

Upper Baggot Street Traders Association
34 Upper Baggot Street
Dublin
DO4Y9CO

Date: 18 July 2022

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

Dear Sir / Madam,

An Bord Pleanála has received your 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

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10/07/2022

Case Ref: HA29N.313509

BusConnects Belfield/Blackrock to City Centre Core Bus Corridor scheme

Dear Sir/Madam,

The Upper Baggot Traders Association represents approximately 80 businesses in the greater Baggot St area. All of these traders, many of whom are in the area for decades, contribute to a successful retail mix of retail/hospitality/medical and professional services. It is very important to note that the area is not just for locals but attracts customers from all parts of the city and indeed many parts of Ireland. The Pharmacies have a trade that covers many parts of South Dublin, many of whom need to travel by car. They are not eligible for disabled parking but still need ready access to on street car parking.

Many of the traders have stated (i.e. Craft Cleaners, John Taylor Menswear) that up to 50% of their customer base travel in excess of five miles to shop.

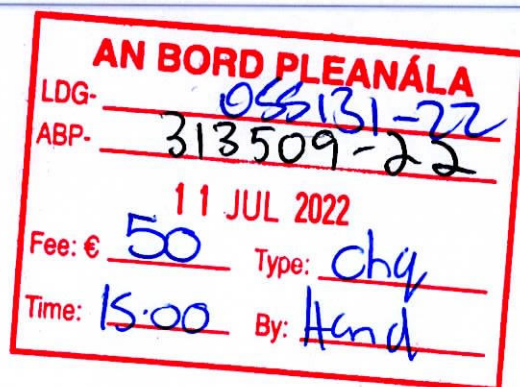
The Aviva Stadium acts as another draw from far and wide into the area and generates much turnover for all concerned.

We strongly feel that the incorrect route has been chosen. The most direct route was to continue the bus corridor along Northumberland Road. It is shorter, more direct, and presents far less obstacles than routing the corridor through Pembroke Road. Mount Street Bridge is a newer bridge than McCartney Bridge and better equipped for the huge increase in bus traffic.

Due to the incorrect route that was chosen, the ramifications for the retail area of Upper Baggot Street are many and varied. The ability of the carborne retail shopper to stop is to be removed. This combined with the reality of no car parks in the immediate area will severely threaten the viability of this retail area as it stands.

As a trading group we oppose the following:

- 1 The removal of loading bays (Not enough as it is)
- 2 The removal of short term parking
- 3 The withdrawal of the ability to stop in a car on the street to facilitate customers medical/retail and service needs.
- 4 The imposition of a Bus Gate/rerouting of traffic to other roads and separating Upper Baggot Street and Pembroke Road will further damage the retail environment. It will copperfasten the demise of the traders by making it impossible to get near the retail village.




5 The massive increase in bus traffic and to what end? These buses will be empty most parts of the day. Working from home has changed work related commuting for good. This Bus Connects plan is based on totally out of date information.

6 The removal of trees or rails or the narrowing of footpaths.

The wrong route has been chosen. Persisting with a route up Pembroke Road into Upper Baggot Street and onto Lower Baggot Street will result in the destruction of not only many businesses but the very fabric of this vibrant beautiful area. This plan to make these historic roads a bus highway beggars belief. Where in any other capital city in Europe would it even be considered?



There are other transport plans (i.e. The Newton Plan) out there which have to be considered and will deliver much better outcomes for all concerned.

