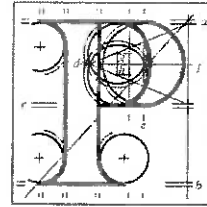


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Dr. Dermot Stokes
24 Marlborough Road
Donnybrook

Date: 11 October 2023

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray 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

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The Bray to City Centre Core Bus Corridor Scheme

Observations – Proposed Scheme from Leeson St to Donnybrook Road

1. General issues

While the proposed scheme is compatible with the Dublin City Development Plan's emphasis on walking, cycling and public transport, the core objective of the proposed scheme is to take a very large number of people *through* Donnybrook, not *to* Donnybrook. This is difficult to reconcile with key elements of the Dublin City Development Plan and, in particular

- the 15 minute city model;
- the identification in the plan of key urban villages, *including Donnybrook*

In the Plan (4.5.2 Approach to the Inner Suburbs and Outer City as Part of the Metropolitan Area) it states (p115) that

Over the next plan period, the strategic approach is also to strengthen the hierarchy of urban villages in the inner suburbs and outer city and consolidate and develop them as key focal points for the communities that they serve... It is envisaged that these will be strong spatial hubs and provide a range of retail, commercial, employment, community and other services. Urban villages will play a key role in developing the concept of a 15 minute city.

So a key general issue is the degree to which the proposals do or do not align with and/or do not sufficiently reflect local population, commercial, service and traffic patterns and how the planned bus corridor project might be tweaked in order to better meet and match these factors.

Another key issue is the degree to which the Proposed Scheme is consistent with the lofty and partnership-based aspirations expressed in the Dublin City Development Plan. In particular, there is the question of consultation. This is especially important where major changes are set out that will have a significant and permanent impact. Under heading **The Vision for Dublin** in the City Development Plan (p19) it states

The city must, collectively through its citizens and civic leaders, develop a shared vision of what sort of city we aspire to, not only for the six-year lifetime of a Development Plan, but for the next 25 to 30 years. It is only by developing a shared vision for Dublin that we can deliver the Core Strategies of each successive Development Plan as crucial stepping stones towards the long-term vision. Without a vision which enjoys broad support, short-term, often competing, interests will prevail, ultimately to the detriment of the city.

This is a very sound statement. A plan composed by technocrats, however well-prepared and disposed, is always likely to fast-track actions at the expense of necessary but time-consuming broad consultation. Impatience begets a dirigiste, and inherently undemocratic, approach. Resorting to online surveys and invitations to comment to assemble a semblance of public opinion is always and inevitably open to colonisation by the "short-term, often competing, interests" referred to in the City Development Plan. The words collectively and shared being so central to the Development Plan's vision, it is very annoying that residents near the bus corridor, whose lives will be dramatically

affected (eg through greatly increased parking on their streets) have not been consulted or informed about the Proposed Scheme. This indicates that, contrary to the lofty aspirations, residents are a mere afterthought and technocrats are in the saddle.

A final general issue: there are many drafting errors in the report, for example Auburn Avenue is repeatedly called Aubrey Road (Chapter 6) and sentences refer to “parking providing” which makes no sense. Lazy and inaccurate drafting suggests lazy and inaccurate analysis.

2. Contextual factors:

The Dublin City Development Plan identifies Donnybrook as a key village, one of a necklace of inner suburban villages that surround the historic core/centre of the city. It is an area steeped in history and a reservoir of Victorian and Edwardian architecture as well as Victorian paving and street furniture. A very high proportion of the buildings on Morehampton Road are listed as protected structures (see Appendix). There is a settled community and active commercial life. All of these are hallmarks of an inner suburban village.

However, Donnybrook is bisected by what becomes the N11. This significantly inhibits its functioning as a village. The national and regional importance of the road is acknowledged. However, there is a significant risk that increasing the status and mono-directionality of the N11 without taking the community and commercial life into account will further handicap Donnybrook’s ability to function as a village.

There are several key factors that should be understood in planning for the village.

The first is the impact the bus corridor is likely to have on the fabric of the village.

An Bord Pleanála is emphatic on the need to maintain fabric of historic city facades and streets and recently refused permission for a couple in Clontarf to retain a bike storage unit at the front of their house as it was, according to the decision, ‘detrimental’ to a Victorian home setting. An Bord said that

“The retention of this unsympathetic intervention within the front curtilage of a protected structure would constitute a visually discordant feature that would be detrimental to the setting of the protected structure as well as to the amenity of adjoining protected structures and the local streetscape”.

