



## **Appendix B1**

UCD Ballsbridge  
to City Centre  
Core Bus Corridor  
– 1st Non-Statutory  
Public Consultation  
Submission Report

# BusConnects Dublin Core Bus Corridor Projects

## Corridor 14 – UDC to Ballsbridge

### Emerging Preferred Route – Public Consultation Report 2018/2019

[www.busconnects.ie](http://www.busconnects.ie)



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# 1 Executive Summary

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## 1.1 Objective of the Scheme

The aim of BusConnects is to transform Dublin's bus system, with the Core Bus Corridor project providing 230kms of dedicated bus lanes and 200km of cycle lanes on sixteen of the busiest bus corridors in and out of the city centre. This project is fundamental to addressing the congestion issues in the Dublin region with the population due to grow by 25% by 2040, bringing it to almost 1.55m.

This report focuses on the Core Bus Corridor which runs from UCD via Ballsbridge to the City Centre (Route 14).

## 1.2 Purpose of the Non-Statutory Public Consultation

The statement below sets out the purpose of the public consultation, as presented on the website:

*The National Transport Authority has today announced details of the third phase of the BusConnects Core Bus Corridor project with the unveiling of the final six of the sixteen routes that are earmarked for development.*

*The aim of BusConnects is to transform Dublin's bus system, with the Core Bus Corridor project providing 230kms of dedicated bus lanes and 200kms of cycle lanes on sixteen of the busiest bus corridors in and out of the city centre. This project is fundamental to addressing the congestion issues in the Dublin region with the population due to grow by 25% by 2040, bringing it to almost 1.55m.*

*Bus services provide the main form of public transport across Dublin with 67% of public transport journeys each day made by bus. The level of commuting to work by bicycle has also increased by 43% since 2011 and the need for better and safer cycling facilities will be provided through the rollout of the Core Bus Corridor project.*

*The first phase of the public consultations commenced in November 2018 with the second phase started in January 2019. The latest public consultation for phase three is commencing today on the Emerging Preferred Routes for the following six corridors:*

- *Ballymun to the City Centre (Option A & B)*
- *Finglas to Phibsborough*
- *Bray to the City Centre*
- *UCD Ballsbridge to the City Centre*
- *Blackrock to Merrion*
- *Ringsend to the City Centre*

*All property owners potentially affected by today's announcement have been notified by post with one-to-one meetings being offered in the coming weeks with those potentially impacted. The public consultation will run until the 30th April 2019.*

*On the six corridors announced today, annual passenger growth in Dublin Bus services has increased by 18% in the period 2015 to 2018. However, the millions of passenger journeys taking place on each of these corridors are facing increasing congestion with delays being frequently experienced by commuters.*

*In launching the public consultation, Anne Graham, CEO of the NTA said:*

*"Today marks the launch of the last in a three-step process of public consultation with the details of the Emerging Preferred Routes being unveiled for the final six Core Bus Corridors.*

*In recent days, the NTA has notified the up to 390 property owners along the final six routes who may be potentially affected by the Emerging Preferred Routes and offered one-to-one meetings to discuss the proposals and listen directly to their feedback. We would also encourage property owners to engage in the consultation process that is underway until the 30th April so we can look at the issues they wish to see addressed.*

*Throughout the development of this project, we are committed to deepening engagement with communities along each of the sixteen routes and the up to 1,470 property owners potentially impacted by the project. That is why we have been holding public information events in recent weeks and will hold similar such events for phase 3 in the next two months.*

*It has been encouraging to see the high level of engagement that we have witnessed as part of the consultation process. Through feedback and observations, we have already suggested a number of solutions including an alternative layout at Santry on the Swords to City Centre route.*

*At the NTA, we are eager to hear the concerns of all those potentially impacted and ensure they are updated at every step of the project. The Community Forums rolled out in recent weeks allow a continuous two-way dialogue with community leaders, residents' associations, special interest groups and public representatives. The dates of the forums for phase three corridors will be finalised very shortly.*

*With the city due to grow by 25% and congestion one of the most significant challenges facing the Dublin region, the BusConnects Core Bus Corridor project is needed now more than ever. Through the development of continuous bus priority and segregated cycle lanes we can meet the growing demand for fast, reliable, punctual and convenient bus journeys in and out of the city centre, and safe cycling facilities for the growing numbers of cyclists."*

## **1.3 Public Consultation Process for BusConnects**

Consultation on the BusConnects Core Bus Corridor Project took place on a phased basis and ran until the 31st May 2019. The first phase of consultation occurred from 14th November 2018 to 29th March 2019. The second phase ran

from 23rd January 2019 to the 30th April 2019 and the final phase ran from 26th February 2019 until the 31st May 2019. The emerging preferred routes within each phase have been listed below;

Phase 1: 14<sup>th</sup> November 2018 to 29<sup>th</sup> March 2019

1. Clongriffin to City Centre;
2. Swords to City Centre;
5. Blanchardstown to City Centre; and
6. Lucan to City Centre.

Phase 2: 23<sup>rd</sup> January 2019 to 30<sup>th</sup> April 2019

7. Liffey Valley to City Centre;
8. Clondalkin to Drimnagh;
9. Greenhills to City Centre;
10. Tallaght to Terenure;
11. Kimmage to City Centre; and
12. Rathfarnham to City Centre.

Phase 3: 26<sup>th</sup> February 2019 to 31<sup>st</sup> May 2019

3. Ballymun to City Centre;
4. Finglas to Phibsborough;
13. Bray to City Centre;
14. **UCD Ballsbridge to City Centre;**
15. Blackrock to Merrion; and
16. Ringsend to City Centre.

Each of the emerging preferred routes can be seen in Figure 1 with the UCD Ballsbridge to City Centre route designated as Core Bus Corridor 14.



**Figure 1: Radial Core Bus Corridors Emerging Preferred Routes.**

## 1.4 Information Provided in Public Consultation

The Public Consultation document provided information about the work that has been carried out as part of the BusConnects Core Bus Corridor Study. Additional information was provided on the official BusConnects website:

<https://www.busconnects.ie/initiatives/core-bus-corridor-project/>

The additional supporting information on the website included:

- Dún Laoghaire to City Centre Core Bus Corridor Options Study – Feasibility and Options Assessment Report including Appendices;
- Dun Laoghaire to City Centre Core Bus Corridor – Stage F Road Safety Audit including Designer’s Response to Road Safety Audit;
- UCD to City Centre Core Bus Corridor Design Drawings; and
- Ballsbridge to City Centre Core Bus Corridor – Route Options Assessment Report including Appendices;

## 1.5 Submissions Received

There were **773** submissions received for the UCD Ballsbridge to City Centre Core Bus Corridor. These submissions ranged from personal submissions sent in by residents, commuters and local representatives, to detailed proposals from public bodies, various associations and private sector businesses. In addition to the submissions received, notes taken by the NTA during meetings with impacted landowners are included in summary of issues raised in this report.

## 1.6 Principal Issues Raised

The submissions received, cover a wide spectrum of views. The majority of the submissions raised concerns about the scheme, or elements therein. A limited number of the submissions were positively supportive of the scheme while many expressed qualified support. Some submissions identified positives within the scheme, while challenging other elements of the overall scheme.

The issues raised included:

- 1) Need for Scheme
- 2) Extension/alternate route required
- 3) Pedestrian Safety
- 4) Insufficient Consultation of Scheme
- 5) Loss of Bus Services
- 6) Loss of residential/amenity access
- 7) Loss of Parking
- 8) Removal of Trees
- 9) Potential Land Acquisition / Boundary Treatments
- 10) Safety relating to conflicting modes
- 11) Devaluation of Property



## 2 Introduction

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Consultation on the UCD Ballsbridge to City Centre Core Bus Corridor Emerging Preferred Route ran for a period of three months, between the 26<sup>th</sup> February 2019 and 31<sup>st</sup> May 2019.

Every property owner potentially affected by the proposals was notified by post on the week commencing 25 February 2019 and a one-to-one meeting was offered in each case.

Public Information Events were held at the following locations:

- Clayton Burlington Hotel, Wednesday 27 March 2019
- Gresham Hotel, Wednesday 24 April 2019

A Community Forum Event was held at the following location:

- Clayton Burlington Hotel, Tuesday 16 April 2019
- Clayton Burlington Hotel, Wednesday 18<sup>th</sup> September 2019

Copies of the Core Bus Corridor Emerging Preferred Route Brochure were available to the public at the Public Information Events, could be sent by post on request, or for pickup at NTA Office reception, and the Brochure was available for downloading from the Authority's website. Relevant background technical reports were also available for downloading from the Authority's website.

The public were invited to make written submissions relating to the content of the UCD Ballsbridge to City Centre Core Bus Corridor Emerging Preferred Route. Submissions could be made by post; by email; or by hand-delivery directly in the reception of the Authority's offices.

## 3 Approach to Assessing the Submission

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The review of the submissions commenced in June 2019 once the consultation period for all three phases had closed. The NTA received 773 no. submissions for the UCD Ballsbridge to City Centre emerging preferred route, from 26<sup>th</sup> February 2019 until 31<sup>st</sup> May 2019. Most entries were digital (email), however, some paper bound entries were posted to the NTA.

All submissions were entered into a database. Of the total submissions, 1 no. file was corrupted, and therefore indecipherable, 8 no. submissions were direct duplications, while 3 no. submissions were unrelated to the proposals. Therefore, a total of 761 no. submissions were assessed.

Signed Petition Letters were submitted in relation to this scheme. These included a letter from the Nutley Avenue Residents Group with 65 no. signatures and a letter from the Clyde Lane Residents with 26 no. signatures. These submissions have been captured within the assessment in this report.