Yours sincerely



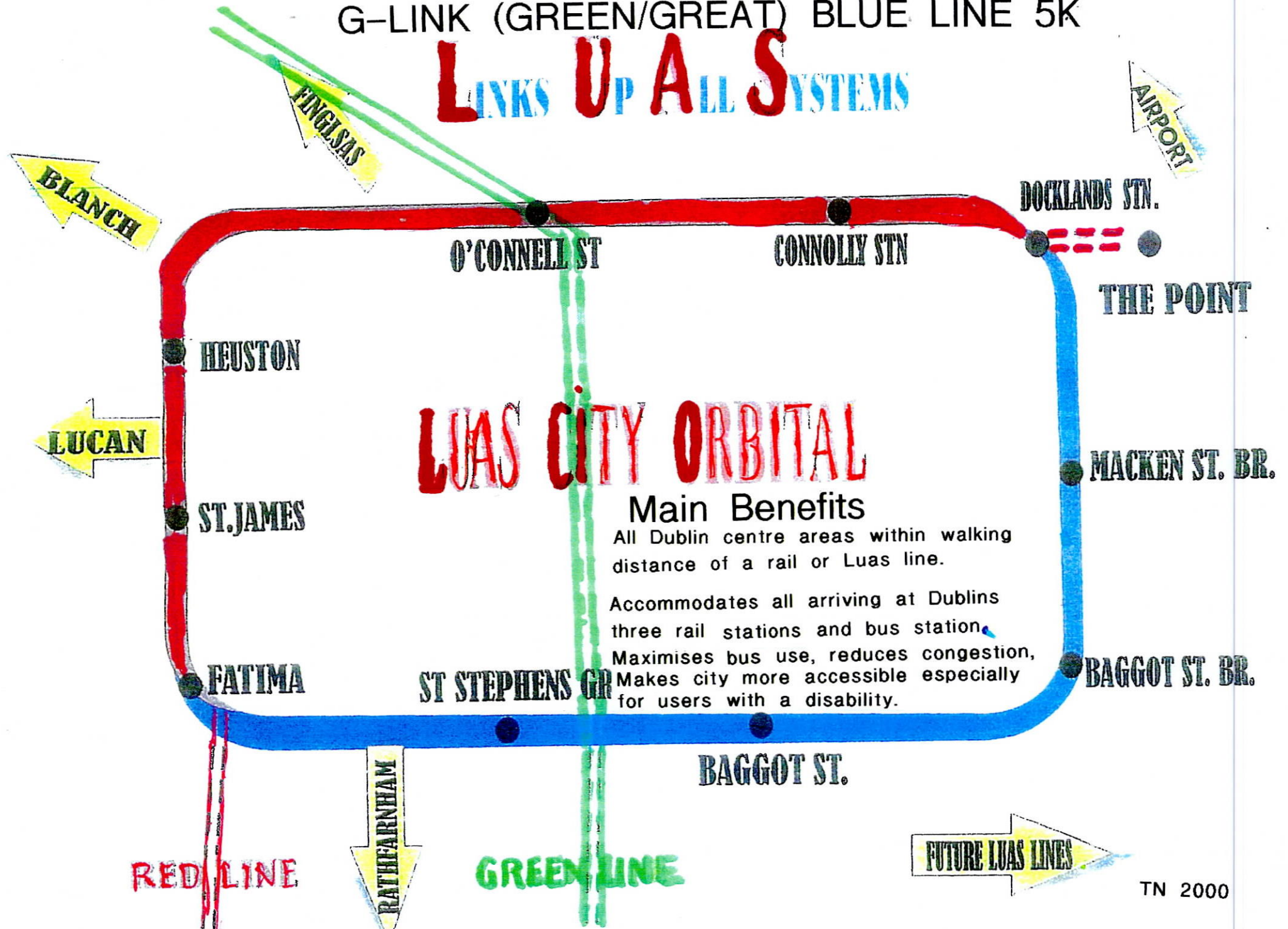
On behalf of the Upper Baggot Traders Association

c/o 34 Upper Baggot St, Dublin 4 D04 Y9C0



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

LINKS UP ALL SYSTEMS





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:

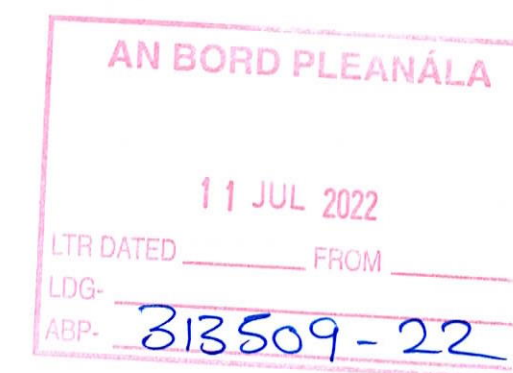
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Monday, 10 January 2022

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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

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

“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.)