“The development proposed for retention would, therefore, be contrary to the proper planning and sustainable development of the area”.

There is no record of what An Bord Pleanála thinks of all the intrusive street signage and bollarding that attends cycle lanes but the above decision would appear entirely contrary to much of it. As Morehampton Road is an old street with very many protected structures, surely the same applies to it as to the street in Clontarf where even a bike shed was considered visually discordant and inappropriate.

See here: <https://www.irishtimes.com/ireland/housing-planning/2023/06/12/bike-shed-in-front-garden-detrimental-to-victorian-home-setting-planners-rule/>

It may, of course, be the case that the aims of the bus corridor can be met with architecturally appropriate signage and indicators, etc. But looking at what has been happening on the North Strand one wouldn't be hopeful.

The local community and businesses don't see Donnybrook as merely an incidental stop on a journey from Bray to Balbriggan. They wish commuters all the best as they pass through but they live and work in Donnybrook and want Donnybrook to function as a village.

The second is the demographic profile of the area. There are many families with school-going children. But there is also a large cohort of older citizens. Also, the area has a number of institutions for individuals with long term care need, such as the Royal Hospital. Many older citizens need cars to transport themselves and/or those they care for. Also, cyclists (and delivery cyclists and commuters on powerful electric bikes in particular) are a greater fear for older citizens than cars because of their silence and speed and, in some cases, aggression and disregard for regulations.

The third is the very high number of schools in the area. This creates a particularly intense traffic load and pattern, one that is (more or less) unique in Dublin. Large numbers of young people arrive in the area every morning from all points, some from relatively significant distances. Many travel on public transport and bicycle but large numbers do not. This is not an issue that can be instantly or simply wished or managed away. Making it a great deal harder for parents to navigate the area is likely to worsen traffic rather than ease it. The challenge for planners is to find ways of decreasing the volume and increasing the flow of traffic without strangling the village.

Fourth, it should never be assumed that the custom for local businesses is strictly local. Many of them serve a much wider catchment area. Their clients and customers are of all age groups and many do not live on a line to the north or south but must firstly find their way to the village and secondly be able to park for as long as they need.

This raises two interconnected issues: access and parking.

As regards access, the urgency attached by the NTA to creating a corridor from Bray to Balbriggan appears to involve closing off options for right-hand turns, except where there is an additional lane to allow it. This seriously compounds the difficulties faced by residents and commuters whose destination is other than along the corridor.

As regards parking, there is parking on Herbert Park. But drivers coming into the city from the south can't turn right at Herbert Park so they turn left to park on Marlborough Road. This is already a problem but it will get very much worse (and particularly for residents on Marlborough Road) if parking is made unavailable on Morehampton Road. I return to this below.

So, in the interests of the village community and commercial interests, is there a way to ease access and spread the parking load while still achieving the general aims of the bus corridor?

It is important that planners consider how road signage might be changed and enhanced to nudge and direct traffic towards parking places where drivers would not be competing (too much) with residents, for example the lower half of Herbert Park (where some parking is currently free for part of the day). Such signage would be especially valuable on the inward-bound carriageway, replacing the now very worn and faded signage beside the bus station, for example, an over-carriageway sign

near RTE directing drivers to “Ballsbridge and Herbert Park P”. Adding Aviva Stadium would also help.

