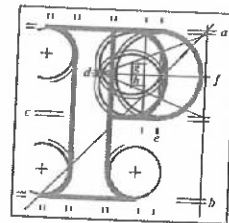


Our Case Number: ABP-317121-23

Planning Authority Reference Number:



An
Bord
Pleanála

Leo Street and District Residents Association &
Lower Dorset Street Community Group
c/o Anthony Kelly, Chairperson
16 Saint Joseph Street

Date: 20 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.

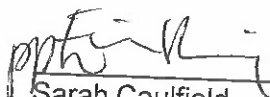
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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,


Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

Tel	Tel	(01) 858 8100
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Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Submission to National Transport Authority Re: Bus Connects Swords to City Centre
Route

AN BORD PLEANÁLA	
LDG- 066433-23	ABT 317121
12 SEP 2023	
Fee: € 50.00	Type: CAPD
Time: 14-43	By: HAWD

Jointly presented from Leo Street and District Residents association
Lower Dorset Street Community Group

Observations specific to Dorset Street

Introduction: Both groups making this submission are part of the District Seven Community Alliance an organisation consisting of several residents' associations and the local business association based in and around Dorset Street. Several years ago, we came together as a broader community and produced the Dorset Street together plan which has been presented and supported by the Central Area Committee.

We have pointed out to Bus Connects on the rare occasion we were given a 20-minute audience that there is no conflict with regards The Dorset Street together plan and the bus connects plan. We have several years ago allowed for the provision of a bus and cycle lane. Bus connects has failed in several areas not only to address the needs of the community, but their plan has the potential to destroy what is left of Dorset Street and leave an ugly motorway cutting through the gateway to Georgian Dublin.

Doing Business in Dorset Street

Loading bays? **A glaring omission from the bus connects plan.** Currently those businesses still operating on Dorset Street take deliveries on the bus lane. Awkward but not impossible as things currently stand with three lanes. Take a way one lane add a cycle lane and bus lane. Deliveries now still must unload on bus lane cross the cycle lane and leave one lane for all traffic to pass. All the way in through Drumcondra shops have loading bays up to the canal bridge. Not so on Dorset Street. What are businesses to do, how do they operate.

The current proposal shows a lack of planning and understanding of local needs it also makes it dangerous for delivery drivers and cyclists. It is an accident waiting to happen and it is negligent bordering on criminal if it was approved.

Solution: Remove the central median which both residents and businesses have already concluded is necessary for the creation of loading bays to allow shops to

operate safely. And cyclists to pass safely. Both DCC and Bus Connects admit having no issue with this. The recent tree planting was done in such a way that they can be taken up and moved to the side. It only takes the will

Environment: Please see attached observation from Professor Debbie Stanstreet lecturer on Public Health at the Royal College of Surgeons.

The overall purpose of this project is to improve the use of Public Transport therefore reducing our carbon emissions and creating a healthy environment for all to enjoy unless you live in a less well of area whereby Bus connects attitude is just put up with it and die.

Why do I say this. Very simply despite all the evidence that the current emissions on Dorset Street are above EU accepted levels and 6 times WHO standards Bus Connects refers to no adverse increase. Adverse increase when emissions are already above accepted level is negligent beyond belief especially when there is not a single plant or shrub being placed along the entire street to at least try to mitigate the levels of emissions in the short term.

Solution: Remove the central median replant the trees and shrubs to both sides add more, create an avenue rather than a dual carriageway. Protect both pedestrians' cyclists' residents and the thousands of hospital patients with multiple ailments who attend outpatients' clinics daily.

Mater Hospital; The Mater hospital is the largest employer in the area with significant plans for development and expansion. With up to 5000 staff and thousands attending daily clinics it has to date not been consulted on its expansion plans and how that may benefit from Bus connects or changes to traffic flow might affect its operation.

Traffic Flow. It is proposed to make a no left turn from Dorset Street onto Synott place. We understand this is to allow the free flow of traffic and to stop cars cutting across a bus lane and cycle lane. However, cars will just divert into Eccles place which is the turn before Synott Place. A narrower street where cars will still cross the bus lane and cycle path and turn Leo Street into a rat run. We offered to walk the street with bus connects and point out the problems that may arise they refused. **Please note Eccles place contains the supply bays for the mater private and cannot be turned into a no left turn.**

No right turn Temple Street onto Dorset Street. This turn is difficult at the best of times with no feeder light. However, its where this traffic goes. It can go straight

ahead into Eccles Street onto the NCR preferable, except that the metro link is going to close it for 5 years and the Mater would like to see the top end pedestrianised. So, it means that this traffic must then divert into Nelson Street and increase the traffic volumes on a relatively quiet street. Once again it would be advisable that the mater be consulted on any future plans.