1. Buses become overloaded.

1. Duplication results in major congestion problems.

2. Buses face more delays; and
3. Too many buses are located in the wrong place.

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.

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.



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.

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.

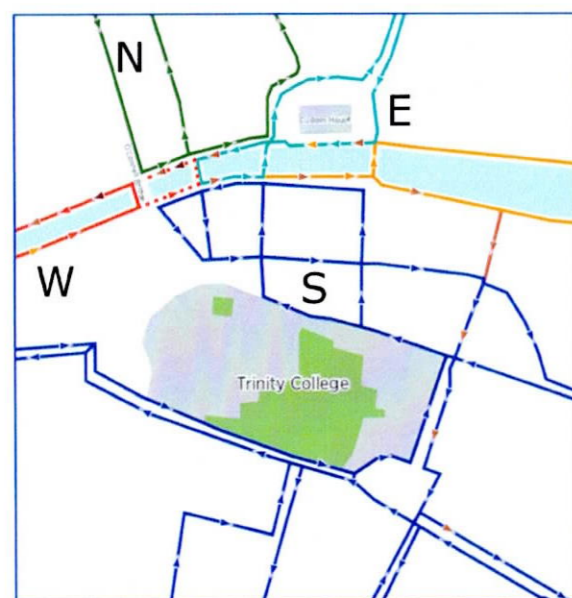
1.8 Bus

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

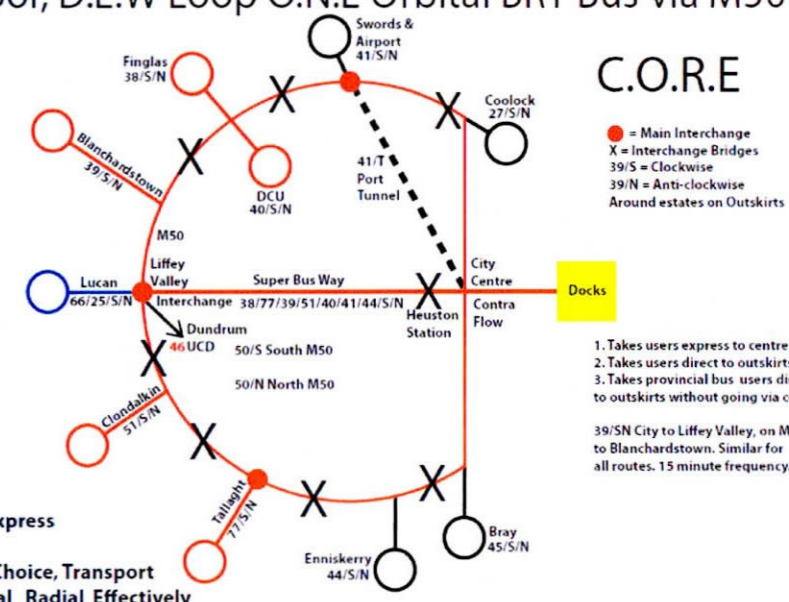


Figure 1.4: Dublin Bus Super Orbital. (Source: Tom Newton.) (See also Appendix C.)