Specific issues arising

- 1. As regards the idea of increasing the numbers of buses**, a study should be done of the maximum numbers of buses that can navigate the streets close to the city centre (Leeson St) at any given time. There is a limit and it is often reached, especially inbound during the morning rush hour. The right turn at the junction of Leeson St and Stephens Green is a particular problem. Consideration should be given to diverting some (though not all) bus traffic left at Hatch Street, turning right on Earlsfort Tce and going straight onto Stephens Green.
2. Likewise, consideration must be given to the increasing impact of large numbers of buses, and therefore passengers, converging on very limited spaces around particular bus stops and Lower Leeson St inbound and Upper Leeson ST outbound in particular. These are effectively small bus stations and it is very difficult for pedestrians to make their way through the heavy queues. But Passengers are often waiting for a specific bus (including buses travelling far beyond Bray and private bus services, eg to Dublin Airport) and the pavements are completely blocked during rush hours. This is exacerbated in Lower Leeson Street by metal fences. In effect, these streets are mini outdoor bus stations. It can be very difficult even for a fit adult. It’s impossible, and very distressing, for anyone with any kind of disability or vulnerability. The plan is supposed to serve pedestrians as well as passengers and cyclists, is it not? So this issue must be addressed.
3. There is a strong case to be made (and local businesses may already have made it) for lower speed limits and traffic calming measures such as speed bumps on the strip between Herbert Park and the Energia Stadium.
4. Likewise, the speed and aggression of some cyclists and the power and silence of electric bikes is a major issue for many, and not only the vulnerable. Accordingly there is a strong case to be made that traffic calming measures should be in place for cycle lanes.
5. A number of toucan crossings are proposed. These are a dubious proposition, if the mess at Leeson Street Bridge is anything to go by. Note: cars are not the problem – the problem is chance-taking pedestrians and cyclists.
6. At present, and notwithstanding official pieties, provision for cyclists is very weak at a number of key junctions, for example inbound cyclists wishing to turn right at Nutley Lane. There are many such junctions on the line of the proposed scheme. It’s very difficult to know how one is to cross, other than dismounting and walking across the pedestrian crossing. If there’s to be more cycling there needs to be better thinking, analysis and design of such junctions.
7. Turning to parking, **Section 6.3.2.5** (Chap 6 p36) refers to side streets that can be used by local residents and visitors / businesses and states that “In total there are approximately 230 parking spaces on streets surrounding R138 Leeson Street Lower, R138 Sussex Street and R138 Leeson Street Upper, approximately 455 parking spaces on streets surrounding R138 Morehampton Road and approximately 229 parking spaces on streets surrounding R138 Donnybrook Road”

Observation: There is very heavy local demand for these parking places and local people are understandably very concerned at the prospect of being shunted considerable distances from their homes to park. The idea that these are just floating spaces is laughable. Furthermore, pressure is likely to substantially increase when new housing is occupied on Morehampton Road, Donnybrook Road and behind McCluskeys. In particular, Marlborough Road is likely to be overrun by those coming from the Donnybrook/Stillorgan side, as it's the first left turn after the row of shops/cafes, etc.

8. In **6.4.6.1.2.4 Parking and Loading** (Ch 6 p97) we read that it is proposed to remove all 20 designated paid parking spaces on R138 Morehampton Road, a proposal that the authors assess to have "a Negative, Moderate and Long-term impact".

Observation: They are correct as regards the negative and long-term effects but wrong as regards "moderate". They seriously underestimate the impact. As noted above, the restrictions on turning off Morehampton Road (in both directions) greatly decrease drivers' capacity to reach parking places adjacent to Morehampton Road. **Consequently, the impact will be particularly negative for Marlborough Road** (from inbound drivers).

9. In this section we also read that it is proposed to relocate the one disabled parking space currently located on Morehampton Road to Herbert Park, "approximately 140m from the existing location". The authors acknowledge that the impact of this will be negative and long-term, which it will be, but they also claim it will be slight, which it will not be.

Observation: It is clear that **the authors of the plan are not disabled**. The disabled space is currently outside two pharmacies, ie important destinations for disabled drivers. 140 metres might not be a great distance for a bus corridor planner but it can be a very considerable distance for a person who is disabled or otherwise vulnerable from a health or physical point of view.

A disabled person coming from the southside (ie inbound from the Stillorgan side) will not be able to turn right onto Herbert Park. So how are they to access this parking? And if they do so by u-turning on Marlborough Road, or reaching Herbert Park via Ballsbridge, how will they traverse the distance of 140m to get to Pure or Boots? Or to the shops and cafes? They have a disabled parking permit for a reason. As for the disabled parking site on Marlborough Road, a number of local residents use it.

In the interests of access and equality, this proposal should be revisited.

10. At **Ch 6, Page 98** the authors assert that

As shown in Table 6.26, the proposed amendments to parking / loading will result in a loss of 94 spaces along Section 1. Where parking is removed, the impact varies between negligible and moderate. The overall significance of effect is assessed as Negative, Moderate and Long-term. This moderate effect is considered acceptable in the context of the planned outcome of the Proposed Scheme, which is to improve accessibility to this local area (on foot, by bicycle and bus) for residents and visitors to local shops and businesses.

