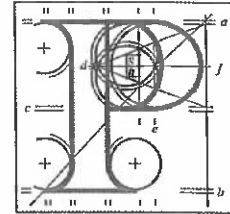


Our Case Number: ABP-317121-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

District 7 Community Alliance
2 Saint Michaels Place
c/o Sebastian Vencken

Date: 13th September 2023

Re: BusConnects Swords to City Centre Bus Corridor Scheme
Swords to Dublin City Centre

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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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 at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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District 7 Community Alliance: An alliance of 7 resident associations in North Central Dublin made up of 1500 households and 200 businesses

Observation for the BusConnects Swords to City Centre Corridor - Case Number 317121

This observation on case 317121 is being made by Sebastian Vencken of 2 Saint Michaels Place, Dublin 7 on behalf of the **District 7 Community Alliance**. This Alliance consists of:

- Broadstone Basin Residents Association
- Berkeley Road Area Residents Association
- BLEND Residents Association
- Leo Street and District Residents Association
- Blessington Street Residents Association
- Inisfallen Residents Association
- Dubhlinn - Dublin North Business and Cultural Community

Together, we are making an observation on behalf of residents and businesses in the Broadstone, Mountjoy and Dorset Street areas, specifically those located in the blue area on the map below.

We would like to thank the NTA and An Bord Pleanála for the opportunity to provide input.

Thank you.

District 7 Community Alliance Committee,

Tony Kelly (Chair)

Ray Kenny (Vice-Chair)

Ragnall Ó Floinn (Secretary)

Pauline Cadell (Treasurer)

Sebastian Vencken (Ordinary Committee Member)

on behalf of all members of the District 7 Community Alliance.

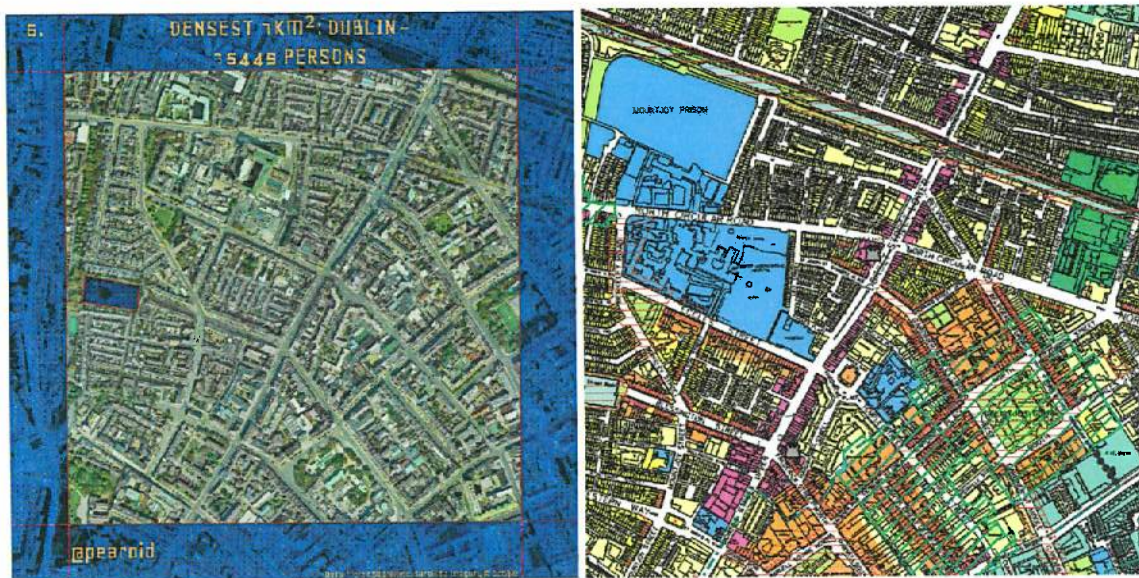




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Dorset Street is Dublin's largest KUV

With 15499 persons/km², the square kilometre that is traversed by Dorset Street represents the densest square kilometre in Ireland (CSO 2016 Census; www.spatialoverlay.xyz). Additionally, Dorset Street represents one of the largest areas in Dublin City that enjoys the designation of a Key Urban Village (Dublin City Development Plan 2022-2028, Zoning Map E), marking it as a crucially important top-tier urban centre for not only for the communities adjacent to this street, but also to the large community of residents and businesses on the street itself.