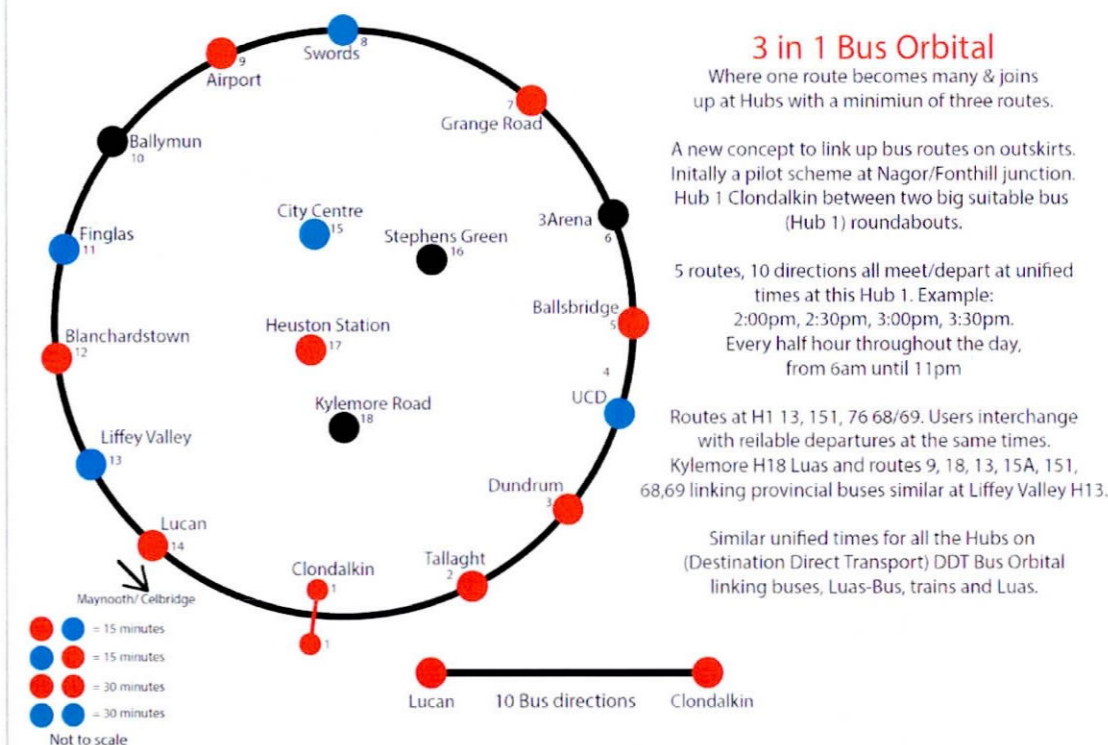


Figure 1.5: 3 in 1 Bus Orbital. (Source: Tom Newton.) (See also Appendix D.)

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.

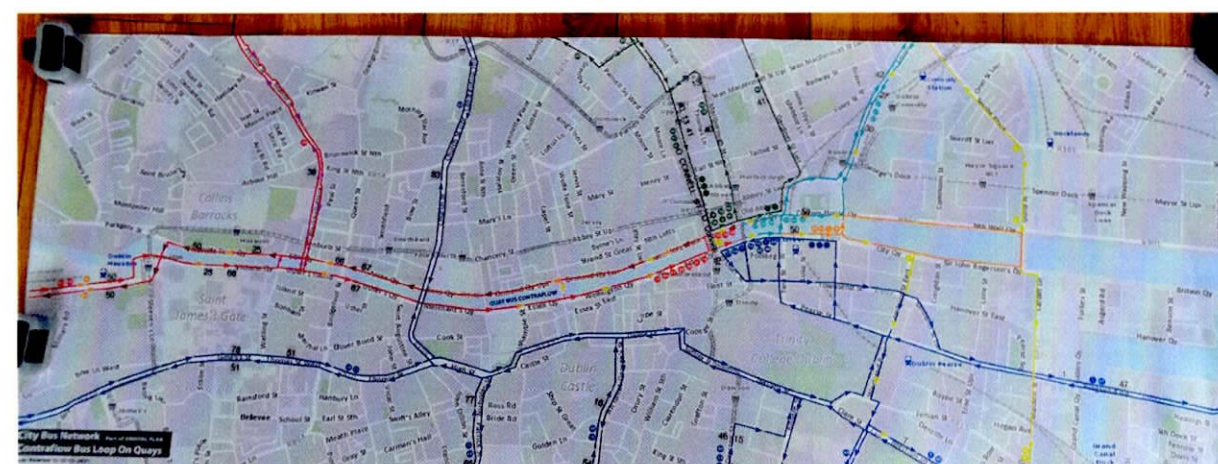


Figure 2.1: City Bus Network – Contraflow Bus Loop on the Quays. (Source: Tom Newton.) (See also Appendix E.)

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.

