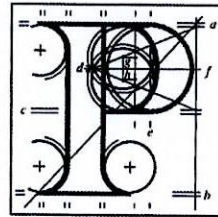


Our Case Number: ABP-314056-22



**An
Bord
Pleanála**

Lauren Tuite
122 Emmet Road
Inchicore
Dublin
Dublin 8

Date: 26 September 2022

Re: Liffey Valley to City Centre Core Bus Corridor Scheme.
Fonthill Road to High Street all in the County of Dublin.

Dear Sir / Madam,

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

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

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

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

BL50A

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Observer's Name:

- Lauren Tuite

Observer's Postal Address:

- 122 Emmet Road, Inchicore, Dublin 8
- d8community@gmail.com

An Bord Pleanala case number:

- 314056

Name of proposed development:

- BusConnects Dublin: Liffey Valley to City Centre

I request an oral hearing on this proposal.

Observation details:

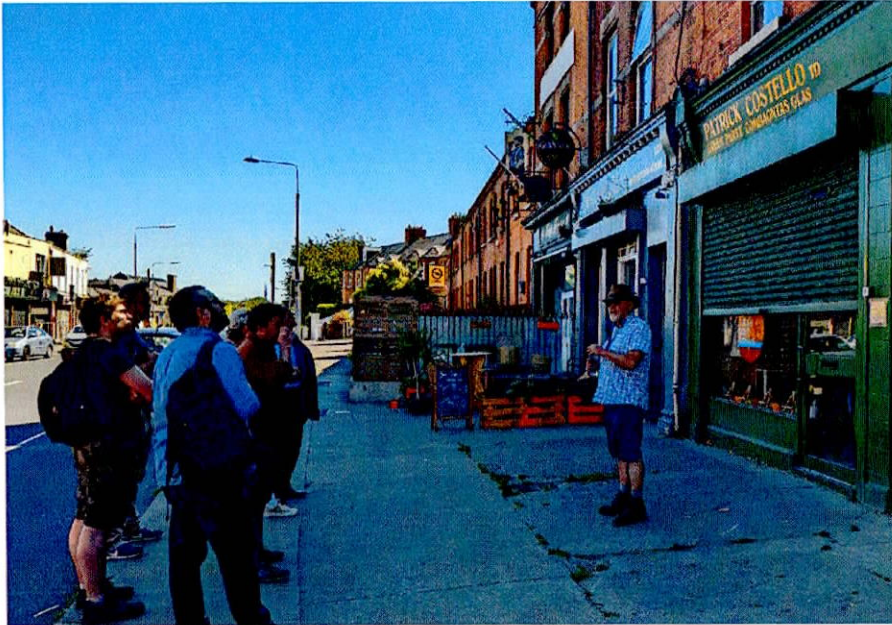
Grounds (see attached pages)

Introduction

D8 Development is a social enterprise that brings life back to empty buildings. In our research and practice, we see the detrimental impact of car prioritised design in Inchicore. As part of our work to tackle dereliction, we lobby for equitable use of public space and the prioritisation of vulnerable road users. We do this in consultation with local residents, businesses, and other organisations. This observation will consider the specific design proposal for 120-124 Emmet Road, the location of our flagship project, and the broader failure to provide walking and cycling infrastructure on Emmet Road by the BusConnects proposal.



Employees of Small Changes, Little Deer Comics, and Flowerpop cut the ribbon on cycle parking installed July 2022.



A walking tour at 122 Emmet Road

Footpath Narrowing at 120-124 Emmet Road

The transport authority proposes to reduce the width of the footpath at 120-124 Emmet Road, remove bicycle parking, and install designated parking spaces. This would have a detrimental impact on the three businesses operating at this location that rely on local people walking and cycling to the premises for the bulk of their trade. This location is also a stop on the historical walking tour from Richmond Barracks to Kilmainham Gaol, and large tour groups gather, several times a day, on the wide footpath outside 124 Emmet Road to hear the history of Emmet Hall and its role in the 1913 Lockout and the 1916 Rising. After many decades of lying idle, these buildings were redeveloped in 2020 and 2021 to provide much needed community facilities and employment including: a grocery store, bookshop and florist. 122 Emmet Road also recently received planning permission for a new commercial unit at first floor level that will be used for yoga and wellness classes. This will involve groups of 30-50 students coming and going at hourly intervals on foot, bicycle, and bus and people will naturally congregate on the footpath outside before and after class.