## 4 Analysis of Issues Raised by Section

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The Core Bus Corridor was divided into six sections, and the issues raised in each submission was entered and categorised in the database by geographical section, by issue type and comment type. The six sections included;

- Section 1: UCD to Nutley Lane;
- Section 2: Nutley Lane;
- Section 3: Nutley Lane to Sandymount Avenue;
- Section 4: Sandymount Avenue to Shelbourne Road;
- Section 5: Shelbourne Road to Eastmoreland Place; and
- Section 6: Eastmoreland Place to Baggot Street Lower.

In addition to the six sections, submissions were also categorised as ‘The Entire Scheme’ where the submission referred to multiple areas, or the scheme as a whole.



**Figure 2: UCD Ballsbridge to City Centre Corridor Map**

A large proportion of the submissions (48%) related to the 'Entire Scheme', while the individual Section which attracted the most submissions (16%) was Section 2 'Nutley Lane', which effectively covers the entire length of Nutley Lane. Section 3 'Nutley Lane to Sandymount Avenue' received the next largest number of submissions (12%).

The 'Entire Scheme' submissions received generally related to the issue of loss of trees and therefore was largely referring to Sections 2 and 3. Combined, submissions for Section 2, Section 3 and the 'Entire Scheme' accounted for 76% of all submissions.

Section 6 'Eastmoreland Place to Baggot Street Lower' accounted for a further 11% of the submissions, while Section 5 'Shelbourne Road to Eastmoreland Place' and Section 4 'Sandymount Avenue to Shelbourne Road' accounted for 10% and 3% respectively. Finally, Section 1 'UCD to Nutley Lane' received <1%

of submissions. The distribution of submissions, across the various sections of the scheme can be seen below in Table 1 and Table 2.

Table 1: Distribution of Submissions per Section of the UCD Ballsbridge to City Centre Core Bus Corridor.

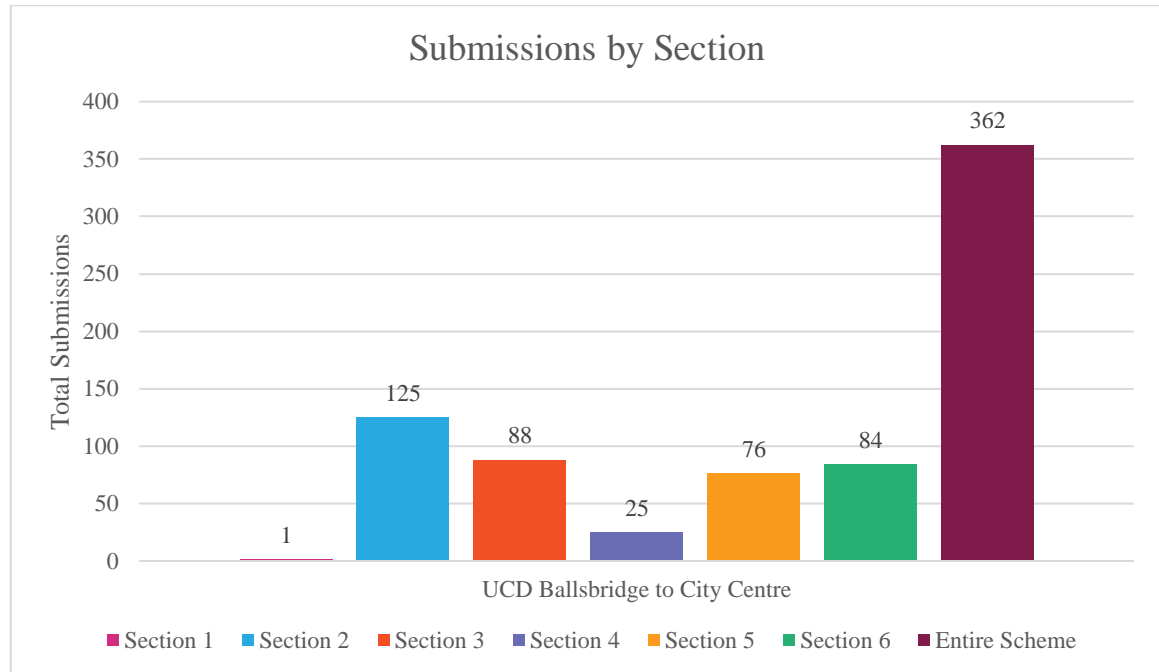


Table 2: Number of Submissions per Section of the UCD Ballsbridge to City Centre Core Bus Corridor.

Section	Number of Comments	Percentage
1: UCD to Nutley Lane;	1	<1%
2: Nutley Lane;	125	16%
3: Nutley Lane to Sandymount Avenue;	88	12%
4: Sandymount Avenue to Shelbourne Road;	25	3%
5: Shelbourne Road to Eastmoreland Place; and	76	10%
6: Eastmoreland Place to Baggot Street Lower.	84	11%
The Entire Scheme	362	48%
<b>Total Assessed</b>	<b>761</b>	<b>100%</b>

## 5 Profile of Those Making Submissions:

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Of the submissions received:

- 95.5% were from residents of the study area who were not directly impacted by the scheme and typically referred to local matters;
- 4.5% other.

## 6 Themes Raised in the Submissions

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All 761 of the submissions received by the NTA were reviewed and the issues raised were categorised, summarised and analysed. The submissions were categorised into a total of eight main themes during this review process.

Theme	Frequency of Comments
Accessibility/ Traffic Impact	353 comments
Integration / Bus Network	123 comments
Land Acquisition	201 comments
Safety	251 comments
Environmental Issues	638 comments
Social Impact	136 comments
Economy / Impact on Local Business	129 comments
Heritage	145 comments

Appendix A provides an in-depth listing of the various issues raised in each section.

## 7 Summary of The Main Issues Raised

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This report identifies the key issues raised in the public consultation process. The Authority will seek to establish the validity of the concerns, the potential consequences for the project, and how best to address the issue and /or mitigate the negative impact.

While a variety of matters were raised in the submissions, the key issues related to the project are as follows:

- 1) Need for Scheme
- 2) Extension/alternate route required
- 3) Pedestrian Safety
- 4) Insufficient Consultation of Scheme
- 5) Loss of Bus Services
- 6) Loss of residential/amenity access
- 7) Loss of Parking
- 8) Removal of Trees
- 9) Proposed Land Acquisition/Boundary Treatment
- 10) Safety relating to conflicting modes
- 11) Devaluation of Property

The nature of the issue, and the proposed NTA response to it, is covered in the following sections.

## Issue 1: Need for Scheme

A number of submissions directly questioned the need for the scheme as a whole, while many queried the need for certain aspects of the scheme, or the scheme in its current form. Many were based around the indicated increase to the cross section and the justification / options assessment for this proposal and the route in general.

There are concerns that one bus lane might be empty in the morning and the other empty in the evening, and therefore the construction cost of the proposed road widening is seen as waste of public expenditure.

There are concerns that the proposals will increase vehicular traffic rather than just improving public transport.

The proposals are seen by some as a short-term solution and other alternatives should be considered.

### ***NTA response to Issue 1***

The UCD Ballsbridge to City Centre Corridor is identified within various policy documents and transport planning studies as a suitable route for the development of an improved bus corridor. The policy context for the corridor is set out in the ‘Dún Laoghaire to City Centre Core Bus Corridor Options Study’ and ‘Ballsbridge to City Centre Core Bus Corridor – Route Options Assessment Report’ prepared by Aecom and Roughan & O’Donovan consulting engineers on behalf of the NTA in December 2017 and February 2018 respectively. These reports assess various CBC route options and recommends an Emerging Preferred Route (EPR) based on a multi-criteria analysis (MCA) of the potential options.

Based on the issues raised as part of this public consultation process, the published EPR for this corridor will continue to be assessed and revised where appropriate, to confirm the Preferred Route Option (PRO) for the CBC.

In relation to the current proposed cross-sections throughout the route, the Preferred Option consists of a number of sections referred to in the submissions, where the overall cross-section has been reviewed and amended where local conditions allow including the following key design developments of particular note:

- Baggot Street Upper the PRO proposal has a narrower road width than the existing situation enabling increased urban realm improvements.
- Pembroke Road, the PRO proposal now consists of a two-lane cross section.
- Merrion Road the PRO proposal now consists of a three-lane cross section between Shrewsbury Road and Ailesbury Road.

## Issue 2: Extension/alternate route required

A number of submissions noted that an alteration and/or extension of the route would be desirable. In particular the proposed routing of buses along Baggot Street was questioned, mainly in relation to what is planned for buses approaching Baggot Street / Fitzwilliam Street junction (start of Route 14) and it was suggested that the tie-in to the existing cross section could create bottlenecks and detract from the time savings achieved.

Another commentary was in relation to the decision to include Nutley Lane in the route. Several submissions suggest that there is no need for a dedicated bus along Nutley Lane – connecting Route 13 and Route 15. It was noted that data has been requested at the public consultations to demonstrate the need for the bus route on Nutley Lane.

There were also a number of submissions specifically relating to the re-routing of cyclists away from what is currently proposed to be a heavily used arterial route for cars and buses. The suggestions included routing cyclist via safer secondary roads, or alternatively routing them along the Strand Road with a dedicated cycleway connecting to the Sutton to Sandycove Cycleway (S2S).

### ***NTA Response to Issue 2***

In relation to the chosen route and extents, the UCD Ballsbridge to City Centre Corridor is identified within various policy documents and transport planning studies as a suitable route for the development of an improved bus corridor. The policy context for the corridor is set out in the ‘*Dún Laoghaire to City Centre Core Bus Corridor Options Study*’ and ‘*Ballsbridge to City Centre Core Bus Corridor – Route Options Assessment Report*’ prepared by Aecom and Roughan & O’Donovan consulting engineers on behalf of the NTA in December 2017 and February 2018 respectively. These reports assess various CBC route options and recommends an Emerging Preferred Route (EPR) based on a multi-criteria analysis (MCA) of the potential options.