Bus stops Possibly one of the issues that will cause the most concern. Proposal is to do away with one of the stops on Dorset Street Upper and move it to Lower creating a large stop in front of the Houses on Dorset Street Lower. Once again Bus connects has totally ignored the concerns of residents.

Currently buses pulling up outside these houses have a full view direct into the peoples' bedrooms. It has got to the point where it is necessary to keep the curtains closed all day or use an Adhesive plastic on the windows. Increasing the number of buses pulling up outside of these houses will lead to direct confrontation.

Solution: Leave bus stops as is or look at ways of not directly impinging on residents' privacy. This would require meeting residents which is alien to Bus connects.

Move bus stops away from residential houses or perhaps some planting of trees which could be done if the central median was removed.

Conclusion. For almost two years the residents and businesses along Dorset Street attended endless meetings to come up with a set of plans for the area. These plans included both cycle lanes and bus lanes and the desire to see a reduction in traffic volume. It also addressed the needs of all who live and work along and of the street. Directly financed by DCC its main conclusion was that for Dorset Street to work for all the central median needed to go. That space is needed on the sides of the road.

The bus connects plan as it stands does not address the greater needs of the area which is regeneration. We welcome bus connects as a catalyst to bring Dorset Street back to life, but they need to engage. As it stands this plan will destroy what's left on the street.

Anthony Kelly Chairperson Leo Street and District Residents Association 0857535421
(16 St Joseph Street Dublin 7)

Marian Lindsay Lower Dorset Street Community Group 0851021893
(94 Lower Dorset Street)

Air quality and Dorset St

From: Debbi Stanistree [REDACTED]

To: [REDACTED]

Date: Wednesday, July 12, 2023 at 09:40 AM GMT+1

Good morning All,

I just wanted to follow up on the discussion last night regarding air quality 'benefits' from Bus Connects from 2028. I'm concerned that there is a perception that we will benefit from better air quality from 2028 onwards. Based on the Air quality chapter (see chapter 7 from the link at the end of this email) this is not correct. In summary, the document outlines how BusConnects will benefit most from 2028 in terms of a very slight reduction in air pollution, **except for a few areas that are going to see an increase until 2043.**

Page 66 in the document (68 using pdf numbering)

In the 2028 DS scenario annual mean concentrations of NO₂ are above the relevant national air quality limit value objective in some areas; 66 exceedances were modelled at receptors on the N1 Drumcondra Road Upper/Drumcondra Road Lower/Dorset Street Upper/Dorset Street Lower/Bolton Street, the R101 North Circular Road, the R104 Coolock Lane, the R106 Swords Road, the R108 Phibsborough Road/St Mobhi Road, the R802 Gardiner Street Upper/Middle/Lower, the R131 Clonliffe Road, the R803 Ballybough Road, the R836 Dublin Road, Belvedere Place, Cathal Brugha Street, Denmark Street Great, Forest Road, Frederick Street North, Hill Street, Mountjoy Square, Parnell Square, Parnell Street, Temple Street and Whitworth Road.

At the bottom of page 72, there is even a boast that annual levels of NO₂ will not exceed 60 mcg/m³, which is astonishing when you think the EU limit is 40 mcg/m³ and the WHO limit is 10 mcg/m³

Just for reference, the WHO and EU annual means are below. We should be aiming for the WHO levels by 2030.

Pollutant	WHO annual mean	EU annual mean
PM ₁₀	15 µg/m ³	40 µg/m ³
PM _{2.5}	5 µg/m ³	25 µg/m ³
NO ₂	10 µg/m ³	40 µg/m ³

Also, on page 79 the report states

*A slight adverse impact is expected at 61 receptors and a moderate adverse impact at three receptors on the R108 Phibsborough Road and the R101 North Circular Road Junction. These localised moderate adverse impacts are considered Negative, Significant and Short-Term, as NO₂ concentrations exceed the limit value, **but will decrease below the limit by 2043** due to reductions in emissions between 2028 and 2043 from advancements in engine technology and the addition of a higher percentage of electric vehicles to the fleet.*

I can't believe that this is acceptable or even legal. I think we should insist on proper EU standard monitoring, given that their modelling suggests the community as at even more risk than previously and that levels are likely to be above EU limits; and also a **proper** mitigation plan.

All documents available here.

<https://swordsscheme.ie>

Seb, if you can see how they have characterized 'moderately adverse' let me know. Given that we are already above legal limits, I think it's quite misleading to label any further increases as moderately adverse.

All the best
Debbi

Prof. Debbi Stanistreet
Head of Dept of Public Health and Epidemiology

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