Loss of Cycle Parking

As well as the narrowing of the footpath, the proposal at this location will also see the removal of 5 sheffield stands that provide cycle parking for ten bikes. Two businesses at this location, Small Changes and Flowerpop are participants in Dublin City Council's E Cargo Bike for Business Scheme and rely on the wide footpath and cycle parking for use and safe storage of the cargo bikes. A condition of the planning permission for 122/124 Emmet Road was the installation of two more sheffield stands

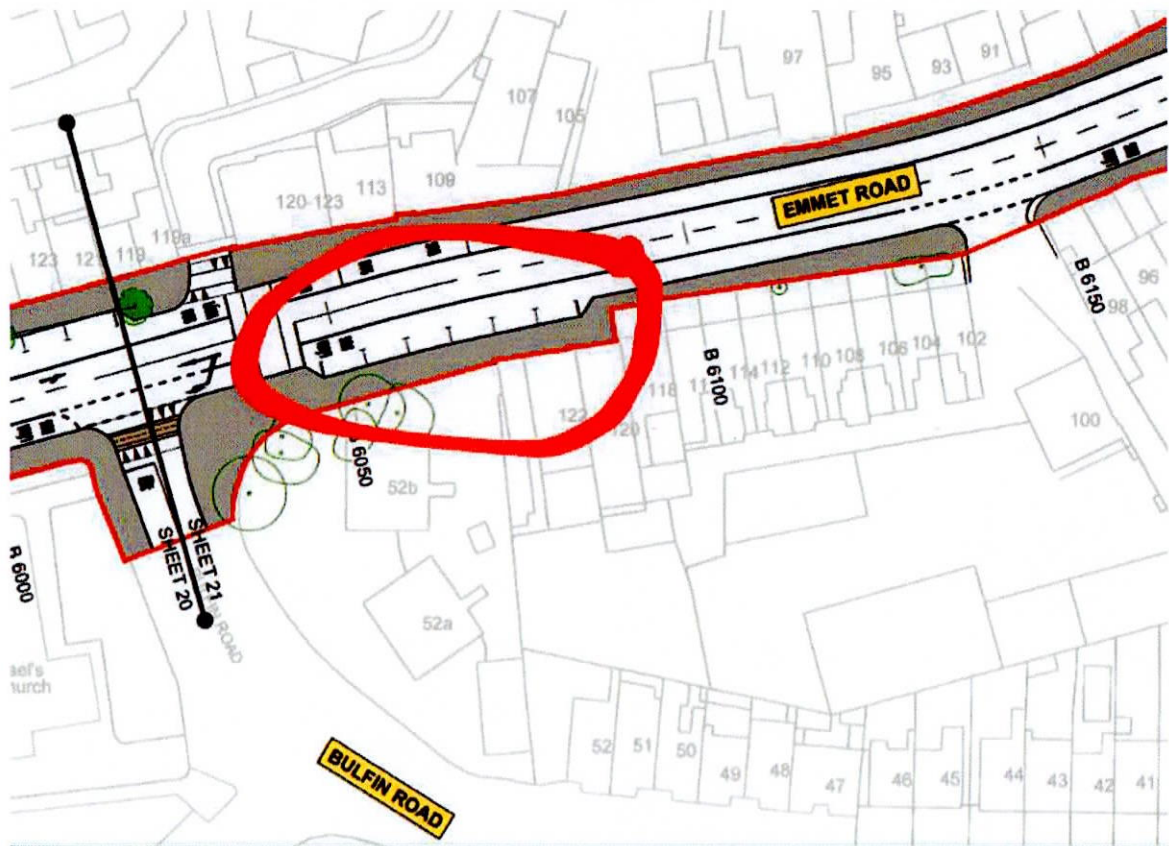
within the space marked for compulsory purchase which will not be possible if this footpath narrowing is implemented.