In relation to cyclist provision, Route 14 forms part of the Primary Cycle Routes 13 and 13A within the Greater Dublin Area Cycle Network Plan – with Primary Routes described therein as “Main cycle arteries that cross the urban area and carry most cycle traffic”. Route 13 and 13A provide direct connectivity to/from the N5 East Coast Trail and the Grand Canal Orbital Route (SO1).

Opportunities for alternative cycle routes away from the BusConnects corridor have been assessed in the review of the Preferred Option. In the Pembroke area in particular an assessment was carried out of the network of lanes running parallel to Pembroke Road as potential quiet street cycling routes. It is considered that although some alternative routes offer benefits to cyclists in some aspects and are used by cyclists, these benefits do not negate the need to provide dedicated cycle facilities on the Primary Cycle Route forming the BusConnects Route 14.



The final designs will be rigorously assessed against all relevant design standards. In particular, vulnerable road user safety will be assessed through a Road User Audit, Road Safety Audit and Disability Audit of the scheme.

### Issue 3: Pedestrian Safety

Throughout the scheme, many concerns were raised over pedestrian safety, particularly in relation to the narrowing of wide footpaths. The safety of vulnerable road users, in particular children, using narrower footpaths and also having to cross such a wide and busy roadway is of concern to residents.

Specific reference was given to the proposed removal of the central reserves on Pembroke Road which allowed for safer crossing. As with Baggot Street, these roads are now seen as a large highways in areas which have many shops, homes, and pubs on either side of the road and many people needing to cross. The perceived increase in traffic volumes (both buses and vehicles) is seen as a safety concern in this regard.

#### ***NTA Response to Issue 3***

Following review of the submissions received and further analysis a number of sections along the route have been assessed and amended as part of the design development, and a key outcome of many of these design interventions is enhanced provision for vulnerable road users. Within the PRO proposal, along with general improvements to the pedestrian environment where possible, amendments have been made on certain key sections referred to in the submissions, with the following key design developments:

On Pembroke Road, the pedestrian environment was a key consideration in the design development and following review of the submissions received and further analysis, the PRO proposal now consists of a two-lane cross section (narrowed from existing). This has resulted in the retention of existing footpath widths and allows for safe pedestrian crossing points.

Likewise, on Baggot Street Upper, the PRO proposal has a narrower road width than the existing situation and maintains the provision of signalised pedestrian crossing points.

Along Merrion Road between Simmonscourt Road and Ailesbury Road the PRO proposals enable a 2m minimum footpath width to be provided with widths up to 4.5m provided in certain locations.

The final designs will be rigorously assessed against all relevant design standards. In particular, vulnerable road user safety will be assessed through a Road User Audit, Road Safety Audit and Disability Audit of the scheme.

## Issue 4: Insufficient Consultation of the Scheme

A large number of submissions questioned the options assessment and data collection process; i.e. details of the process provided at consultation described the route and the proposed cross section as being the preferred option over all alternatives.

Many submissions note that there is little evidence of new trees being provided like-for-like or a compensatory planting strategy – it is noted that this may alleviate some of the opposition to the scheme if provided. It is also noted that the public consultation maps were considered by some to be misleading with regards to trees to be retained, as it was suggested that it was not clear if trees are in private lands or public lands. It was also suggested that the maps did not clearly indicate which trees are being removed.

It was suggested in some submissions received that business owners and residents have not been engaged with fully on the true impact of the proposals including land take, footpath amendments, and loss of parking.

There were further suggestions that sufficient detailed surveys have not been carried out to date to justify proceeding with the plan, including socio-economic, traffic, topographical, environmental, and underground services surveys.

### ***NTA Response to Issue 4***

As part of this non-statutory public consultation this CBC received 773 submissions, while overall 13,000 submissions were received. On this CBC, in relation to the non-statutory public consultation there have been two Community Forums, and a significant number of both one to one meetings and meetings with business and residents groups during the development of the PRO.

Following this design development, a further round of non-statutory public consultation will be carried out to present these revised designs to the public. In tandem with this, representatives of local bodies will continue to be regularly updated at Community Forum presentations and other group meetings throughout the process. Finally, the statutory public consultation process will be followed as part of the preparation of a planning application for the scheme.

## Issue 5: Loss of Bus Services

There were concerns raised, particularly in the Sandymount area, that existing bus routes will be lost, and that the proposed services are either insufficient or that the plans provided do not detail them enough to alleviate concerns.

In particular the No. 1 and No. 47 buses are noted as valuable local services that are used by many locals and not just commuters. The No. 17 and No. 18 buses are also noted as well-used local buses.

***NTA response to Issue 5***

The issues highlighted above relate to the BusConnects Bus Network Redesign which is subject to a separate public consultation process.

**Issue 6: Loss of Residential Amenity / Access**

There were a number of concerns raised throughout the scheme in relation to land take of property frontages resulting in a reduction to access / residential amenity and the potential overarching impact to the character of the areas.

In particular, residents expressed concerns regarding the potential land take on Pembroke Road being on the northern side of the road, given that some houses along here have steps affronting their boundaries and land take suggests that these steps would require the steps to be amended or the proposal could compromise access to their homes.

There were concerns raised, within some submissions, regarding the proposed amendments to some of the side roads connecting onto Merrion Road and how this may impact traffic in the area. One example in particular, that was queried, was the removal of the right-turn movement onto Beatty's Avenue from Ballsbridge.

Some submissions also expressed concerns in terms of loss of parking for those who need to park outside their homes for health reasons, or the removal of on-street parking on main roads, potentially resulting in increased parking on adjacent residential streets. There were also concerns raised in relation to bus stops being located in front of existing driveways. Access to and from driveways was suggested to be restricted in the proposals due to the need to contend with multiple modes.

In terms of overall amenity of the areas, concerns were raised that the current proposals could destroy the residential nature of these historical areas, with submissions suggesting that the current character of areas such as Pembroke Road, Baggot Street, and Ballsbridge are that of historic urban villages and some submissions suggested these would be irrevocably destroyed by the Emerging Preferred Route proposals if implemented.

***NTA response to Issue 6***

The impact on property boundaries has been assessed further in terms of how it may affect access arrangements to properties, particularly where stepped access might be affected. Following review of the submissions received and further analysis the PRO proposal has been amended at a number of locations as follows:

Pembroke Road has been amended such that there will be no likely impact to property boundaries along this section. In total, the PRO proposals have reduced the number of properties impacted from 67 properties down to 9 properties when compared to the EPR with none of the residential properties on Pembroke Road, now being impacted.

The access arrangement to Beatty's Avenue/Herbert Cottages has been amended in the PRO. It is proposed to provide an additional access to Ballsbridge Avenue from Ballsbridge Park, while the Beatty's Avenue entrance is proposed to be left-in / left-out only. This allows for full access and egress without the need for cars to cross multiple lanes of traffic uncontrolled.

The locations of bus stops have been reviewed in relation to private access and may have been relocated in the current preferred option to maintain such accesses. The final designs will be rigorously assessed against all relevant design standards.

The character of all areas through which the corridor passes has been reviewed and considered in the design development. As part of a review of the design of Baggot Street Lower, the central median is proposed to be retained (along with all trees and lamps on the median where feasible) within the current preferred option. Likewise in areas such as Baggot Street Upper and Pembroke Road the current preferred option proposes the retention and improvement of the pedestrian footpaths and proposals have been developed by landscape architects which build upon the existing character of the areas, while still achieve the public transport related objectives of BusConnects. Trees are also retained in these areas.

Where potential land acquisition is envisaged, the NTA will engage readily with landowners potentially impacted by the proposed scheme. This engagement process will seek to agree measures, whether financial and/or physical, to mitigate the direct impact of the proposed scheme. The precise land take required for this scheme can only be determined at detailed design level, and its justification will be presented as part of a Compulsory Purchase Order, should such be required.

The potential impacts of the proposed scheme will be fully quantified as part of the Environmental Impact Assessment (EIA) process which will be carried out by the NTA during the preparation of a planning application for the scheme. These impacts will be taken into account by An Bord Pleanála in its assessment of the scheme.

## Issue 7: Loss of Parking

The potential removal of on-street parking is a concern to local business owners, some of whom suggest there are no multi-storey parking facilities within walking distance in this area of the city. It has been further suggested that some businesses' may lose the ability to take deliveries.

Some resident's submissions highlight their reliance on on-street parking and identify that they make use of the Dublin City Council permits.

A number of submissions queried if the impact on residents from the loss of parking has been studied in sufficient detail. Concerns were expressed that the removal of some on-street parking might push commuter parking into the adjacent residential streets and restrict access to houses.

***NTA response to Issue 7***

The current scheme proposal has reduced the impact on parking when compared to the Emerging Preferred Route (EPR) published in February 2019, in particular in the areas of Baggot Street Upper and Lower, and Pembroke Road. The allocation of loading bays and parking spaces will be determined during the detailed design stage.

The potential impacts of the proposed scheme will be fully quantified as part of the Environmental Impact Assessment (EIA) process which will be carried out by the NTA during the preparation of a planning application for the scheme. These impacts will be taken into account by An Bord Pleanála in its assessment of the scheme

**Issue 8: Removal of Trees**

The most frequent issue raised during the public consultation related to the potential removal of trees as part of the scheme. The concerns that were expressed relate mainly to aesthetics of the area, environmental concerns (both carbon absorption and biodiversity aspects), and the coverage provided from sun and rain.

Numerous submissions suggested that there is little evidence of new trees being provided like-for-like or a compensatory planting strategy. It was also suggested in some submissions that the public consultation maps were considered to be misleading as regards trees to be retained, as it is not clear how many of the trees on the drawings are in private lands and it was further suggested that the maps do not indicate the trees which are likely to be removed. Some submissions suggested that the trees being removed are known and requested that these be highlighted on the drawings to illustrate the true impact.