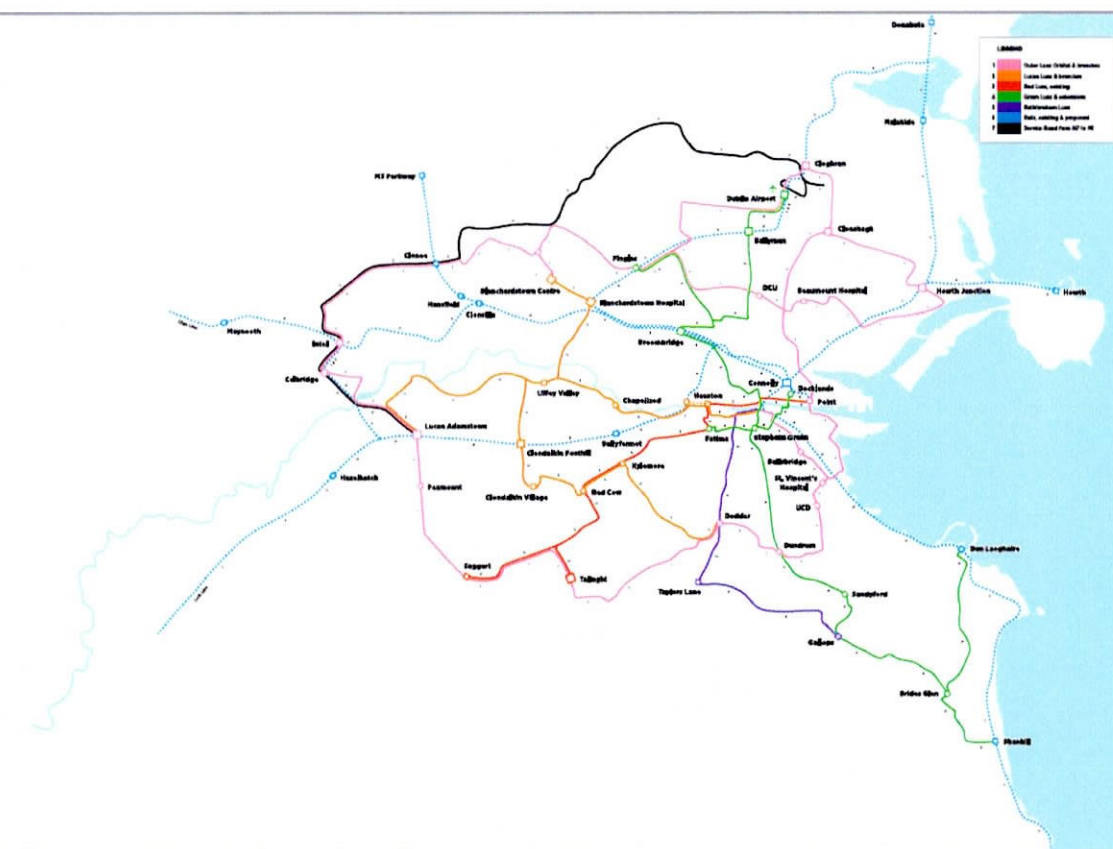


Figure 3.1: Map showing Road, Rail and Light Rail. (Source: Tom Newton.) (See also Appendix F.)

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

A handwritten signature in black ink, appearing to read 'Tom Phillips'.

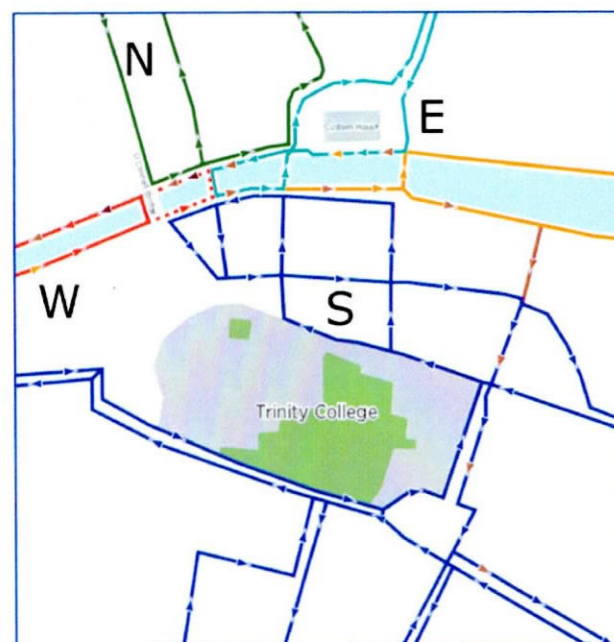
Tom Phillips
Managing Director
Tom Phillips + Associates

Encl.