Contravention of National and Local Transport and Planning Policy

Setting aside the detrimental economic and social impacts of the footpath narrowing, the proposal for this particular street section is contrary to all of the current transport policies and strategies underpinning the BusConnects project including:

- The National Planning Framework (NPF) and National Development Plan (NDP) (see National Strategic Outcomes on Compact Growth, Sustainable Mobility, Enhanced Amenity and Heritage, and Transition to a Climate-Resilient Society)
- The National Investment Framework for Transport in Ireland (NIFTI) establishes hierarchies which prioritise environmentally sustainable and proportional solutions to a given transport need or opportunity)
- The Road Safety Strategy 2021 - 2030 (promotion and provision of safe road environments for otherwise healthy, active modes)
- Climate Action Plan 2021 (Provide for an additional 500,000 daily public transport and active travel journeys by reallocating road space from the private car to prioritise walking, cycling and public transport)
- Transport Strategy for the Greater Dublin Area 2016 - 2035 (to contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods)

We believe that halving the number of parking spaces proposed at this location would be an acceptable compromise, so that there would be no narrowing of the footpath at 120-124 Emmet Road. We would also like to see one of the spaces reserved for blue badge holders.



Proposed designated parking spaces at 120-124 Emmet Road

Emmet Road

Looking at the plan for Emmet Road/Inchicore more broadly, this proposal fails to provide basic and meaningful improvements for walking, cycling and public realm. Continuous footpaths are not provided at *any* of the intersections with minor roads or entrances to estates/apartments: see junction of Emmet Road with Spa Road, St Vincent Street West, Camac Close, Kilmainham Bank, Bulfin Road, entrance to 100 Emmet Road, Myra Close, Luby Road (pages 21-23 of the Landscaping and General Arrangement Drawings). At present, many of these junctions with Emmet Road side streets do not have the appropriate ramps or dished curbs to allow a wheelchair user to navigate the footpath safely, forcing the pedestrian onto the road to continue her journey. Providing continuous footpaths at all junctions would give pedestrians the necessary safety and comfort to access locals services as well as bus stops, and make this proposal compliant with DMURS.



Steps at access to side roads force mobility aid users to use the road as they cannot proceed on the footpath (location at junction with Kilmainham Bank)