***NTA Response to Issue 8***

A number of sections along the route have also been assessed and amended as part of the design development, and a key outcome of many of these design interventions is the potential retention of a significant number of existing trees. Within the current preferred option, along with general retention of trees where possible, amendments have been made on certain key sections referred to in the submissions, with the potential outcomes as follows:

- all existing trees on the Baggot Street Lower median are proposed to be retained;
- all existing trees on Pembroke Road between Lansdowne Road and Waterloo road are proposed to be retained;
- over half of the existing trees on Pembroke Road between the Ballsbridge and Lansdowne Road junctions are proposed to be retained;
- over half of the existing trees on Merrion Road from the RDS to Nutley Lane are proposed to be retained; and
- all existing trees on the residential (west) side of Nutley Lane from Nutley Avenue to Nutley Road are proposed to be retained.

In total, the PRO proposals have reduced the number of trees proposed to be removed from approximately 160 trees to 119 trees when compared to the EPR.

The NTA recognises the environmental, visual and amenity value of trees, foliage and planting in the urban landscape. However, this must be balanced against the requirement to provide sustainable means of moving people around the city-region.

The NTA is committed to sustainable transport, and also to appropriate planting in the urban realm for visual and environmental purposes. In this regard, should the scheme progress, a full planting scheme will be designed and included as part of the project. The planting scheme will be designed to optimise the public realm and environmental benefits, while minimising the maintenance requirement and the impact on public lighting.

The impact on trees will be more accurately quantified during the detailed design stage, with further appropriate options to minimise the impact on trees developed and assessed where feasible.

## Issue 9: Potential Land Acquisition / Boundary Treatment

Concerns were raised in a number of submissions in relation to the potential land-take required for the scheme and the details provided relating to it were identified as a cause of concern. It was suggested that many of the houses along the route may be protected structures or part of an architectural conservation area, and the boundary works, and removal of trees could detract from the heritage of the structures and their curtilage – many with antique railing, mature trees, hedges, and steps.

In some submissions it was expressed that the decision to acquire land from one side of the road in certain locations has not been backed up with sufficient justification. Many submissions received expressed a concern with the perceived lack of clear detail regarding the proposed land take other than the annotation on the drawings.

A number of establishments / clubs / institutions along the route provided specific submissions in relation to the full impact of land-take.

### ***NTA Response to Issue 9***

Following review of the submissions received and further analysis, a number of sections along the route have been assessed and amended as part of the design development, many of which reduce the impact on private properties, particularly those with heritage value. The PRO proposes amendments to some sections referred to in the submissions, with the following key design developments of particular note:

- On Pembroke Road there is no land take required within the PRO due to the proposed two-lane cross section with the inclusion of a Bus Gate;
- On Merrion Road adjacent to Merlyn Park there is no land take required within the PRO due to the three-lane cross section with the bus priority traffic signals; and



- On Nutley Lane there is no land take required to residential properties within the PRO due to the consolidation of the cycling facilities into a single two-way cycle track and the removal of the footpath on the east side between St. Vincent's Hospital and Elm Park Golf Club. These proposals have also reduced the potential land take to Elm Park Golf Club.

In total, the PRO proposals have reduced the number of properties impacted from 67 properties down to 9 properties when compared to the EPR. Of the residential properties on Pembroke Road, all which are no longer being impacted, 28 are listed on the Record of Protected Structures.

Where potential land acquisition is envisaged, the NTA will engage readily with landowners potentially impacted by the proposed scheme. This engagement process will seek to agree measures, whether financial and/or physical, to mitigate the direct impact of the proposed scheme. The precise land take required for this scheme can only be determined at detailed design level, and its justification will be presented as part of a Compulsory Purchase Order, should such be required.

The potential impacts of the proposed scheme will be fully quantified as part of the Environmental Impact Assessment (EIA) process which will be carried out by the NTA during the preparation of a planning application for the scheme. These impacts will be taken into account by An Bord Pleanála in its assessment of the scheme.

## Issue 10: Safety Relating to Conflicting Modes

A common issue raised in the submissions received, stemming from the proposed cross section, is the perceived multiple conflict points for residents exiting/entering homes by car, from side roads, and other premises. This is due to the potential requirement in many cases for drivers to cross a footpath, a cycle path, a bus lane, and either enter a car lane or cross one to enter another. It is suggested that this arrangement effectively results in a conflict with four other modes on each occasion – all with different speeds, priorities, and stopping abilities. This was suggested that this is a serious health and safety issue.

There were also concerns raised in some submissions in relation to cyclist safety. A number of submissions oppose the non-segregated nature of the cycle provision and the need to mix with bus and vehicular traffic in certain circumstances. It was suggested in some submissions that an alternative cycle route through safer streets or along the Strand Road be developed. The safety of cyclists was also highlighted as a concern in some submissions given the potential bus stop arrangement whereby buses will cross the cycle lane at every stop and cyclists may be forced to stop or enter the bus/traffic lane.

### ***NTA Response to Issue 10***

The designs included in this public consultation exercise have been assessed for feasibility and safety against the relevant design standards. Nonetheless, the designs are preliminary in nature, and will require significant additional work to bring them to a point where the NTA is prepared to submit the overall proposal

for planning consent. The various issues raised in this consultation process will also feed into the designs.

The final designs will be rigorously assessed against all relevant design standards. In particular cyclist safety will be assessed through a Road User Audit and Road Safety Audit of the scheme.

## Issue 11: Devaluation of Property

Some submissions raised this issue with regard to a number of locations and generally as a result of or in relation to other issues outlined herein. The possible cumulative impact of the scheme proposals on the value of properties was highlighted as a concern. A number of residents are wary of impacts to their gardens regardless of apparent compensation, as well as the fears of increased traffic (noise, pollution, and vibrations), and long construction periods causing uncertainty.

### ***NTA Response to Issue 11***

In total, the PRO proposals have reduced the number of properties impacted from 67 properties down to 9 properties when compared to the EPR.

Where potential land acquisition is envisaged, the NTA will engage readily with landowners potentially impacted by the proposed scheme. This engagement process will seek to agree measures, whether financial and/or physical, to mitigate the direct impact of the proposed scheme. Should Compulsory Purchase Order be required, this process will fairly assess the impact of the proposed scheme on properties and provide for mitigation measures including for the construction of new boundary walls

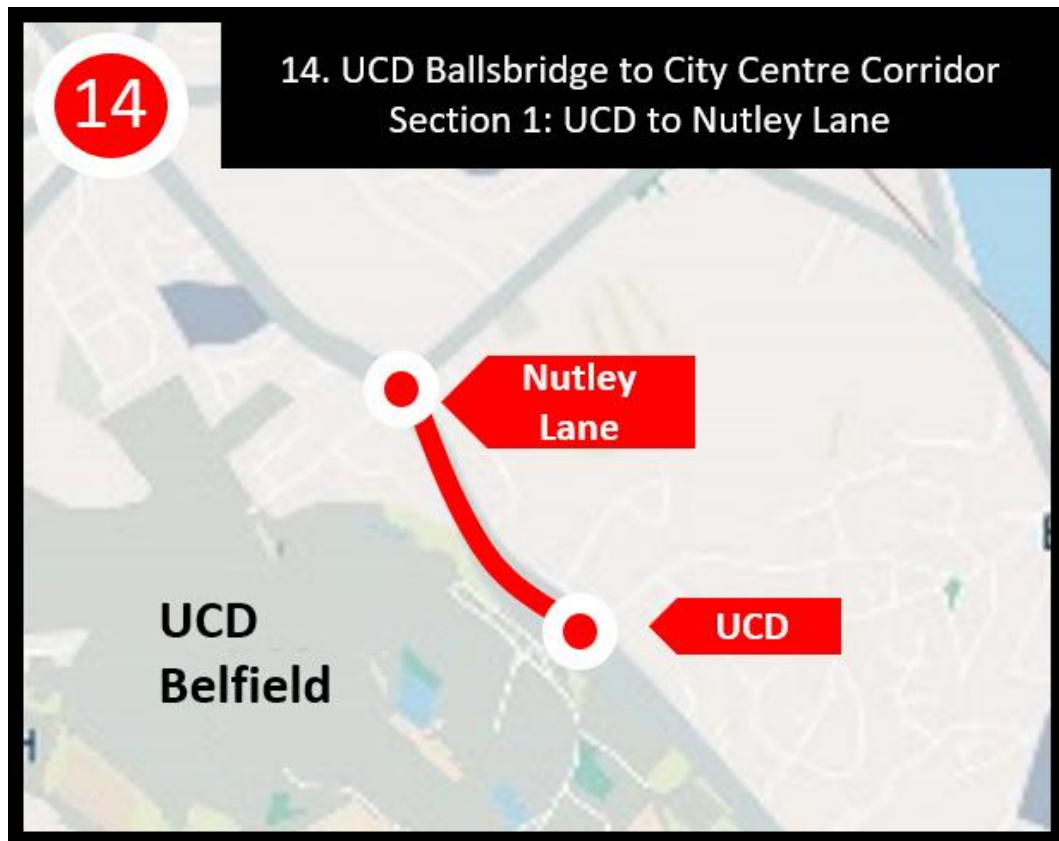
The potential impacts of the proposed scheme will be fully quantified as part of the Environmental Impact Assessment (EIA) process which will be carried out by the NTA during the preparation of a planning application for the scheme. These impacts will be taken into account by An Bord Pleanála in their assessment of the scheme.