[illegible]

APPENDIX B - DUBLIN CITY CENTRE BUS PLAN

Dublin City Centre Bus Plan



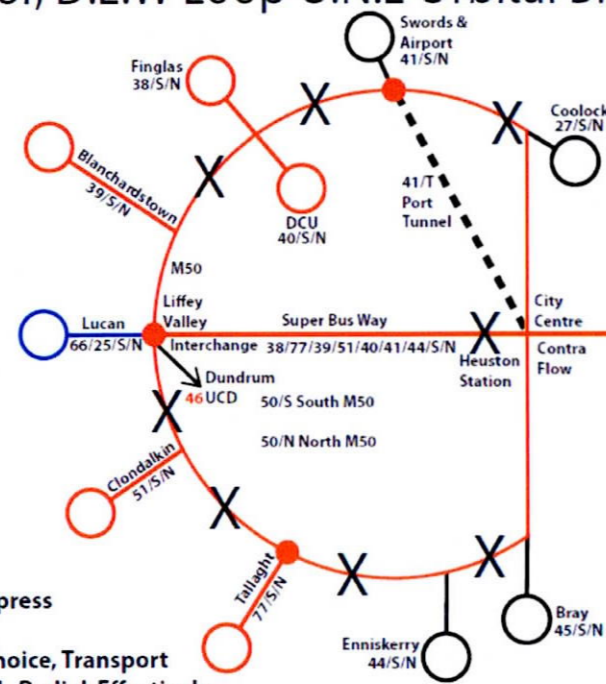
New city layout for bus network in the City Centre. Buses come into the city from North, South, East and West forming and interchange without obstructing each other, the Luas and other traffic flow. This creates a new safety concept (C.H.O.B) for cycling and cycling families (e-scooter) in the city centre. 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

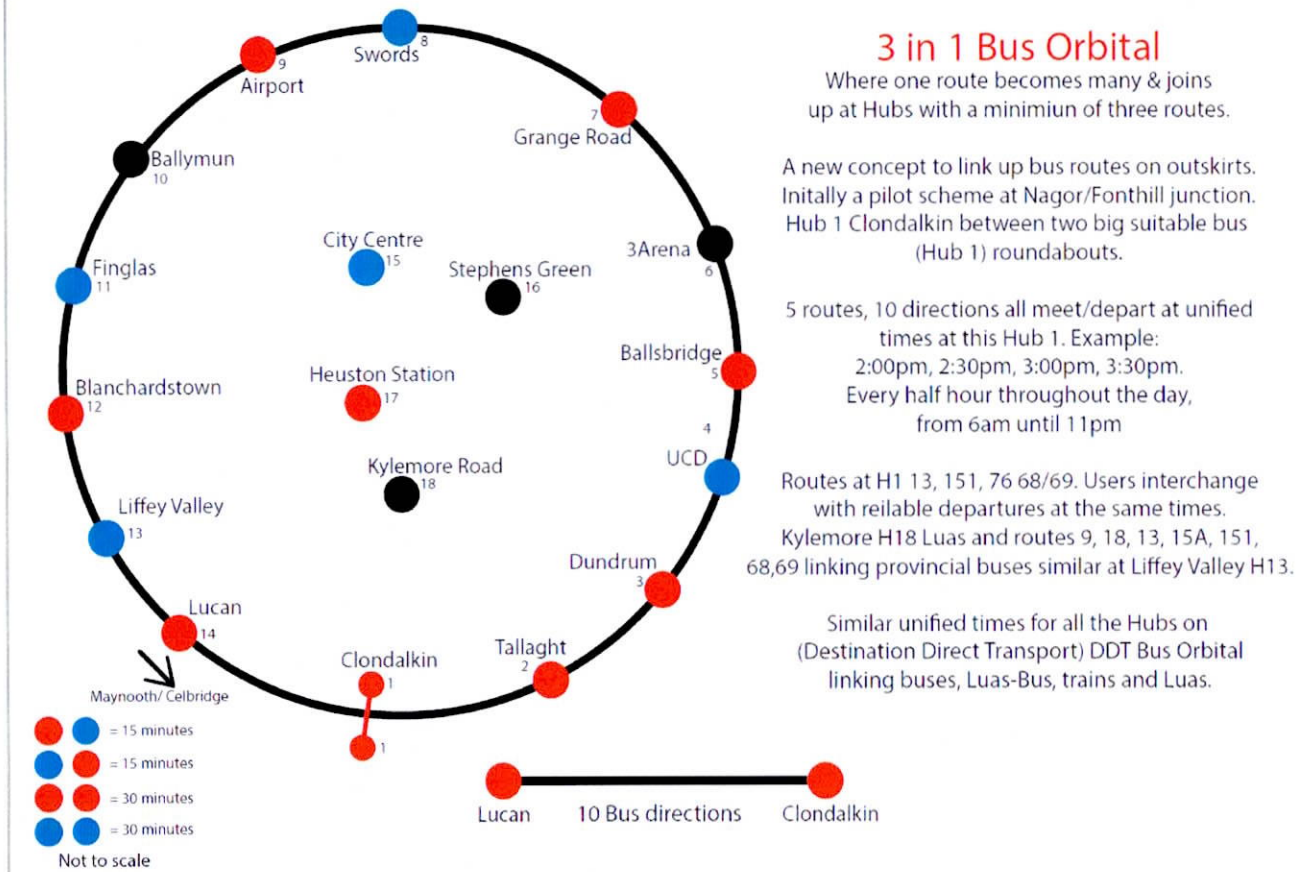
- = Main Interchange
- X = Interchange Bridges
- 39/S = Clockwise
- 39/N = Anti-clockwise
- Around estates on Outskirts