Unfortunately, over the years both Dublin City Council and the National Transport Authority have failed in treating Dorset Street as a living street. Rather it has been treated as a multi-lane traffic corridor between the city centre and the suburbs.

BusConnects presents an opportunity to provide a modal shift that reduces the volumes of private motor traffic on Dorset Street and to reimagine the street as a living street on which residents and businesses will be allowed to thrive. For this reason, the District 7 Community Alliance (D7 Community Alliance) supports the BusConnects project. However, we have great concerns that the measures proposed will stop significantly short of allowing Dorset Street itself as a living street and Key Urban Village. We contend that, as it stands, the BusConnects plans for Dorset Street will fail to meet the projected aims in *Section 1.1* of the submitted EIA report (Vol 1) that state to:

- *Improve accessibility to jobs, education and other social and economic opportunities through the provision of improved sustainable connectivity and integration with other public transport services; and*
- *Ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.*

We are disappointed that no design iterations have been considered at all from the initial conception of the project, as evidenced in *Section 4.3* of the EIA Report (Vol 2), despite significant engagement



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with the NTA consultations by the residents and business on and off Dorset Street. From the conception of this project, the community felt that they weren't sufficiently consulted and that the NTA lacks knowledge about the provisions and needs of Dorset Street. Dorset Street also fails to be regarded as a unique community in the Community Assessment proposed in *Section 10.2.1.1* of the EIA Report (Vol 2), despite it being a Key Urban Village. One must then assume that the Dorset Street Community Area overlaps with the ones that did make the cut in the EIA report, such as Berkeley Road and Dominic Street, but the NTA provides no map or detailed boundaries of the study area. This again shows a lack of recognition by the NTA that the Dorset Street area itself is a centre of residential and business activity.

Further salient pieces of evidence of this lack of knowledge about the street are the various errors in *Volume 1 General Arrangement Drawings* such as, but not limited to:

- *Sheet No. 34, Ch A11150* that shows a bus stop will be relocated from a location where no bus stop currently exists.
- *Sheet No. 35, Ch 11450-11500* that incorrectly shows an exception to a right turn ban for motorcycles, cycles and public service vehicles up a one way street (Blessington St), while the left turn ban (with exceptions) for North Frederick Street is missing.
- *Sheet No. 35, Ch 11500-11550* that incorrectly shows a pedestrian crossing, where none exists. No proposal of a new pedestrian crossing at this location is anywhere to be found in the proposed plans.

Finally, what may be in the eyes of the community the most disappointing omission, is the complete lack of recognition of the Greater Dorset Street Together Plan, a DCC-funded, community-led public realm improvement plan for Dorset Street that is included in the Dublin City Development Plan 2022-2028 and which predates the BusConnects project by several years.

Central Median

The central median that runs from Binn's Bridge to Blessington Street has long been a focus of contention among residents and businesses along Dorset Street. This median (partially planted and 2 metres in width at most parts) has no useful purpose for this relatively narrow street and contributes to the poor aesthetic of Dorset Street as a dual-carriageway, rather than a living street. The removal of this central median is a core enhancement proposed in the Greater Dorset Street Together Plan.