## Appendix A

### Summary of Issues Raised By Route Section

## Section 1: UCD to Nutley Lane

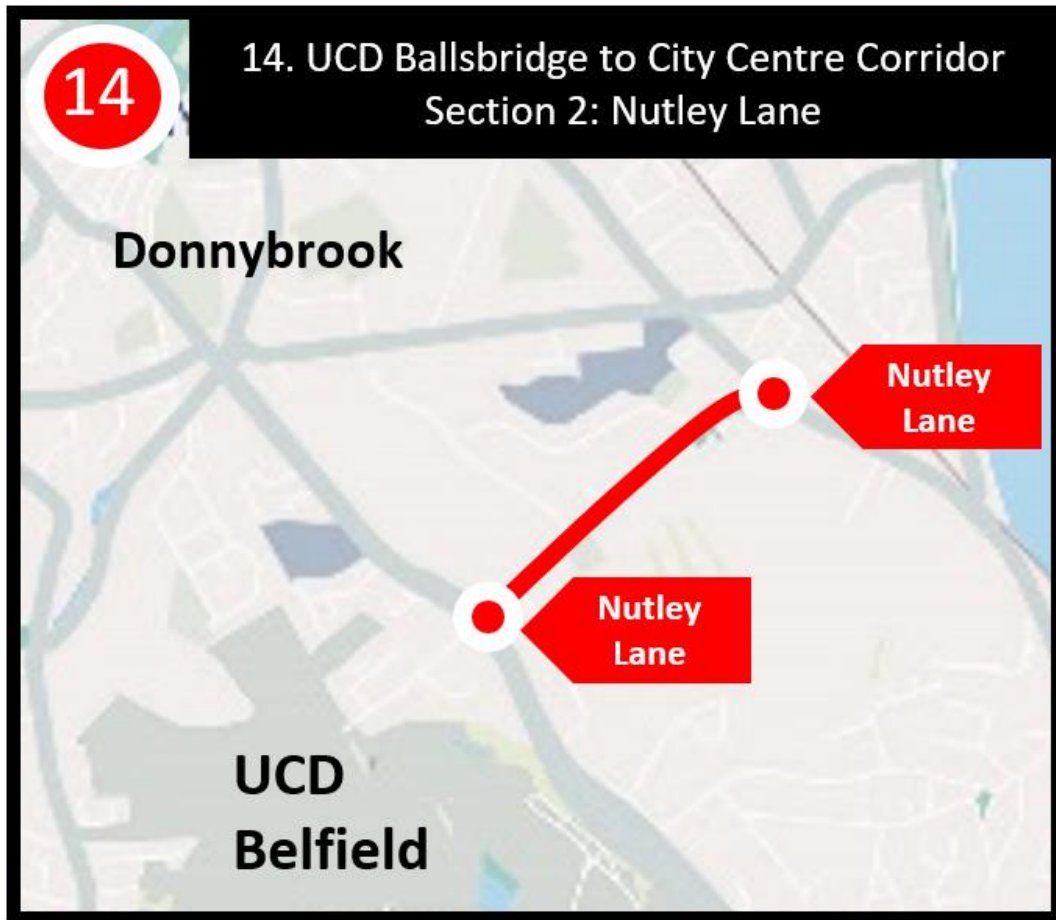


**Figure 3: Section 1 UCD to Nutley Lane**

The main comments observed within Section 1 include:

- A suggestion was made identifying an alternative arrangement within and connecting to/from the UCD Campus – in that rather than exiting and entering the campus at Montrose, a circular route be taken. This may involve exiting the campus at Clonskeagh and going towards Ballsbridge via Beaver Row, Anglesea Road, etc. While on return, routing along Anglesea Road and re-entering the campus at the Montrose entrance.
- This submission also suggested a number of minor roads in the area be made one-way such as Beaver Row eastbound, Belmont Ave westbound, Marlborough Road eastbound – however it is noted that these roads are more related to Route 13. Along with such interventions the submission recommended time restrictions for right turning on roads which remain two-way.
- A concern which arose in submissions generally related to Nutley Lane, the right-turn movement of buses from the R138 at the western extent of Section 1. Although it was detailed in the public consultation drawings it is viewed as being potentially unsafe and unclear, given the need for a bus to stay left and then cross three lanes of traffic into town.

## Section 2: Nutley Lane



**Figure 4: Section 2 Nutley Lane**

The main comments observed within Section 2 were:

- A large number of submissions were based around the likely increase in the cross section of what is currently perceived as a residential road with through traffic. Concerns regarding a potential induced demand effect were raised, citing traffic studies which have shown that road widening does not always provide long term increased capacity – and a number of submissions suggested that the presence of a junction on each end of the road could possibly negate the additional capacity provided. Some residents proposed alternative arrangements such as reducing the proposed cross section to two bus lanes, and a single traffic lane (perhaps from R138 as far as the Hospital entrance, then becoming two-way, or alternating eastbound and westbound in AM and PM), along with other potential amendments such as a single two-way cycle track on the Elm Park side or having no footpath provision from Elm Park Golf Club Entrance to the Hospital entrance (on east side) as the main demand on this side is from those parking.
- Some residents raised concerns regarding potential multiple conflict points for residents exiting/entering their homes, as well as the multiple other shoppers/golf club members/parents/visitor approaching Nutley Lane from side roads/other premises. It was suggested that this is due to drivers having to cross a footpath, a cycle path, a bus lane, and either enter a car lane or cross

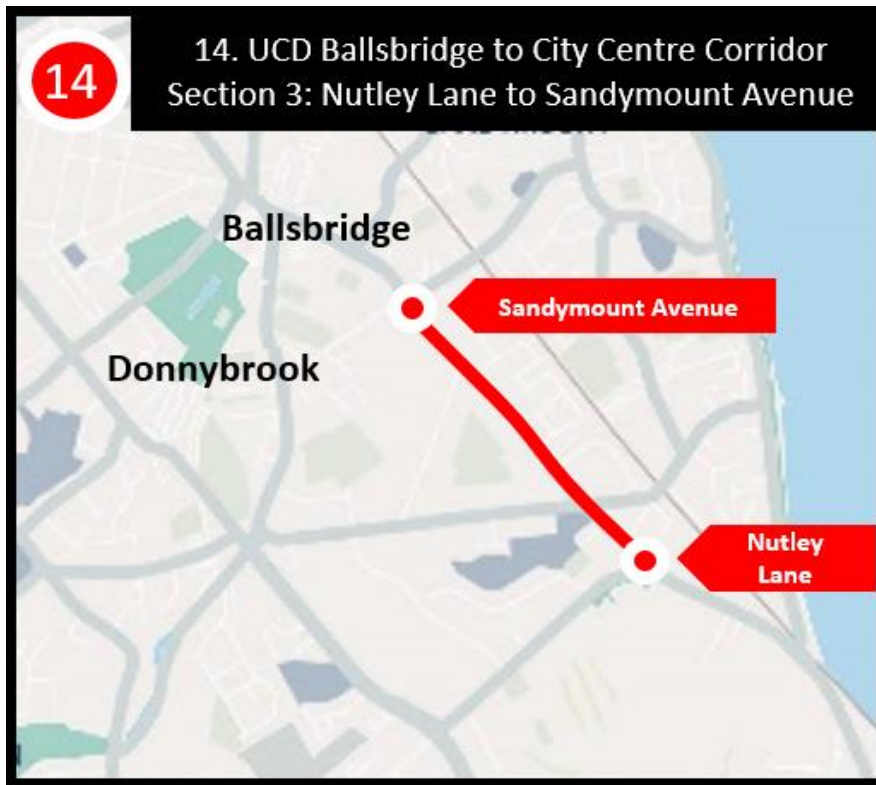
one to enter another. It was suggested that this could result in a conflict with four other modes on each occasion – all with different speeds, priorities, and stopping abilities. It was suggested that this is a serious health and safety issue.

- The removal of on-street trees and those in front gardens was highlighted as a concern amongst residents. The concerns relate mainly to aesthetics of area, environmental concerns (both carbon absorption and biodiversity aspects), and the coverage provided from sun and rain. Alternative suggestions included a recommendation to create a central median with linear mature trees in a boulevard cross section, with land take for same focussed on the Elm Park side. Many submissions note that there is little evidence of new trees being provided like-for-like or a compensatory planting strategy.
- Residents raised concerns in relation to the potential loss of trees in front gardens and the overall impact on properties. Residents expressed their wariness of such impacts to their gardens regardless of apparent compensation. Anecdotal examples were provided in some submissions of proposed purchases of properties on Nutley Lane which have fallen through due to the Bus Connects proposals and there are therefore fears were expressed over the potential devaluation of properties.
- The potential removal of on-street parking on Nutley Lane raised concerns that cars may instead park on Nutley Road and other adjacent residential roads. It was suggested that this already happens when major events are on and the parked cars make it difficult for cars to pass each other and can lead to traffic on the residential roads.
- There were concerns expressed that sufficient detailed surveys have not been carried out to permit proceeding with the plan, including socio-economic, traffic, topographical, environmental, and underground services.
- A number of submissions suggest that there is no need for a dedicated bus connection down Nutley Lane – connecting Route 13 and Route 15 – as it is a relatively short walking distance between the two. It was claimed in some submissions that data has been requested at the public consultation events to demonstrate the need for the bus route on Nutley Lane but that this has not been provided.
- Likewise, a number of submissions question the need for both cycle and bus provision on Nutley Lane, with alternative suggestion for cycle lanes being Woodbine Road or Booterstown Avenue.
- It was suggested in some submissions that the proposal is seen to possibly divide the community into two distinct areas with a large busy roadway splitting them.
- It is stated on a number of occasions that there are historic streams / rivers in this area, many of which have been culverted, and possibly a high-water level. Some submissions have expressed concerns of flooding given the proposed increase in hard standing area associated with this plan. There were some related concerns about access to the various services including these culverts

and to the potential environmental impact of increased traffic on the areas discharging into these water courses.

- A number of residents were also concerned with the locations and number of bus stops, suggesting the possible added noise and vibrations so close to residential homes could be disruptive.
- Some submissions raised concerns with regard to potential impacts on local sports facilities.