Observation: the Proposed Scheme places a multi-lane bus and bike highway through Donnybrook. How does this improve accessibility to the local area for residents? **As regards the proposals on parking, you can't extinguish 94 parking spaces on a relatively short distance without very significant disruption, particularly to local residents.**

Contrary to the bland assurance (deriving only from "qualitative assessment" based on "professional judgement and experience" by the consultants) that the impact will be moderate, the changes will have a very significant impact on businesses and residents along Morehampton Road and on the adjacent streets. The allowance for parking dislocation is utterly inadequate. The report blithely assumes that there is adequate parking on side streets to accommodate the erasure of 94 parking places. But, as noted above, no account has taken of the fact that it isn't possible to access the majority of these places due to restrictions on right turns off Morehampton Road coming from either direction.

For example, there are spaces on the east side, including a small carpark, by Mulberry Gardens. But most inbound drivers are likely to have passed the two locations from which these can be accessed before realising they can't turn at Auburn Avenue or Brendan Road.

It is inevitable that extinguishing 94 parking places will have extremely serious effects on the most accessible streets, in particular Marlborough Road.

Dr Dermot Stokes
24 Marlborough Road
Donnybrook
Dublin 4
09/10/2023

Appendix

From the Record of Protected Structures

5286	1	Morehampton Road, Dublin 4	Dublin 4	House
5287	2	Morehampton Road, Dublin 4	Dublin 4	House
5288	3	Morehampton Road, Dublin 4	Dublin 4	House
5289	4	Morehampton Road, Dublin 4	Dublin 4	House
5290	5	Morehampton Road, Dublin 4	Dublin 4	House
5291	6	Morehampton Road, Dublin 4	Dublin 4	House
5292	7	Morehampton Road, Dublin 4	Dublin 4	House
5293	8	Morehampton Road, Dublin 4	Dublin 4	House
5294	9	Morehampton Road, Dublin 4	Dublin 4	House
5295	10	Morehampton Road, Dublin 4	Dublin 4	House
5296	11	Morehampton Road, Dublin 4	Dublin 4	House
5297	12	Morehampton Road, Dublin 4	Dublin 4	House
5298	13	Morehampton Road, Dublin 4	Dublin 4	House
5299	14	Morehampton Road, Dublin 4	Dublin 4	House
5300	15	Morehampton Road, Dublin 4	Dublin 4	House
5301	16	Morehampton Road, Dublin 4	Dublin 4	House
5302	17	Morehampton Road, Dublin 4	Dublin 4	House
5303	18	Morehampton Road, Dublin 4	Dublin 4	House
5304	19-29 (odd)	Morehampton Road, Dublin 4	Dublin 4	Hotel
5305	20	Morehampton Road, Dublin 4	Dublin 4	House
5306	22	Morehampton Road, Dublin 4	Dublin 4	House
5307	24	Morehampton Road, Dublin 4	Dublin 4	House
5308	26	Morehampton Road, Dublin 4	Dublin 4	House
5309	28	Morehampton Road, Dublin 4	Dublin 4	House
5310	30	Morehampton Road, Dublin 4	Dublin 4	House
5311	31	Morehampton Road, Dublin 4	Dublin 4	House
5312	32	Morehampton Road, Dublin 4	Dublin 4	House
5313	33	Morehampton Road, Dublin 4	Dublin 4	House
5314	34	Morehampton Road, Dublin 4	Dublin 4	House
5315	35	Morehampton Road, Dublin 4	Dublin 4	House
5316	36	Morehampton Road, Dublin 4	Dublin 4	House
5317	37	Morehampton Road, Dublin 4	Dublin 4	House
5318	38-40 (even)	Morehampton Road, Dublin 4	Dublin 4	Convent
5319	39	Morehampton Road, Dublin 4	Dublin 4	House
5320	41	Morehampton Road, Dublin 4	Dublin 4	House
5321	42	Morehampton Road, Dublin 4	Dublin 4	House
5322	43	Morehampton Road, Dublin 4	Dublin 4	House
5323	44	Morehampton Road, Dublin 4	Dublin 4	House
5324	45	Morehampton Road, Dublin 4	Dublin 4	House
5325	46	Morehampton Road, Dublin 4	Dublin 4	House
5326	47	Morehampton Road, Dublin 4	Dublin 4	House
5327	48	Morehampton Road, Dublin 4	Dublin 4	House
5328	49	Morehampton Road, Dublin 4	Dublin 4	House
5329	50	Morehampton Road, Dublin 4	Dublin 4	House
5330	51	Morehampton Road, Dublin 4	Dublin 4	House
5331	52	Morehampton Road, Dublin 4	Dublin 4	House