Although the removal of the two vehicle lanes along much of Dorset Street, as described in the proposed plans, is welcome and we believe should be kept, the central median should be removed in its entirety and this space redistributed to footpaths, cycle tracks and planting of trees and shrubs between the footpaths and traffic lanes. The D7 Community Alliance notes that one of the design alternatives set out in *Section 5.3* in the EIA Report (Vol 1) included the complete removal of the central median, albeit with the retention of the vehicle lanes planned for removal in the *Draft Preferred Option*. This proves that the NTA has explored the idea of removing the central median and may have deemed it as a realistic possibility. We advocate to combine the *Design Alternative* of removing the central median and the *Draft Preferred Option* of removing the vehicle lanes.

Removing the central median would solve the following potential issues that the proposed plans touch on:



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- Removal of the central median allows for redistribution of space to the planned cycle tracks along Dorset Street. These cycle tracks are currently planned to be 1.5m in width along the entire length of Dorset Street (*Section 4.5.5.2, Table 4.19*). This width is below the desirable width for one-way cycle tracks (2m) in the Design Manual for Urban Roads and Streets (DMURS) and below the absolute minimum width (2m) and significantly below the recommended width (2.5m) for one-way cycle lanes with a projected flow of >300 cycles per peak hour as recommended in the NTA's Cycle Design Manual (*Section 6.4.6.2.2.3, Table 6.55* of the EIA report projects 375 peak-hour cycling trips). The redistribution of the space gained by removing the central median can bring the proposed cycle tracks to within DMURS and Cycle Design Manual standards. Furthermore, along most of the length of Dorset Street, the cycle tracks will front directly onto the bus lanes in the proposed plans, with very little to no buffer protecting cyclists from vehicles travelling at 50 km/h. This makes sacrificing the central median to provide additional width to the cycle lanes and the addition of a buffer even more pertinent.
- Removal of the central median allows for redistribution of space to footpaths, which at many locations in the proposed plans will be reduced to the absolute minimum width as stated in the DMURS. The many pedestrian pinch points along Dorset Street, which as a community street enjoys significant pedestrian traffic, will lead to dangerous conflicts with cyclists and vehicular traffic.
- In *Section 6.2.2.2* of the EIA report (Vol 2), the NTA states that the proposed scheme has designed and assessed with reference to the DMURS guidelines, explicitly including the guideline on multi-functional streets:

Multi-Functional Streets – The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment;

Dorset Street is the definition of a multi-functional, place-based street, but nowhere in the EIA report is there any reference to this. The Greater Dorset Street Together Plan singles out the central median as both a literal and figurative barrier to the place-making and multifunctionality of Dorset Street. This is due to the central median having the effect of slicing a barrier through the street creating a carriageway effect. It prioritises the street as a route rather than a destination, inhibiting place-making. Removing the central median and redistributing the tree planting to both sides of the street will reduce the carriageway effect and bring both sides of the street closer.

- In the proposed plans, all bus stops along Dorset Street are Shared Landing bus stops. As stated in *Section 4.6.4.5* of the EIA report (Vol 2), the preference are Island Bus Stops as this minimises conflict between cyclists and pedestrians. Considering that Dorset Street enjoys significant bicycle traffic (proposed to double in the plans) and is projected to have the highest peak-hour bus passenger loading along the entire Swords - City Centre route (as stated in *Sections 6.4.6.2.3.1 and 6.4.6.2.3.2* of the EIA report (Vol 2)), it is imperative that maximum space is allowed for pedestrians waiting for the bus, particularly when bus stops are proposed to be consolidated as is the intention in the plans. Removing the central median may allow for Island bus stops at certain locations along Dorset Street where currently Shared Landing bus stops are proposed.
- The entire stretch along Dorset Street between the North Circular Road and Dominic Street doesn't contain a single loading bay. This is despite the street containing dozens of retail and



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hospitality businesses and despite the street's zoning as a Key Urban Village. The proposed plans do not contain a single loading bay.