### Section 3: Nutley Lane to Sandymount Avenue



**Figure 5: Section 3 Nutley Lane to Sandymount Avenue**

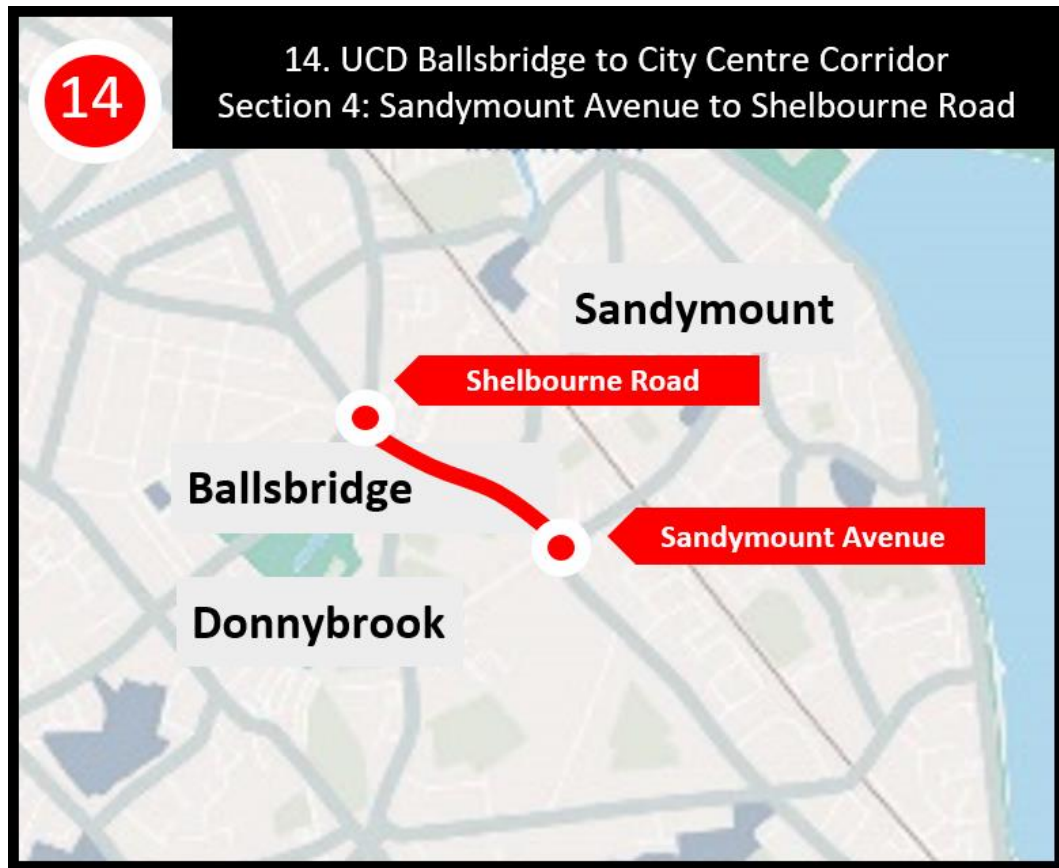
The main comments observed within Section 3 include:

- As with Nutley Lane, a common issue is the perceived multiple conflict points for residents exiting/entering their homes. It was suggested that the scheme may result in a conflict with four other modes on each occasion – all with different speeds, priorities, and stopping abilities. This was noted as a possible serious health and safety issue.
- The potential removal of on-street mature trees and those in front gardens was also a cause for concern amongst residents. The concerns relate mainly to aesthetics of area, environmental concerns (both carbon absorption and biodiversity aspects), and the coverage provided from sun and rain. Many submissions suggested that there is little evidence of new trees being provided like-for-like or a compensatory planting strategy.
- It was claimed in some submissions that although there were tree report and surveys carried out, the results do not consider the higher level environmental benefits of urban trees. Submissions referenced examples such as the current funding programme in the UK for planting of trees in urban areas to mitigate rising temperatures, and a Dutch study which supported this thinking in showing that tree shading of hard standing can reduce local summer temperatures.
- In addition to the potential loss of trees in front gardens, the overall impact on the properties was highlighted as a concern. Residents are wary of such

impacts to their gardens regardless of apparent compensation and there are fears over the potential devaluation of property.

- A number of submissions queried the options assessment process in determining that the proposed cross section is the preferred option over all alternatives, with suggestions of fewer lanes with altered directions at peak times. There is a perceived lack of information on the assessment and on the alternative arrangements considered and a perception that the increased capacity will in fact increase traffic and this would not be desirable.
- There were concerns raised that existing bus routes will be lost, and the proposed services are either not sufficient or the plans provided do not detail them enough to alleviate concerns. In particular the 1 and 47 are noted as valuable local services that are used by many locals and not just commuters. The 17 and 18 are also noted as well used local buses.
- It is suggested that the current plans indicate the closure of an entrance to an established access to the back of some residential properties on Merrion View Avenue, and that no alternative is indicated. It was suggested that this is an established right of way which is heavily used.
- Concerns were expressed over the perceived narrowing of the footpaths along this section, in relation to possible safety issues and universal access.
- A number of residents were also concerned with the locations and number of bus stops. There was a specific concern over the proposed relocation of the bus stop outside the Merrion Court apartments resulting in a narrow footpath opposite the Merrion shopping centre and suggestions were received that it should be relocated to where sufficient space is available. Some submissions suggested that the location of potential bus stops could impact on access to properties, in particular if kassel kerbs are installed and expressed safety concerns in relation to bus stop and shelter locations.
- Many submissions related to safety concerns around focussing cyclists on a busy arterial route which might become busier with more buses and traffic. Alternatively, it was suggested in some submissions that cycle provision be focussed along the coast, in line with the S2S proposals.
- Contrarily, there are a number of submissions which suggest the typical cross should include shared cycle and bus lanes along this section in order to reduce overall cross section.
- Some concerns were expressed that sufficiently detailed surveys have not been carried out to permit proceeding with the plan, including socio-economic, traffic, topographical, environmental, and underground services.
- In general, many of the above outlined issues which were raised were also related back to the potential devaluation of property which is a cause for serious concern in many submissions.
- Some submissions were received welcoming the proposals suggesting that they will encourage modal shift away from private cars, in particular transport to local schools.

## Section 4: Sandymount Avenue to Shelbourne Road



**Figure 6: Section 4 Sandymount Avenue to Shelbourne Road**

The main comments observed within Section 4 include:

- Some submissions raised concerns regarding the potential amendments to some of the side roads connecting onto Merrion Road and how this may affect surrounding traffic. These are summarised as follows:
  - The egress of Anglesea Road is shown to be reduced to a single lane from the current two-lane arrangement, and it is suggested that this will cause excessive queuing of vehicles, on an already busy road.
  - Similarly, the removal of the right-turn movement from Merrion Road to Shelbourne Road is queried as it is seen as a frequently used route and would require detouring to Lansdowne Road.
  - The removal of the right turn movement onto Beatty's Avenue was also queried in some submissions – as there is currently no way of getting from Merrion Road into Beatty's Avenue/Herbert Cottages unless an access is provided via Ballsbridge Park (currently egress only).
  - The removal of the left turn movement onto Elgin/Clyde Road is queried and there are also alternative suggestions that Herbert Park be made a no through road rather than Eglin/Clyde Road to enhance the park function and remove cars.



- It was suggested that the additional lanes introduced along Merrion Road will make it more difficult at side road priority junctions such as Sydenham Road, particularly turning right into town, and perhaps yellow boxes or signals are required.
- It is suggested that pedestrian crossings be provided on all four arms of the Merrion Road/Sandymount Avenue/Serpentine Avenue junction as currently appears to be only on the Merrion Road arms.
- Generally, the above are all seen as interventions which might hinder cars and cause additional queuing in the area, and it was suggested that the proposals do not consider those who require a car in their daily lives.
- As with other sections, the removal of on-street mature trees and those in front gardens was highlighted as a cause for concern amongst residents. The concerns relate mainly to aesthetics of area, environmental concerns (both carbon absorption and biodiversity aspects), and the coverage provided from sun and rain. It is suggested that in particular in the Ballsbridge area the trees form an important part of the history and lives of those living in the area. Many submissions note that there is little evidence of new trees being provided like-for-like or a compensatory planting strategy. It is also claimed that the public consultation maps are seen as misleading as regards trees to be retained, as it is not made clear that many of them on the drawing are in private lands.
- It is suggested that many of the houses along the route are protected structures or part of an architectural conservation area, and the boundary works, and removal of trees could possibly detract from the heritage of the structures and their curtilage.
- The safety of vulnerable road users, in particular children, crossing such a wide and busy roadway is expressed as a concern to residents. The particular example of Ballsbridge was provided in some submissions due to the number of shops and pubs on either side of the road with heavy pedestrian crossing movements.
- A significant number of submissions were based around the potential increase in the road cross section (often suggesting that it is at the expense of trees) and the justification / options assessment for this proposal. There were concerns raised that one bus lane could be empty in the morning and the other empty in the evening, and therefore the construction cost of the road widening is suggested as waste of public expenditure. Alternative suggestions include three lanes with two lanes inbound in the morning and two lanes outbound in the evening, combining cycle facilities into a single narrower two-way cycle track, increased rail capacity, softer measures such as congestion charges, carpooling and banning cars from City Centre.