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

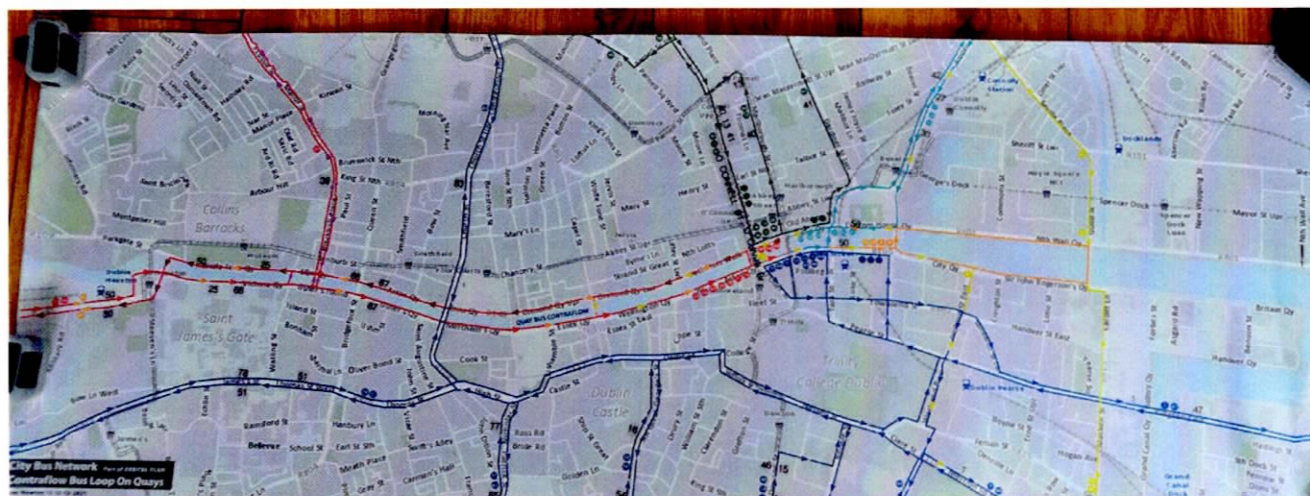
39/SN City to Liffey Valley, on M50 to Blanchardstown. Similar for all routes. 15 minute frequency.

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



APPENDIX F – MAP SHOWING ROAD, RAIL AND LIGHT RAIL (EXISTING AND PROPOSED)

