dublin B.E.S.T for business, entertainment, shopping and tourism. This creates the ideal public transport interchange in the city centre. By getting the city centre right, the rest of the public transport network will fall into place. This can be done quickly at little cost, benefiting all areas and public transport users (Especially users who has a disability) with a highly maintained public convenience (toilets), an essential part of the plan to make the city centre great. No public transport plan will work successfully if we don't get the city centre right

TN 20

APPENDIX C - BUS SUPER ORBITAL

Door to Door, D.E.W Loop O.N.E Orbital BRT Bus via M50

Bus Super Orbital



C.O.R.E

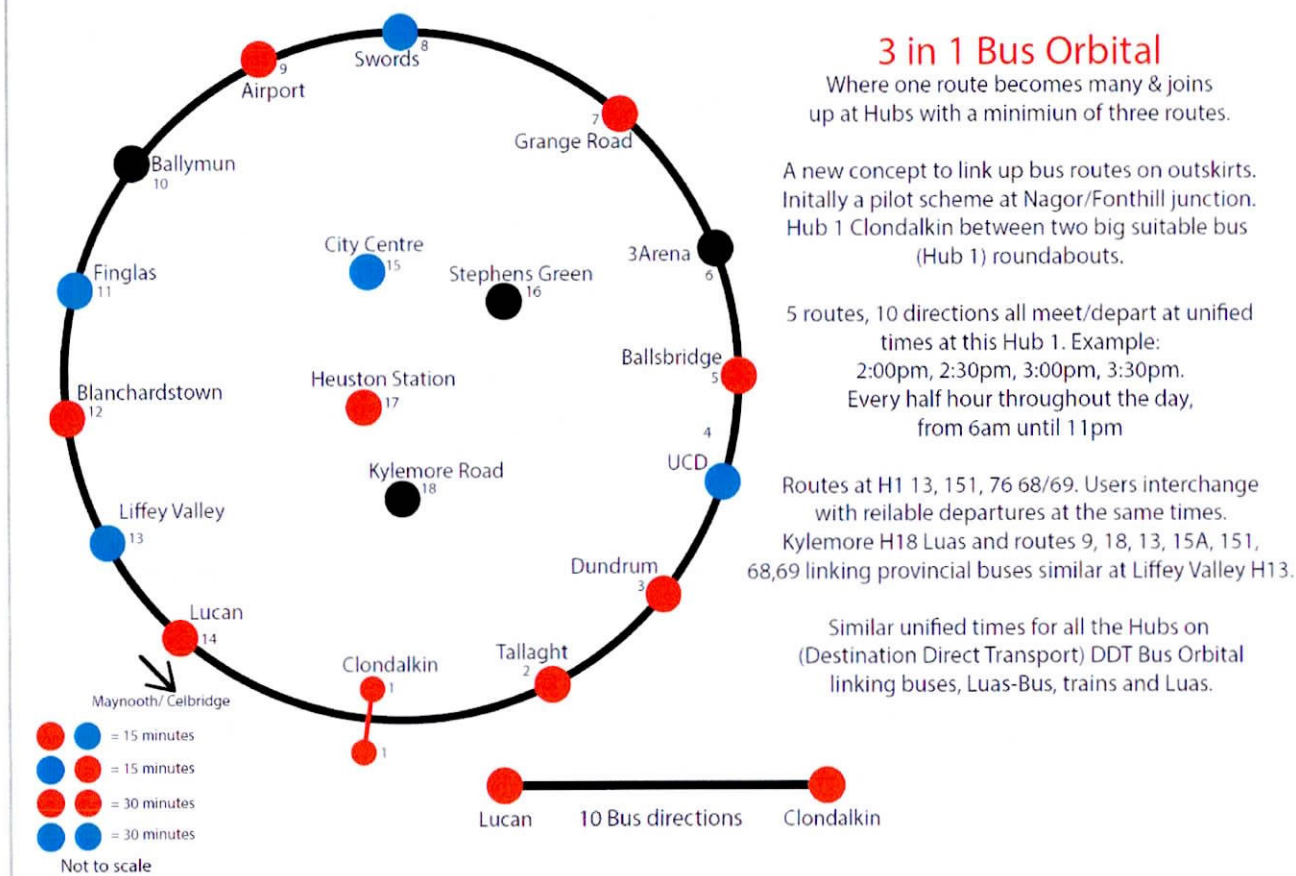
- = Main Interchange
- X = Interchange Bridges
- 39/S = Clockwise
- 39/N = Anti-clockwise
- Around estates on Outskirts

1. Takes users express to centre
2. Takes users direct to outskirts
3. Takes provincial bus users direct to outskirts without going via centre

39/SN City to Liffey Valley, on M50 to Blanchardstown. Similar for all routes. 15 minute frequency.

- O.N.E Orbital Network Express
- D.E.W Dual Estate Way
- P.A.C.T Passenger, Access, Choice, Transport
- C.O.R.E Connecting Orbital Radial Effectively

APPENDIX D - 3 IN 1 BUS ORBITAL



APPENDIX E - CITY BUS NETWORK – CONTRAFLOW BUS LOOP ON THE QUAYS