## Section 5: Shelbourne Road to Eastmoreland Place



**Figure 7: Section 5 Shelbourne Road to Eastmoreland Place**

The main comments observed within Section 5 include:

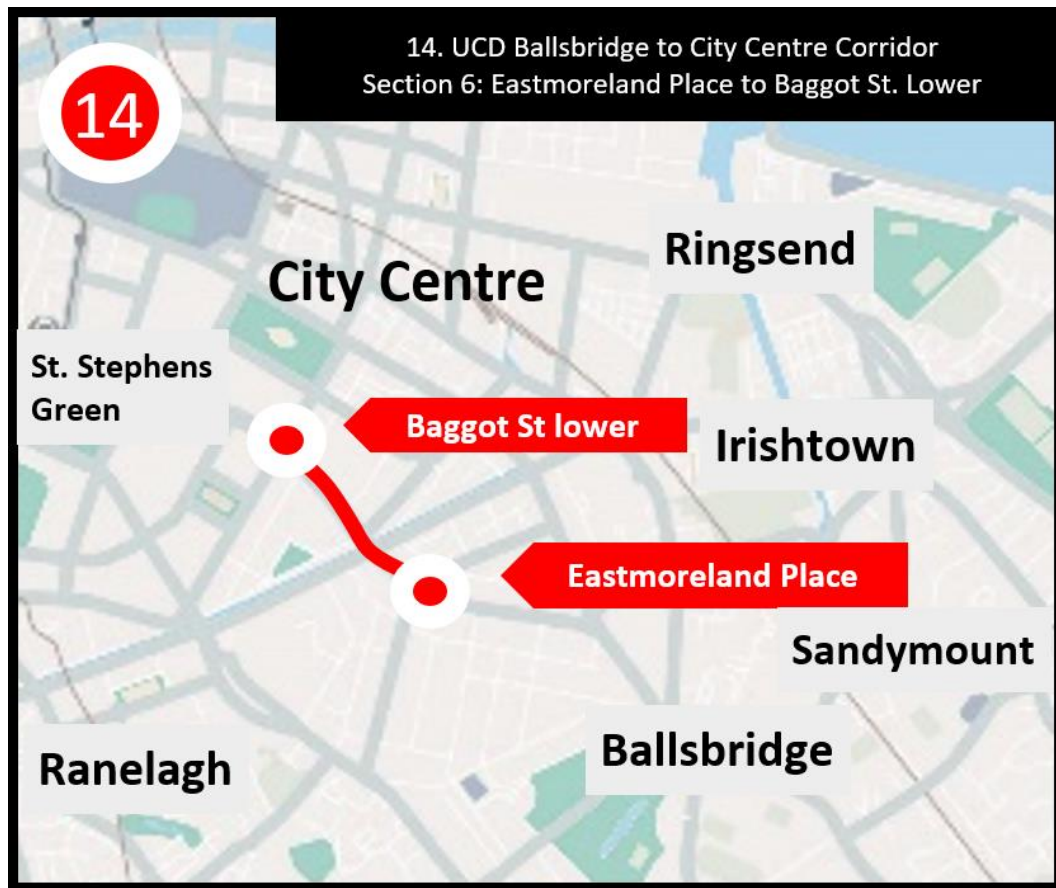
- It is suggested in some submissions that many of the houses along this section of the route are protected structures or part of an architectural conservation area, and the potential boundary works, and potential removal of trees could possibly detract from the heritage of the structures and their curtilage – many with antique railing and steps. Residents expressed concerns that if boundaries are moved it could also amend existing bin / bike stores. It was further suggested that potential land take may impact structural walls forming part of houses. It was claimed in some submissions that in previous applications it has been held by Dublin City Council and An Bord Pleanála that even minor works to railings or boundary walls “would seriously affect the character” of the Protected Structures and were refused permission.
- A number of submissions expressed concerns regarding the potential land acquisition on Pembroke Road being on the northern side of the road, given that the houses along here have steps affronting their boundaries and the land acquisition suggests these steps will potentially need to be amended. It has been suggested that if land acquisition is required it should be on the other side of the road – and that no justifiable evidence has been provided as to why this side of the road was chosen.

- There were some concerns raised that the current proposals could destroy the residential nature of this protected historical area – with submissions stating that the character of the Pembroke Road/ Baggot Street area is that of an urban village and might be irrevocably destroyed by the current proposals if implemented.
- As with other sections, the removal of on-street mature trees and those in front gardens was a suggested cause for concern amongst residents. These concerns relate mainly to aesthetics of the area, environmental concerns (both carbon absorption and biodiversity aspects), and the coverage provided from sun and rain. In particular, in the Pembroke Road area it was suggested in some submissions that the trees form an important part of the history of the area. Suggestions were made that the maps published were misleading as they do not indicate the trees being removed, and are therefore the effects of the plan are suggested to not be fully transparent.
- A number of submissions expressed concerns with the removal of on-street parking along Pembroke Road as it is suggested that many residents rely on this for parking as they do not have driveways. There were also concerns from residents of surrounding areas that if Pembroke Road parking is removed, cars might spill over to roads such as Pembroke Lane / Wellington Road etc. and restrict access and parking for residents.
- The removal of parking and conversion into 24-hour bus lanes is claimed to completely remove the ability of residents with no driveways to have home deliveries, to place a skip in front of their home, or have temporary scaffolding erected, which are of particular concern to those living in protected structures which by law they are required to maintain.
- There are concerns that the proposals may increase vehicular traffic rather than just improving public transport, and therefore there could be increased pollution, noise, and vibrations.
- A number of submissions questioned the options assessment and data collection process in determining the route and the proposed cross section as being the preferred option over all alternatives. There is a perceived lack of information on the assessment and a perceived lack of justification / supporting evidence for the works – and a fear that if this solution is carried out and is then determined to not be fit for purpose, the possible impact will be irreversible. A number of alternatives were suggested such as underground public transport, cable-car type systems, rerouting of cyclists, allowing use of bus lanes by car sharing vehicles, reducing cross section and altering direction of travel in opposing peaks, amongst others.
- There were concerns expressed that adding bus lanes might not solve the issue of improving public transport, and that the current issues stem more from a lack of actual buses. There were also queries in relation to the time savings outlined within the report – with concerns raised in relation to items such as in-line bus stops, increased right and left turning traffic on Pembroke Road due to road closures and the pinch point of Macartney (Baggot Street) Bridge which are seen as obstructions which may reduce the time savings expected. It

is also suggested that buses are often late by the time they arrive in these areas.

- Some submissions raised concerns relating to the potential danger for vulnerable road users in particular children crossing such a wide and busy roadway – with specific references to the removal of the central reserves on Pembroke Road which allowed for safer crossing. The safety of cyclists was also raised as a concern given the potential bus stop arrangement whereby buses would cross the cycle lane at every stop and cyclists would be required to stop or enter the bus/traffic lane. Similar concerns are raised regarding the narrowing of footpaths given the volume of pedestrians that will be using them.
- In general, many of the above outlined issues which were raised were also related back to the potential devaluation of property which is a cause for serious concern in many submissions.
- There were concerns expressed that sufficiently detailed surveys have not been carried out to permit proceeding with the plan, including socio-economic, traffic, topographical, environmental, and underground services. The actual congestion on Pembroke Road was queried, with the claim that An Garda Síochána regularly place speed detection vans on the road.
- There were concerns expressed in relation to the potential relocation of the kiosk at the Pembroke Road / Northumberland Road junction as it is suggested that it forms part of the fabric of the area.

## Section 6: Eastmoreland Place to Baggot Street Lower



**Figure 8: Section 6 Eastmoreland Place to Baggot Street Lower**

The main comments observed within Section 6 include:

- As with other sections, the removal of on-street mature trees along the central median of Baggot Street and elsewhere was highlighted as a cause for concern amongst residents. The concerns relate mainly to aesthetics of area, environmental concerns (both carbon absorption and biodiversity aspects), and the coverage provided from sun and rain. It is suggested in some submissions that trees in the area should have the same protection as structures such as Georgian Houses. It is also suggested that the public consultation maps can be misleading with regard to trees to be retained, as it is not made clear if many of them on the drawing are in private lands. The proposals for compensatory planting are queried, suggesting that a caveat is applied and that there is perceived lack of defined commitment. Similarly there were concerns expressed that the plans do not include provisions to amend the scheme if the trees impacted are deemed to be overly significant.
- Some submissions suggested that many of the houses along the route are protected structures or part of an architectural conservation area, and the potential boundary works, and potential removal of trees could possibly

detract from the heritage of the structures and their curtilage, many of which have antique railings, mature trees, hedges, and steps.

- Concerns are raised in some submissions over the perceived narrowing of the footpaths in the Baggot Street area which it was suggested are needed due to heavy footfall. It is suggested that the narrowing of streets may detract from this and negatively affect local businesses.
- Some submissions suggested that business owners have not been engaged with fully on the true impact of the proposals.
- The potential removal of on-street parking was raised as a concern to local business owners as it is suggested that there are no multi-storey parking facilities within walking distance to this side of the city. Concerns were expressed that this would be coupled with the proposed loss of businesses abilities to take deliveries to cause difficulties for local businesses. In relation to residents, some submissions suggest that many of them rely on on-street parking and make use of the Dublin City Council permits. It was also queried whether the impact to residents of the proposed loss of parking has been studied in sufficient detail.
- Some submissions claim that the scheme will result in the implementation of what is seen to be a large dual carriageway through the Baggot Street area and could potentially create a divide in the community and detract from the quality of life and historic village atmosphere for the residents and visitors. In particular the removal of the central median with its mature trees and street lamps is suggested as a major issue within the submissions.
- There were some concerns raised that the plans may not make it any safer or attractive for cycling, as one of the main detractors from cycling is the fumes from cars and buses. A number of submissions opposed the non-segregated nature of the cycle provision and the need to mix with bus and vehicular traffic. It is suggested that an alternative cycle route through safer streets be developed.
- A number of submissions questioned the options assessment and data collection process in determining the route and the proposed cross section as being the preferred option over all alternatives. There is a perceived lack of information on the assessment and a perceived lack of justification / supporting evidence for the works – and a fear that if this solution is carried out and is then determined to not be fit for purpose, the impact will be irreversible. The proposals are suggested by some as a short-term solution and other alternatives such be considered such as underground metro, underground road network, congestion charges, taxing free parking spaces, or increasing park-and-ride facilities.
- The proposed routing of buses along Baggot Street is questioned, mainly in relation to what is planned for buses approaching Baggot Street / Fitzwilliam Street junction (end of Route 14) and how the tie-in to the existing cross section could potentially create bottlenecks and detract from the time savings achieved.