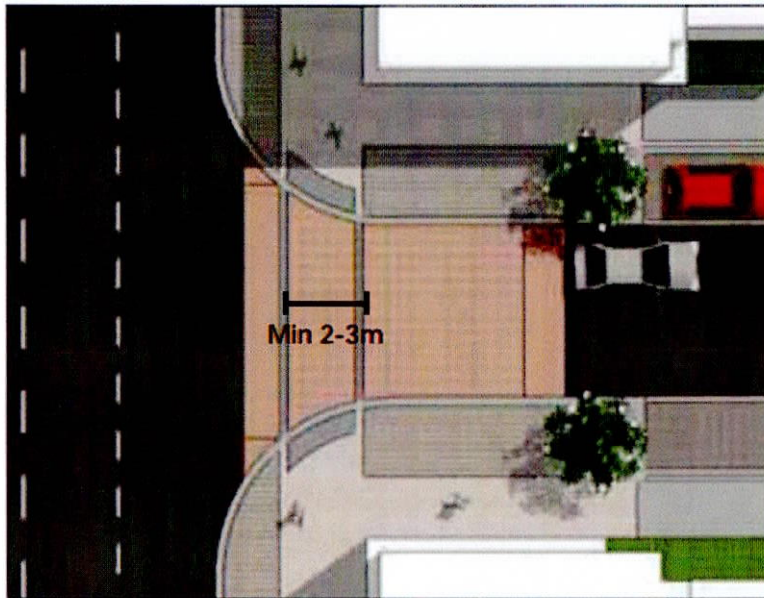
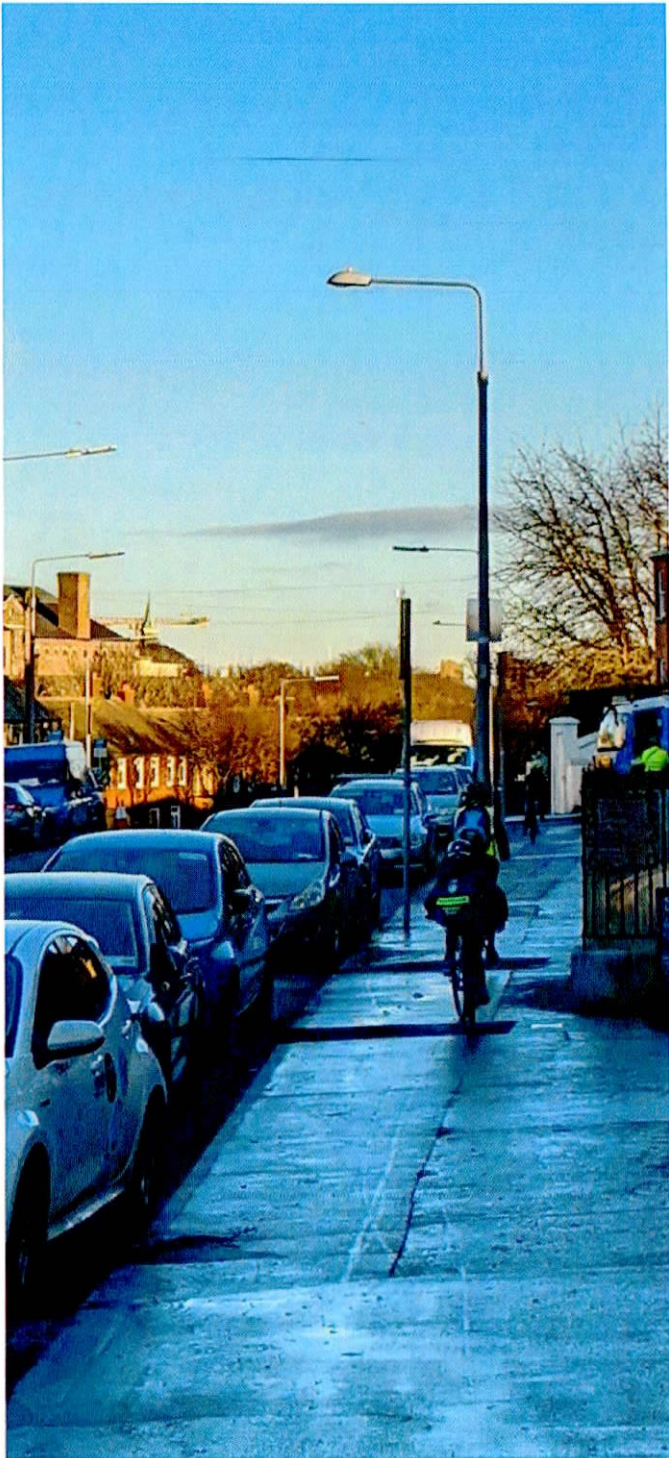


Figure 4.41: Standard crossing widths to be used in most circumstances across the main carriageway of Access or Link streets and across side junctions with Local streets.

With regards to cycling infrastructure, the proposal for Emmet Road is shared bus and cycle lanes. This is unacceptable as it will exclude all but the bravest cyclists from using them. Currently there are large numbers of cyclists of all ages and abilities using the wide footpaths to cycle on rather than risk using the bus lane currently provided on Emmet Road. The narrowing of the footpaths proposed will make this mixing of pedestrians and cyclists even more dangerous. The transport authority must design infrastructure that is useful and accessible to everyone, and should be reducing the number of car lanes and parking space for private cars to achieve this.