The absence of loading bays have often been highlighted by the business community on the street as a significant barrier to their operations and as a reason for the decline of many types of businesses on the street. Loading bays are essential to the street and a redistribution of space from the elimination of the central median to the sides of the street could accommodate space for loading bays at several important locations. Currently, delivery vehicles frequently park in the bus lanes and on the footpaths. Without loading bays, this practice will very likely continue, significantly harming the public transport and active travel objectives of the BusConnects programme.

- The entire stretch along Dorset Street between the North Circular Road and Dominic Street contains only two disabled parking spots. In *Section 6.4.6.1.6.4* of the EIA report (vol 2), it is proposed to remove one of these disabled parking spots, leaving only one for this mixed-use street. This is simply unacceptable for people with disabilities, particularly when considering the proximity of three hospitals in the immediate vicinity of the street. Removing the central median will allow for a redistribution of space to much needed disabled parking along the street.
- In several meetings and consultations with the NTA, we made clear the importance to the community of removing the central median and replanting of trees along the sides of the road, as envisioned in the Greater Dorset Street Together Plan. Indeed, DCC responded to this by replanting several dead trees on the median using "root boxes" that can allow the replanting of these trees at a later point in time. *Section 3.4.1.2* of the EIA report (Vol 2) states that the removal of the central median and the replanting of trees and shrubbery to the sides of the street "is not straightforward" and that "it was evident from the available utilities information that the footpaths on both sides of the carriageway are very significantly congested with services, particularly in comparison with the central reserves." We are very disappointed that this is simply stated without any evidence anywhere in the EIA report that there is indeed a congestion of services and that the replanting would indeed be problematic. We hope that An Bord Pleanála will not accept the NTA's statement at face-value.

In summary, the removal of the 2m-wide central median down the centre of Dorset Street will allow for the redistribution of this space to footpaths, cycle tracks, planting, loading bays, bus stops and disabled parking. These are all measures that will not only significantly enhance the street as a mixed-use community street, but will also allow the transport aims and public realm aims of the BusConnects project to be more likely met.

Poor cycle infrastructure Blessington St - Granby Row

A glaring omission in the proposed plans is the absence of a segregated cycle track on the city-bound side of the street between Blessington Street and Granby Row and a complete absence of any cycling infrastructure on the outbound side of this same stretch. *Section 4.6.3.2* of the EIA report (vol 2) states

There are no sections of cycle lane proposed as part of the Proposed Scheme,

This is simply untrue as evidenced in the *Volume 1 - General arrangements, Ch 11500 - 11769*, where it is clear that the unprotected cycle lane (informally called "murder strip") along this long section of



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the street will be retained in the proposed plans. The "Positive Moderate improvement" from D to C, stated in *Section 6.4.6.1.6.2, Table 6.49* in the EIA report (vol 2) is very misleading as there are no changes from the current, existing arrangement on this section of the street whatsoever; there currently already exists a city-bound unprotected cycle lane and outbound bus lane for cyclist.

It may be justifiable to reduce the vehicle traffic lanes and implement bus priority signalling (such as is proposed for the Phibsborough Road in the Finglas - City Centre BusConnects plans) to accommodate segregated cycle tracks along both sides of the street as would be recommended in the DMURS and Cycle Design Manual for this part of the street. This arrangement would then comply with the road user hierarchy stated in the BusConnects programme compared to the currently proposed arrangement.

No cycle lane Parnell Sq West/Granby Row

Parnell Square West and Granby Row represent a major pedestrian and cycling artery from the Parnell Street/Henry Street/Moore Street retail core. No changes to the current cycling and pedestrian infrastructure are put forward in the proposed plans whatsoever. In informal meetings with the NTA we were told that "this section is not really part of the plans". Unfortunately, these words have become evident in the proposed plans. We find this unacceptable, as Parnell Square West/Granby Row are very much part of the BusConnects plans, not only as an important terminus location for the routes, but also as they are indeed included in the descriptions and arrangement maps of the Swords - City Centre plan itself. The NTA should not be allowed to be absolved from its responsibility over this section of the route.