## Entire Scheme

The main comments observed – many of which were echoed in the individual sections – include:

- The majority of submissions suggested that the removal of on-street mature trees, those in front gardens, and elsewhere is a cause for concern. The concerns relate mainly to aesthetics of area, environmental concerns (both carbon absorption and biodiversity aspects), and the coverage provided from sun and rain.
- Numerous submissions suggest that there is little evidence of new trees being provided like-for-like or a compensatory planting strategy. It is also suggested that the public consultation maps were seen as misleading with regards to trees to be retained, as it was not clear if many of them on the drawing are in private lands and that the maps do not indicate the trees which are being removed. Some submissions suggested that the trees being removed are known and should be highlighted on the drawings to describe the true impact.
- It is suggested that many of the properties along the route are protected structures or part of an architectural conservation area, and the potential boundary works, and potential removal of trees could possibly detract from the heritage of the structures and their curtilage – many of which have antique railings, mature trees, hedges, and steps. In many cases it is felt that the decision of which side of the road to acquire land in certain locations has not been backed up with sufficient justification.
- Some submissions identified that there is a concern that the current proposals would destroy the residential nature of these historical areas – with some submissions stating that the character of areas such as Pembroke Road, Baggot Street, and Ballsbridge are that of historic urban villages and would be irrevocably destroyed by the current proposals if implemented.
- A significant number of submissions were based around the increase in the cross section (often suggesting that it is at the expense of trees) and the justification / options assessment for this proposal. There are concerns that one bus lane may be empty in the morning and the other empty in the evening, and therefore the construction cost of the road widening is suggested as waste of public expenditure.
- A common issue is the perceived multiple conflict points for residents exiting/entering homes, from side roads, and other premises. This is due to the requirement in many cases for drivers to cross a footpath, a cycle path, a bus lane, and either enter a car lane or cross one to enter another. This could result in a conflict with four other modes on each occasion – all with different speeds, priorities, and stopping abilities. This was suggested as being a serious health and safety issue.
- Concerns are raised in some submissions over the perceived narrowing of footpaths. It is considered that the narrowing of footways might detract from the character of the areas and the ability for the areas to accommodate heavy footfall. The safety of vulnerable road users in particular children using

narrower footpaths and also having to cross wide and busy roadways is of concern to residents.

- It is suggested in some submissions that business owners have not been engaged with fully on the true impact of the proposals.
- The potential removal of on-street parking was raised as a concern to local business owners as it is suggested that there are no multi-storey parking facilities within walking distance to this side of the city. Concerns were expressed that this would be coupled with the proposed loss of businesses abilities to take deliveries to cause difficulties for local businesses. In relation to residents, some submissions suggest that many of them rely on on-street parking and make use of the Dublin City Council permits. It was also queried whether the impact to residents of the potential loss of parking has been studied in sufficient detail.
- There were some related concerns raised in submissions that the removal of on-street parking will push commuter parking into the adjacent residential streets and restrict access to houses.
- A large number of submissions questioned the options assessment and data collection process in determining the route and the proposed cross section as being the preferred option over all alternatives. There is a perceived lack of information on the assessment and a perceived lack of justification / supporting evidence for the works – and a fear that if this solution is carried out and is then determined to not be fit for purpose, the impact will be irreversible. The proposals are seen by some as a short-term solution and other alternatives such be considered.
- There are concerns that the plans do not make it any safer or attractive for cycling, as one of the main detractors from cycling is the fumes from cars and buses. A number of submissions opposed the non-segregated nature of the cycle provision and the need to mix with bus and vehicular traffic. It is suggested that an alternative cycle route through safer streets or along the Strand Road be developed. The safety of cyclists is also a concern given the potential bus stop proposal whereby buses would cross the cycle lane at every stop and cyclists would be required to stop or enter the bus/traffic lane. Similar concerns are raised regarding the potential narrowing of footpaths given the volume of pedestrians that will be using them.
- The design for what is planned for buses approaching Baggot Street / Fitzwilliam Street junction (end of Route 14) and how the tie-in to existing cross section is likely to create bottlenecks and detract from the time savings achieved previously on the route.
- There are concerns that sufficiently detailed surveys have not been carried out to permit proceeding with the plan, including socio-economic, traffic, topographical, environmental, and underground services.
- In general, many of the above outlined issues which were raised were also related back to the potential devaluation of property which is a cause for serious concern in many submissions.



- A submission was made by professors from a local university. The submission notes their support of the planned increase to cycleways and improvements to public transport throughout the city to create a more sustainable transport system.
  - However, the submission expresses deep concerns with the potential removal of gardens and street trees through the scheme, in particular in the neighbourhoods with significant amounts of mature trees.
  - The submission expresses concern with the perceived lack of scientific definition provided for the term ‘appropriate mitigation measures’ which is used within the route assessment report. Similarly, it is suggested that the proposals for planting trees is unsatisfactory and the wording does not provide a sufficient commitment.
  - The submission also requests that a detailed natural capital plan for the bus corridor is carried out so that the true economic, ecological and cultural value of the proposed corridor is assessed so that an appropriate and equivalent replanting plan can be designed.
  - This submission suggests that urban and suburban street and garden trees reduce overall energy consumption in winter and reduce electricity use for air conditioning in summer in warmer climates. They are also an important urban carbon sink for greenhouse gasses released from transport, home and business energy use.
  - The submission recommended that appropriate surveys should be undertaken on all the proposed routes so that the economic, biodiversity, cultural and aesthetic value of mature tree loss can be evaluated against the value gained via expansion of cycle routes and bus lanes and where necessary, appropriate mitigation can be designed and implemented. This should be undertaken particularly in relation to carbon and particulate pollution as it would provide a more comprehensive environmental accounting for the bus corridor project than is currently evident from the literature provided as part of the consultation process.
- A submission was received from the a resident’s association in the area noting that they generally support the modal shift towards sustainable modes of transport but had concerns relating to the Bus Connects proposals. Namely the following:
  - Material and potential adverse impact on protected structures (including railings and boundary treatment of houses) – with reference to Section 8.5.2 of the *Architectural Heritage Protection Guidelines for Planning Authorities*;
  - Removal of mature and important trees – proposing an alternative for cyclists being the use of mews lanes for cycle routes;
  - Removal of on-street parking for residents; and
  - Closure of routes without traffic impact assessment – in particular the closure of Elgin Road.

- A submission was made on behalf of a resident's association in the area. The group welcomes efforts to make public transport faster, predictable and more reliable, and support plans to improve the infrastructure for sustainable modes such as walking, cycling, and low-emission vehicles. However, they have the following representations in relation to the current proposals for Route 14:
  - They expect that as part of the ongoing scheme development there should be key review points and stakeholder consultations to enable input to be provided into the final version of the proposals, and that key dates within this should be communicated appropriately.
  - Local bus routes in Sandymount such as the 1 and the 47 should be maintained due to their significance and frequent use for key trips in the area.
  - All cycle infrastructure should be integrated with wider projects such as the East Coast Trail and the Liffey Cycle Route.
  - Where possible large and mature trees should be retained, particularly along Merrion Road, however this should not detract from the objective of dramatically improving bus and cycle provision.
- A submission was received by a resident's association in the area regarding the current design proposals and how it effects the wider Pembroke District. The main issues raised were as follows:
  - The road widths in the area are too narrow to accommodate all modes and should not need to, the pedestrian should be considered as the priority in the design;
  - The narrowing of footpaths is unsafe given the number of families in the area walking to school often with buggies or toddlers. They note the proposal to narrow the footpaths is contrary to best practice for these gatherings at events and give particular reference to the crowds attending events in the Aviva Stadium or the RDS.
  - They already have been seeking traffic calming measures on Upper Baggot Street to provide median refuge islands allowing safer crossing for pedestrians, as well as pocket parks. They suggest additional pedestrian crossings are required.
  - They note that they believe current journey times are satisfactory and there is no advantage to increasing these.
  - They note that properties on the Land Acquisitions Maps showing Pembroke Road, & others indicate major interventions to approximately 94 Protected Structures and that Legal Obligations under the Planning Act 2000 are that one is legally obliged to prevent the Protected Structure from Damage or Neglect.
  - The mature trees in the area are distinctive and environmentally important and should be preserved.
  - They believe the solution should not be to try give parity to all modes but to prioritise and develop a scheme through a multi-disciplinary team of experts with consideration for urban design.

- A submission was made on behalf of a residents association in the area. The fundamental concerns of the submission were as follows
  - Loss of large number of mature trees along Merrion Road – with them seen as an established and attractive feature along Merrion Road, positively contributing to the architectural character and urban realm of the neighbourhood;
  - Adverse Impact on the Environment – as the existing mature trees that line these roads play an essential role in protecting residents from the worst effects of the growing levels of traffic;
  - The permeability of proposed Route 14 is inadequate and unsafe – noting that the lack of adequate, safe and effective infrastructure for sustainable modes of travelling will further deter people from choosing walking, cycling and public transportation as their main mode for travelling, and that the current design prioritises cars before sustainable modes;
  - Possible negative impact on the established character of Shrewsbury Road and the surrounding area – noting that the loss of vibrant visual amenities has the potential to drain the sense of place and unique urban fabric which is strongly associated with the area as well as eradicate the diverse social and economic life present in its surrounds, and in turn potentially leading to decrease in property value;
  - Route 14 will adversely alter the place value of Merrion Road and the surrounding area – in that, with reference to the Design Manual for Urban Roads and Streets, it should be acknowledged that the road is not an isolated entity but an integral part of the neighbourhood which has a well-established and vibrant sense of place, which is jeopardised by the current form of Route 14; and,
  - The potential negative Impact on the local communities of Dublin City and the Public Realm – the introduction of major traffic core routes through vital Dublin city neighbourhoods will dissect these thriving communities and permanently damage the present vibrant community spirit within the city.



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