Footpath cycling on Emmet Road

We note that there are other NTA "CycleConnects" plans to create a Camac Greenway, but the greenway will not connect homes and services that are on Emmet Road and will function as a recreational amenity and bypass of the town. The cycling infrastructure must be provided on Emmet Road and the road space re-allocated accordingly so that local people can walk and cycle safely in the town, and businesses can benefit from higher footfall.

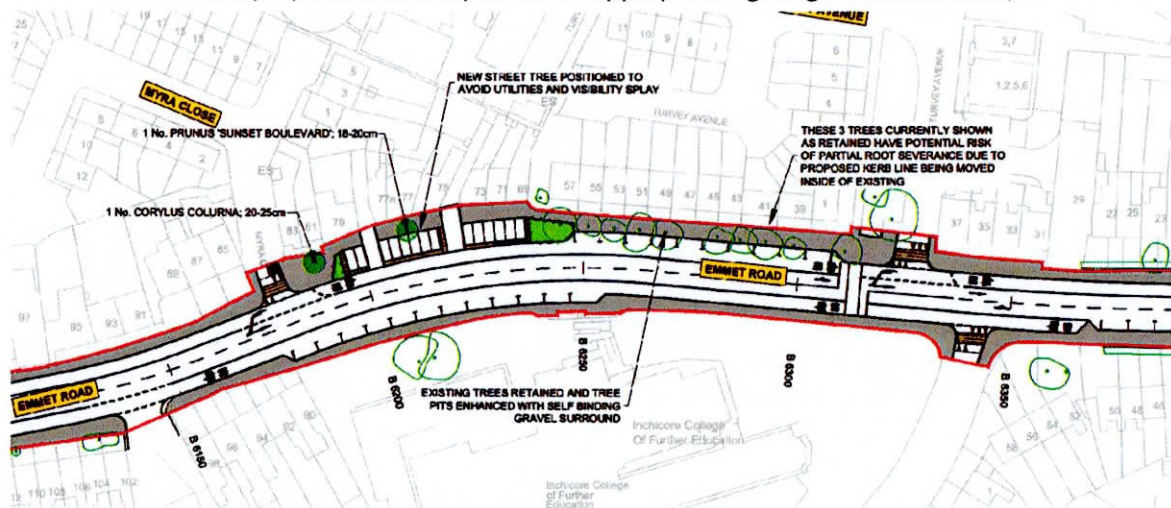
Finally on the issue of public realm, this proposal fails to deliver much needed improvements.

Street Trees

- As noted in the Landscape General Arrangement Drawings, the narrowing of footpaths to provide more on street parking will put the few existing mature trees at risk of root severance. (image a)
- There are no plans to include street trees as part of the upgraded paving between St Vincent Street West and the junction with Tyrconnell road, an area in desperate need of greening.
- The footpath narrowing on the south side of Emmet Road will require the removal of recently installed tree planters and benches. These planters were installed and are maintained by the Inchicore Environmental Group and provide seating so less mobile residents can take breaks on their journey by foot.

Lighting

- Emmet Road is an historic road and connects important heritage sites (Kilmainham Gaol, Goldenbridge Cemetery, Richmond Barracks, and the soon to be restored Kilmainham Mill). The lighting should be high quality heritage lighting as is planned for other parts of the scheme. This proposal does not provide for appropriate lighting for Emmet Road)



Moving the kerb line to provide on street parking will put existing mature trees at risk of severance



Planters with trees and seating on Emmet Road.

Conclusion

Thanks to previous consultations with residents, plans for the Inchicore area have been greatly improved. The introduction of a one-way system for private cars on Grattan Crescent means we'll have more room for people, safer crossing infrastructure, and the preservation of our historic tree canopy. By the NTA's modelling, 1,000 fewer cars will travel through Inchicore at peak times daily. This huge reduction in through traffic should motivate much more ambitious and beautiful plans for Inchicore's main avenue: Emmet Road. Sacrificing public realm and the advances made in regenerating the historic street by residents and businesses to facilitate parking and high speed private motor traffic is contrary to the goals of this worthy project and should be refused permission.