Currently, this street is incredibly dangerous to cyclists due to the many conflicts with busses pulling in and out of stops and with cars chaotically swerving across the very wide, laneless street. Their incline towards Dorset Street, makes Parnell Square West and Granby Row particularly precarious for cyclists who are forced to cycle uphill, leading to a higher risk of falls and conflicts. None of this will be helped by the proposed bus lane on Parnell Square West and the "Positive Moderate" effect on cycling as stated in *Section 6.4.6.1.6.2, Table 6.49* is highly misleading. The issue is busses constantly pulling out in front of cyclists going uphill. A situation that will not be remedied at all by the proposed plans and, in fact, will likely become worse due to the additional vehicle PCUs, as predicted in *Table 6.69* of the EIA report (vol 2).

Meanwhile, the footpaths remain very narrow despite COVID emergency measures to widen the bus stops. These footpaths have a lot of pedestrian traffic (particularly shoppers) and pedestrians are frequently forced onto the roadway.

Parnell Sq West and Granby Row are very wide streets and could easily accommodate a dedicated cycle lane and wider footpaths. The perpendicular parking on Parnell Sq West is also retained in the proposed plans, despite this being recommended against in *Section 4.4.9* of the DMURS. This could easily be transformed into parallel parking, creating even more space on the street, while improving safety.

It is baffling that the NTA has chosen to entirely ignore an incredibly busy and important terminus on the BusConnects route in the commercial heart of Dublin. We wish for the plans for these streets to be revised.



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Right turn ban onto Eccles Street

The right turn ban from Dorset Street to Eccles Street will create a significant traffic, noise and pollution burden for residents on the North Circular Road, Berkeley Road and Wellington Street Lower by displaced city-bound traffic that is redirected up these streets. The increases in vehicular PCUs on these streets is very concerning and may be ameliorated by removing the proposed right-turn ban.

Bus Stops

Dorset Street, running on a north/south axis, serves as the primary route leading out of the city towards destinations like the airport, Swords, Dundalk, and Belfast. The surrounding area boasts a diverse range of residential accommodations, from new apartments to Georgian houses, alongside hostels, hotels, and AirB&Bs. The vicinity also houses a prison, three major hospitals (Mater Public, Mater Private & Temple St. Children's Hospital), and schools such as Belvedere & St. Mary's. Although the population density surpasses places like Phibsborough and Drumcondra village, Dorset Street essentially functions as a vehicular thoroughfare rather than an urban village. Notably, it's also the most congested and polluted street in Dublin. These factors are crucial for the Bus Connect scheme's considerations.

Between North Frederick St./Dorset St./Blessington St. intersections and North Circular Rd/Belvedere Rd, there are four westward bus stops (No. 11, 12, 14 & 15) and three eastward stops (No. 49, 51, 52).

Bus Stop 11, in front of St. Raphael House, caters to routes 13 & 40 and remains unchanged, like Bus Stop 15 past the North Circular Road. Bus Stop 12, near Hennessey's Pub, services multiple routes. Its planned elimination poses issues since it's the primary post-Parnell Square west exit. It serves a vast residential area and key locations like the Mater Hospitals and private clinics. Its significance extends to those needing airport access via buses 16 & 33. Its proposed consolidation with Bus Stop 14 seems misguided, given its volume and strategic importance.

Bus Stop 14, situated outside No 99 Lower Dorset St estate, will potentially see Bus Stop 12's traffic. Given its location near direct on-street residences, this could disrupt local living with noise, litter, and other nuisances.

Heading back citywards, Bus Stop 49 caters to various routes including airport services. While Bus Stop 50 is non-existent, Bus Stop 51, outside No. 7 Dorset St. Lwr, handles a similar route range. Bus Stop 52, near the Post Office, serves as the last stop before Parnell Square and is vital for residents, tourists, and professionals. It's a crucial node for those with luggage, making it indispensable for user convenience and promoting bus service use.

